

September 27, 2022

Secretary Elizabeth Biser
N.C. Department of Environmental Quality
217 W. Jones Street
Raleigh, N.C. 27603

Re: Request to hold Special Meeting on Biomass/Enviva Permit LLC

Dear Secretary Biser:

We are writing to you, as members of your Environmental Justice and Equity Advisory Board, to express our concerns about the wood pellet industry in North Carolina.

For several years, the wood pellet industry has been expanding in communities throughout the South, including here in the state of North Carolina. We fully recognize that most of the wood pellets made in the region are exported to Europe. Our concerns pertain to the industry's impact on North Carolina's environment and economy.

First, and foremost, we are particularly concerned about the deleterious impacts of wood pellet production on environmental justice communities in our state. Every North Carolina biomass facility is in a community that is at least 25% non-white with slow growing or declining populations and high poverty rates. Moreover, most of these communities are already overburdened with locally unwanted land-uses and polluting industries that pose major threats to public health and safety.

Second, as the wood pellet industry seeks to increase production and deplete valuable forest resources in the process, questions have been raised regarding possible diminishing demand for biomass derived from wood pellets. For example, a recent *New York Times* article¹ reported on a new policy proposal under consideration in the European Union that would change goals for energy generation and plans for decreasing greenhouse gases, which in turn would affect how biomass is subsidized. The article references concern about carbon dioxide emissions citing the time it takes to regrow forests. It also encourages the use of woody biomass from industrial waste rather than unprocessed wood and shifting to other forms of renewable energy altogether. If demand truly changes and production in North Carolina slows down, a critical unanswered question is how will impacted communities be protected from stranded assets and adverse impacts?

Third, biomass from wood pellets does not contribute to the state's renewable energy generation goals. Nor does the industry advance our clean energy goals.

We are raising these concerns because DEQ currently is considering the Enviva Pellets LLC permit in Ahoskie. As noted in DEQ's draft EJ report, Hertford County where the proposed facility will be located is a Tier 1 County--- a NC Department of Commerce designation given to

¹ Lois Parshley, *Europe Rethinks Its Reliance on Burning Wood for Electricity*, May 17, 2022, <https://www.nytimes.com/2022/05/17/climate/eu-burning-wood-electricity.html?auth=login-google1tap&login=google1tap>

the state's most economically depressed counties based on average unemployment rate, medium household income, percentage growth in population, and adjusted property tax per capita—and home of the Meherrin Tribe. Moreover, Hertford County is 60 percent African American and the census tract in which the facility will be located is 69 percent African American.

Making matters worse, Hertford County has a poverty rate of almost 22%, ranks within the bottom 25% of North Carolina counties for health outcomes, and, according to the DEQ EJ Tool, has a death rate that exceeds the statewide death rate. Emblematic of the potential adverse impact on public health and the environment, despite the installation of pollution control devices at the Enviva plant, the increased production of wood pellets from 481,800 oven-dried tons to 630,000 tons annually will create an overall rise in greenhouse gases of nearly 30% bringing the total to an estimated 238,000 tons of greenhouse emission each year.²

Part of our charge involves engaging community members, visiting impacted communities and creating opportunities to share information. In August, EJE advisory board members attended the Enviva Pellets public hearing in Ahoskie where local government, community members and advocates spoke on both sides of the issue. It is clear the logging industry is important to the state and local economy. However, during the public hearing, local citizens raised major concerns about the environmental, health and ecological effects of the Enviva plant on their community and their personal health and wellbeing. Notably, a member of the Meherrin Tribe spoke at the public hearing and did not recall any specific outreach from DEQ in this matter.

We believe additional engagement and exchange of information with the residents of Ahoskie and Hertford County is needed; and at our August Quarterly Board meeting, the Board unanimously voted to schedule such a meeting. Therefore, we are requesting that DEQ convene a Special Meeting on Biomass to address questions and concerns about the Enviva plant and the permitting decision. We further ask that DEQ division and permitting staff be present and a virtual option be offered to maximize community engagement in the meeting.

We realize this takes extra effort and staff time but feel this is crucial to truly address the needs and concerns as well as create equitable outcomes for environmental justice communities in our state.

Respectfully submitted,

James H. Johnson Jr., Ph.D., Chair
Marian Johnson-Thompson, Vice Chair
DEQ Environmental Justice & Equity Advisory Board

CC: EJE Advisory Board

² DEQ Enviva Pellets Ahoskie – Public Hearing factsheet, August 16, 2022