

Appendix C. Stakeholder Engagement

NCDEQ designed and implemented a multi-pronged community engagement strategy to support the development of North Carolina's Comprehensive Climate Action Plan (CCAP). The approach emphasized regional reach, transparency, and inclusion, with the goal of creating space for all North Carolinians to meaningfully participate in the planning process. Outreach focused on local and regional governments, tribes, public agencies, nonprofit organizations, and residents, particularly in rural and low income areas that experience high energy costs.

1.1. List of Engaged Organizations

No.	Organization
1	City of Wilmington
2	Wilmington New Hanover County
3	Town of Carrboro
4	Orange County
5	Town of Chapel Hill
6	City of Hendersonville
7	City of Asheville
8	The Research Triangle Cleantech Cluster
9	Mecklenburg County
10	Town of Boone
11	Buncombe County
12	City of Raleigh
13	City of Greensboro
14	Fountain Works
15	Robinson Consulting Group
16	Town of Davidson
17	Town of Morrisville
18	New Hanover County
19	Forsyth County
20	City of Winston-Salem
21	Town of Hillsborough
22	Columbus County
23	Cumberland County
24	Robeson County
25	Wake County
26	McDowell County
27	Warren County
28	Halifax County
29	Central Pines Regional Council

30	Durham County Government
31	Cities Initiative
32	Center for Energy Education
33	KPMG, College of the Atlantic
34	North Carolina Department of Natural and Cultural Resources
35	Conservation Trust for North Carolina
36	Sustainable Sandhills
37	NCDOT
38	North Carolina State University

1.2. **Spotlight Interview Questions and Summaries**

1. Are you with an organization that is helping reduce GHG emissions, or are you an individual concerned with climate change?
2. Can you give a brief description of what project/projects that you or your organization are currently doing within your community?
3. What are some of the top concerns that you have or within your community?
4. What barriers are preventing you from engaging in actions that help reduce greenhouse gas emissions?
5. How have you/your family been impacted by climate change?
6. What are your top priorities to help reduce climate degradation?
7. What actions have you or your community taken or plan to take to reduce GHG emissions? (You could provide a targeted list here to reduce the discussion.)
8. What specific actions do you wish were in place in your community?
9. Do you have concerns about unintended consequences (like increased traffic around EV charging stations) of climate action? If yes, please describe.
10. Has your entity developed a plan to reduce carbon and other greenhouse gas (GHG) emissions?

1.2.1. **Interview with Barbara Melvin – 6/4/2025**

Barbara Melvin, representing the North Carolina Indian Housing Authority, shared her organization’s work in providing energy-efficient, affordable housing to low- and very-low-income families in rural southeastern North Carolina. Through partnerships with [USDA Rural Development](#)¹ and SystemVision², they have been building houses that help reduce greenhouse gas emissions and lower utility costs for the owners. Melvin stressed the importance of incorporating sustainable practices in building codes and educating both homeowners and contractors about energy efficiency. She also highlighted the challenge of limited support for modifying existing homes and the critical need for outreach and hands-on assistance in low-income communities, especially with seniors. Melvin left us with this thought: *“We all have to be willing to share our knowledge and help one another because the small things we do make a big difference, and we could change the world with them.”*

1.2.2. Interview with Warren Darrell – 5/7/2025

Warren Darrell, actively teaches climate science at UNCW³ and Duke⁴ while volunteering on wetland restoration projects. His key concerns include public apathy and misinformation about climate change. Darrell noted barriers such as lack of efficient transportation alternatives and limited market options for low-emission vehicles. Darrell also advocates for improved energy management in public buildings, especially schools, and recognizes public education’s fundamental role to enabling political and systemic change. Darrell left us with this: *“If our school systems and government jump manage their energy use by using automation, more efficient lighting, and more efficient air conditioning, there’s a synergy with education. Energy savings for an entire school division can also be integrated into the lesson plans, for both academic levels, the students who are going to move on to engineering and science, and on the technical level for the students interested in hands-on careers.”*

1.2.3. Interview with Jonelle Kimbrough (Sustainable Sandhills) – 5/1/2025

Jonelle from Sustainable Sandhills⁵ discussed the nonprofit’s comprehensive efforts to promote sustainability across 11 counties in North Carolina. Their programs focus on encouraging alternative transportation, electric vehicle education, carbon sequestration through tree planting in schools, and community awareness around energy and water conservation. Kimbrough highlighted a few challenges that included limited funding, staff capacity, and resistance in rural, conservative, and transient communities. A highlight of their work is a school-based carbon bank that has sequestered nearly 1,000 tons of carbon through over 4,000 trees. Jonelle’s key message: *“We want participation from as many people as possible in sustainability. We don’t want that one person doing it perfectly, we want a million people doing it imperfectly.”*

1.2.4. Interview with Carla Norwood and Jenni Rogan – 5/1/2025

Jenni Rogan and Carla Norwood of Working Landscapes⁶ discussed their nonprofit’s work supporting rural community development, particularly in Warren County, NC. Their initiatives include operating a food hub to connect local farmers with institutional buyers, promoting soil health practices, and engaging in resilience planning with small towns. Some of the challenges that they emphasized rural areas face include limited climate infrastructure, aging housing stock, inadequate funding, and public disconnection from nature. They highlight the importance of place-based solutions—like skill-building for low-energy living and increasing electrification—and stress that effective climate strategies in rural communities differ significantly from urban models. A lack of EV charging stations, reliance on inefficient housing, and agriculture’s climate impact are among their key concerns. Jenni Rogan mentioned *“Climate change impacts all parts of life... I try to make decisions based on my kinds of habits and lifestyle.”*

2. Online Survey Results

2.1. CPRG Personal Survey Results

The Climate Pollution Reduction Grant (CPRG) survey is a public feedback tool aimed at shaping input to North Carolina’s next statewide climate strategy. The survey collected responses from

residents and stakeholders and invited them to share their input on greenhouse gas reduction priorities and individual actions respondents are taking to reduce their personal greenhouse gas reductions. The survey will help ensure that the CCAP aligns with community concerns.

The CPRG Survey reached 110 individuals over a period of 147 days. The survey was promoted through social media, emails, and message boards. The age demographic ranges from under 18-65+, with 1% under 18, 25% of the responders being between the ages of 18 and 30, 23% from 31-50, 18% 51-65, and 30% over 65. The geographic areas of the surveyed were 31% suburban, 29% small town, 18% rural, and 21% from an urban city. The household incomes range is from \$0-\$130,000+ with 17 preferring not to say. 37% surveyed identified as White or Caucasian, 2% Asian or Asian American, 2% Black or African American, 3% Hispanic or Latinx, and 2% identify as two or more races/ethnicities. 23% identified as women, 7% men, and 1% non-binary. 2% identified as differently abled and 3% immunocompromised. 4% are students and 2% are veterans. 5% identified with LGBTQIA+ and 2% preferred not to answer the question. The majority of the surveyed group find emails and social media to be the most effective point of contact for information about the Comprehensive Climate Action Plan.

The results concluded that 94% of NC residents surveyed are interested in learning about climate change and reducing GHG emissions. 43% of those surveyed were not affiliated with a government or non-profit agency. (Figure 1) The majority's level of knowledge surrounding greenhouse gas emissions and the impacts of climate change was "somewhat knowledgeable" with 0% having no knowledge at all. (Figure 2) When asked on a scale from 0 to 10, with 0 being "not important at all" and 10 being "extremely important," how important is reducing greenhouse gas emissions to you? The surveyed scored a 68 on the Net Promoter Score, this meaning more found greenhouse gas emission reductions important. (Figure 3) When considering their concern about severe weather events, reduced air quality, prolonged drought, damage to wildlife and habitat, recurrent flooding, impacts on agriculture and food production, and extreme heat, the majority of the surveyed all expressed they were very concerned with all listed with some requesting more information. (Figure 4) Out of the surveyed, only three expressed they have not been personally or adjacently impacted by climate change. (Figure 5) The majority of the surveyed labeled industry, electricity, and transportation in their top three most important sector for reducing GHG emissions and the majority labelled agriculture, waste, and commercial and residential buildings in their bottom three. 21 % deemed electricity the most important sector for reducing greenhouse gas emissions and 24% chose transportation and 32% chose industry as number one. (Figure 6) 91 of the surveyed chose transition to renewable energy as a top priority to help reduce climate degradation, and over 70 said to reduce landfill waste, and develop more sustainable food systems were top priorities as well. (Figure 7) Improving air, water, and soil quality as well as conservation and habitat protection were chosen as the most important co-benefits of reducing greenhouse gas emission. (Figure 8) Only two participants claimed to not be taking any steps to reduce greenhouse gas emissions. 87 participants claimed to use energy efficient light bulbs and 77 use energy efficient appliances, 67 consolidate their daily car trips, 81 reduce and recycle waste, 65 eat less meat and dairy, and 59 compost organic waste. 44 participants claim to use electric powered rather than gas powered lawn equipment. 56

support local and sustainable food sources and 53 have planted native and adapted plants in their yard. (Figure 9) The biggest barrier that prevents the surveyed from engaging in emission reducing activities is the cost and affordability and limited access to public transit. (Figure 10) 78 out of the 110 stated that they wish more actions were in place for more renewable energy sources used in their community and 63 wish for more available public transportation. (Figure 11) With more government support the majority said they would install solar power and make their homes more energy and water efficient. (Figure 12) When considering disbenefits or unintended consequences of electric vehicles, 50% of the surveyed stated to have no concerns, 24% having concerns, and 26% were unsure. (Figure 13)

The two responses that answered yes to being a part of an entity that has developed a plan to reduce carbon and other greenhouse gas (GHG) emissions both expressed that the main barriers they face are funding, staffing, and knowledge. They also stated that they do not have the workforce to implement the plan but do have a baseline GHG emission inventory derived from either state government or self-developed. Only half identified all the possible GHG sources and either represent the GHG reduction goals by year or percentage. The plans specified do not have an outline to track reductions. The one hotspot emphasized by one plan was fleet building and energy. Only one plan included community engagement and a data quality assurance plan. The community engagement was conducted through virtual and in-person meeting, as well as a website. Both plans include future data collection.

Supporting figures from the survey:

1. Are you a resident interested in learning about climate change and reducing GHG emissions?



Figure C-1: General Interest

5. What level of knowledge do you have about greenhouse gas (GHG) emissions? (where they come from, how they impact our daily lives and our climate, etc.)



Figure C-2: Knowledge surrounding greenhouse gas emissions

6. How important is reducing greenhouse gas emissions to you? Select a value from 0 to 10, with 0 being 'not important at all' and 10 being 'extremely important'



Figure C-3: Importance of greenhouse gas reduction

7. Since greenhouse gases contribute to a variety of climate concerns, how concerned are you about the following climate-related hazards?



Figure C-4: Climate concerns

How have you or your family been impacted by climate change? Choose all that apply.

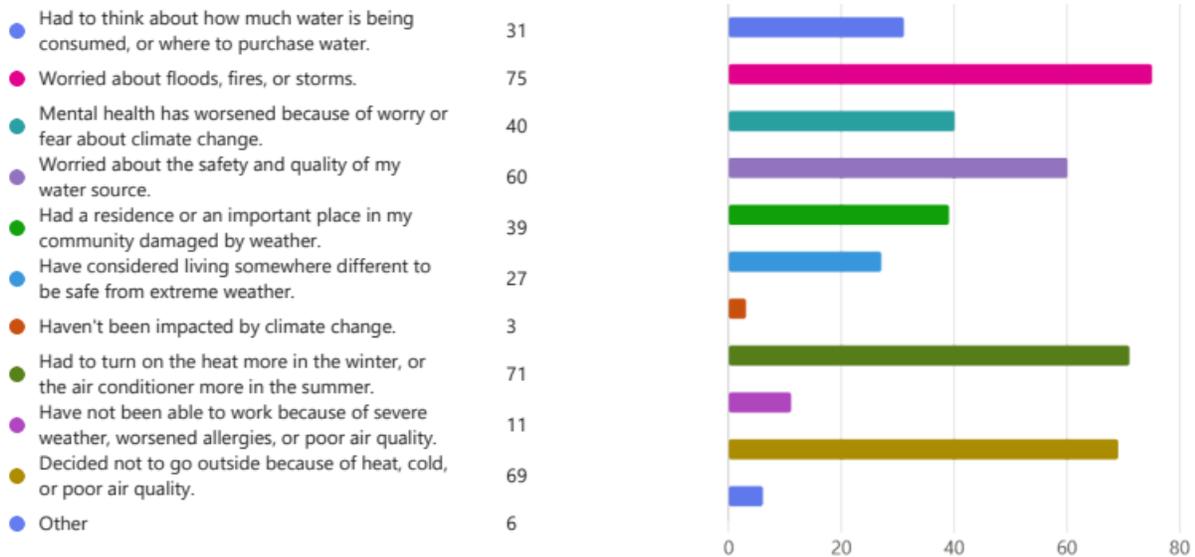


Figure C-5: Personal impacts from climate change

9. As part of this process, six sectors have been identified for reducing greenhouse gas emissions. Electricity, Commercial and Residential Buildings, Transportation, Waste, Agriculture, and Industry. Please rank these sectors, with the most important at the top and the least important at the bottom.



Figure C-6: Most important sectors

10. What are your top priorities to help reduce climate degradation? Select all options that resonate with you.

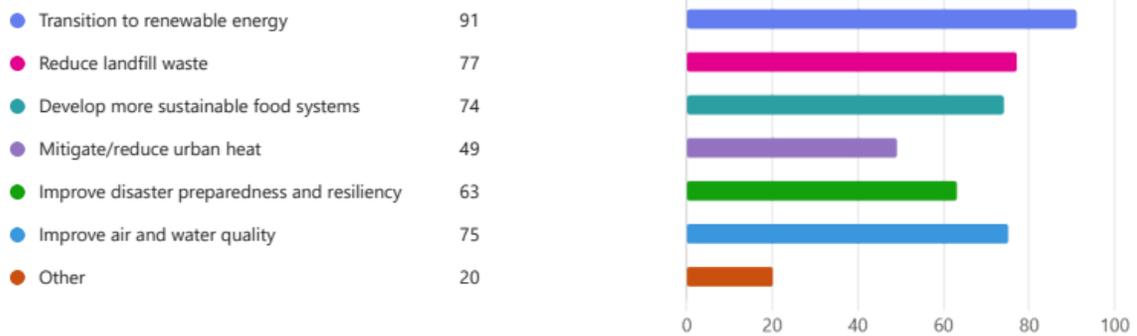


Figure C-7: Priorities to reduce climate degradation

11. Which co-benefits of reducing greenhouse gas emissions are most important to you? (Select up to 3)

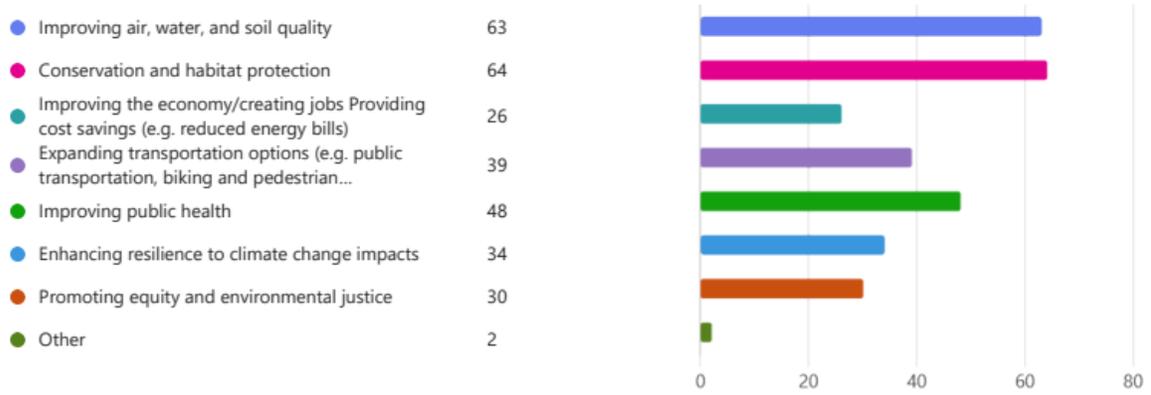


Figure C-8: Important co-benefits to reducing greenhouse gas emissions

12. Are you taking any actions to help reduce greenhouse gas emissions? If so, select all that apply.

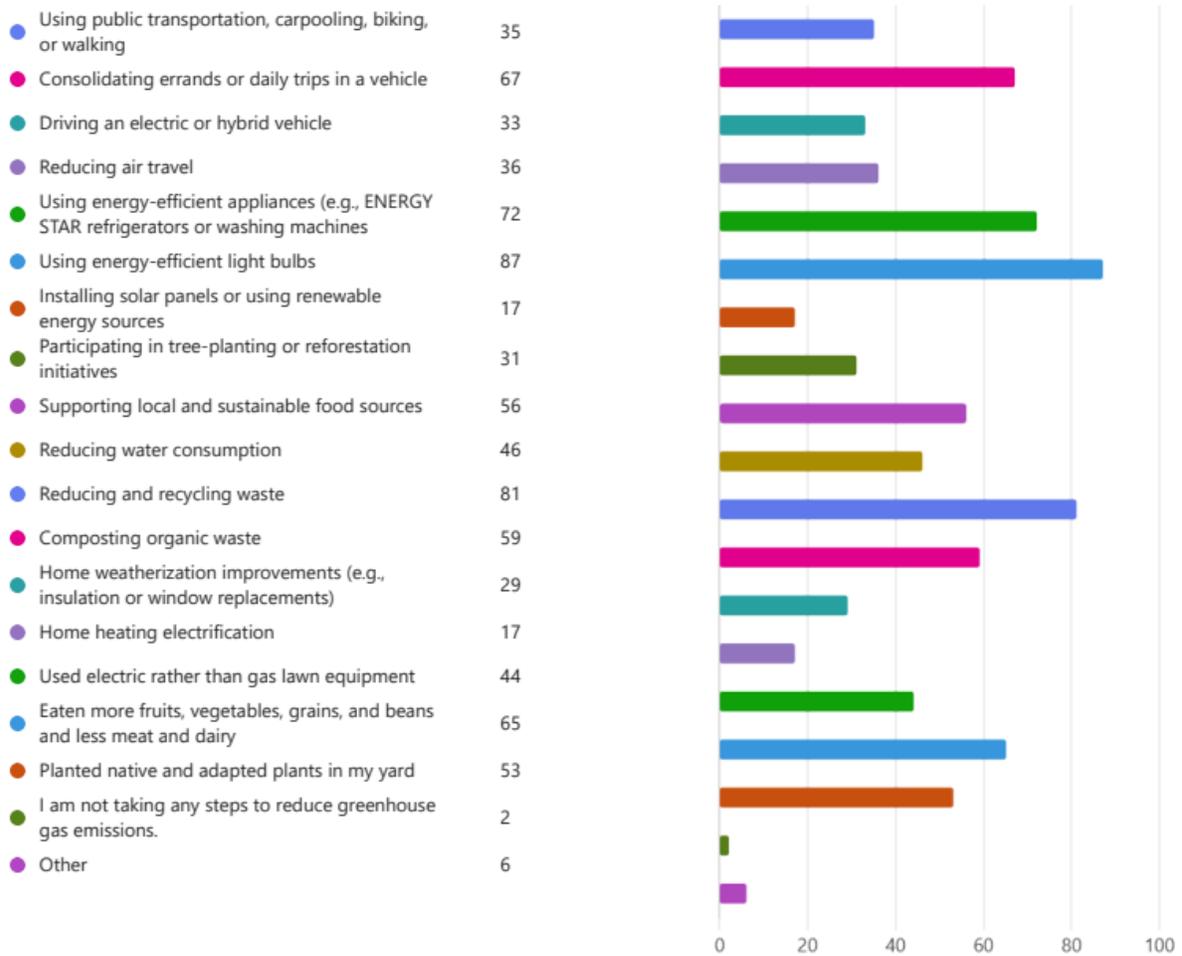


Figure C-9: Personal Actions

13. What barriers are preventing you from engaging in any of the above activities? Select all that apply.

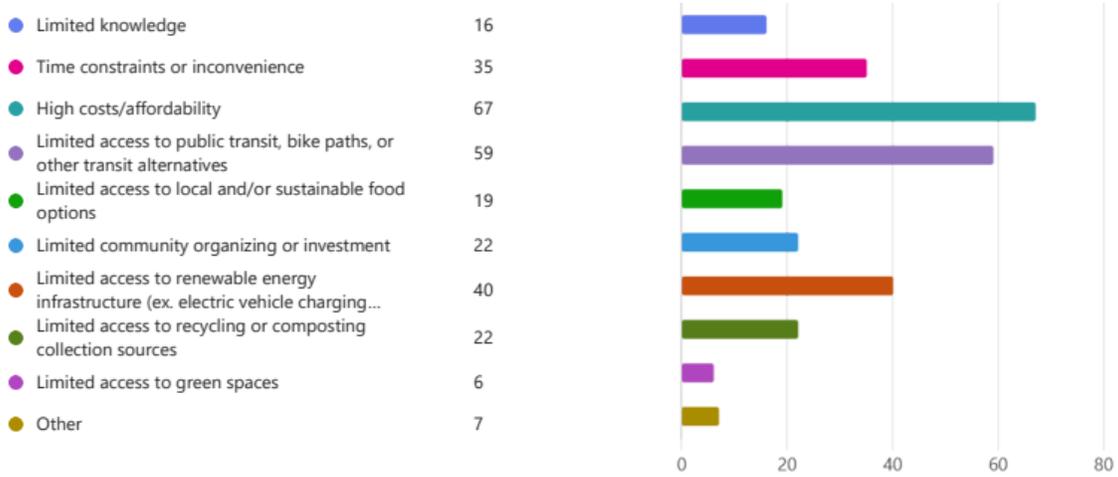


Figure C-10: Barriers to engage in personal greenhouse gas emission reductions

14. What specific actions do you wish were in place in your community? Select up to 5.

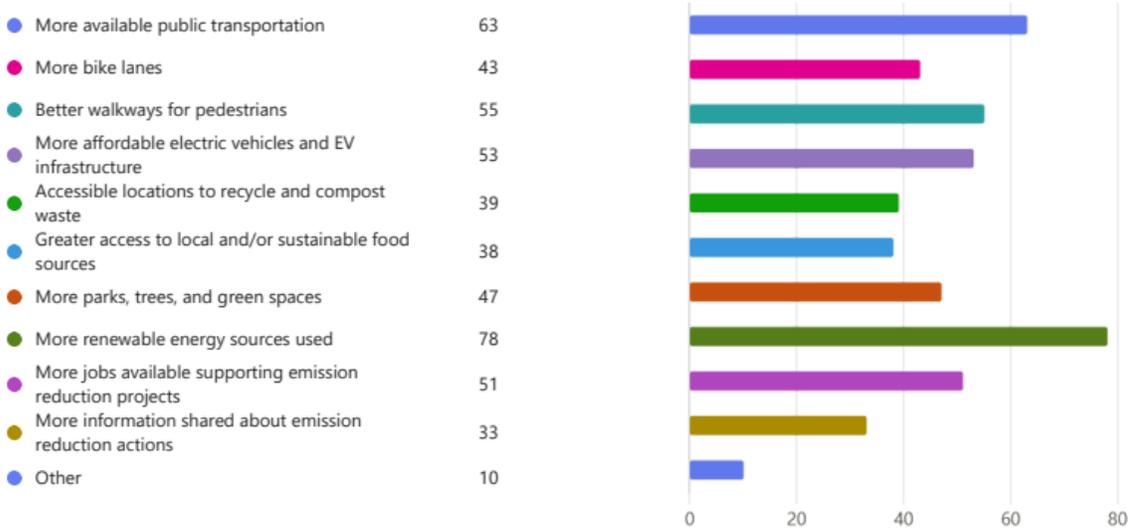


Figure C-11: Preferred future actions in their community

15. If you had support from your local government, (e.g. free services, tax incentives or safe walkways) which additional actions would you consider taking? Please select all that apply.

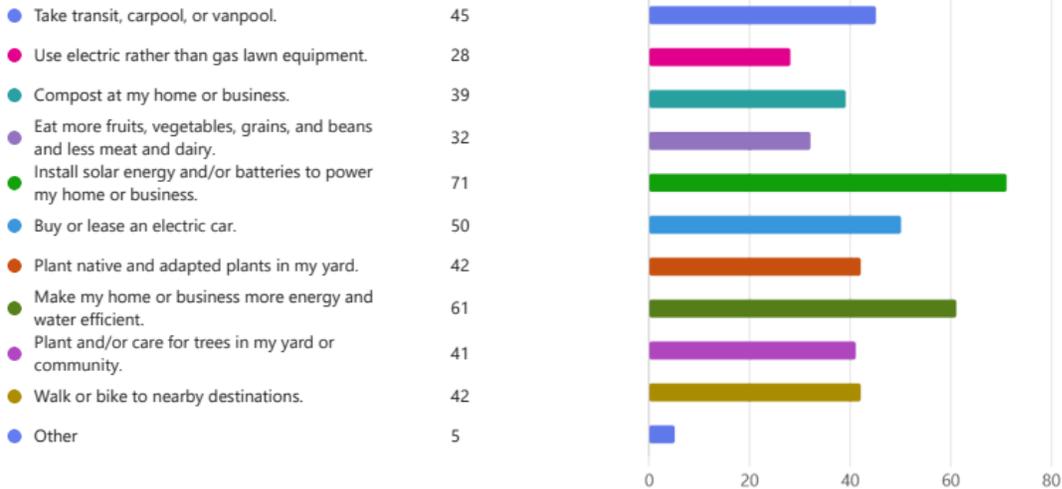


Figure C-12: Preferred local government actions

16. Do you have concerns about disbenefits or unintended consequences (like increased traffic around EV charging stations) of climate action?



Figure C-13: Concerns about disbenefits or unintended consequences of climate action

2.2. Landfill Survey Results

The NC Landfill Cover Survey was open for 37 days and received 29 responses. It was created by the NC Department of Environmental Quality to engage with North Carolina landfill operators about their current management practices and interest in reducing their greenhouse gas emissions. Methods to receive responses for this survey was through emails and phone calls with landfill operator contacts. The survey received 29 responses from these counties: Burke, Camden, Cleveland, Edgecombe, Transylvania, Cherokee, Anson, Surry, New Hanover, Granville, Orange, Alleghany, Davidson, Caldwell, Forsyth, Avery, Cabarrus, Wilson, Carteret, Greene, Granville, Pasquotank, Chatham, Moore, Mecklenburg, New Hanover, and Wilkes. Insights received from this survey include what counties and facilities are currently limiting their greenhouse gas emissions, general interest and concerns surrounding management changes for GHG emission reductions, and information needed for future actions.

The survey asked operators the following questions and gave respondents the option of adding additional comments or suggestions:

1. Does your landfill have a methane collection or control system?
2. Are you considering future methane emission upgrades?
3. What are the biggest challenges to landfill cover upgrades?
4. Are you interested in decarbonizing your waste collection fleet through electrification or engine conversion?
5. What additional support would be helpful?

The responses showed wide variation in current practices. They provide insight into current landfill practices, challenges, and interest in future methane reduction measures. Key findings include:

1. Final Cover Status
 - Fourteen facilities reported having no engineered cover.
 - Eight reported only having a partial cover.
 - Six reported installing an engineered cover.
 - One facility was unsure of their type of cover.
 - Three facilities indicated plans to install or upgrade within the next five years.

2. Methane Control Systems

- Fifteen facilities reported no methane control systems.
- Eight reported having an active system.
- Five reported a passive system.
- One facility was unsure if there was any methane control system.

3. Barriers to Cover Upgrades

- Cost was the most frequently cited barrier to cover upgrades.
- Lack of staff capacity, technical feasibility, and permitting uncertainty were also stated as challenges to installing cover upgrades.

4. Future Interest in Methane Reduction

- Seven facilities expressed interest in early gas collection systems.
- Four facilities are interested in some type of system improvements.
- Several facilities stated interests in other measures (e.g., flowmeters, gas-to-energy).
- Fifteen facilities reported no current plans for any methane reduction systems.

3. Comments on CCAP

The NCDEQ provided a 30-day public comment period from September 8 through midnight on October 6, 2025. The comments were collected, reviewed and documented in accordance with the laws and regulations of the NCDEQ and EPA as required. All information included here is considered public information and not confidential.

Comments received were relevant to the CCAP only. Comments not pertaining to the CCAP were not addressed. Substantive comments may be included in the final CCAP document. Commenters were directed to be concise and as brief as possible to convey their viewpoint. Comments that convey similar viewpoints were addressed as one.

Comments that are exact replicates were addressed as one. Responses to comments will be included on the CPRG website with the final publication of the CCAP. All comments are considered public information and are addressed as such.

Summary

The NCDEQ received 19 comments from residents, nonprofit organizations and state agencies. The overarching themes addressed in these comments include regulatory and policy changes at the federal and state levels, microgrids, transportation, data centers,

food waste and NWL. While some recommendations are outside the scope of the CCAP, where practicable, changes were incorporated into the narrative. The NCDEQ appreciates the time and effort taken by the commenters to improve the CCAP.

3.1. US Army CORPS of Engineers, Retired

Name: Brayton Willis

Organization: US Army CORPS of Engineers, Retired

Email address: bpwillis88@gmail.com

Date comment was received: 2/12/2025

Comment: Thank you for allowing me to comment on how the N.C. Department of Environmental Quality’s State Energy Office can reduce greenhouse gas emissions. Transportation is a significant contributor to greenhouse gas emissions (GHG) in the United States. In 2022, statistics revealed that transportation accounted for 28% of total GHG emissions in the country. I had the privilege of serving on the Citizens Advisory Committee (CAC) for the development of the Wilmington Metropolitan Planning Organization’s Cape Fear Moving Forward 2045 Plan. This plan is intended to guide transportation projects in our region over the next 25 years and will be utilized by federal, state, and local governments. In the final meeting of the CAC, I recommended including a statement in the introduction of the plan that all future projects be prioritized and ranked based on their potential to reduce GHG emissions. However, my proposal was voted down, with a tally of 13 against and 1 in favor. It is unfathomable that a basic GHG criterion for transportation projects, which contribute significantly to GHG emissions here in North Carolina, would not be regarded as a critical performance measure for priority scoring.

Another consideration for a significant reduction in GHG emissions is tolling congestion in our major cities like Charlotte and Raleigh

NCDEQ Response: Thank you for your comment. We appreciate your insights related to transportation projects. The CCAP notes projects that are ongoing within the NCDEQ are those that have funding and are measurable and have been or will be implemented, like Measures 1-3. The CCAP documents measures including efforts to increase the number of low-carbon emitting vehicles on the road including school and transit buses, garbage trucks, emergency vehicles, and on and off-road construction vehicles. Measures such the Volkswagen Settlement, the DC Fast Program, Diesel Emission Reduction Act (DERA), and Clean Fuels Advanced Technology (CFAT) are currently in place to provide funding to

support adoption of low carbon emitting vehicles and charging infrastructure across the state. Additionally, both Wilmington and Morehead City have taken action in their ports to improve freight shipping efficiency by upgrading technology and expanding more efficient corridors. Based upon our 2024 GHG Inventory, we have identified transportation as the highest GHG emitting sector. As a result, the CCAP emphasizes measures taken in transportation sector to reduce GHG emissions. Our transportation sector currently includes measures to increase medium- and heavy-duty zero-emission and electric vehicles to replace diesel vehicles, strengthen public and regional transit options, and strategies to reduce vehicle miles traveled. NCDEQ will continue to investigate further measures and progress in transportation in the progress report of the CCAP submitted to the EPA by 2027. As we document activities since the submission of the CCAP, we will continue to monitor progress in transportation and other regional entities. We appreciate your work serving in the Wilmington Metropolitan Planning organization in GHG reduction work at a regional level. NCDOT and North Carolina's Metropolitan and Rural Planning Organization serve as key agencies in identifying and prioritizing transportation funding efforts. Your suggestion to rank projects and plans in importance based upon GHG emissions will be taken into account of how we can monitor our progress in NC. In continuation, your suggestion for placing tolls on cities to curb GHG emissions is a good consideration and incentive for cities to take more aggressive action. However, these actions fall under the authority of the North Carolina Division of Transportation (NCDOT) and local government. NCDEQ does have the authority to share information and support transportation strategies to help meet our GHG emission reduction goals. Unfortunately, NCDEQ is not an implementing agency of GHG emission reduction measures. NCDEQ provides support and assistance to the public, businesses, and local governments in administering regulatory programs designed to protect air quality, water quality, public's health, and promote the adoption and advancement of clean energy.

Summary: This comment discusses the long-term transportation planning efforts in the region, emphasizing the importance of prioritizing projects that reduce greenhouse gas (GHG) emissions. The author serves on the Citizen Advisory Committee for the Wilmington Metropolitan Committee and has presented several areas of concern in the transportation sector. Despite a recommendation to rank future projects based on their potential to lower GHG emissions, the proposal was rejected in a final meeting of the CAC. The author expresses concern over this decision, noting the significant contribution of transportation to GHG emissions in North Carolina and suggesting tolling congestion in major cities as another strategy for meaningful emission reductions.

3.2. Private resident - Elizabeth Fensin

Name: Elizabeth Fensin

Organization: Not listed

Email address: glassalgae@hotmail.com

Date comment was received: 2/22/25

Comment: Regardless of whatever is going on nationally or internationally, I hope North Carolina will do everything possible to combat climate change.

Despite the recent snow, temperatures have been steadily increasing overall. I hope NC remains a temperate state and does not become tropical.

Thank you for all you do!

Best,

Elizabeth Fensin

Raleigh 27603

NCDEQ Response: Thank you for your comment. We will continue to investigate further actions and projects taken since the submission of the CCAP to continue to emphasize the need for further action for GHG reduction efforts.

Summary: NC is experiencing a variety of indicators of climate change and needs to continue to pursue actions to mitigate climate change.

3.3. Wake Forest School of Law

Name: Ellie Hubbuch

Organization: Wake Forest School of Law

Email: hubbeh23@wfu.edu

Date Comment was Received: 10/6/25

Comment:

Dear Madam or Sir:

The Wake Forest University School of Law’s Environmental Law and Policy Clinic submits the attached comments on the draft North Carolina Department of Environmental Quality’s (the “DEQ”) Comprehensive Climate Action Plan (the “CCAP”). The draft CCAP is a thorough, well-organized, and ambitious plan that recognizes the scale and urgency of the climate crisis in North Carolina. However, the CCAP fails to reflect or estimate the many changes in law and regulatory policy in the past year, seriously undermining the credibility of the estimates. While modeling emissions changes in a fast-moving regulatory environment can be challenging, we encourage DEQ to do its best to inform the public of these changes and to quantify them now, not later. While accounting for policy changes that are not yet final may not be feasible, DEQ should at least provide a parallel modeling scenario that assumes the proposed changes in state and federal laws and policies are carried out. The draft CCAP projection simply ignores these sea changes in state and federal regulatory context making it out-of-date and misleading before it is even issued. The attached comments attempt to detail the relevant legal and policy changes and, where available, provide information on potential climate emissions impacts. We strongly encourage DEQ to inform the public of these threatened and, in some case, existing changes so that the CCAP accurately reflects the current regulatory context and likely emissions scenarios.

Sincerely,

Ellie Hubbuch,

Clinical Student at Wake Forest University School of Law’s Environmental Law and Policy Clinic

I. Introduction

The Environmental Law & Policy Clinic at Wake Forest University School of Law is providing comments on the North Carolina Department of Environmental Quality’s (the “NCDEQ”) draft North Carolina Comprehensive Climate Action Plan (the “CCAP”), released on September 5, 2025. We provide comments encouraging the NCDEQ to address deficiencies in the CCAP’s greenhouse gas (“GHG”) inventory, emission projections, and assumptions, particularly in light of recent federal and state regulatory and policy changes that undermine North Carolina’s climate goals.

II. Background

The CCAP is a narrative climate planning report that provides an overview of all GHG sources/sinks and sectors following industry standard protocols. Its purpose is to “present an updated and expanded set of strategies, technologies, and implementation pathways to help the state achieve its near- and long-term GHG emissions targets.”

The NCDEQ produced a thorough, well-organized, and ambitious plan that recognizes the scale and urgency of the climate crisis in North Carolina. The CCAP reflects significant technical work, interagency coordination, and stakeholder engagement. Its sector-by-sector emissions inventory and proposed reduction measures provide a foundation for long-term climate action in North Carolina.

North Carolina’s GHG inventory and business-as-usual (“BAU”) projections form the analytical foundation for the CCAP. These analyses are crucial, as they establish a statewide baseline for past and future emissions and allow North Carolina to evaluate the potential impact of future GHG reduction measures. The most recent inventory, completed by the NCDEQ in January 2024, covers historical emissions from 1990 to 2020 and projects future emissions through 2050 under a BAU scenario. However, these projections assume no new federal or state policies beyond those in effect as of 2022.

Developing and drafting the CCAP is not an easy task, particularly during a period of rapidly shifting environmental policy at both the state and federal levels. These changes introduce serious uncertainty and make it more difficult to accurately estimate future emissions and evaluate the effectiveness of proposed measures. Estimating emissions

and proposing measures is also a labor-intensive and time-consuming process for the NCDEQ.

However, by omitting the impact of recent regulatory and policy changes, the CCAP paints an overly optimistic picture of North Carolina's climate progress, misleading stakeholders and delaying necessary, more aggressive action at the state level. While the CCAP includes a broad disclaimer in the Executive Summary acknowledging the rapid change in federal and state policy and funding landscapes, it does not account for how these setbacks could delay progress or weaken reduction efforts.

The CCAP also claims that North Carolina is "on track to meet its goal of reducing GHG emissions by 50 percent below 2005 levels by 2030." This claim is misleading if regulatory and policy changes are not considered. For the CCAP to serve as an effective roadmap, it must present a more candid evaluation of the current obstacles to achieving North Carolina's climate goals by providing some estimate of the potential impact of the recent and pending regulatory developments.

Several specific federal and state developments may significantly impact the feasibility and pace of the measures outlined in the CCAP. These include:

- The proposed reconsideration of the Environmental Protection Agency's 2009 Endangerment Finding, the legal basis for federal GHG emission regulation.
- The elimination of civil penalties for noncompliance with the corporate average fuel economy standards.
- The elimination of federal clean energy tax incentives, such as electric vehicle tax credits.
- Federal regulatory and policy changes affecting offshore wind development.
- North Carolina's Senate Bill 266, which repealed House Bill 951's 2030 carbon reduction target.

These developments significantly alter the statewide baseline for future GHG emissions and the effectiveness of proposed reduction measures. A more robust analysis of their

implications is essential for the CCAP to serve as a reliable roadmap for guiding climate action in North Carolina.

A practical next step would be for the NCDEQ to supplement the CCAP with a parallel modeling scenario that incorporates recent regulatory and policy changes. Such an approach would give policymakers and stakeholders a clearer sense of the state's likely emissions trajectory while building on the CCAP's foundation.

III. The CCAP Ignores the EPA's Proposed Reconsideration of the 2009 Endangerment Finding

The CCAP ignores one of the most consequential recent developments in federal climate policy: the Environmental Protection Agency's (the "EPA") proposed reconsideration of the 2009 Greenhouse Gas Endangerment Finding (the "Endangerment Finding"), and the sweeping regulatory rollbacks that would follow.

On March 12, 2025, EPA Administrator Lee Zeldin announced that the EPA would reconsider the Endangerment Finding and "regulations and actions that rely on that Finding." The Endangerment Finding determined that GHGs endanger public health and welfare, thereby requiring the EPA to regulate GHG emissions from new motor vehicles under the Clean Air Act (the "CAA"). While its immediate effect was the promulgation of vehicle standards, the EPA has since relied on the Endangerment Finding and its underlying determinations as the scientific and legal foundation for other GHG rulemakings and regulatory actions across multiple sectors, including power plants, oil and gas development, and aircraft engines.

Since 2010, the EPA, at times in conjunction with other federal agencies, has issued numerous regulations supported by the Endangerment Finding. If the Endangerment Finding is repealed, each of these regulations is vulnerable. At particular risk are the GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles promulgated under the CAA. The EPA has also signaled potential changes for other industries whose GHG regulations rely in part on the Endangerment Finding, including oil and gas, power plants, and aircraft engine manufacturers. A repeal would therefore call into question the

scientific and legal basis for a decade of climate regulation, threaten the durability of numerous GHG standards, and directly undermine the assumptions underlying the CCAP.

The consequences of repeal are staggering. The Environmental Defense Fund (the “EDF”) recently modeled the cumulative effects of reversing nine major clean air related standards, many of which rely on the Endangerment Finding. The EDF estimates that reversal would produce over 18 billion metric tons of climate pollution by 2055, which is equivalent to nearly three times the annual emissions from the United States today. The EDF further modeled the specific impacts of the EPA’s proposal to repeal all light- and medium-duty vehicle GHG standards. Through 2055, cumulative GHG emissions would increase between 9.1 and 17.9 billion MT, NO_x would increase between 2.4 and 4.7 million US Tons, PM would increase between 68,000 and 169,000 US Tons, and SO_x would increase between 37,000 and 54,000 Tons. The climate harms from repealing just these standards are projected to cost between \$1.7 and \$3.9 trillion. Reversing the Endangerment Finding will therefore not only worsen climate pollution but also impose economic and public health costs. Yet the CCAP accounts for none of these realities.

The NCDEQ’s Division of Air Quality (the “DAQ”) has underscored risks of repealing the Endangerment Finding. In its September 26, 2025, comments on the EPA’s proposal, the DAQ emphasized the importance of strong federal leadership in enabling North Carolina to meet its climate goals. The DAQ credited the state’s progress, namely 28% gross GHG reductions and 38% net reductions between 2005 and 2020, to a “strong science-based federal-state partnership” and “well designed GHG emission reduction strategies.” The DAQ also warned that the “EPA’s proposed action will have serious impacts on North Carolina’s plans for reducing GHG emissions.” For example, the DAQ modeled the repeal of GHG standards for light-duty vehicles and trucks and found that, by 2035, daily NO_x emissions in Mecklenburg County would rise by 0.19 tons, representing a 2.4% increase in on road emissions and 0.8% in total emissions for the county. The DAQ concluded that repeal of the Endangerment Finding “has the potential to eliminate much of [North Carolina’s] progress and significantly impede investment in the state’s clean energy economy.” The CCAP’s failure to grapple with this warning is a glaring omission.

Moreover, the scientific basis for the Endangerment Finding has only strengthened since 2009. The EPA’s determination rested on a robust, peer-reviewed body of research

affirming that GHGs endanger public health and welfare. In the years since, atmospheric CO₂ levels are up 10.5%; sea level rise, globally (compared to 1993-2008 average), is up 2.13 inches (more than twice as much as it was in 2009); eight of the top ten hottest years on record have occurred; and the frequency and duration of heatwaves in the U.S. have increased 34% and 17%, respectively. North Carolina is especially vulnerable to these harms. With approximately 3,375 miles of shoreline and extensive low-lying topography, the state is vulnerable to the effects of sea-level rise. The North Carolina Coastal Resources Commission's Science Panel predicts sea levels will rise by 1.9 to 10.6 inches at different locations along North Carolina's coasts by 2045, threatening communities, infrastructure, and ecosystems across the state.

The Endangerment Finding and the GHG standards it supports are scheduled to deliver vital pollution reductions that are needed to address these intensifying harms and protect North Carolina. For instance, the EPA's GHG emissions standards for fossil-fuel power plants, one of the standards the EPA now proposes to repeal, was projected to deliver approximately 1.3 million metric tons of carbon reductions between 2028 and 2047, producing over \$270 billion in monetized benefits. These reductions should help slow climate damages, reduce costly flooding, and protect communities across the state. But the Endangerment Finding is now under serious threat, as are all these projected benefits.

Despite this reality, the CCAP is written as if federal protections will remain intact. Its GHG inventory and BAU projections assume the continued existence of the Endangerment Finding and federal GHG standards it supports. In doing so, the CCAP rests on a deeply flawed foundation. It overstates the protections North Carolina can rely upon and understates the risks of inaction. By ignoring the EPA's proposed reconsideration, the CCAP not only misrepresents the landscape of federal climate policy but also jeopardizes the state's ability to plan effectively for its future.

IV. The CCAP Fails to Consider the Effect of Removing CAFE Penalties

The CCAP also fails to consider the effect of removing penalties for noncompliance with federal corporate average fuel economy ("CAFE") standards. The National Highway Traffic Safety Administration's (the "NHTSA") CAFE standards regulate how far vehicle manufacturers' fleets must travel on a gallon of fuel. The NHTSA sets CAFE standards for

passenger cars and for light trucks, and separately sets fuel consumption standards for medium and heavy-duty trucks and engines.

The CAFE standards for motor vehicles set by the federal government encourage energy conservation. Historically, civil penalties for noncompliance were significant and had increased over time. As of 2024, the NHTSA set the penalty at \$17 per tenth of a mile per gallon that a manufacturer's average fuel economy fell below the applicable standard. These penalties served as a key incentive for manufacturers to prioritize fuel efficiency, resulting in reduced greenhouse gas emissions.

The trajectory of federal vehicle standards shows how changes at the federal level directly affect state climate planning. In 2020, under the Trump administration, the NHTSA and the EPA issued the Safer Affordable Fuel-Efficient ("SAFE") Vehicles Rule. The rule lowered the annual CAFE and GHG emissions standard increases from 5% per year to 1.5% per year for Model Years 2021-2026 Passenger Cars and Light Trucks. By design, the proposed standards would increase fossil fuels burned and harmful pollution emitted into the atmosphere. The EDF warned that the SAFE Vehicles Rule would result in increased annual emissions of 200 million tons of CO₂ by 2050.

Later administrations attempted to restore stronger standards. On December 30, 2021, the EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023-2026, and on March 31, 2022, the NHTSA issued coordinated final CAFE standards for Model Years 2025-2026. The EPA estimated that these rules would deliver substantial climate benefits. From 2023 to 2050, the rules would achieve more than 3.1 billion tons of CO₂ reductions, along with 3.3 MMT of CH₄ and 0.097 MMT of N₂O reductions, representing a 9% reduction in CO₂ and an 8% reduction in both CH₄ and N₂O emissions relative to a no-action scenario. The EPA's estimates demonstrate how strong federal vehicle standards can deliver measurable reductions.

However, that regulatory foundation is at serious risk. The One Big Beautiful Bill Act, enacted on July 4, 2025, eliminates all civil penalties for noncompliance with CAFE standards. Specifically, Section 40006 resets the maximum civil penalty to \$0.00.⁴⁶ While manufacturers remain legally obligated to meet CAFE targets, there is no longer any penalty for noncompliance. Manufacturers may ignore the standards altogether. The

NCDEQ warned as early as 2018 that even weakening CAFE and federal GHG emission standards for light-duty vehicles would have “significant negative impacts” on North Carolina’s ability to reduce emissions and would “[b]ackslide on future emissions relied upon in North Carolina State Implementation Plans.”

The NCDEQ further stressed that strong federal standards are “critical for mitigating climate change impacts in North Carolina.” If simple weakening posed such risks, eliminating enforcement altogether poses a far greater threat. This is especially critical given that, in 2020, the transportation sector accounted for 36% of GHG emissions in North Carolina. This is the largest share of any sector.

When combined with the EPA’s proposed repeal of the Endangerment Finding, the removal of CAFE penalties compounds the danger to North Carolina’s climate goals. The Endangerment Finding provided the legal foundation for regulating GHGs under the CAA, while the CAFE penalties ensured compliance with federal fuel economy standards. With both stripped away, North Carolina is left without federal support in addressing its largest source of GHG emissions.

Even so, the CCAP incorrectly assumes the continued existence of strong federal vehicle standards and enforcement penalties for noncompliance. As a result, its emissions modeling, BAU projections, and policy framework are based on assumptions that no longer reflect reality. Given that transportation alone contributes more than one-third of statewide emissions, this oversight fundamentally undermines the accuracy, credibility, and utility of the CCAP.

V. The CCAP Overlooks the Elimination of Federal Clean Energy Tax Incentives

The CCAP overlooks the effects of eliminating key federal clean energy tax incentives under the Inflation Reduction Act of 2022 (the “IRA”), including electric vehicle (“EV”) tax credits. In doing so, the CCAP overstates the feasibility of its transportation electrification measures and progress towards North Carolina’s climate goals.

The IRA is the largest investment in reducing carbon pollution in US history. It introduced funding, programs, and incentives to accelerate the transition to a clean energy economy. According to the EPA, taking advantage of IRA incentives, such as tax credits, is “key to lowering GHG emission footprints and accelerating the clean energy transition.” In 2023, the U.S. Department of Energy estimated that the IRA, together with the Bipartisan Infrastructure Law, would reduce U.S. GHG emissions by up to 41% below 2005 levels by 2030.

Among the most consequential incentives were three EV tax credits: the New Clean Vehicle Credit, the Previously Owned Clean Vehicle Credit, and the Qualified Commercial Clean Vehicle Credit. A 2024 study by researchers at Pacific Northwest National Laboratory and the University of Washington found that these IRA incentives “significantly accelerate transportation electrification in the near-term” compared to scenarios without them.

However, the One Big Beautiful Bill Act ended all three credits on September 30, 2025. The market consequences of eliminating these credits are substantial. Ford’s CEO has predicted EV sales will fall to just 5% of U.S. vehicle sales. A 2024 joint study by professors at the University of California, Berkley, Duke University, and Stanford University estimated EV registrations could fall by 27% without the tax credits. In terms of emissions, the Salata Institute for Climate and Sustainability at Harvard University projects that eliminating all three of the new, commercial, and used EV tax credits would increase 2030 emissions by 20.3 MMT compared to the 2030 baseline forecast.

Yet despite these developments, the CCAP continues to assume robust EV adoption. The CCAP lists electrification as a “feasible, measurable, and implementable” GHG emission reduction measure to achieve North Carolina’s climate goals.” The CCAP projects reductions of 37,339 MTCO_{2e} by 2030 and 186,696 MTCO_{2e} by 2050 from electrifying commercial vehicles such as school buses, transit buses, garbage trucks, emergency vehicles, and construction vehicles. These projections assume continued market support for EV adoption, yet the loss of the Qualified Commercial Clean Vehicle Credit removes precisely the type of incentive that made adoption feasible. Under this now-expired credit, businesses and tax-exempt organizations could claim up to \$7,500 for vehicles

under 14,000 lbs. and \$40,000 for vehicles over 14,000 lbs., the exact vehicles emphasized in the CCAP.

But the CCAP ignores the expiration of these federal incentives. The CCAP's BAU scenario predicts transportation emissions in North Carolina will fall to 35.56 MMTCO_{2e} by 2050 due to expected EV adoption, cleaner fuel standards, and vehicle emission regulations. This projection, however, fails to consider the market consequences caused by the expiration of EV tax credits. By overlooking these changes, the CCAP not only misrepresents the likely trajectory of transportation emissions but also undermines its credibility as a roadmap for achieving North Carolina's climate goals.

VI. The CCAP Fails to Address Federal Regulatory and Energy Policy That Undermine Offshore Wind Development

The CCAP fails to address federal regulatory and energy policy that undermine offshore wind development, and in doing so, overstates the feasibility of meeting North Carolina's GHG reduction goals. While the CCAP relies on renewable resources like wind to offset generation from electric generating units, it does not adequately consider three recent federal actions that have significantly undermined the viability of offshore wind development in North Carolina.

First, Executive Memorandum 2025-01966, issued January 20, 2025, effectively halted new offshore wind leases as well as all federal permitting and approval activities on existing leases pending completion of additional federal agency reviews. For North Carolina's existing offshore wind lease areas, the Executive Memorandum freezes all progress on permitting and project approvals, placing developers in a state of regulatory limbo.

Second, the One Big Beautiful Bill Act limits federal tax credits for wind energy by mandating that offshore wind projects be placed in service by December 31, 2027, to qualify. Given the early-stage status of lease areas off North Carolina's coast, combined with the lengthy permitting and construction processes for offshore wind, it is extremely unlikely for any project in the state to meet the 2027 deadline. Researchers estimate that

repeal of the 45Y (production) and 48E (investment) tax credits alone could increase power-sector CO2 emissions by 350-400 MT in 2035, with a cumulative increase of 3,500-4,500 MT between 2025 and 2040. Wind generation capacity is projected to fall by 125-225 GW in 2035.

Third, an Executive Order issued July 7, 2025, directs the Secretary of the Treasury to “strictly enforce” the termination of the clean electricity production and investment tax credits for wind facilities. This Executive Order has the potential to further restrict eligibility for tax credits for offshore wind projects.

The impact of these federal changes is already evident. In 2024, following a directive from the North Carolina Utilities Commission (the “NCUC”) and a stakeholder settlement, Duke Energy (“Duke”) issued an Acquisition Request for Information (“ARFI”) to the three offshore wind leaseholders off the North Carolina coast. The ARFI sought information for up to 2,400 MW of offshore wind by 2035, including confidential pricing details to assess whether offshore wind could be a least-cost, reliable resource.

However, in August 2025, Duke formally abandoned plans to move forward with a binding offshore wind proposal, citing “substantial regulatory hurdles” imposed by recent federal actions and policy changes. Specifically, Duke named Executive Memorandum 2025-01966, the One Big Beautiful Bill Act, and the July 7 Executive Order as the key drivers of increased “risk and uncertainty.” Duke concluded that these actions and policies make it “extremely difficult for offshore wind projects to achieve commercial operation by 2035.” Further, according to Duke’s 2025 Carolinas Resource Plan, filed on October 1, 2025, wind is not an economically viable resource for customers through 2040. Accordingly, neither onshore nor offshore wind is included in Duke’s recommended portfolio for years 2035 and 2040.

The CCAP names Executive Order 218, issued by Governor Roy Cooper in June 2021, as a “sector-specific goal to reduce GHG emissions,” and incorporates the executive order into its workforce analysis. Executive Order 218 set an ambitious target of deploying 2.8 GW of offshore wind by 2030, and 8.0 GW by 2040, while establishing the NC Taskforce for Offshore Wind Economic Resource Strategies to support policy coordination and economic development. The executive order reflects North Carolina’s commitment to a

clean energy transition and to capturing the supply chain, port, and workforce benefits of a growing offshore wind industry. According to the National Renewable Energy Laboratory, the state’s designated wind areas have substantial potential. Wind capacity is approximately 1,982 MW at the Kitty Hawk areas and 1,782 MW at the Wilmington areas. Further, the South Eastern Wind Coalition estimates that a 2.8 GW offshore wind project could reduce annual CO2 emissions by 3.51 million tons.

However, Executive Order 218 expired on December 31, 2024, and its vision is increasingly at odds with the federal regulatory landscape. Offshore wind development is capital intensive and time-sensitive, requiring long lead times for permitting and construction. The uncertainty introduced by the current federal environment, especially with respect to permitting freezes and the erosion of tax credit eligibility, makes it highly unlikely that North Carolina will achieve 2.8 GW of wind by 2030.

The consequences of offshore wind underperformance are significant. As of 2020, North Carolina’s electricity generation and use sector accounted for approximately 30% of statewide GHG emissions, or 41.77 MMTCO₂e. The CCAP explicitly relies on electricity generated from “renewable resources like solar, wind and geothermal” to offset generation from electric generating units. Yet, without offshore wind contributing at scale, the burden of decarbonization will shift to other resources such as solar, which faces its own cost and reliability restraints. This underscores a fundamental flaw in the CCAP’s planning assumptions. By failing to acknowledge and consider current regulatory hurdles to offshore wind production, the CCAP presents an overly optimistic pathway to meeting North Carolina’s climate goals.

VII. The CCAP Incorrectly Relies on House Bill 951’s Repealed 2030 Carbon Target

The CCAP incorrectly relies on House Bill 951’s (“HB 951”) repealed 2030 carbon target, overstating North Carolina’s current policy framework for reducing GHG emissions.

The CCAP identifies HB 951 as one of the “key policies” for driving GHG reductions. Passed in 2021, HB 951 required the NCUC to take “all reasonable steps” to achieve two major goals: (1) a 70% reduction in carbon dioxide emissions from 2005 levels by 2030 from electric generating facilities owned or operated by certain electric public utilities; and (2) carbon neutrality by 2050. To achieve these goals, HB 951 also mandated the development of a comprehensive “Carbon Plan” with utility and stakeholder input.⁹⁶ The Carbon Plan would guide the path to achieve the reduction goals, subject to NCUC review every two years.

However, the CCAP fails to account for a critical change in state policy. In 2025, the General Assembly passed Senate Bill 266 (“SB 266”), which eliminated the interim target of a 70% reduction by 2030. While HB 951’s 2050 neutrality goal technically remains in place, the removal of the 2030 benchmark fundamentally alters the policy trajectory. Independent analysis confirms the significance of this change. Researchers at NC State University recently concluded that “eliminating the interim target would increase natural gas generation by nearly 40% between 2030 and 2050.” Further, without the interim requirement, major utilities like Duke face diminished legal pressure to accelerate near-term emissions reductions, especially in the context of ongoing regulatory challenges in other emission sectors. The NCUC has already directed Duke to cease modeling scenarios designed to achieve the 2030 target.

Further, Duke’s 2025 Carolinas Resource Plan makes clear that, absent HB 951’s mandate, Duke will pull back from clean energy in favor of fossil fuels. Indeed, the president of Duke’s North Carolina operations stated, “By not having that interim target date, it gives us more flexibility in the system.” The 2025 Carolinas Resource Plan details how Duke intends to meet rising electricity demand in North and South Carolina.

Duke has forecasted increasing demand from large customers like data centers to power AI and other software. Early last year, Duke projected these data centers would need an additional 3.9 GW of capacity, equal to about four nuclear power plants and enough to serve millions of households. By May of 2025, Duke’s prediction rose to almost 6 GW. These projections have factored into Duke’s 2025 Carolinas Resource Plan, which calls for:

- Five new combined-cycle natural gas plants through 2033.

- Seven combustion turbines by 2033.
- Delaying the retirement of power plants that can burn either coal or gas at Belews Creek, Cliffside, and Marshall until as late as 2040.
- Doubling battery storage, reaching 5,600 MW by 2034.
- Pursuing new nuclear generation opportunities and developing an early site permit application for a small modular reactor at Belews Creek.
- Scaling back solar procurement targets.

The emissions impact of Duke’s 2025 Carolinas Resource Plan is significant. Under the plan, CO2 emissions actually increase into the mid-2030s, peaking around 60 million short tons in 2036. By contrast, a proposal consistent with HB 951’s 70% reduction mandate would have cut CO2 emissions to below 23 million short tons by 2030. In other words, Duke’s plan produces roughly three times the amount of CO2 emissions in 2036 than a plan compliant with HB 951 would. Yet the CCAP fails to reflect any of these developments.

By continuing to cite HB 951’s 2030 carbon reduction target as if it were still active law, the CCAP presents a misleading picture of North Carolina’s policy landscape. The CCAP treats the repealed law as a cornerstone of its modeling, workforce planning, and emissions trajectory. This disconnect undermines the credibility of the plan and overstates North Carolina’s likely emissions progress. The NCDEQ must perform its analysis without this obviously inappropriate assumption and should provide estimates of the impacts of the new legislative and regulatory landscape described above.

VIII. Conclusion

To address the CCAP’s shortcomings, the NCDEQ must take immediate steps to align the plan with current realities:

1. Update North Carolina’s GHG Inventory and BAU Projections. The NCDEQ must update the GHG inventory and BAU projections to incorporate emissions impacts of the EPA’s proposed reconsideration of the Endangerment Finding, the elimination of CAFE penalties, regulatory barriers to offshore wind development,

and the repeal of HB 951. This includes modeling worst-case scenarios, such as a full repeal of federal GHG standards, which could add billions of metric tons of emissions by 2055.

2. In the Alternative, Provide a Parallel Modeling Scenario. Recognizing the significant effort required to produce the CCAP, the NCDEQ could maintain the existing framework while also developing a separate model that incorporates recent federal and state regulatory and policy changes to present alongside the existing analysis. This model would complement the current CCAP by offering policymakers and stakeholders a more realistic picture of likely emissions trajectories and the additional measures needed to achieve climate goals.
3. Acknowledge Regulatory Uncertainty with Transparency and Rigor. The NCDEQ must provide a comprehensive analysis of how federal and state policy changes could delay or derail GHG reduction efforts. This should include quantitative estimates of emissions increases and their economic and public health costs. A dedicated section in the CCAP should outline contingency plans, such as state-level policies to offset federal rollbacks, to ensure stakeholders understand the challenges and proposed solutions. The current Executive Summary disclaimer is inadequate for this purpose.
4. Align with Current Policy and Remove Outdated References. The NCDEQ must eliminate references to expired or repealed policies, including Executive Order 218 and HB 951's 2030 target. This ensures the CCAP's modeling, workforce planning, and emissions trajectories reflect North Carolina's current legal and policy framework, enhancing its credibility.

By implementing these recommendations, the NCDEQ can strengthen the CCAP's accuracy and utility as a roadmap for achieving North Carolina's climate objectives. It will also enable stakeholders to fully understand and account for the impacts of legislative and regulatory changes recently taken or being considered. Failure to address these issues risks perpetuating an overly optimistic narrative, undermining public trust, and delaying the aggressive action needed to combat the climate crisis. A revised plan, grounded in current policy realities and informed by rigorous analysis, will better position North Carolina to achieve its climate objectives and protect its communities, economy, and environment for future generations.

NC DEQ Response: We thank you for well thought out and thorough critique of the CCAP. We recognize the shifting landscape of policy surrounding policies regarding GHG emission reduction and climate change.. Many plans and policies your comment addresses are still in a state of flux, and we can provide the current state of the policy as it stands currently before the CCAP's submission. As a result, we may be able to address

policies, projects, and plans that have not been addressed, new, or updated within the CCAP in the progress report to be submitted to the EPA in 2027. Your suggestion to list policies and regulations (such as the reconsideration of the 2009 EPA Endangerment Act) that may impede our progress is an excellent recommendation.. Our EV sales projections and growth in clean energy across the various sectors is reflected upon projected growth from our most current data from our stakeholders and current measures being completed across the six sectors. Our monitoring of our stakeholder’s progress will be tracked and reported in the NCDEQ’s Progress Report in 2027, in which the aftermath of recent policies and regulations will be reported. Furthermore, in reference to the new requirements of the Duke’s Carbon Plan, we based our calculations off the most recent Consolidated Carbon Plan and Integrated Resource Plan released in 11/2024. Duke Energy is required to release an updated Consolidated Carbon Plan and Integrated Resource Plan in 2026, upon which we can take into account the new considerations when making our calculated GHG projections.

Furthermore, we recognize there are many assumptions that must be made when calculating projected GHG emission reductions. We are making calculations based on the latest data we currently have from the most current GHG inventory and data from our stakeholders. You are correct in that do not assume any new policies and regulations when making our projected calculations; however, there is no feasible method to project what new regulations will be put in place from the current state to 2050. Progress reports in future years are put in place to reflect changes in policies in which will impact our GHG emission reduction calculations. We will update calculations as more current data becomes available. new GHG inventory is anticipated to be released in 2026. DAQ may account for recent changes in policies and regulations will compiling the new GHG inventory.

We thank you for your comment. Though we are excited for the advances and work North Carolina has made across the state in mitigating GHG emission reductions, our data well presents there are gaps and need for improvement across the state. We recognize many of our measures need further development in reaching our net zero goal. We hope the CCAP provides a framework to illuminate where further action is needed to reduce GHGs because our current efforts across the state are not sufficient. With the new implementation of new regulations and policies, we will update our data reflected in the CCAP accordingly. We hope that any negative feedback as a result of new legislation will raise awareness of the serious threat of GHGs and need to address them. Going forward, NCDEQ will continue to monitor updates to measures and identify new measures since the submission of the CCAP and provide them in the NCDEQ’s Progress Report. Any

relevant legislative impacts upon measures across the six sectors will be monitored and included in the progress report.

You offer many insightful recommendations to strengthening our state's efforts. We will consider your recommendations and other meaningful public feedback as a potential chapter in the NCDEQ progress report. Unfortunately, NCDEQ is not an implementing agency of GHG emission reduction measures. NCDEQ provides support and assistance to the public, businesses, and local governments in administering regulatory programs designed to protect air quality, water quality, public's health, and promote the adoption and advancement of clean energy.

Summary: The Environmental Law and Policy Clinic at Wake Forest University School of Law offers a critical review of the draft North Carolina Comprehensive Climate Action Plan (CCAP), emphasizing its failure to incorporate major recent changes in federal and state climate policy. The Clinic points out that the CCAP overlooks significant developments, such as the proposed rollback of federal greenhouse gas (GHG) regulations, the elimination of penalties for vehicle fuel economy noncompliance, the loss of federal incentives for clean energy and electric vehicles, new regulatory obstacles to offshore wind, and the repeal of North Carolina's interim 2030 carbon reduction target. These oversights, they argue, render the plan's emissions projections and policy assumptions outdated and overly optimistic. The Clinic urges the Department of Environmental Quality to update its greenhouse gas inventory, business-as-usual projections, and scenario modeling to reflect the current regulatory landscape, provide a transparent assessment of risks and uncertainties, and remove references to expired or repealed policies, so the CCAP can serve as an accurate and realistic guide for North Carolina's climate strategy.

3.4. Southern Environmental Law Center

Name: Megan Kimball

Organization: Southern Environmental Law Center

Email: mkimball@selc.org

Date Comment was Received: 10/6/25

Comment:

The Honorable D. Reid Wilson

Secretary

North Carolina Department of Environmental Quality

217 W. Jones Street

Raleigh, NC 27603

cprg@deq.nc.gov

Re: Comments on North Carolina's Draft Comprehensive Climate Action Plan

Dear Secretary Wilson,

Thank you for the opportunity to comment on North Carolina's Draft Comprehensive Climate Action Plan (CCAP). The draft reflects a significant and thoughtful effort to provide a long-term framework for achieving emissions reductions across all major sectors, while charting a pathway to net zero by 2050. We recognize the breadth and ambition of the plan, as well as its attention to issues of workforce, resilience, natural and working lands, and community-led solutions.

Several features of the CCAP stand out as particularly valuable. The inclusion of geothermal pilot programs demonstrates a willingness to explore innovative approaches to building decarbonization beyond traditional efficiency and electrification. Likewise, the emphasis on peatland restoration recognizes North Carolina's unique opportunity to protect and restore globally significant carbon sinks. The plan's attention to workforce development—through job projections, skills gap analysis, and strategies for growth—reflects an important effort to connect climate policy to economic opportunity. Finally, the use of energy burden mapping and community spotlights coupled with a focus on grid resiliency bring valuable human context to the plan, offering a clearer picture of how climate measures affect households and communities across the state. Harmonizing climate mitigation and adaptation strategies and documenting improved public health and resilience outcomes will help the state achieve cost effective results that improve the safety and well-being of residents.

At the same time, we must highlight some serious shortcomings in the assumptions underlying the plan. While the Draft CCAP’s emissions inventory and business-as-usual projections establish a critical statewide baseline for evaluating potential reduction pathways, the plan does not fully account for recent state and federal regulatory changes—including the repeal of North Carolina’s 2030 carbon target and federal rollbacks affecting vehicle standards and offshore wind. As a result, the plan risks presenting an unrealistically hopeful scenario of the Sec. Wilson state’s climate trajectory. A more candid assessment of these obstacles, and their implications for both 2030 and 2050 pathways, is critical to ensure the CCAP serves as an effective blueprint for climate action. Given recent policy changes, achieving the 2050 net zero target will require even greater ambition to compensate for weakened federal baselines and slower near-term progress. The plan should also be explicit that, as a planning document, it need not limit itself to measures with guaranteed funding today—its value lies in setting a comprehensive vision that identifies needed strategies even if resources must follow later.

Building from these more general points, there are several other areas where the CCAP should be strengthened to improve its effectiveness, competitiveness for federal funding, and durability. What follows is a sector-by-sector assessment of the proposed measures, with specific recommendations for refinement.

1. Transportation

Transportation remains North Carolina’s largest source of greenhouse gas emissions, yet the plan does not elevate vehicle miles traveled (VMT) reduction to the central role it deserves. While EV adoption and freight efficiency are important, they cannot achieve the needed scale of reductions alone. Land use reform and multimodal access can multiply benefits: smaller homes and more compact development reduce energy and travel demand, while narrower, slower streets allow for safer travel and more tree canopy. Investments in transit, walking, and cycling infrastructure would further cut emissions, lower household costs, and expand mobility for underserved communities.

- Measure 1: Medium- and Heavy-Duty Zero-Emission Vehicles — This measure

targets a highly polluting subsector and would improve air quality in freight corridors. It should include adoption timelines, workforce training, and prioritization of vehicle replacement in overburdened communities.

- Measure 2: Public EV Charging Network — Expansion of charging infrastructure is essential, but equitable coverage in rural areas, multifamily housing, and low-income neighborhoods must be guaranteed to avoid charging deserts and reinforcing existing disparities.

- Measure 3: Port Efficiency Programs — A sound strategy that would be stronger with commitments to shore power, drayage truck electrification, and freight logistics improvements.

1 For a detailed discussion of how rapidly changing state and federal landscape impact the assumptions underlying the CCAP, please see the comments submitted by the Environmental Law & Policy Clinic at Wake Forest University School of Law.

- Measure 4: Regional VMT Reduction Strategies (Unfunded) — Recognizes the importance of VMT reduction but lacks funding and detail. At the very least, it should include commitments to transit-oriented development, multimodal infrastructure, and smart land use policies.

Recommendation: The CPRG program specifically encourages investment in hard-to fund but transformative projects such as rural transit, e-bike rebates, and medium- and heavy duty truck electrification. In addition to the recommendations noted above with regard to Measures 1-4, these priorities should be more explicitly incorporated to improve the plan’s competitiveness for federal implementation grants while delivering durable climate and equity benefits.

2. Energy Efficiency and Building Decarbonization

The CCAP makes progress in reducing emissions by addressing both energy supply and building performance, but greater ambition is needed to meet statewide goals. As the economy continues to electrify, reducing emissions from the electric power sector will be increasingly important. On the supply side, expanding solar and offshore wind is essential. These zero emissions electricity generating resources have near-zero marginal operating costs and can improve energy supply vital to economic development at least cost. Increasing generation from these resources should be paired with battery storage,

increasingly long-duration storage, and grid modernization to ensure reliability. The Department's efforts with microgrids are promising and commendable but should be expanded rapidly because microgrids can interconnect renewable energy more quickly than if additions are limited to the utilities' interconnection processes, while also providing resilience during extreme weather events. On the demand side, efficiency and electrification are included, yet the scale of proposed retrofits and fuel-switching programs falls short of the opportunity.

- Measure 5: Renewable Energy Expansion — Builds on state leadership in clean power but should set explicit storage and grid modernization targets.
- Measure 6: Microgrids for Resilience — Promising link between clean energy and resilience; deployment should prioritize rural and vulnerable communities.
- Measure 7: Residential Energy Efficiency — Positive step but would have greater impact with higher targets and sharper focus on low-income and multifamily housing.
- Measure 8: Building Decarbonization (Fossil Fuel Replacement) — HVAC electrification is critical but requires complementary codes, performance standards, and financing tools.

Recommendation: The CCAP should scale retrofits and electrification programs in tandem with grid upgrades, while ensuring resources are directed toward low-income and multifamily housing. This integrated approach would directly align with CPRG's emphasis on measurable reductions, household savings, and resilience.

3. Industry

The industrial sector is addressed only briefly in the draft plan, despite being a significant contributor to statewide emissions. With just one measure, the section does not reflect the scale of the challenge or opportunity. Attention to efficiency, fuel switching, and cluster-based strategies would help ensure this sector contributes fully while preparing the workforce for transition.

- Measure 9: Industrial Decarbonization Planning (Unfunded) — Planning is a useful start, but without funding this measure risks being symbolic. Embedding

pilot projects, technical assistance, and workforce training would strengthen alignment with CPRG priorities.

Recommendation: The CCAP should identify near-term industrial actions—such as efficiency upgrades, waste heat recovery, and low-heat electrification—while laying the groundwork for longer-term solutions like clean hydrogen and industrial clusters. Pairing these with equity-focused workforce programs would improve readiness for CPRG implementation funding.

4. Waste and Methane

The plan addresses methane but relies too heavily on landfill gas capture, which risks locking in infrastructure that is costly and inconsistent with long-term climate goals. More emphasis should be placed on upstream solutions that prevent waste from entering landfills in the first place. Expanded food waste diversion, composting, and organics recycling would deliver faster and more durable methane reductions while also creating economic opportunities for local governments and small businesses. At the same time, electrification of waste fleets can improve both climate and public health outcomes, but it will require coordinated procurement strategies and state support to make adoption feasible for localities.

- Measure 10: Food Waste Diversion and Composting — A strong upstream strategy, but the CCAP should commit to building regional composting facilities, establishing food rescue networks, and setting clear diversion targets to achieve scale.
- Measure 11: Waste Fleet Electrification — Promising for reducing emissions and diesel exposure, but municipalities will need state-level guidance, technical assistance, and financing tools to accelerate fleet turnover.
- Measure 12: Landfill Gas Capture Improvements — Can help reduce methane leakage when done properly, but should be a transitional measure paired with (1) aggressive diversion and composting goals to avoid overreliance on gas-to-energy systems and buildout of natural gas infrastructure, (2) policies that discourage increasing methane generation through landfill expansion or methane-generating waste practices, (3) advanced monitoring and fugitive emissions abatement

measures to ensure leaks are detected and gas is captured, and (4) additional protections for communities living near landfills to address the potential negative impacts of landfill gas-to-energy projects

Recommendation: By embedding upstream strategies—such as mandatory organics diversion, support for municipal composting, and statewide food waste reduction campaigns—the CCAP would deliver greater long-term benefits while aligning more closely with CPRG’s preference for source reduction. Pairing these efforts with clear guidance and financing for fleet electrification would ensure the waste sector contributes more fully to statewide emissions reductions.

5. Natural and Working Lands

This sector is one of the CCAP’s strengths, recognizing the importance of conservation, restoration, and urban forestry in reducing emissions and building resilience. North Carolina’s coastal habitats and peatlands represent globally significant carbon sinks, while its agricultural and forestry sectors offer broad opportunities for climate-smart practices. At the same time, urban forestry and land conservation provide co-benefits beyond sequestration—such as flood mitigation, heat reduction, and improved air quality—that are critical for community resilience. Ensuring durable funding mechanisms and explicit equity provisions will be essential to make these benefits lasting and fairly distributed.

- Measure 13: Coastal Habitat and Peatland Restoration — Leverages globally significant carbon sinks but requires sustained funding and monitoring.
- Measure 14: Agriculture and Forestry Practices — Encourages climate-smart practices but should include equity strategies and support for small farmers and landowners.

Recommendation: By explicitly framing land-based measures as multi-benefit strategies—pairing carbon sequestration with flood mitigation, urban cooling, and equitable access to tree canopy—the CCAP can demonstrate the holistic approach favored under CPRG. Strengthening commitments to permanent funding mechanisms,

such as conservation easements or trust funds, would also help guarantee the durability of these gains.

6. Equity and Implementation

Equity and implementation must move beyond framing to become enforceable commitments. Governor Cooper’s Executive Orders, in particular EO 246 and EO 292, established clear requirements for integrating environmental justice into climate and energy planning, and the CCAP should more directly demonstrate how it will meet those mandates.

Consideration of rural status, low-income status, and energy burdens is helpful in ensuring the equitable distribution of benefits under the CCAP. More clarity is necessary as to resource allocation guidance. For example, the revised plan should commit a set share of efficiency, transit, resiliency, and clean energy investments to the most burdened communities.

Workforce analysis is another strength, but it must be paired with funded training and apprenticeship programs in underserved communities, ensuring that residents gain equitable access to emerging clean energy and resilience jobs. The plan should also establish formal mechanisms for community participation and feedback, such as advisory boards or structured stakeholder processes, so that implementation reflects the needs of those most affected.

The CCAP frequently describes measures as “funding dependent,” which reflects a real challenge but risks undermining commitments. To address this, the state should pursue durable financing strategies such as green bonds, revolving loan funds, or a dedicated climate trust fund to provide sustained support. Finally, transparency and accountability will be critical. A public facing dashboard, similar to the dashboard created to track progress of the Atlantic Conservation Coalition on implementation of the CPRG, with annual updates, broken down by sector and geography, would allow communities to track progress, monitor equity outcomes, and hold agencies accountable.

7. Resilience

The one-year anniversary of Hurricane Helene underscores the urgency of embedding

resilience as a core framework for climate action. While the CCAP references resilience as a key objective in the introduction, it should serve as a unifying thread across all sectors. Transportation projects should incorporate flood protection and stormwater management; building codes should require both energy efficiency and hazard resistance; and land conservation should be explicitly tied to floodplain management and coastal buffering. Resilience planning should also address social infrastructure, ensuring that hospitals, schools, and emergency shelters are prioritized for clean energy and backup power investments. Because CPRG encourages projects that combine emissions reductions with resilience, North Carolina has an opportunity to model an integrated approach that protects lives, safeguards infrastructure, and makes climate investments more durable over time.

Conclusion

The Draft CCAP represents a strong and forward-looking framework for climate action in North Carolina. We strongly support innovation in areas such as geothermal pilots, peatland restoration, and workforce analysis. But the draft plan should be strengthened. By using more realistic assumptions for projected emissions, elevating VMT reduction, scaling retrofit ambitions, prioritizing upstream waste solutions, embedding durable conservation funding, tying equity and workforce commitments to measurable outcomes, and fully integrating resilience, the plan can be far more effective—and even set a national standard—for comprehensive, equitable, and durable climate action. Strengthening these elements will also ensure the plan is well positioned for success under the Climate Pollution Reduction Grants program.

Thank you for your leadership and for the opportunity to provide these comments.

Sincerely,

Megan Kimball

Senior Attorney

NC DEQ Response: Thank you for your well thought out comment. We recognize the shifting nature of environmental policies and plans regarding climate change and GHG emission reduction, which we allude to in the CCAP. We have provided the most current state of measures addressed in the CCAP at the time our draft of this document was submitted for public feed-back. We will provide any new and updated measures in the

2027 CCAP progress report. GHG inventories provide a comprehensive account of emissions over a specific area through given timeframe, with our latest inventory monitoring the range 1990-2020. GHG inventories require time to identify GHG sources and sinks and collect GHG emissions to compile into a report; as a result, emission inventories cannot reflect real-time data. Our 2024 GHG Inventory used in the CCAP will serve as a baseline inventory upon which we can monitor the impacts of implemented measures and any adopted legislation. Emission calculations rely on data that has been modeled and calculated using the best, and most up to date, science and engineering tools and practices. Additionally, NCDEQ performed internal quality assurance measures to evaluate consistency and accuracy, including cross-checks with other datasets and peer consultation on model assumptions.

We would further like to add, that the CCAP is a planning document. Though there may be gaps in measures addressed in the CCAP, NCDEQ cannot implement changes to measures addressed in the document. NCDEQ can influence implementations opportunities; however, NCDEQ is not the implementing agency. We direct you to Figure 8 (page 41) of the CCAP. Figure 8 is a compiled a summary of implementation authorities across all 14 GHG emission reduction measures. This summary identifies the lead (direct or oversees implementation) and supporting entities (contribute expertise, outreach, or technical assistance), and legal authority (the statutory framework underpinning that role) that hold the responsibility, operational capacity, or programmatic expertise to carry out the types of actions outlined in each measure. The figure provides transparency about where institutional responsibility currently exists for each measure. The CCAP addresses current work being done to mitigate GHG emissions and provides data how NC is doing to reach net-zero emissions by 2050. Consequently, we recognize the industry and waste sectors lacked the sufficient funding to provide more detailed GHG emission data. We can only make our GHG emission reduction estimates based on the latest GHG inventory report. In addition, not all recommendations, plans, and policies targeted towards GHG emission reduction efforts were not incorporated into CCAP due to not aligning with the CCAP's measure criteria in that they can be implementable, feasible, and provide measurable data.

Our calculations may be updated as new data is received that is relevant to North Carolina's GHG reduction efforts across the six sectors. The Division of Air Quality (DAQ) is required to release an updated GHG inventory for 2026, upon which we will update our GHG emission and reduction calculations for the 2027 CCAP progress report. We

recognize that our calculations take into account many necessary, but well thought out, assumptions. For example, we cannot currently account for any updates to our calculations due to new policy changes. Our calculations for our BAU and projected GHG emissions can only rely on historical data and our most recent GHG inventory and most up to date data provided by our partnered stakeholders on our measures. We cannot incorporate new policy changes into the CCAP due to there is no current data how these new regulations impact our measures. As a result, the rate at which receive new data and calculate new GHG emissions cannot allow for yearly (or more frequent reports). DAQ updates their inventory every two-years, upon which we heavily base our GHG emission and reduction calculations. However, ultimately our calculations agree with your comment in that North Carolina still needs to increase our GHG reduction efforts to reach our net-zero emissions goal by 2050.

We would further like to add NCDEQ cannot alter the adoption timeline of EVs. This is a milestone that is not under the jurisdiction of NCDEQ. Adoption timelines of zero-emission vehicles (ZEVs) were set as goals in Executive Order 80 in 2018 with an ambition to have 80,000 sales of ZEVs by 2025. This ZEV sales goal was adjusted in Executive Order 246 in 2022 to increase the number of ZEV sales to 1.25 million by 2030. North Carolina Division of Transportation (NCDOT) is our provider of ZEV sales data. Without state incentives, which are outside of the purview of the CCAP, EV adoption will remain organic in nature. The CCAP cannot provide this data, seeing as adoption timelines is an implementation measure and not the scope of the planning grant's measures. The CCAP documents measures including efforts to increase the number of low-carbon emitting vehicles on the road including school and transit buses, garbage trucks, emergency vehicles, and on and off-road construction vehicles. Measures such the Volkswagen Settlement, the DC Fast Program, Diesel Emission Reduction Act (DERA), and Clean Fuels Advanced Technology (CFAT) are currently in place to provide funding to support adoption of low carbon emitting vehicles and charging infrastructure across the state. Additionally, both Wilmington and Morehead City have taken action in their ports to improve freight shipping efficiency by upgrading technology and expanding more efficient corridors. In addition, in reference to programs such as retrofit upgrades and electrification programs working in tandem with grid upgrades, the SEO has programs in place that address these measures separately; yet, not working together. This is a thoughtful consideration we could incorporate as suggestion as a need to maximize programs by considering stakeholder collaboration. Furthermore, our workforce analysis does include programs that focus on providing apprenticeships and training for clean energy jobs (targeted especially, towards rural, high-energy burden

communities). NCDEQ has partnered with the Department of Commerce (DOC) to identify measures focused on providing training and apprenticeship opportunities throughout the state, including efforts targeted towards rural, high-energy burden communities. DOC has established pathways linking clean energy job growth with access to training and employment. Through programs like NCWorks, ApprenticeshipNC, and the Community College System, DOC ensures workforce opportunities reach rural, low-income, and high energy burden communities. Partnerships including AdvanceNC and EEveryone Charging Forward connect local workers to jobs in solar, wind, EV, and building efficiency sectors.

Summary: This comment outlines a comprehensive set of recommendations aimed at strengthening a climate action plan to ensure its effectiveness, equity, and durability. It highlights the importance of using realistic assumptions when projecting future emissions, which allows for more accurate goal-setting and accountability. The recommendations urge elevating Vehicle Miles Traveled (VMT) reduction targets, emphasizing the need to reduce automobile dependency through expanded public transit, active transportation infrastructure, and smarter urban planning strategies. Scaling up retrofit ambitions is proposed, calling for broader and deeper energy efficiency improvements in existing buildings, including incentives for upgrades and adoption of advanced technologies.

Further, the document advocates for prioritizing upstream waste solutions, such as reducing waste generation at the source, expanding recycling and composting programs, and implementing circular economy principles. Embedding durable conservation funding is emphasized to ensure the long-term protection and restoration of natural resources, with strategies for sustainable financing mechanisms that support ongoing conservation initiatives.

Equity and workforce commitments are to be tied directly to measurable outcomes, ensuring that disadvantaged communities benefit from climate action and that quality jobs are created across the sector. The plan encourages the full integration of resilience measures, including adaptation strategies to address climate risks, proactive infrastructure upgrades, and community preparedness initiatives.

By reinforcing these strategic elements, the author asserts that the climate action plan can become not only more impactful but also a potential model for national standards in climate policy. The recommendations position the plan favorably for success in the

Climate Pollution Reduction Grants program, which supports transformative projects that reduce greenhouse gas emissions. In closing, the author expresses gratitude for leadership and the opportunity to contribute insights toward advancing comprehensive climate solutions.

3.5. North Carolina League of Conservation Voters

Name: Michelle Carter

Organization: North Carolina League of Conservation Voters

Email: info@nclcv.org

Date Comment was Received: 9/26/25

Comment:

Hey David,

Trump and Congress have actively rolled back progress on national climate action, as has the pro-polluter Republican majority in the North Carolina legislature; but [Gov. Stein's administration has pushed to move North Carolina towards a cleaner, more sustainable future.](#)

The Biden-Harris Administration awarded our state \$3 million to create a comprehensive climate plan to lower greenhouse gas emissions and protect our state from the impacts of climate change. Recently, the NC Department of Environmental Quality released a draft of that plan.

Overall, this is a great plan, but we think there are a few things we can improve to make it even better for folks across the state.

Make Your Voice

Heard - Advocate for a Stronger Climate Plan

Donald Trump and Congress have actively rolled back our nation's progress on addressing the climate crisis even while states and communities face more costly energy prices due to Big Oil's greed. The same goes for the pro-polluter Republican majority in North Carolina's legislature. However, Gov. Stein is still pushing our state for strong climate action. He recognizes the importance of clean air, clean drinking water, and the significant benefits of a clean energy economy. The Inflation Reduction Act awarded our state \$3 million to create a climate plan to reduce our state's greenhouse gas emissions. Recently, the NC Department of Environmental Quality (NC DEQ) delivered that draft plan to the public and are accepting comments

Overall, this is a good plan - but we think our state can do more.

What the Plan Gets Right

There's a lot this plan gets right. It demonstrates a comprehensive and forward-thinking approach to clean energy, job creation, environmental justice, and emissions reductions. The proposed strategies not only address greenhouse gas emissions but also consider economic growth, equity in communication, and resilience to climate impacts. Key highlights include:

- o Expansion of microgrids and renewable power in Helene-impacted

Western NC

- o Clean energy jobs for workers are in high demand and are anticipated to continue especially those for the wind, solar, electric vehicle construction and repair and building efficiency (construction) sectors; an additional 10,000 jobs by 2050 NCDEQ has developed and modeled three measures for the waste sector that collectively will reduce GHG emissions by 17% by 2030 and 25.3% by 2050

- o Improvements in outreach to rural communities and those without broadband internet: radio, fact sheets and other publications, local newspapers

Takes into consideration how to lower co-pollutants like NO_x, SO₂, and PM_{2.5}

o Create carbon sinks to sequester GHG emissions and embrace nature-based solutions for flood mitigation, sea level rise, and erosion for natural / working lands

How the Plan Can Improve

There are, however, a few areas where this plan could be strengthened. While the overall direction is positive, several key gaps remain that could limit the plan's effectiveness in achieving its climate, equity, and resilience goals. Addressing these concerns would enhance both environmental and community outcomes across the state. These areas for improvement include:

o Plans to reduce emissions do not account for increases in the power sector driven by AI infrastructure buildout, delays in coal plant closures, and continued investment in methane gas

o Lack of focus on public transportation initiatives, despite transportation being North Carolina's largest source of GHG emissions; consider adding state incentives for electric vehicles Launch microgrids in Eastern NC, especially in high energy-burdened communities

o Consider public-private partnerships with major retailers (e.g., Food Lion, Harris Teeter, Walmart) for discounted or free shopping days to incentivize food donations before expiration dates

o Localize trash disposal rather than allowing localities in the Triangle to send their waste to Eastern NC, which fills local landfills and exacerbates biogas and environmental justice issues

o Increase intentional public environmental education, such as partnering with public libraries to host energy efficiency workshops or community composting trainings

NC DEQ Response: Thank you for your comment. We recognize that North Carolina's GHG emission reduction efforts do have several gaps. However, NCDEQ cannot implement these gaps in the measures addressed across the six sectors. In addition, not all recommendations, plans, and policies targeted towards GHG emission reduction efforts were not incorporated into CCAP due to not aligning with the CCAP's measure criteria in that they can be implementable, feasible, and provide measurable data. GHG

inventories provide a comprehensive account of emissions over a specific area through given timeframe, with our latest inventory monitoring the range 1990-2020. GHG inventories require time to identify GHG sources and sinks and collect GHG emissions to compile into a report; as a result, emission inventories cannot reflect real-time data. Our 2024 GHG Inventory used in the CCAP will serve as a baseline inventory upon which we can monitor the impacts of implemented measures and any adopted legislation. Emission calculations rely on data that has been modeled and calculated using the best, and most up to date, science and engineering tools and practices. Additionally, NCDEQ performed internal quality assurance measures to evaluate consistency and accuracy, including cross-checks with other datasets and peer consultation on model assumptions. In addition, our measures do not include the impacts emissions from power from AI infrastructure and closure of coal firing plants. NCDEQ recognizes the energy strain data centers places on the electrical grid; however, we cannot account for GHG emissions and energy use data that has yet to be acquired. The impacts of these activities will likely be included in the 2026 GHG Inventory Report. In addition, North Carolina does have measures to improve microgrid reliability, particularly geared to target rural, high-energy burdened communities. For example, NC Sustainable Energy Association's (NCSEA) Clean Energy Recovery proposal noted "[a]s it relates to grid infrastructure, many communities across Western NC, especially remote areas were without power, access to clean drinking water, and vital communications for weeks. In the immediate aftermath of Hurricane Helene, organizations on the ground like Footprint Project (FP)98 and Land of Sky Regional Council (LOSRC)99 were focused on delivering immediate relief through temporary microgrid solutions designed to bring power, water purification, and communications to communities in need. Up to twenty-four stationary microgrids will be installed across six Helene affected counties, and two mobile "Beehive" microgrid hubs will be installed to serve the entire state of North Carolina during future disasters (one in Western North Carolina and one in Eastern North Carolina). This is a pilot program that is anticipated to provide relief to microgrids in events of emergencies throughout the state. In addition, Department of Energy (DOE) provides funding opportunities for investing microgrid resiliency and upgrades such as DOE Grid Resilience Program, BIL Section 40101(d), DOE Grid Innovation Fund, GRIP Program, Grid Resilience Utility and Industry Grants, the Energy Improvements in Rural or Remote Areas Program, Transmission Siting and Economic Development (TSED) Grant Program. Though these funding opportunities exists, NCDEQ cannot implement these grants, but rather share this information with the public and relevant entities to provide awareness of funding in areas of need.

We appreciate your insights related to transportation projects. The CCAP notes projects that are ongoing within the NCDEQ are those that have funding and are measurable and have been or will be implemented, like Measures 1-3. The CCAP documents measures including efforts to increase the number of low-carbon emitting vehicles on the road including school and transit buses, garbage trucks, emergency vehicles, and on and off-road construction vehicles. Measures such as the Volkswagen Settlement, the DC Fast Program, Diesel Emission Reduction Act (DERA), and Clean Fuels Advanced Technology (CFAT) are currently in place to provide funding to support adoption of low carbon emitting vehicles and charging infrastructure across the state. Additionally, both Wilmington and Morehead City have taken action in their ports to improve freight shipping efficiency by upgrading technology and expanding more efficient corridors.

The CCAP identifies the current work being done to date in addressing GHG emission reduction and identifies all sources and sinks of GHG emissions. Though your recommendations are great suggestions, any policy changes and gaps in measures addresses in the CCAP need to be brought before a legislative board and/or addressed with the stakeholder directly. The CCAP's mission is to bring awareness of work being done to date and current state of progress in reducing GHG emissions.

We entirely agree with you the public education of the importance of GHG emission reduction and how the public can lead more sustainable lifestyles is a key component of GHG emission reduction. We hope we can identify more public education plans to include in our 2027 CCAP progress report and will take the suggestion to include a gap analysis within our report to identify areas of need. Awareness of the need for public outreach events should be brought towards local legislation for implementation opportunities.

Summary: This comment presents a comprehensive set of proposals aimed at addressing energy, food security, and environmental challenges in Eastern North Carolina, particularly in communities facing substantial energy burdens. The first recommendation is to launch microgrids in these regions, which would strengthen local energy resilience and reliability, especially in areas prone to outages and high utility costs. The plan also advocates for public-private partnerships with major retailers such as Food Lion, Harris Teeter, and Walmart, suggesting initiatives like discounted or free shopping days to motivate food donations before products reach expiration, thereby reducing food waste and supporting community nutrition needs.

A further strategy involves the localization of trash disposal systems to prevent localities in the Triangle from transporting their waste to Eastern NC. This approach would help alleviate the pressure on local landfills, reduce harmful biogas emissions, and address environmental justice concerns that disproportionately affect rural communities. Lastly, the document calls for increased and intentional public environmental education, proposing partnerships with public libraries to host workshops and programs focused on energy efficiency and sustainability, empowering residents with knowledge and practical tools to reduce energy consumption and environmental impact.

3.6. Clean Aire NC

Name: Not Listed

Organization: Clean Aire NC

Email: Not Listed

Date Comment was Received: 10/6/25

Comment:

Dear Department of Environmental Quality Staff,

CleanAIRE NC is a non-profit organization advocating for the health of all North Carolinians by pursuing equitable and collaborative solutions that address climate change and air pollution. CleanAIRE NC's mission is to protect North Carolina's air quality and ensure people have clean air to live healthier and happier lives.

CleanAIRE NC supports the overall vision of the Comprehensive Climate Action Plan (CCAP) to reduce economy-wide greenhouse gas (GHG) emissions to 50% below 2005 levels by 2030. In addition, our organization supports achieving net-zero economy-wide GHG emissions as soon as possible. However, our organization submits the following

comments to address key gaps and opportunities for improvement in the CCAP, specifically related to transportation and waste reduction.

I. The CCAP Fails to Address Opportunities for State-Level Incentives and Public Transit.

Transportation is North Carolina’s largest source of GHG emissions. While the CCAP recognizes regional and diverse transportation approaches to reduce vehicle miles traveled (VMT) and increase EV adoption; the CCAP lacks actionable recommendations and state-level commitments to ensure widespread and equitable impact.

The CCAP highlights funding for EV charging infrastructure, including \$14 million to expand statewide access and prioritization of rural communities. However, the CCAP does not provide actionable recommendations from previous policies (Executive Order No. 246) for this infrastructure. The CCAP acknowledges that “absent from this measure are ways in which to incentivize the adoption of electric light-duty vehicles.”

There should be state level incentives to ensure EV charging infrastructure in rural communities. Furthermore, simply expanding charging stations may not overcome the loss of federal incentives or guarantee rural adaptation. CleanAIRE NC urges the inclusion of state-level incentives for EV purchases and targeted programs to reduce barriers in underserved areas. Additionally, the CCAP does not include public transit opportunities. North Carolina must prioritize robust public transportation funding and implementation when addressing reducing GHG emissions. The CCAP should address transportation equity and accessibility. Not everyone has access to a vehicle, let alone electric vehicles. A more localized example of public transit opportunities and reducing GHG emissions is the Mecklenburg County Transit Tax Referendum, which proposes increasing the local sales tax to expand bus, light rail, and road improvements. Strengthening public transit infrastructure is essential to reducing single-occupancy vehicle use, cutting emissions, and improving accessibility, particularly for low-income and historically underserved communities. Climate action plans that include public transit help ensure that the benefits of sustainability efforts are shared equitably.

II. The CCAP Acknowledges Certain Waste Management Options but Does Not Fully Address or Assess the Range of Available Solutions.

The CCAP identifies three key waste measures to reduce GHG emissions: diverting food waste, decarbonizing collection fleets, and improving landfill gas collection.

These measures are projected to collectively reduce waste sector GHG emissions by 17% by 2030 and 25.3% by 2050.

CleanAIRE NC supports the focus on food waste diversion and landfill methane capture, but notes that the CCAP lacks strategies to meaningfully change how households, businesses, and institutions manage waste. For example, while the CCAP encourages educational outreach and partnerships with food producers to direct surplus to food banks, practical barriers remain: large grocery chains face restrictions on donating food near expiration, and composting programs remain limited in reach. For these reasons, our organization recommends the CCAP to include expanded community-level composting and food recovery programs. Successful pilot programs such as Compost Now and the Wilmington Compost Company are some examples. In addition, incentives for early food donation from retailers and restaurants before products reach expiration dates. Furthermore, the CCAP should take into consideration the communities that are most affected by emissions caused by waste; and address mitigation planning for landfills.

CleanAIRE NC urges the NCDEQ to strengthen the CCAP by incorporating actionable recommendations and strategies regarding state-level incentives, policies to increase cleaner public transit options, and expand waste management measures.

Implementing these recommendations will help ensure that North Carolina achieves meaningful GHG reductions and promotes equity. Thank you for your time and consideration in this matter. Please do not hesitate to reach out if you have any questions.

Sincerely,

CleanAIRE NC

NC DEQ Response: Thank you for your critique of the CCAP. The addition of recommendations, though a good idea, is beyond the scope of the CCAP. The CCAP is a

planning document to bring awareness of all the sources and sinks of GHG emissions in North Carolina. The CCAP seeks identify current work being done to reduce GHG emissions and where our current work stands in helping us reach North Carolina's net-zero GHG emission goal by 2050. Though North Carolina's measures in mitigating GHG emissions do contain gaps, NCDEQ is not the entity to devise strategies and make recommendations in measures to strengthen them. Your comment addressing expanding charging infrastructure in rural areas is a pressing need. Measure 2 of the CCAP addresses projects targeted towards EV port installation. Programs such as CFAT and the VW settlement (implementing both DC Fast and Level 2 charging ports) provide funding to install charging ports across the state and incentivize EV adoption into motor fleets, school buses, garbage trucks, emergency vehicles, and mass-transit vehicles, which help make EVs more feasible for rural areas. However, statewide incentives for EV adoption by the public does present gaps in funding, which we mention. The scope of the CCAP is to present where there are funding opportunities to which North Carolina should take advantage of to reduce GHG emissions.

Your suggestions to mitigate food waste are good suggestions but again represent areas of opportunity where North Carolina lacks funding to diverting GHGs from the waste sector. Currently, Food Lion (Food Lion Feeds) and Wegmans (Zero Waste Initiative) currently have a program in place, which donates near expired food to food banks and pantries to reduce waste and support families in need. Your suggestion indeed highlights the need to develop methodology from GHG emissions avoided from these programs.

In the NCDEQ Progress Report in 2027, we will work to identify GHG emission reduction measures not addressed in the CCAP and continue to monitor measures addressed in the CCAP since it's November 2025 submission. **Summary:** This comment consists of a formal letter from CleanAIRE NC to the North Carolina Department of Environmental Quality (NCDEQ), advocating for a strengthened Climate Change Action Plan (CCAP). CleanAIRE NC specifically urges NCDEQ to incorporate targeted and actionable recommendations, including the development of state-level incentives designed to promote the adoption of cleaner technologies and practices across various sectors. Additionally, the letter calls for the implementation of new policies aimed at expanding and improving public transit options, which would reduce emissions from transportation and increase access to sustainable mobility for communities statewide. CleanAIRE NC also highlights the necessity of broadening waste management measures, emphasizing the importance of addressing landfill emissions and advancing mitigation planning for

sites most impacted by waste-related pollution. By pursuing these recommendations, CleanAIRE NC believes North Carolina will be better positioned to achieve substantial reductions in greenhouse gas (GHG) emissions while fostering greater equity among its residents. The letter concludes with an expression of gratitude for the consideration of these ideas and an invitation for further engagement or questions, underscoring the organization's commitment to collaborative environmental progress.

3.7. Randy Strait, DAQ

Name: Randy Strait, DAQ

Organization: Comments on draft CCAP report (reviewed the PDF file downloaded from DEQ website that is posted for public input, <https://www.deq.nc.gov/state-energy-office/2025-nc-ccap-draft/open>)

Email: N/A

Date Comment was Received: 9/24/25

Comment: Comments on draft CCAP report (reviewed the PDF file downloaded from DEQ website that is posted for public input, <https://www.deq.nc.gov/state-energy-office/2025-nc-ccap-draft/open>)

Acronyms - add

Diesel Emission Reduction Act (DERA) – spelled out on pages 45, 48

Utility Savings Initiative (USI) – spelled out on pages 74, 93, 242

Note: I did not do a thorough check on acronyms; these are just two that I noticed were missing from the list.

Per discussion with Brian Phillips, revise the following paragraph as noted in track edits. DEQ/DAQ did not start using DERA funds until after 2005.

“Since 1995, the NCDEQ DAQ has offered individuals, businesses, and organizations DERA state

funding to help cover the costs of their emission reduction projects. These projects include

diesel engine replacements, diesel oxidation catalyst retrofits, marine diesel repowers, and

many more.⁴⁰”

On page 94, replace “energy use information (EUI)” with EUI since it is defined on the previous page (and information should be intensity).

Energy Use Intensity (EUI) – page 93

energy use information (EUI) – page 94

Page 95 – remove comment by Luca Tjossem and response by Logan Pfeiffer

Comment – see table on next page.

The values in Table 2 represents emissions associated with onsite fuel combustion activities in the Residential, Commercial, and Industrial (RCI) sectors. The sector label in Table 3 excludes “Industrial” but the emission values are the same the values in Table 2 that includes “Industrial.” Hopefully, this is a labeling issue and can be corrected by adding “Industrial” to the sector name in Tables 3, 6, and Table 24 (Measures 8). As you

may know, Industrial fuel consumption is separate from the Industrial Sector emissions activity addressed by Measure 9. If Measures 7 and 8 do not cover the Industrial sector, the baseline emissions values in Table 3 should be lower than the values in Table 2. If needed, DAQ can assist with separating the reference case emissions for the residential, commercial, and industrial fuel use sectors.

For Measure 8, I also have a concern with the estimated emission reductions for 2050 resulting in negative emissions for the RCI sectors. This just does not seem possible. If the analysis of Measure 8 includes Industrial fuel consumption but should not have, then the emission reductions for just the Residential and Commercial sector would be lower and when compared to the baseline (that includes all three RCI sectors) most likely would not show a negative value in 2050. Happy to discuss further.

NC DEQ Response:

These edits will be taken into consideration and corrected accordingly.

3.8. PEW Trust

Name: Alex Moya

Organization: PEW Trust

Email: amoya@pewtrust.org

Date Comment was Received: 10/6/25

Comment:

Dear Secretary Wilson: On behalf of The Pew Charitable Trusts (Pew), please accept these comments on the draft North Carolina Comprehensive Climate Action Plan (CCAP). Pew's U.S. Conservation project advances commonsense solutions that address the impacts of a changing environment on nature and communities. We applaud the state's commitment to harnessing natural and working lands, including wetlands like pocosins and salt marshes, to advance North Carolina's climate goals.

Pew’s interest relative to the CCAP is to support protection and restoration of North Carolina’s vital coastal wetlands to reduce carbon pollution and build resilience of coastal communities. While the state saw a net gain in estuarine wetland acreage from 1996–2006, it experienced net losses from 2006–2016 due primarily to conversion to unvegetated shoreline and open water. These losses directly impact existing carbon stocks and other essential benefits such as natural defense from flooding and erosion. The management of these landscapes requires coordination across local, state, and federal agencies. The North Carolina’s CCAP provides an important opportunity to spur action across agencies to stem the loss of carbon rich habitats and expand their recovery. While the CCAP spans the entire state economy, our feedback focuses on the following strategies and measures:

- Sector: Natural and Working Lands
 - Measure 13: Coastal Habitat Enhancement and Peatlands Restoration
 - 13.1: Coastal Habitat Enhancement Initiative
 - 13.2: Peatland Restoration on Public Land and Acquisition and Restoration on Private Land

Natural and working lands (captured under Land Use, Land Use Change, and Forestry sector of the state’s GHG inventory) represent the state’s sole net carbon sink, offsetting approximately 34% of the state’s gross GHG emissions in 2020. This underscores the critical need for measures to safeguard existing carbon sinks and to pursue ecosystem restoration wherever possible to increase carbon sequestration and storage. North Carolina deserves recognition for its looking approach in the CCAP. By addressing the growing threats of catastrophic wildfire, sea level rise, and other stressors to its coastal landscapes, the plan will not only reduce and avoid emissions that would otherwise occur when habitats are degraded but also strengthen community resilience.

Detailed comments for each measure are listed below.

Measure 13. Coastal Habitat Enhancement and Peatlands Restoration

North Carolina deserves recognition for its leadership in acknowledging the intersection between carbon management and resilience in the natural and working lands sector. This integrated approach not only aligns state policy with the latest science but also supports coordinated decision-making across agencies and highlights the urgency of protecting and restoring the state’s landscapes as part of a comprehensive climate solution. Especially in the wake of Hurricane Helene, pragmatic, durable climate planning that can transcend political cycles and maintain bipartisan relevance is needed more than ever.

Funding

While the projects listed under Measure 13 will be funded through Atlantic Conservation Coalition (ACC) funding, North Carolina should explore the development of public-private partnerships, environmental markets, and other innovative conservation finance tools to accelerate investment in nature-based solutions to further mobilize and scale projects that reduce carbon pollution. Leveraging these approaches can unlock new sources of capital and incentivize improved management across private and public lands. For example, the state of Virginia passed a bill in April 2020 to allow carbon offset credits for seagrass restoration. Now, the state is poised to enter the global carbon market, with revenue used to implement additional monitoring, restoration, and research. By piloting a similar model, North Carolina could enhance the resilience and carbon sequestration potential of its coastal habitats while delivering co-benefits for communities and biodiversity.

Pew also recommends the state utilize Duke University’s “Nature Finance Case Study Library” to learn from other states who have been successful in financing and structuring public-private projects that generate revenue for a diverse set of stakeholders. Duke is also partnering with the U.S. Fish and Wildlife Service to create a centralized database to connect shovel-ready restoration projects with interested investors. By offering practical tools, data, and examples, the clearinghouse can help decision-makers scale nature-based solutions that deliver cobenefits—such as carbon sequestration, flood protection, and biodiversity conservation—while addressing societal challenges.

Looking Ahead

While the draft CCAP does not explicitly mention scheduled updates for the plan in the future, the 2027 CCAP Status Report still presents an opportunity to embed specific and measurable targets for natural and working lands. Embedding clear goals for carbon stewardship, ecosystem restoration, and land-based emissions reductions into future CCAP updates or progress reports will strengthen the state’s ability to meet statutory greenhouse gas limits while reinforcing the role of natural and working lands as essential climate mitigation and resilience solutions.

To ensure continued progress, especially on coastal habitat restoration efforts that risk losing momentum once Climate Pollution Reduction Grant (CPRG) funding ends, Pew also recommends full implementation of the state’s 2020 Natural and Working Lands Action Plan and the 2024 Executive Order (EO) 305 for Natural and Working Lands. The state should incorporate implementation of the EO 305 conservation goals, including conserving one million acres of forests and wetlands, into its CCAP.

Implementing the targets set forth in EO 305 will help protect carbon stocks and support continued carbon sequestration.

As North Carolina continues to bolster its coastal habitat management for mitigation and resilience, it can look at examples from other states that have increased their ambition in the natural and working lands sector, including:

- **Maine:** In 2024, Maine released its updated “Maine Won’t Wait” sector-wide climate plan, which includes a goal for the natural and working lands sector to increase the total acreage of conserved natural and working lands in the state to 30 percent by 2030.⁵
- **New Jersey:** In 2024, New Jersey released its Natural and Working Lands Strategy that includes conservation, restoration, and management targets across natural and working lands for 2030 and 2050, covering over 25,000 acres of wetlands.⁶
- **California:** California released its Natural and Working Lands Climate Smart Strategy (Strategy) in 2022,⁷ followed by Nature-based Solutions (NBS) targets in 2024.⁸ The Strategy outlines major initiatives, while the NBS targets include specific actions and associated acreage amounts that provide a basis for the state to model, analyze, and measure climate action on its lands. For wetlands, the state established targets to protect, restore and build resilience on more than 233,000 acres of wetlands.

Measure 13-1. Coastal Habitat Enhancement Initiative

Pew commends North Carolina for noting that targeted climate-smart planning and other conservation efforts are essential to maintaining and restoring coastal ecosystems, especially with sea level rise. We encourage North Carolina to continue to

engage in the South Atlantic Salt Marsh Initiative (SASMI) and implement the strategies, objectives, and actions outlined in both SASMI’s regional plan, Marsh Forward, and the North Carolina Salt Marsh Action Plan to protect, restore, and conserve North Carolina’s salt marsh habitat, including acquiring land to conserve future marsh migration corridors.

An opportunity that could have both resilience and carbon pollution reduction benefits is restoring tidal flow to impounded wetlands. In areas where rising sea levels are breaching impoundments and causing flooding, the state should prioritize restoring tidal connectivity, benefitting salt marsh habitat and reducing methane emissions from degraded impounded wetlands.

Pew would also like to highlight a potential opportunity to dramatically increase the measurable carbon benefit and market value of salt marsh protection and restoration projects in North Carolina. One of the projects funded through the ACC aims to understand and quantify the “lateral flux” of natural alkalinity from the state’s salt marsh ecosystems, and the associated increase in durable carbon storage in seawater. Rates of lateral/aquatic carbon exports from tidal wetlands can be larger than the rate of soil carbon sequestration that is currently included in the NC GHG inventory. The results of this project are expected to be available in 2027 and can be incorporated into the next update of the NC GHG inventory.

Measure 13-2. Peatland Restoration on Public Land and Acquisition and Restoration on Private Land

Pew commends the state for elevating pocosin restoration in the CCAP and for recognizing the climate and resilience value of these ecosystems. However, given their importance in mitigation, resilience, and to public health, Pew recommends more explicitly recognizing the critical role that freshwater wetlands can play in fire resilience across the state. Healthy, intact peatlands provide numerous benefits, including better flood prevention, improved water quality, increased cultural and recreational opportunities, and a reduced risk of catastrophic wildfire. Fully or partially drained wetlands, including high carbon peatlands, are vulnerable to stressors such as drought and wildfire, which can increase carbon pollution, harm human health, and reduce communities’ protection against floods and fires. We encourage North Carolina to utilize

forthcoming (late 2025) ditch mapping from Duke University to more fully understand the extent of peatland degradation across the state and prioritize pocosin restoration opportunities for future initiatives.

Recognizing the outsized importance of peatlands, Pew also recommends that the state develop a GHG inventory for pocosins and other freshwater wetlands. Incorporating these habitats into the state's next inventory update in 2027 will ensure tracking of emissions and removals and better direct funds towards conservation and restoration initiatives. Any field data on carbon stock/fluxes taken as part of peatland restoration projects funded through CPRG could also inform development of a freshwater wetland GHG inventory. North Carolina can also look to other states like Washington, that are utilizing the Wetland Intrinsic Potential (WIP) Tool, which combines digital elevation models with satellite imagery, hydrology, and vegetation data, to identify vital freshwater wetlands that are often missing from outdated datasets, including high-carbon forested wetlands hidden beneath dense tree canopy. If utilized with North Carolina-specific data, the tool could help guide protection and restoration measures that maintain soil moisture and inform better forested wetland management that safeguards carbon stocks and strengthens fire resilience.

Conclusion

We applaud North Carolina for its comprehensive efforts to address the climate crisis, including elevating the role of natural and working lands in reducing and avoiding emissions and advancing community and ecological resiliency. We commend North Carolina for recognizing the critical role that coastal wetlands and peatlands can play in this effort. Pew welcomes the opportunity to help build knowledge and advance science-based policies in support of North Carolina's CCAP, and we look forward to continuing to engage as the CCAP is refined and finalized.

Sincerely,

Alex Moya

Officer, U.S. Conservation

NC DEQ Response: Thank you for encouragement of the CCAP's efforts in natural working lands. North Carolina is fortunate to have received funding as a four-state

coalition to implement work in preserving and conserving natural working lands (NWL) as carbon sinks. The coalition—Maryland, North Carolina, South Carolina, Virginia, and The Nature Conservancy—is partnering with the Nicholas Institute’s Nature Activation Hub (<https://nicholasinstitute.duke.edu/project/atlantic-conservation-coalition>) on this effort. NWL restoration and conservation efforts include restoration of peatlands and marshes, conservation of land in marsh migration corridors to ensure it is available for migration with SLR, developing living shorelines to conserve marsh lands, and planting native tree species in urban areas to encourage reforestation. Though measures addressing NWL may contain gaps and may be in need in of recommendations, the CCAP’s scope is to identify projects, plans, and policies happening to date in GHG reduction efforts. Consequently, NCDEQ cannot be the implementer of policy and project changes. The Atlantic Conservation Coalition, the Nature Conservancy, the North Carolina Coastal Confederation, the North Carolina Forestry Service, and the Roanoke Cooperative’s Sustainable Forestry and Land Retention Project are working with the North Carolina Division of Natural and Cultural Resource as the agencies implementing projects to preserve and conserve natural working lands through the implementation grant funding they received in April 2024. We encourage to reach out to NWL’s implementing agencies to suggest any recommendations you brought to light to strengthened NWL GHG emission reduction efforts. Your comment to develop a GHG inventory for pocosins and wetlands presents another gap in funding the state does not currently have. We recommend reaching out to the Division of Air Quality to developing an inventory targeted towards natural working lands to emphasize their extreme value as carbon sinks. Unfortunately, the scope of the GHG Inventory does not fall under the jurisdiction of NCDEQ. NCDEQ will continue to monitor progress in the NWL sector in the NCDEQ Progress Report, in which any relevant updates will be provided.

Summary: The Pew Charitable Trusts provided feedback on North Carolina’s draft Comprehensive Climate Action Plan (CCAP), emphasizing the importance of protecting and restoring natural and working lands—especially wetlands—to advance the state’s climate and resilience goals. North Carolina’s wetlands act as major carbon sinks, offsetting about 34% of state emissions in 2020, but recent losses due to shoreline conversion threaten these benefits. Pew advocates coordinated agency action, innovative funding, clear targets, and adaptation of best practices from other states. The recommendations focus on enhancing coastal habitats and peatlands, leveraging new financial tools, supporting data-driven restoration, and implementing conservation goals to strengthen climate mitigation and community resilience.

3.9. Model 1 Commercial Vehicles

Name: Davis Wood

Organization: Model 1 Commercial Vehicles

Email: dwood@model1.com

Date Comment was Received: 9/5/25

Comment: I work for Model 1 Commercial Vehicles in Charlotte, NC. We have Ford electric passenger and cargo vans listed on State Contract that many public and private entities could put to use and improve air quality. We have a large stock and currently priced comparable to gas vans and come with a level 2 charger.

NC DEQ Response: Thank you for your comment, NCDEQ may take into account your entity's GHG reduction efforts for our future progress report to submit to the EPA in 2027 in which we will provide further GHG reduction efforts not highlighted in the CCAP. Yet, NCDEQ is vendor neutral and cannot make recommendations to direct interested parties towards a specific vendor. We encourage you to reach out to relevant measures, such as DERA, CFAT, and the VW Settlement, to be a potential vendor to support these funding efforts.

Summary: Model 1 Commercial Vehicles possess Ford electric passenger and cargo vans that can be marketed to public and private entities.

3.10. International Association of Plumbing and Mechanical Officials

Name: John Mullen

Organization: IAPMO

Email: John.mullen@iapmo.org

Date Comment was Received: 9/5/25

Comment: I write to highlight the potential role of the International Association of Plumbing and Mechanical Officials (IAPMO) as a partner in advancing these goals. IAPMO is a standards-developing organization with deep expertise in plumbing, mechanical systems, hydronics, and geothermal energy applications. Its codes, certifications, and training programs are already widely recognized across the United States and internationally. write to highlight the potential role of the International Association of Plumbing and Mechanical Officials (IAPMO) as a partner in advancing these goals. IAPMO is a standards-developing organization with deep expertise in plumbing, mechanical systems, hydronics, and geothermal energy applications. Its codes, certifications, and training programs are already widely recognized across the United States and internationally. I encourage DEQ to consider IAPMO as a technical partner in the implementation of the CCAP. Integrating IAPMO’s codes and training programs into state-supported initiatives could accelerate North Carolina’s progress toward its climate, workforce, and equity goals. Thank you, John Mullen / Candidate for Town of Waxhaw, NC Commissioner (Union County)

NC DEQ Response: Thank you for your comment, NCDEQ may take into account your entity’s GHG reduction efforts for NCDEQ’s progress report to submit to the EPA in 2027 in which we will provide further GHG reduction efforts not highlighted in the CCAP. We encourage you also to reach out to relevant stakeholders listed in the CCAP for potential collaborations in funding GHG reduction efforts. NCDEQ encourages IAPMO to contact the Department of Commerce (DOC) to make this entity aware of agency. DOC works closely with works closely with local, regional, national and international organizations to advance economic, community and workforce development for the state.

Summary: This comment recommends the International Association of Plumbing and Mechanical Officials (IAPMO) as a technical partner for North Carolina’s Clean Climate Action Plan (CCAP). IAPMO’s expertise in plumbing, mechanical systems, and geothermal energy—along with its widely recognized codes and training programs—can help the state advance its climate, workforce, and equity goals.

3.11. Resident - Kirk Williams

Name: Kirk Williams

Organization: Resident

Email: kirk.williams107@gmail.com

Date Comment was Received: 9/6/25

Comment: We do not have time for incrementalism. I am providing concepts and ideas, not hard data. The hard data benefits of such ideas are easy to determine and extrapolate. Stop trying to please everyone.

Require Duke Power to serve residents of NC (as is a key element of their existence) by low or no cost homeowner energy generation (namely solar) grid tie in and excess generation credits back to homeowners. Pay off stock, state takeover and management, and thereafter return all profits and revenues to the state to meet aggressive clean energy goals.

Develop plans and begin mass transit plans between larger cities and subsequently to extend throughout the state based on most benefit. Keep it public. Fast, clean, and teach and educate people to use it. Then begin inner city mass transit.

Amtrak is archaic and a band aid/futile approach.

Join with other states and take over all rail infrastructure.

The technology for single source high speed train utilizing the interstate footprint is now.

Implement a visible vehicle emissions rule and enforce it. Assist tagged individuals to repair and replace such vehicles. Repair or get off the road. See California.

Implement no idling rules for ALL stops less than 1 minute, all vehicles, and provide enough money for public education. See California.

Eliminate tax deduction within the state for large truck fast depreciation which causes myopic behavior to get big engine trucks for predominantly low demand and urban use.

Upgrade infrastructure requirements for state rest areas and private truck stops for fee/use based electrical hook ups and outlaw ALL overnight idling in all areas, and enforce it period.

Artificially inflate state tax on fuel to appropriately reflect the true overall cost to our state society and use such money to implement goals.

Appropriately tax large trucks to reflect the true cost to the wear, tear, and damage of our road systems.

NC DEQ Response: Thank you for your feedback. We appreciate your time in reviewing the measures North Carolina has taken to mitigate GHG emissions. Duke Energy is regulated by the North Carolina Utilities Commission (NCUC); as a result, NCDEQ cannot implement your suggestion on how they serve their users. NCUC operates as an independent regulatory body. NCDEQ recommends directing your suggestions related to Duke Energy to NCUC.

In reference to your comment of developing mass transit between cities across the state, the CCAP currently references in measure 1 plans to implement medium and heavy-duty low carbon and electric vehicles across the state. These vehicles include school buses, transit buses, garbage trucks, emergency vehicles, and off- and on-road construction vehicles at local jurisdictions across the state. Clean Fuels Advanced Technology (CFAT) program is a measure that provides funding for agencies to adopt alternative fuel vehicles (biodiesel, E-85 ethanol, electric, hybrid electric, natural gas, and propane) into their fleets. CFAT projects can include funding for low carbon and electric vehicles for mass transit. In addition, the Centralina Clean Fuels Coalition works with public and private fleets, local governments, elected officials, the private sector and the general public to identify community-driven choices that save energy and promote the use of alternative fuels and advanced vehicle technologies in transportation. The North Carolina Division of Transportation (NCDOT) is the lead agency for implementing transportation related measures.

NCDEQ would also like to highlight that DAQ has a complaint form that can be filed via an online form to submit a complaint towards vehicles spewing excess exhaust (<https://www.deq.nc.gov/about/divisions/air-quality/motor-vehicles-and-air-quality/smoking-vehicle-complaint-form>). Vehicles found in violation are required to

service the vehicle. If the vehicle is charged with a second offense, additional penalties are charged.

In regards to restricting idling, North Carolina repealed restrictions on heavy-duty vehicle idling in Sessions Law 2015-286 (page 57).

NCDEQ directs your comment to any suggestions regarding taxes and tax deductions to purview of the General Assembly. The General Assembly has the authority to enact new laws and policies that would regard to taxes.

Any upgrades and modifications to state rest-areas and truck stops falls under the duty of the Federal highway system. This measure is not within the jurisdiction of the state.

Again, we appreciate your review, but NCDEQ would like to highlight NCDEQ is not an implementing agency of GHG emission reduction measures. NCDEQ provides support and assistance to the public, businesses, and local governments in administering regulatory programs designed to protect air quality, water quality, public's health, and promote the adoption and advancement of clean energy.

Summary: This comment calls for transformative action in North Carolina's energy and transportation sectors. The comment advocates to require Duke energy to serve residents of NC by low or no cost homeowner energy generation (namely solar) grid tie in and excess generation credits back to homeowners. . The comment further pushes for the development of fast, accessible public mass transit between major cities and eventual statewide expansion, including modern inner-city systems. It recommends a multi-state takeover and modernization of rail infrastructure with high-speed trains along interstate corridors. Environmental policies include strict, enforced vehicle emissions standards, repair assistance for non-compliant vehicles, and a ban on idling for over one minute. Tax reforms would eliminate rapid depreciation deductions for large trucks, increase fuel taxes to reflect true societal costs, and implement higher taxes on heavy trucks to address road wear and damage. Enhanced infrastructure at rest areas and truck stops would support electric vehicles and strictly prohibit overnight idling, providing fee-based electrical hookups and ensuring compliance through enforcement and public education.

3.12. Piedmont Natural Gas

Name: Gregory Cope

Organization: Piedmont Natural Gas

Email: Gregory.cope@duke-energy.com

Date Comment was Received: 9/11/25

Comment: Nice over-view

NC DEQ Response: Thank you for your kind words.

3.13. Self & NC League of Conservation Voters

Name: Peter Lourekas

Organization: Self & NC League of Conservation Voters

Email: pixbill@aol.com

Date Comment was Received: 9/16/25

Comment: NC is uniquely suited to generate both solar and wind renewable energy. We need to continue to develop these energy sources to reduce energy prices and to lower our impact on the environment

NC DEQ Response: We agree with your comment. North Carolina is a prime state for the development of solar and wind energy. We hope our emphasis in the need to reach our GHG net zero goals by 2050 will highlight the need for North Carolina to expand clean energy sources.

Summary: North Carolina needs to take advantage of our state's ability to develop solar and wind energy sources in order to reach our net zero goal by 2050.

3.14. The Lamb-Fleming Family

Name: Conlan Lamb

Organization: The Lamb-Fleming Family

Email: lambconlan@gmail.com

Date Comment was Received: 9/21/25

Comment: Thank you for the Cooperative Climate Action Plan.

NC DEQ Response: Thank you, we appreciate your encouragement!

3.15. Center for Progressive Reform

Name: Sophie Loeb

Organization: Center for Progressive Reform

Email: sloeb@progressivereform.org

Date Comment was Received: 9/23/25

Comment: Plans to reduce emissions do not include increases in the power sector due to AI buildout, delay of coal plant closures, and buildout of methane gas.

Lack of focus on public transportation initiatives, despite transportation being NC's number one source of GHG emissions. Consider adding state incentives for EVs.

Launch microgrids in Eastern NC, especially in high energy burdened areas

Consider public-private partnerships between major retailers (Food Lion, Harris Teeter, Walmart) for discounted or free shopping days to incentivize food donations before expiration dates

Localize trash disposal rather than localities in the Triangle sending their waste down to Eastern NC, filling their landfills and exacerbating biogas/environmental justice issues

More intentional public environmental education, like partnering with public libraries on energy efficiency workshops or hosting composting trainings

NC DEQ Response: Thank you for your comment. Gaps in measures you have identified in the CCAP are a concern. Yet, your insight brings to light opportunities where North Carolina could increase efforts to help increase our progress to net zero GHG emissions by 2050. However, the CCAP is a planning document that identifies existing plans and policies to reduce GHG. As a result, NC DEQ is not the implementer to changes in CCAP measures or one to implement changes across North Carolina's GHG efforts. In addition, our measures do not include the impacts emissions from power from AI infrastructure and closure of coal firing plants. NCDEQ recognizes the energy strain data centers places on the electrical grid; however, we cannot account for GHG emissions and energy use data that has yet to be acquired. Any emissions from data center usage and coal firing plants may be included in the 2026 GHG Inventory.

Furthermore, we recognize the importance of the encouragement of adopting low carbon emitting and electric vehicles and associated infrastructure throughout the state. Governor Roy Cooper set adoption timelines of zero-emission vehicles (ZEVs) as goals in Executive Order 80 in 2018 with an ambition to have 80,000 sales of ZEVs by 2025. This ZEV sales goal was adjusted in Executive Order 246 in 2022 to increase the number of ZEV sales to 1.25 million by 2030. The CCAP documents measures (CCAP measures 1&2) including efforts to increase the number of low-carbon emitting vehicles on the road including school and transit buses, garbage trucks, emergency vehicles, and on and off-road construction vehicles. Measures such the Volkswagen Settlement, the DC Fast Program, Diesel Emission Reduction Act (DERA), and Clean Fuels Advanced Technology (CFAT) are currently in place to provide funding to support adoption of low carbon emitting vehicles and charging infrastructure across the state. Additionally, both Wilmington and Morehead City have taken action in their ports to improve freight shipping efficiency by upgrading technology and expanding more efficient corridors.

North Carolina does have measures (CCAP measure 6) to improve microgrid reliability, particularly geared to target rural, high-energy burdened communities. For example, NC Sustainable Energy Association's (NCSEA) Clean Energy Recovery proposal noted "[a]s it relates to grid infrastructure, many communities across Western NC, especially remote areas were without power, access to clean drinking water, and vital communications for

weeks. In the immediate aftermath of Hurricane Helene, organizations on the ground like Footprint Project (FP)⁹⁸ and Land of Sky Regional Council (LOSRC)⁹⁹ were focused on delivering immediate relief through temporary microgrid solutions designed to bring power, water purification, and communications to communities in need. Up to twenty-four stationary microgrids will be installed across six Helene affected counties, and two mobile "Beehive" microgrid hubs will be installed to serve the entire state of North Carolina during future disasters (one in Western North Carolina and one in Eastern North Carolina). This is a pilot program that is anticipated to provide relief to microgrids in events of emergencies throughout the state. In addition, Department of Energy (DOE) provides funding opportunities for investing microgrid resiliency and upgrades such as DOE Grid Resilience Program, BIL Section 40101(d), DOE Grid Innovation Fund, GRIP Program, Grid Resilience Utility and Industry Grants, the Energy Improvements in Rural or Remote Areas Program, Transmission Siting and Economic Development (TSED) Grant Program. Though these funding opportunities exist, NCDEQ cannot implement these grants, but rather share this information with the public and relevant entities to provide awareness of funding in areas of need

Though partnering with major retailers in food waste disposal and public education is beneficial, these projects were not identified by the CCAP to have funding in place to be near implementable. Currently, Food Lion (Food Lion Feeds) and Wegmans (Zero Waste Initiative) currently have a program in place, which donates near expired food to food banks and pantries to reduce waste and support families in need. Your suggestion indeed highlights the need to develop methodology from GHG emissions avoided from these programs.

Not all recommendations, plans, and policies targeted towards GHG emission reduction efforts were not incorporated into CCAP due to not aligning with the CCAP's measure criteria in that they can be implementable, feasible, and provide measurable data. The scope of the CCAP is identify our current progress to net-zero GHG emissions to 2050 and emphasize that North Carolina needs to continue and improve GHG emission reduction efforts. Unfortunately, NCDEQ is not an implementing agency of GHG emission reduction measures. NCDEQ provides support and assistance to the public, businesses, and local governments in administering regulatory programs designed to protect air quality, water quality, public's health, and promote the adoption and advancement of clean energy.

We entirely agree with you the public education of the importance of GHG emission reduction and how the public can lead more sustainable lifestyles is a key component of

GHG emission reduction. We hope we can identify more public education plans to include in our 2027 CCAP progress report and will take the suggestion to include a gap analysis within our report to identify areas of need. Awareness of the need for public outreach events should be brought towards local legislation for implementation opportunities.

Summary: Current emission reduction plans overlook expected increases in the power sector from AI expansion, delayed coal plant closures, and new methane gas projects. Public transportation—North Carolina’s top source of greenhouse gases—lacks focus, and state incentives for electric vehicles should be considered. Launching microgrids in Eastern NC, especially in high energy burden communities, is recommended. Forming partnerships with major retailers (Food Lion, Harris Teeter, Walmart) could promote food donations through special shopping days. Localizing trash disposal would prevent Triangle-area waste from burdening Eastern NC landfills and worsening environmental justice concerns. Finally, enhancing public environmental education—such as through library workshops on energy efficiency and composting—is suggested.

3.16. NC WARN and the Center for Biological Diversity

Name: Sara Heilman

Organization: NC WARN and the Center for Biological Diversity

Email: sara@ncwarn.org

Date Comment was Received: 9/26/25

Comment: I am submitting these comments on behalf of NC WARN and the Center for Biological Diversity.

1. Deploy Local Solar-Plus-Storage Systems on Public Facilities that are Critical During Emergencies

Due to reliability needs during emergencies, we propose that solar-plus-storage (SPS) be deployed on critical public facilities such as fire/rescue/EMS stations, emergency shelters and other public buildings. We urge prioritizing communities most vulnerable to

climate and economic challenges who need these critical facilities in times of climate disasters like hurricanes as well as extreme heat.

Initial efforts should be creating these emergency centers in communities of low-income households, particularly in southeastern NC communities that have largely been left behind in development, are disproportionately communities of color, and which are frequently impacted by hurricanes and other flooding by torrential rainfalls.

Public facilities with solar and batteries can also serve as the center of local microgrids. Distributed energy projects like local solar and on-site batteries can reduce reliance on transmission lines and reduce power losses caused by moving electricity across an already stressed grid. This step could and should pave the way toward the installation of SPS on other public facilities and beyond.

2. Curb the Climate and Affordability Crises from Data Centers

Policies should be implemented to protect our state from the influx of data centers and other large facilities (including for crypto-mining), which are enormously energy- and water-intensive.

Significant guardrails should be set on data centers and other large power-using facilities to protect North Carolinians and the environment. On-site solar, renewables, and batteries should be required of new (and existing) data centers and other large power users. If these facilities are built, they should maximize solar power on rooftops, parking areas, lawns and south-, west- and east-facing walls.

Additional guardrails should include:

(i) requiring a public interest test at the state and respective local government levels to assess whether and how the data center serves the public interest, which includes assessing (a) the degree to which these data centers will increase electricity demand and drive rate increases to build the infrastructure to meet the new demand; (b) the environmental impacts including water usage and electricity buildout through which types of energy; (c) the societal purpose of the data center or technology infrastructure; (d) the jobs impacts and other economic impacts to the state or local economy. Such a test should inform permitting decisions, as well as decisions on whether any public subsidies should be offered to them;

(ii) requiring that any approved large electricity users be powered first by on-site SPS, and that any additional generation necessary be powered by nearby responsibly-sited solar power or wind arrays of moderate scale close to the proposed site(s) to avoid driving new transmission construction;

(iii) requiring that such corporations invest their own money in the new generation as a portion of the overall investment, particularly because it will provide among the greatest economic returns and not be passed onto ratepayers;

(iv) requiring that the costs of providing power not be subsidized by other customers as has been typical in North Carolina's past but are borne directly by the data center or technology company; and

(iv) requiring transparency measures so that data centers must disclose electricity usage, water usage, environmental impacts, and greenhouse gas and other pollutant emissions.

Thank you for your consideration of these recommendations!

NC DEQ Response: Thank you for your comment. Gaps in measures you have identified in the CCAP are a concern. Yet, your insight brings to light opportunities where North Carolina could increase efforts to help increase our progress to net zero GHG emissions by 2050. However, the CCAP is a planning document that identifies existing plans and policies to reduce GHG. As a result, NC DEQ is not the implementer to changes in CCAP measures or one to implement changes across North Carolina's GHG efforts. In addition, not all recommendations, plans, and policies targeted towards GHG emission reduction efforts were not incorporated into CCAP due to not aligning with the CCAP's measure criteria in that they can be implementable, feasible, and provide measurable data. The scope of the CCAP is identify our current progress to net-zero GHG emissions to 2050 and emphasize that North Carolina needs to continue and improve GHG emission reduction efforts.

Your emphasis to develop solar power to increase grid resiliency during times of need such as storms and other outages in high energy-burdened (particularly rural) areas draws attention to where we are lacking funding. North Carolina does have measures (CCAP measure 6) to improve microgrid reliability, particularly geared to target rural,

high-energy burdened communities. For example, NC Sustainable Energy Association’s (NCSEA) Clean Energy Recovery proposal noted “[a]s it relates to grid infrastructure, many communities across Western NC, especially remote areas were without power, access to clean drinking water, and vital communications for weeks. In the immediate aftermath of Hurricane Helene, organizations on the ground like Footprint Project (FP)98 and Land of Sky Regional Council (LOSRC)99 were focused on delivering immediate relief through temporary microgrid solutions designed to bring power, water purification, and communications to communities in need. Up to twenty-four stationary microgrids will be installed across six Helene affected counties, and two mobile “Beehive” microgrid hubs will be installed to serve the entire state of North Carolina during future disasters (one in Western North Carolina and one in Eastern North Carolina). This is a pilot program that is anticipated to provide relief to microgrids in events of emergencies throughout the state. In addition, Department of Energy (DOE) provides funding opportunities for investing microgrid resiliency and upgrades such as DOE Grid Resilience Program, BIL Section 40101(d), DOE Grid Innovation Fund, GRIP Program, Grid Resilience Utility and Industry Grants, the Energy Improvements in Rural or Remote Areas Program, Transmission Siting and Economic Development (TSED) Grant Program. Though these funding opportunities exists, NCDEQ cannot implement these grants, but rather share this information with the public and relevant entities to provide awareness of funding in areas of need.

NCDEQ recognizes the energy strain data centers places on the electrical grid; however, we cannot account for GHG emissions and energy use data that has yet to be acquired. The impacts of these activities may be included in the 2026 GHG Inventory Report. However, this is not a current measure being implemented in the state, thus was not included in the CCAP. The CCAP provides the necessary data and lists of policies, projects, and plans in place North Carolina is currently working on to reduce GHGs. We hope this document will spark stakeholders to identify where we can increase the intensity of our GHG reduction efforts. We encourage you to reach out to legislation and supporting entities listed within the relevant sectors for any new policy and plan ideas. In addition, we will provide a progress report of the CCAP to the EPA, which will include any new and updated policies and measures since the submission of the CCAP.

Summary: Submitted by NC WARN and the Center for Biological Diversity, this comment recommends installing solar-plus-storage systems on crucial public facilities—like fire stations and emergency shelters—especially in low-income, disaster-prone

communities in southeastern North Carolina. These solar and battery-equipped buildings could function as local microgrid hubs, reducing reliance on distant transmission lines and improving power reliability.

The comment also urges strong policies for data centers and other large energy users to curb their environmental and economic impact. Requirements include on-site renewables, public interest assessments before permitting, corporate investment in new generation infrastructure, and prohibiting ratepayer subsidies. It also calls for transparency in energy and water use, emissions, and environmental impacts to encourage responsible development and bolster North Carolina's sustainability and resilience.

3.17. Resident - Jeff Botz

Name: Jeff Botz

Organization: Self

Email: jeffbotz@gmail.com

Date Comment was Received: 9/27/25

Comment: Just from living in the Union County, Anson County area for about two decades, I have watched the massive clear cutting and reduction of forested areas for use as new farm land or new residential construction. This reduces the natural carbon catching and conversion activity of green leafy areas of these forests which have a net negative contribution to GHG in this area and replaces it with housing and lawn areas or farm fields both of which have a relatively plus factor for GHG production. When people cut down forests to create these new environments maybe they should be required to buy or create some form of carbon offset to compensate for the loss of green leafy areas. The other factor that has a subtle and long term negative affect on the environment is the seasonal use of glyphosate weed killers on huge areas of farmland. This slowly kills soil character and affects water quality through surface runoff, as well as, subterranean migration to the water table, This farm strategy contributes to total environmental quality

reduction and, although a short term benefit to the farmer, represents a long term cost to the environment and society in general.

NC DEQ Response: Thank you for your comment. North Carolina has received \$421 million in funding to help conserve and preserve natural working lands to serve as carbon sinks. Your comment sheds light the importance of conserving these lands to help GHG emission reduction efforts. We encourage you to reach out to the North Carolina Division of Cultural and Natural Resources for your suggestion to link you with the appropriate stakeholder. Additionally, concerns of pesticide use falls under the authority of the Department of Agriculture. Though these concerns do not register with NCDEQ as the implementing authority, we encourage the community to raise awareness to the appropriate agency to raise awareness of local concerns. Unfortunately, the CCAP serves as a document to shed light of plans and policies currently implemented to reach our GHG reduction goals versus identifying what we should implement. However, implementation funding for natural working lands includes reforestation projects such as ones led by the Roanoke Cooperative through their Sustainable Forestry and Land Retention Project (SFLRP), which will support small forest landowners in implementing climate-smart practices, reforestation, and conservation easements. Roanoke Cooperative currently works to promote sustainable forestry and land retention in thirteen counties in northeastern North Carolina (Bertie, Chowan, Edgecombe, Gates, Granville, Halifax, Hertford, Martin, Nash, Northampton, Perquimans, Vance, and Warren). Furthermore, the project works to provide outreach to educate landowners of sustainable land practices. North Carolina continues to implement sustainable farm and land use practices through non-profits such as Working Landscapes (Warren County) and Sustainable Sandhills (Fayetteville, NC). Additional land conservation and preservation agencies working across the state include the North Carolina Land and Water Fund, Coastal Land Trust, and Preservation NC.

Summary: The comment notes the past two decades in Union and Anson Counties, widespread deforestation for new farms and housing developments has greatly reduced the area's natural carbon absorption, increasing greenhouse gas emissions. The writer proposes that those responsible for clearing forests should offset this loss with carbon credits. Additionally, routine use of glyphosate weed killers is degrading soil health and water quality, posing long-term environmental costs that outweigh short-term agricultural gains.

3.18. ChathamCAN (Climate Action Network)

Name: Vickie Atkinson

Organization: ChathamCAN (Climate Action Network)

Email: vatkinson@frontier.com

Date Comment was Received: 9/27/25

Comment: Kudos on the overall plan! Climate change is a critical issue and I appreciate that NC is taking this step to have a strong action plan. It is comprehensive, addressing greenhouse gas emissions, the need for increased clean energy, our state's economy, jobs, climate justice and how to communicate and engage with residents. Some specifics: good that renewable energy and micro-grids for the western part of NC are included; good measures for waste reduction bringing down GHG emissions; important that we focus on job training and preparing for the work that will have to be done.

Some things that can be improved or need to be added are:

- Micro-grids and renewable energy for eastern NC (already faces steep economic challenges, is at high risk for storm and hurricane damage, has high energy burden, experiences environmental injustice).
- It is unfair that much of the central part of the state takes waste to eastern NC and dumps it on them. The plan needs to address that injustice.
- More needs to be done to partner with communities (libraries, schools, cooperative extension, etc.) to give residents the tools to engage in climate solutions. While individual actions will not solve the climate crisis, research shows that individual action is a "gateway drug" to public policy support and collective action. In particular, community programs on energy efficiency and composting could give people the tools they need to take action and realize they can do something. It doesn't hurt that in some cases, it will save them money at the same time.
- No focus on public transportation initiatives. We need more EVs and charging stations (as well as funds for monitoring and maintaining EV chargers) AND we need more alternatives to cars. NC's number one source of GHG emissions. Encourage bus rapid transit. Consider adding state incentives for EVs and e-bikes - other states are doing so.

-Also need to encourage more quality, dense housing with commercial businesses incorporated to promote walkability and biking and reduce the need to rely on cars to meet needs.

-I recently saw the excellent idea to consider public-private partnerships between major retailers (Food Lion, Harris Teeter, Walmart) for discounted or free shopping days to incentivize food donations before expiration dates. I strongly support this idea. Food waste is a huge driver of greenhouse gas emissions. Businesses likely would appreciate the good publicity that would come from their actions to reduce food waste and reduce hunger in their communities. Please look into this!

-Reform the permitting requirements that make solar so expensive and slow to install. It is much less expensive in other countries and some other states. Bring balcony (or plug-in) solar to NC. Utah recently passed this unanimously. See the nonprofit <https://www.brightsaver.org/>

Thank you for all the work on this important part of the solution to a critical problem.

NC DEQ Response: Thank you for your comment. Gaps in measures you have identified in the CCAP are a concern. Yet, your insight brings to light opportunities where North Carolina could increase efforts to help increase our progress to net zero GHG emissions by 2050. However, the CCAP is a planning document that identifies existing plans and policies to reduce GHG. As a result, NC DEQ is not the implementer to changes in CCAP measures or one to implement changes across North Carolina's GHG efforts. Though partnering with major retailers in food waste disposal and public education is beneficial, these projects were not identified by the CCAP to have funding in place to be near implementable. In addition, not all recommendations, plans, and policies targeted towards GHG emission reduction efforts were not incorporated into CCAP due to not aligning with the CCAP's measure criteria in that they can be implementable, feasible, and provide measurable data. The scope of the CCAP is identify our current progress to net-zero GHG emissions to 2050 and emphasize that North Carolina needs to continue and improve GHG emission reduction efforts.

North Carolina does have measures (CCAP measure 6) to improve microgrid reliability, particularly geared to target rural, high-energy burdened communities. For example, NC Sustainable Energy Association's (NCSEA) Clean Energy Recovery proposal noted "[a]s it relates to grid infrastructure, many communities across Western NC, especially remote areas were without power, access to clean drinking water, and vital communications for weeks. In the immediate aftermath of Hurricane Helene, organizations on the ground like

Footprint Project (FP)98 and Land of Sky Regional Council (LOSRC)99 were focused on delivering immediate relief through temporary microgrid solutions designed to bring power, water purification, and communications to communities in need. Up to twenty-four stationary microgrids will be installed across six Helene affected counties, and two mobile "Beehive" microgrid hubs will be installed to serve the entire state of North Carolina during future disasters (one in Western North Carolina and one in Eastern North Carolina). This is a pilot program that is anticipated to provide relief to microgrids in events of emergencies throughout the state. In addition, Department of Energy (DOE) provides funding opportunities for investing microgrid resiliency and upgrades such as DOE Grid Resilience Program, BIL Section 40101(d), DOE Grid Innovation Fund, GRIP Program, Grid Resilience Utility and Industry Grants, the Energy Improvements in Rural or Remote Areas Program, Transmission Siting and Economic Development (TSED) Grant Program. Though these funding opportunities exists, NCDEQ cannot implement these grants, but rather share this information with the public and relevant entities to provide awareness of funding in areas of need.

Furthermore, we recognize the importance of the encouragement of adopting low carbon emitting and electric vehicles and associated infrastructure throughout the state. Governor Roy Cooper set adoption timelines of zero-emission vehicles (ZEVs) as goals in Executive Order 80 in 2018 with an ambition to have 80,000 sales of ZEVs by 2025. This ZEV sales goal was adjusted in Executive Order 246 in 2022 to increase the number of ZEV sales to 1.25 million by 2030. The CCAP documents measures (CCAP measures 1&2) including efforts to increase the number of low-carbon emitting vehicles on the road including school and transit buses, garbage trucks, emergency vehicles, and on and off-road construction vehicles. Measures such the Volkswagen Settlement, the DC Fast Program, Diesel Emission Reduction Act (DERA), and Clean Fuels Advanced Technology (CFAT) are currently in place to provide funding to support adoption of low carbon emitting vehicles and charging infrastructure across the state. Additionally, both Wilmington and Morehead City have taken action in their ports to improve freight shipping efficiency by upgrading technology and expanding more efficient corridors.

Your suggestions to mitigate food waste are good suggestions but again represent areas of opportunity where North Carolina lacks funding to diverting GHGs from the waste sector. Currently, Food Lion (Food Lion Feeds) and Wegmans (Zero Waste Initiative) currently have a program in place, which donates near expired food to food banks and

pantries to reduce waste and support families in need. Your suggestion indeed highlights the need to develop methodology from GHG emissions avoided from these programs.

We entirely agree with you the public education of the importance of GHG emission reduction and how the public can lead more sustainable lifestyles is a key component of GHG emission reduction. We hope we can identify more public education plans to include in our 2027 CCAP progress report and will take the suggestion to include a gap analysis within our report to identify areas of need. Awareness of the need for public outreach events should be brought towards local legislation for implementation opportunities.

Summary: The comment praises North Carolina's climate plan for addressing greenhouse gas emissions, advancing clean energy, supporting the economy and jobs, and promoting climate justice. It commends the inclusion of renewable energy and micro-grids in western NC, waste reduction efforts, and job training initiatives. Key recommendations for improvement include expanding renewable energy and micro-grids to eastern NC, addressing waste disposal inequities, strengthening community partnerships for energy efficiency and composting, and enhancing public transportation. The summary also encourages state incentives for EVs and e-bikes, denser walkable development, public-private partnerships to reduce food waste, and reforms to make solar energy installations simpler and more affordable.

3.19. Jubilee Community Earth Team

Name: Charles Jansen

Organization: Jubilee Community Earth Team

Email: chas.jansen@icloud.com

Date Comment was Received: 10/5/25

Comment: This good plan would be improved.

Plans to reduce emissions do not account for increases in the power sector driven by AI

infrastructure buildout, delays in coal plant closures, and continued investment in methane gas

Lack of focus on public transportation initiatives, despite transportation being North Carolina's largest source of GHG emissions; consider adding state incentives for electric vehicles

Launch microgrids in Eastern NC, especially in high energy-burdened communities

NC DEQ Response: Thank you for your comment. We recognize that North Carolina's GHG emission reduction efforts do have several gaps. However, NC DEQ cannot implement these gaps in the measures addressed across the six sectors. In addition, not all recommendations, plans, and policies targeted towards GHG emission reduction efforts were not incorporated into CCAP due to not aligning with the CCAP's measure criteria in that they can be implementable, feasible, and provide measurable data.

We appreciate your insights related to transportation projects. The CCAP notes projects that are ongoing within the NCDEQ are those that have funding and are measurable and have been or will be implemented, like Measures 1-3. The CCAP documents measures including efforts to increase the number of low-carbon emitting vehicles on the road including school and transit buses, garbage trucks, emergency vehicles, and on and off-road construction vehicles. Measures such as the Volkswagen Settlement, the DC Fast Program, Diesel Emission Reduction Act (DERA), and Clean Fuels Advanced Technology (CFAT) are currently in place to provide funding to support adoption of low carbon emitting vehicles and charging infrastructure across the state. Additionally, both Wilmington and Morehead City have taken action in their ports to improve freight shipping efficiency by upgrading technology and expanding more efficient corridors.

In addition, our measures do not include the impacts emissions from power from AI infrastructure and closure of coal firing plants. NCDEQ recognizes the energy strain data centers places on the electrical grid; however, we cannot account for GHG emissions and energy use data that has yet to be acquired. The impacts of these activities may be included in the 2026 GHG Inventory Report.

North Carolina does have measures (CCAP measure 6) to improve microgrid reliability, particularly geared to target rural, high-energy burdened communities. For example, NC Sustainable Energy Association's (NCSEA) Clean Energy Recovery proposal noted "[a]s it relates to grid infrastructure, many communities across Western NC, especially remote areas were without power, access to clean drinking water, and vital communications for weeks. In the immediate aftermath of Hurricane Helene, organizations on the ground like

Footprint Project (FP)98 and Land of Sky Regional Council (LOSRC)99 were focused on delivering immediate relief through temporary microgrid solutions designed to bring power, water purification, and communications to communities in need. Up to twenty-four stationary microgrids will be installed across six Helene affected counties, and two mobile "Beehive" microgrid hubs will be installed to serve the entire state of North Carolina during future disasters (one in Western North Carolina and one in Eastern North Carolina). This is a pilot program that is anticipated to provide relief to microgrids in events of emergencies throughout the state. In addition, Department of Energy (DOE) provides funding opportunities for investing microgrid resiliency and upgrades such as DOE Grid Resilience Program, BIL Section 40101(d), DOE Grid Innovation Fund, GRIP Program, Grid Resilience Utility and Industry Grants, the Energy Improvements in Rural or Remote Areas Program, Transmission Siting and Economic Development (TSED) Grant Program. Though these funding opportunities exists, NCDEQ cannot implement these grants, but rather share this information with the public and relevant entities to provide awareness of funding in areas of need.

The CCAP identifies the current work being done to date in addressing GHG emission reduction and identifies all sources and sinks of GHG emissions. Though your recommendations are great suggestions, any policy changes and gaps in measures addresses in the CCAP need to be brought before a legislative board and/or addressed with the stakeholder directly. The CCAP's mission is to bring awareness of work being done to date and current state of progress in reducing GHG emissions.

Summary: The comment notes the emissions reduction plan for North Carolina could be improved by addressing rising power demand from AI infrastructure, delays in coal plant closures, and continued methane gas investments. It should also prioritize public transportation, offer incentives for electric vehicles, and implement microgrids in energy-burdened Eastern NC communities.

