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Thank you for the opportunity to provide public comment on the modified text released on April 14, 2026, ahead of the May 28, 2026 public hearing. On behalf of Grassroots Carbon and the broader agricultural community, we are writing to strongly advocate for the expanded inclusion and support of carbon removal and reduction offsets created by California ranchers through regenerative grazing and soil carbon sequestration.

Grassroots Carbon is a carbon removal company that partners with ranchers across the United States to generate verified soil carbon removal credits through the adoption of adaptive multi-paddock (AMP) grazing and other regenerative land management practices. To date, Grassroots Carbon has facilitated millions of dollars in payments to ranchers nationwide for high-integrity, verified soil carbon sequestration.

California has set statutory targets requiring a 40% statewide GHG emissions reduction by 2030 and an 85% GHG emissions reduction by 2045. To reach these ambitious climate goals, it is essential to leverage the massive carbon sink potential of working lands. California's approximately 38 million acres of rangeland represent one of the largest untapped carbon removal opportunities in the state. Peer-reviewed literature and field data from programs like Grassroots Carbon's demonstrate that improved grazing management can sequester meaningful quantities of CO₂ in soils over time, while simultaneously restoring grassland ecology, improving soil water retention, and reducing wildfire fuel loads.

As CARB finalizes the 15-Day Amendments, we urge the Board to ensure that Cap-and-Invest protocols appropriately incentivize soil carbon offsets and recognize the critical climate solutions provided by ranchers. We offer the following comments on the modified text:

I. Soil Carbon Sequestration Should Be Recognized as an Eligible Activity Including Under the Manufacturing Decarbonization Incentive Allocation Framework

The MDI program represents an important mechanism for incentivizing investments that reduce GHG emissions from covered industrial facilities.

We note with interest the addition of section 95891(g)(2)(H), which creates a new potentially eligible project category for capital costs, electricity costs, and associated design, engineering, and permitting costs for equipment that captures CO₂ emissions, contingent on Board approval of a quantification methodology. While this provision is oriented toward mechanical carbon capture, utilization, and storage (CCUS) technologies, we urge CARB to consider that nature-based carbon removal through soil carbon sequestration on California rangelands represents an equally valid and scientifically demonstrated pathway for removing CO₂ from the atmosphere.

Recommendation: We request that the Board explicitly consider whether soil carbon sequestration on managed rangelands—verified through direct soil sampling and rigorous MRV protocols—could qualify as an eligible pathway. CARB should ensure that future quantification methodologies are technology-neutral and do not inadvertently exclude proven nature-based approaches.

II. Request for Future Regulatory Engagement on Rangeland Carbon

Grassroots Carbon recognizes that many of the changes we advocate for—particularly the development of a compliance-grade rangeland soil carbon protocol—extend beyond the scope of this 15-Day Notice. However, the 15-Day Amendments establish several precedents and create regulatory frameworks (such as the MDI allocation structure, the CCUS quantification methodology pathway, and the incentive-stacking provisions) that are directly relevant to future integration of rangeland carbon into the Cap-and-Invest Program.

We request that CARB:

1. Include rangeland soil carbon sequestration in the scope of any future quantification methodology

development.

2. Initiate a stakeholder engagement process specifically focused on developing a compliance offset protocol for California rangeland soil carbon, drawing on the substantial body of scientific research, existing voluntary market protocols, and practical field experience from programs like Grassroots Carbon.

3. Consider the role of agricultural and rangeland sectors explicitly in the forthcoming post-2030 rulemakings.

Conclusion

Scaling nature-based carbon removal is vital to the integrity and success of California's climate goals. California's 38 million acres of rangeland represent one of the largest untapped carbon removal opportunities in the state. Regenerative grazing practices, verified through rigorous direct soil measurement, can sequester meaningful quantities of CO₂ while delivering co-benefits that directly support California's climate adaptation, wildfire resilience, water security, biodiversity, and rural economic vitality.

The 15-Day Amendments to the Cap-and-Invest Program create regulatory frameworks and precedents—particularly around carbon sequestration methodologies, incentive stacking, streamlined verification, expanded eligible activities, and practical accommodations for sequestration project administration—that can and should be extended to include nature-based carbon removal on working ranch lands. California ranchers are uniquely positioned to deliver high-quality offsets that provide direct environmental benefits in the State, and Grassroots Carbon has the field data, measurement protocols, and operational track record to support CARB in developing the scientific and regulatory foundation for this work.

Grassroots Carbon stands ready to work with CARB staff, California ranchers, and other stakeholders to bring rangeland soil carbon into the Cap-and-Invest Program. We would welcome the opportunity to share our field data, measurement protocols, and practical experience with CARB staff at any time.

Thank you for your time, consideration, and dedication to achieving California's climate targets.

Respectfully submitted,
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