

Nicole Capizzi

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RE: Rule Development Phase ♦ Public Comment Period (informal) on Chapter 173-446
WAC, Climate Commitment Act Program
SUBMITTED BY: Nicole Jain Capizzi

To best incentivize Washington farmers to adopt practices that build soil health and naturally sequester carbon, I recommend that Ecology expand the carbon credit protocols included in the Climate Commitment Act Program to include soil carbon offset projects. Creating a soil carbon market for Washington farmers will buffer the risks of transitioning from traditional farming practices that maximize yield above all else toward those that increase farm resilience, sequester carbon, and provide direct environmental benefits to the state.

As an inspector for the Washington State Department of Agriculture's Organic Program for ten years and a small-scale farmer and cooperative extension farm educator for Washington State University and University of Wisconsin during the preceding ten years, I have served as an advisor and auditor to over five hundred small farm enterprises.

Even in the best of times, profit margins are incredibly thin for farmers, making it difficult to prioritize longer-term stewardship of soil and water over short-term production increases achieved from synthetic fertilizer use, heavy tillage, and other practices that deplete soil health. In contrast, practices like planting cover crops, reducing tillage, and applying compost build long term soil health but include additional upfront costs. The payoff from healthier soils, however, is more efficient use of water and nutrients; more resilience to drought, flood, and erosion; and more resistance to pest and disease issues. Building soil health also benefits the environment broadly by sequestering more carbon and protecting water quality.

Farmers are also interested in improving soil health. A 2022 study conducted by the Soil Health Institute, for example, showed that 66% of farmers surveyed were interested in the impact of agricultural inputs on soil health and indicated an interest in prioritizing practices that help them rely less on purchased fertilizer and pesticides and improve their underlying soil health.

However, farmers are hesitant to adopt these practices because of additional costs and risks inherent in transitioning to new farming methods. Access to emerging soil carbon offset projects can lower the risk of making that transition by offering an additional revenue stream.

Agriculture makes up approximately 14% of Washington state's economy, and the addition of a soil carbon offset to the Climate Commitment Act Program would provide more incentives for Washington's robust agriculture sector to transition to soil health practices that increase soil carbon sequestration and ultimately increase resilience to climate extremes.

Thank you for considering my recommendation to expand the carbon credit protocols included in the Climate Commitment Act Program to include soil carbon offset projects.

Sincerely,

Nicole Jain Capizzi