

Grassroots Carbon (Michael Dillinger)

Subject: Joint Comments on Chapter 173-446 WAC

To: Washington Department of Ecology

From: Grassroots Carbon

Date: March 5, 2026

Re: Request to Also Include Trusted Soil Carbon Protocols to Fulfill RCW 70A.65 Mandates

Dear Washington Department of Ecology,

On behalf of Grassroots Carbon, I submit these comments regarding the proposed rulemaking for Chapter 173-446 WAC. We represent a diverse coalition of Washington land stewards and ranchers who are ready to deploy nature-based solutions to meet Washington's climate goals.

While we support the Department's work on the US Forest Protocol, we respectfully submit that the current approach is incomplete. If Ecology does not follow on this rulemaking with one on soil carbon, the program overlooks the state's second-largest carbon sink: its agricultural soils and grasslands.

We urge the Department to next adopt a trusted soil carbon protocol such as the Climate Action Reserve (CAR) Soil Enrichment Protocol (SEP) as an eligible offset methodology. Protocols like this are uniquely capable of verifying carbon removal from both regenerative farming and regenerative grazing.

1. Alignment with the Climate Commitment Act (CCA)

The Legislature did not intend for the Cap-and-Invest program to stop at the forest edge. The authorizing statute, the Climate Commitment Act (RCW 70A.65), explicitly identifies agricultural and grazing lands as critical tools for carbon sequestration.

In RCW 70A.65.270 (2)(a)(vii), the legislature directs that funds and programs should be used to: "Either preserve or increase, or both, carbon sequestration and storage benefits in forests, forested wetlands, agricultural soils, tidally influenced agricultural or grazing lands..."

Furthermore, RCW 70A.65.260 (1)(f)(ii) explicitly lists "Soil management" as a priority for emissions reductions in the agricultural sector.

The Department's current exclusion of a soil carbon protocol effectively sidelines these statutory priorities. Adopting a soil offset protocol next would bring the Department's offset program into full alignment with the text of the CCA by enabling the "agricultural soils" and "grazing lands" explicitly mentioned in the law.

2. The Science

Washington's rangelands are sometimes incorrectly viewed solely as emission sources (via enteric methane). However, peer-reviewed science demonstrates that Adaptive Multi-Paddock (AMP) grazing—a key practice incentivized by soil offset protocols—can turn ranches into net carbon sinks.

- **Net Carbon Sink:** Research by Teague et al. indicates that AMP grazing can sequester sufficient soil organic carbon (SOC) to completely offset the methane emissions of the ruminants grazing that land, resulting in a net negative carbon footprint.¹
- **Mechanism:** By mimicking the movement of wild herds (short duration grazing followed by long recovery periods), AMP grazing stimulates deep root growth in perennial grasses. This pumps liquid carbon (root exudates) into the soil, feeding the microbial ecosystem and building stable soil carbon aggregates.
- **Applicability:** This is directly relevant to Eastern Washington's shrub-steppe and grassland ecosystems and other pasture, grazing and grassland areas across Washington, where forestry protocols are inapplicable but the potential for soil carbon storage is immense.

4. Co-Benefits: Water, Fire, and Resilience

The CCA mandates that investments result in "long-term environmental benefits and increased resilience" (RCW 70A.65.270). Soil carbon projects deliver these specific co-benefits to Washington:

- Drought Resilience (The "Soil Sponge"): USDA NRCS data indicates that a 1% increase in soil organic matter allows soil to hold approximately 20,000 to 25,000 gallons of water per acre.⁴ For Washington's dryland farmers and ranchers, this biological water storage is a critical hedge against the region's increasingly hot, dry summers.
- Wildfire Mitigation: Regenerative grazing reduces the load of fine fuels (dry invasive grasses) that drive catastrophic range fires, replacing them with healthier, greener perennials that are more fire-resistant.
- Salmon Recovery: Both no-till farming and improved grazing management significantly reduce sediment runoff into waterways, directly supporting the state's massive investment in salmon habitat recovery.

Conclusion

The Climate Commitment Act was written to encompass the full breadth of Washington's "working lands"—forests, farms, and ranches alike.

We urge the Department of Ecology to recognize the scientific reality that healthy soil is a carbon sink, and to next adopt a soil offset protocol to allow Washington's farmers and ranchers to participate in the Cap-and-Invest market.

Sincerely,

Mike Dillinger

Grassroots Carbon Chief Legal Officer

References

1. Teague, W.R., et al. "The role of ruminants in reducing agriculture's carbon footprint in North America." *Journal of Soil and Water Conservation* 71.2 (2016): 156-164.
2. Huggins, D.R., et al. "Soil carbon sequestration in the dryland cropping region of the Pacific Northwest." *Journal of Soil and Water Conservation* 62.1 (2007).
3. Integrity Council for the Voluntary Carbon Market (ICVCM). "Assessment of Climate Action Reserve Soil Enrichment Protocol v1.1." (2025).
4. Nichols, R. (USDA NRCS). "Soil Organic Matter: The Sponge of the Soil." (2015). Validated by Libohova, Z., et al. (2018).