

Isometric (Beth Weed)

Please see the attached letter.

**Washington State Department of Ecology**

Attn: Carbon Management under the Cap-and-Invest Program

Submitted via: CCA_carboncapture@ecy.wa.gov

Re: Public Comment on Carbon Management under the Cap-and-Invest Program (June 2026)

Dear Ecology Carbon Management Team,

Isometric is a carbon removal registry and standard-setter. We design and operate independent protocols for the measurement, reporting, and verification of CDR across direct air capture with geologic storage, biomass with carbon removal and storage (BiCRS/biochar/bio-oil), enhanced rock weathering, ocean alkalinity enhancement, and mineralization.

Our comments address four areas: (1) the case for classifying 1000+ year duration CDR under the exemptions pathway; (2) a protocol recognition framework; (3) pathway scope and definitions; and (4) MRV and reporting, followed by a brief note on the WCI opportunity.

We are also engaged in California's parallel SB 905 rulemaking, having submitted detailed comments in June 2026. Given Washington's announced linkage with California and Québec under the Western Climate Initiative, the two processes are directly connected, and we flag points of alignment throughout this letter.

I. Moving Durable CDR Under the Exemptions Pathway

We recommend that 1000+ year duration ("technology-based") CDR be classified under the **permanent sequestration exemptions pathway** (WAC 173-446-040), not the offsets pathway.

The statutory foundation already supports this categorization, where WAC 173-446-040(2)(a)(iii) exempts from covered emissions:

Sequestered carbon dioxide when it can be demonstrated to Ecology's satisfaction that it qualifies as permanent sequestration, as defined in WAC 173-407-110, either through long-term geologic sequestration or by conversion into long-lived mineral form.

This provision does not specify that the CO₂ must be captured at a point source. WAC 173-407-110 defines permanent sequestration as retention with high confidence that *substantially 99% of greenhouse gases will remain contained for at least one thousand years*. High-durability CDR pathways demonstrably meet that standard and there is no statutory barrier to their inclusion. A rulemaking decision to recognize durable CDR as qualifying, paired with the protocol infrastructure in Section II, would be a logical next step.

The offsets pathway has three structural features that disadvantage durable CDR: a 5% emissions cap that limits uptake; no durability requirement, meaning durable CDR would compete on price against significantly less expensive biological offsets; and an existing protocol approval list that covers only forest management. None of these problems apply under the exemptions pathway.

Classifying CDR as an exemption also creates the right compliance architecture. Covered entities would face four tiers: (1) eliminate emissions through efficiency and electrification; (2) purchase forest/soil offsets up to the 5% cap; (3) deploy point-source CCS where practicable; and (4) use durable CDR to remove residual emissions the first three options cannot address. An uncapped CDR option caps allowance prices at the cost of durable CDR, while keeping the pressure on to decarbonize first.

II. Protocol Recognition: Leveraging Prior Work

Established voluntary registries, including Isometric, already operate protocols applying rigorous MRV to high-durability removal pathways. Ecology should recognize qualified third-party protocols rather than duplicating that work.



As an interim measure while Ecology builds out a formal recognition process, we recommend fast-tracking any protocol that already meets published criteria, rather than routing recognition through a single external body. Protocols approved by the Integrity Council for the Voluntary Carbon Market (ICVCM) under its Core Carbon Principles framework would likely qualify, but ICVCM status should be treated as one indicator of likely compliance, not the threshold. Ecology should retain direct authority to evaluate and recognize protocols against its own published criteria, with ICVCM and ISO 14064-series alignment serving as useful reference points.

Qualifying protocols already exist and are actively crediting projects for direct air capture with geologic storage, bioenergy with carbon capture and storage, biochar, enhanced rock weathering, ocean alkalinity enhancement, and mineralization. Ecology should recognize these as a first tranche rather than waiting to develop state-specific methodologies pathway by pathway. For marine CDR approaches, federal permitting coordination with EPA and NOAA will run in parallel, but that coordination workstream should not be a gating condition on the recognition of existing rigorous marine CDR protocols.

Formal recognition criteria should require at minimum: a documented public comment process before protocol adoption; independent third-party verification by an ISO 14065-accredited VVB with conflict-of-interest rules and a rotation requirement; pathway-specific 1,000-year durability targets; net life-cycle accounting; uncertainty quantification with conservativeness factors; reversal accounting; and public data publication. Recognition should be subject to periodic review, with a clear de-recognition process for protocols that fall out of compliance.

Where a project has already been verified under a recognized voluntary registry, Washington's program should accept that documentation in lieu of duplicative submission, requiring only Washington-specific registration and traceability disclosures. The aim is a single set of high-quality MRV obligations across voluntary and compliance contexts.

III. Pathway Scope and Key Definitions

The rulemaking should explicitly name eligible CDR pathways and adopt precise definitions. On pathways, we recommend the following be recognized under the exemptions pathway from the outset:

- Direct air capture with geologic storage;
- Biochar;
- Bio-oil sequestration;
- Enhanced rock weathering;
- Ocean alkalinity enhancement (including shore-side dosing facilities with a Washington nexus); and,
- Ex-situ mineralization

The rule should also allow additional pathways to be added as protocols mature without re-opening core rulemaking.

On definitions, we recommend including:

- **Net Removal:** Gross atmospheric removal minus all material project life-cycle emissions, under a specified LCA methodology with documented uncertainty. Net removal, not gross, should be the unit of account.
- **Reversal:** The unintended return to the atmosphere of carbon previously credited as removed.
- **Discount/Conservativeness Factor:** A deduction applied to claimed removals to account for measurement uncertainty and reversal risk, applied conservatively when uncertainty is high.
- **Verification Body:** An independent third party accredited under ISO 14065, with no prohibited financial relationship to the project operator.



On utilization: the rulemaking should distinguish **durable carbon utilization** (physical or chemical storage and eligible for an exemption claim) from **carbon utilization with displacement** (avoided-emissions, not a removal and therefore not eligible). Conflating these would allow avoided-emissions credits to be claimed as removals.

IV. MRV and Reporting

Projects claiming the exemption should be subject to ongoing monitoring obligations. For geologic storage: subsurface plume and pressure-front tracking consistent with EPA UIC Class VI at minimum, with an explicit consistency check between modeled and monitored plume behavior. Reversal triggers should be defined in regulation, including seismic events $\geq$ magnitude 2.7 within the area of review, caprock migration, or plume migration outside expected boundaries, each triggering reinstatement of the monitoring array and, if confirmed, reversal liability (re-surrender of equivalent allowances or replacement removals within a defined cure period). Monitoring plans should be reviewed on a five-year cadence.

Registry reporting should require: net removal with documented uncertainty and LCA methodology; machine-readable, openly licensed project data; and cross-registry traceability (registry name, protocol, credit IDs) to prevent double-counting with voluntary markets and, once linkage is active, across WCI jurisdictions.

V. The Broader WCI Opportunity

Washington's rulemaking matters well beyond its borders. If Washington adopts a well-designed, uncapped, durability-differentiated CDR exemptions pathway, it creates a model that other WCI partners can adopt, building toward a multi-jurisdictional compliance market for durable CDR that does not depend on federal action. We recommend that Ecology design the exemptions pathway with WCI harmonization in mind from the outset, coordinate with CARB on SB 905 protocol recognition criteria (the criteria proposed here are consistent with those being developed in that rulemaking), and build cross-registry traceability into the framework to prevent double-counting as linkage deepens.

We are happy to share our SB 905 public comment and our existing CDR verification protocols as reference materials, and to participate in any technical workgroup on WCI carbon management standards.

Classifying durable CDR under the permanent sequestration exemptions pathway would accelerate investment in the highest-integrity carbon removal approaches at a moment when the market needs clear demand signals. It would establish Washington as a leading policy innovator and give the Western Climate Initiative a durable CDR framework to build on, with the potential to reach a scale no single state could achieve alone. With support from the statutory language, existing voluntary market protocol infrastructure, and the WCI linkage, the timing and foundations are right to create meaningful action.

We would be keen to continue this conversation. Please let us know if we can provide any additional documentation, or if a follow up meeting would be useful.

Best,

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