

Grassroots Carbon (Michael Dillinger)

Subject: Comments on Proposed Amendments to the Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms (Cap-and-Invest)

To: California Air Resources Board (CARB)

From: Grassroots Carbon

Date: March 5, 2026

Re: Implementation of AB 1207 and SB 840: Maximizing Nature-Based Solutions through Adding the Climate Action Reserve Soil Enrichment Protocol for Offsets

Dear Chair Randolph and Members of the Board,

On behalf of Grassroots Carbon, I submit these comments regarding the proposed amendments to the Cap-and-Trade Regulation for the agricultural land stewards—including ranchers in the California rangelands and farmers in the Central Valley—who are deploying scientifically verified soil carbon solutions.

We strongly support the Legislature's extension of the program through 2045 under AB 1207.

However, to meet the ambitious net-zero mandates of AB 1279 and the nature-based targets of AB 1757, California must further expand its offset portfolio to soil carbon.

We respectfully urge the Board to include the Climate Action Reserve (CAR) Soil Enrichment Protocol (SEP) as an eligible Compliance Offset Protocol.

1. Legislative Support for Nature-Based Offsets

Recent legislative activity supports CARB broadening the scope of the offset program to include working lands.

- AB 1207 (Friedman) extends the program and directs CARB to "consider additional protocols for carbon removal and nature-based carbon offsets."
- SB 840 (Limón) mandates that CARB update compliance offset protocols to reflect "best available science" and prioritizes nature-based solutions.
- AB 1757 (Garcia) defines "natural carbon sequestration" to explicitly include "compost application, cover crops, [and] planned grazing."

Excluding agricultural soil carbon from the Cap-and-Invest program is no longer consistent with this support. Adopting the CAR Soil Enrichment Protocol is the most efficient pathway for CARB to fulfill the mandates of AB 1207 and SB 840.

2. Scientific Validity in California Landscapes

Recent California-specific science demonstrates that these sinks are real, measurable, and significant and the CAR Soil Enrichment Protocol has been approved by the Integrity Council for the Voluntary Carbon Market (ICVCM) under its Core Carbon Principles (CCPs). This validates that the protocol meets the highest global standards for additionality and permanence.

Rangelands and Adaptive Grazing (Grassroots Carbon Focus)

California's 34 million acres of rangeland are a massive, underutilized carbon sink.

- Sequestration Data: A 2025 study on California rangelands found that Adaptive Multi-Paddock (AMP) grazing resulted in 17% greater Soil Organic Carbon (SOC) stocks in surface soils compared to conventional grazing.

3. Critical Co-Benefits for California

Integrating the SEP aligns the Cap-and-Invest program with the state's broader climate adaptation strategy.

- Water Security (The "Soil Sponge"): California's water resilience relies on soil structure. USDA and CA-specific data indicate that a 1% increase in soil organic matter increases water holding capacity by roughly 20,000 gallons per acre. For the Central Valley, this means reduced aquifer

overdraft during drought years.

- Air Quality (PM2.5 Reduction): The San Joaquin Valley consistently faces the worst particulate pollution in the nation. The SEP incentivizes reduced tillage, which directly mitigates dust and PM2.5 emissions from agricultural operations, delivering immediate public health benefits to disadvantaged communities (DACs) in the Valley.
- Wildfire Resilience: Regenerative grazing reduces fine fuel loads (invasive annual grasses) on rangelands, creating functional fuel breaks that protect wildland-urban interface (WUI) communities.

Conclusion

California has always been a global leader in climate policy. By adopting the CAR Soil Enrichment Protocol, CARB can unlock the power of the state's working lands, ensuring that the agricultural sector is an active partner in achieving Carbon Neutrality by 2045.

We stand ready to provide data from our California pilot projects to assist staff in this review.

Sincerely,

Mike Dillinger, Chief Legal Officer, Grassroots Carbon

References

1. Stanley, P., et al. "Amping up soil carbon: soil carbon stocks in California rangelands under adaptive multi-paddock... grazing." *International Journal of Agricultural Sustainability* (2025).
2. Ryals, R., and Silver, W.L. "Effects of organic matter amendments on net primary productivity and greenhouse gas emissions in annual grasslands." *Ecological Applications* (2013). See also: Marin Carbon Project data.
3. Mitchell, J.P., et al. "Tillage and Cover Cropping Affect Crop Yields and Soil Carbon in the San Joaquin Valley." *UC Agriculture and Natural Resources* (2015).
4. Flint, L.E., et al. "Increasing soil organic carbon to mitigate greenhouse gases and increase climate resiliency for California." *California Fourth Climate Change Assessment* (CNRA-2018-006).