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, Democracy Green, Environment North Carolina, NC 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.  

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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

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  
**NC Black Alliance**

La’Meshia Whittington, Deputy Director  
**Advance Carolina**

Rick Savage, President  
**Carolina Wetlands**

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**

Jim Warren, Executive Director  
**NC WARN**

Pauline Endo, Lead Coordinator  
**Southern Forest Conservation Coalition**

Andy Wood, Executive Director  
**Coastal Plain Conservation Group**

Chelsea Easter, Eastern Program and Volunteer Pilot Manager  
**SouthWings**

Gayle Goldsmith, Chair  
**NC Climate Solutions Coalition**

Tina Christensen, Executive Director  
**Winyah Rivers Alliance**

Jefferson Currie II  
**Lumber Riverkeeper**

Sanja Whittington, Executive Director  
**Democracy Green**

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