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*Thomas Gaman, Registered Forester #1776*

January 16, 2009

California Climate Action Registry  
523 W. 6<sup>th</sup> St. Ste 428  
Los Angeles, Ca 90014

RE: Revised Forestry Protocols

Dear CCAR Staff and Board;

Thank you and your committee for all the hard work on revising the CCAR Forest Protocols. I have experience using the earlier protocols and commend your efforts.

I have two comments regarding FIA baselines and certification of woodlands.

1. **FIA Baseline.** I have worked on the USFS Forest Inventory and Analysis (FIA) program for many years. Our company, as USFS contractors, has collected a very substantial portion of the California FIA database. I have also used FIA data extensively in analysis of carbon stocks, oak woodlands, habitat suitability, forest inventory, and other modeling. The data are carefully collected in the field using protocols with strong bases in science and practice, and are also subjected to rigorous quality control. The data are available via the internet and can be used for analysis. There are over 500 field variables for which data are collected in the FIA program. There are thousands of FIA plots located at undisclosed locations throughout California. Without doubt the FIA program represents the best "snapshot" of California's diverse vegetation.

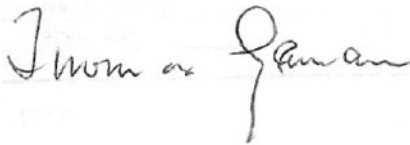
Interpretation of the FIA can however be subjective and complex. Fortunately the FIA program provides tools for this purpose. The major factor in establishing a baseline in any given forest type will be to select the most appropriate FIA plots among thousands obtained from throughout the state. I would hope that the final protocols would provide some guidance on this process. If you have questions I am available to respond to questions and provide further information on the FIA as necessary.

2. **Oak Woodlands.** My recent use of the FIA data in analysis of 1300 plots in oak woodland and forest types in California suggests that 38% of plots in those types include "non-forest inclusions" or understocked areas<sup>1</sup>. We also have documented that oaks woodlands are at risk throughout the state<sup>2</sup>, and that there are substantial efforts underway to restore oak woodland habitat. As part of my work with the California Oak Foundation we are always trying to encourage restoration of oak woodlands. Such efforts could be certified under the CCAR Forest Protocols as Reforestation, Improved Forest Management or Avoided Conversion, or, in some cases, under the Urban Forest Protocols.

I therefore would hope that the new CCAR protocols are designed to provide incentives that encourage the restoration, regeneration and protection of California oak woodlands and hardwood rangelands.

Congratulations on a very good revision of the protocols. If you have any questions about any of the above please do not hesitate to ask.

Sincerely,

A handwritten signature in cursive script that reads "Tom Gaman". The signature is written in dark ink on a light-colored background.

Tom Gaman

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<sup>1</sup> Gaman, Tom. (2008). Oaks2040. Carbon Resources in California Oak Woodlands. Published by the California Oak Foundation and available at [www.californiaoaks.org/html/2040.html](http://www.californiaoaks.org/html/2040.html)

<sup>2</sup> Gaman, Tom & Jeffrey Firman. 2006. Oaks2040. The Status and Future of Oaks in California. Published by the California Oak Foundation and available at [www.californiaoaks.org](http://www.californiaoaks.org)