

NC Sierra Club □ NC Environmental Justice Network □ Natural Resources Defense Council □ Dogwood Alliance □ Southern Environmental Law Center □ Clean Air Carolina □ NC Black Alliance □ Sound Rivers □ Advance Carolina □ Carolina Wetlands Association □ NC Interfaith Power & Light □ Cape Fear River Watch □ NC Justice Center □ Southwings □ NC Climate Solutions Coalition □ EcoRobeson □ Toxic Free NC □ NC Warn □ Southern Forest Conservation Coalition □ Coastal Plain Conservation Group □ NC League of Conservation Voters □ Rachel Carson Council □ Democracy Green □ Environment North Carolina □ NC Conservation Network □ Waterkeepers Alliance □ Concerned Citizens of Northampton County □ Lumber Riverkeeper

February 3, 2021

Governor Roy Cooper
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699

Re: Request for Executive Order on Wood Pellet Industry Impacts

Dear Governor Cooper,

The NC Sierra Club, NC Environmental Justice Network, Natural Resources Defense Council, Dogwood Alliance, Southern Environmental Law Center, Clean Air Carolina, NC Black Alliance, Sound Rivers, NC Justice Center, Concerned Citizens of Northampton County, Advance Carolina, Carolina Wetlands Association, NC Interfaith Power & Light, Cape Fear River Watch, Southwings, NC Climate Solutions Coalition, EcoRobeson, Toxic Free NC, NC Warn, Southern Forest Conservation Coalition, Coastal Plain Conservation Group, NC League of Conservation Voters, Rachel Carson Council, Environment North Carolina, Democracy Green, North Carolina Conservation Network, Waterkeepers Alliance, and the Lumber Riverkeeper represent hundreds of thousands of members and supporters in our state who care about climate change and environmental justice. We are concerned that the wood pellet industry is tainting our air and water, locating polluting industry in low-income and minority communities, and clearcutting thousands of acres of our state's forests, our most effective carbon sink to help address climate change. We urge you to take executive action to study and address the environmental and community impacts of the wood pellet industry on the state.

Thank you for your leadership on climate change with your 2018 Executive Order 80 (EO80), which set a statewide goal to address climate change and charted a future for a clean energy economy. The North Carolina Clean Energy Plan, created to comply with EO80, states that the wood pellet industry does not advance North Carolina's clean energy economy and increases carbon emissions in the state during logging, processing and transportation. The plan also notes that biomass combustion releases carbon faster than if the forests were left intact to sequester carbon.¹

¹ NC DEQ. (2019). *NC Clean Energy Plan*. Section 1.3, p.25.

Further, Article XIV, Section 5 of the NC Constitution states that it is the policy of this State to conserve and protect its lands and waters for the benefit of all its citizenry. That includes our vast and biodiverse forests.

We also applaud your 2020 Executive Order 143 that took historic action to address the disproportionate impact of COVID-19 on communities of color by forming the Andrea Harris Social, Economic, Environmental, and Health Equity Task Force (“Task Force”) to create economic stability, eliminate health disparities, and achieve environmental justice. We appreciate the charge of the Task Force to “advance climate justice by prioritizing actions that equitably reduce greenhouse gas emissions, increase community resilience to the impacts of climate change, and advance sustainable economic and infrastructure recovery efforts for low-income, minority and vulnerable communities.”

Wood pellet factories are often sited in low-income communities of color that already face myriad environmental threats. The industrial-scale production of wood pellets creates harmful particulate matter, volatile organic compounds (VOCs) that create smog, and other hazardous pollutants that menace the health of local communities. To protect these communities, the cumulative environmental and health impacts of the wood pellet industry combined with the impacts of other nearby industries and pollution sources should be considered during the permitting process for wood pellet factories. In addition, an environmental justice analysis should be conducted when new permits for wood pellet manufacturing facilities are sought and the results should be considered by the Department of Environmental Quality (DEQ).

The impacts from the state’s growing wood pellet industry are counter to the greenhouse gas reduction goals set out in EO80, the environmental justice goals set out in EO143, and the environmental preservation ethic enshrined in our state constitution. Our forests are major carbon sinks, critical to the removal of carbon dioxide from the atmosphere. Older, diverse forest ecosystems sequester more carbon than tree farms and young forests that replace original stands after they are razed for pellet processing.

We write to ask you to take executive action to identify, quantify, and protect North Carolina’s high-value and biodiverse forests. Building on the foundation of EO80 and the Clean Energy Plan, we encourage you to lead our state and the Southeast in fully understanding and addressing the significant climate and community impacts of the wood pellet industry. To that end, we ask that you issue an executive order including the following:

- Prior to acting on a permit application related to wood pellets, DEQ shall ensure that the applicant has provided information to allow for an evaluation of environmental and public health impacts. The permit application shall not be deemed complete until DEQ has received information about the facility's contribution to greenhouse gas emissions; cumulative forest, health, and environmental justice impacts; monitoring protocols; and capture and control processes. DEQ shall consider the cumulative community and climate impacts in permitting decisions.
- To ensure that North Carolina's economic and climate change goals are in alignment, the state shall end economic incentives for the wood pellet industry.²
- DEQ shall complete a report on the climate and community impacts of forest harvesting activities for the production of wood pellets by Nov. 1, 2021. In addition, DEQ shall consolidate information held by state agencies to identify forested areas of high habitat and natural resource value, including those documented to be habitat for rare, threatened or endangered fish, wildlife or plant species; or important to water quality.

EO80 rightly prioritized the fight against climate change. A logical next step is to better understand and address the impacts of a growing industry that contributes to climate change and environmental injustice. Thank you for considering our request.

Sincerely,

Erin Carey, Director of Coastal Programs
NC Sierra Club

Naeema Mohammad, Organizing Co-Director
NC Environmental Justice Network

Luis Martinez, Senior Attorney & Director of Southeast Energy
Natural Resources Defense Council

Derb Carter, Director of NC Offices
Southern Environmental Law Center

² From 2012 through 2016 the NC Department of Commerce awarded Enviva and its subsidiaries \$2.87 million through four separate grants. Dogwood Alliance. (2020). *Can Biomass Companies Stay Afloat?*. p. 3.

Sherri White-Williamson, Environmental Justice Policy Director
North Carolina Conservation Network

Robert K. Musil, PhD., M.P.H., President & CEO
Rachel Carson Council

Dan Crawford, Director of Governmental Relations
NC League of Conservation Voters

Marcus Bass, Deputy Director
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La'Meshia Whittington, Deputy Director
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Belinda Joyner, President
Concerned Citizens of Northampton County

Robie Goins, Chairman of Advisory Team
EcoRobeson

Daniel E. Estrin, General Counsel & Advocacy Director
Waterkeeper Alliance

Susannah Tuttle, M.Div, Director
Interfaith Power and Light

Emily Zucchino, Director of Community Engagement
Dogwood Alliance

Dana Sargent, Executive Director
Cape Fear River Watch

Drew Ball, State Director
Environment North Carolina

Heather Deck, Executive Director
Sound Rivers

Alexis Luckey, Executive Director
Toxic Free NC

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Sanja Whittington, Executive Director
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Al Ripley, Consumer, Housing & Energy Project Director
NC Justice Center

cc: Jeremy Tarr, Senior Advisor, Climate Change Policy, Office of Governor Cooper

Darryl Childers, Policy Advisor, Office of Governor Cooper