

To: Director Abraczinskas, DAQ.publiccomments@ncdenr.gov
cc: Governor Cooper, Jeremy.Tarr@nc.gov

Date

Subject: "Active Energy Renewable Power"

We are writing to urge the NC Division of Air Quality to grant a 90 day extension to the public comment period and reschedule the public meeting of Registration Number 10636R00 to allow NC DEQ, local officials, and impacted residents time to fully research and understand the currently unknown impacts of this technology on air quality, carbon emissions, and local pollution. Furthermore, Governor Cooper declared a state of emergency¹ for COVID-19 on March 10 that will impact the ability of many of the people in Robeson County and across the state to submit comments and attend the public meeting on March 16.

While climate action is a top priority of the Cooper Administration, dirty industries continue to expand and protections for forests fall short. Active Energy Group is applying for a permit to produce 40,000 tons of wood pellets per year. However, they have indicated plans to increase production to 400,000 tons per year². If Active Energy Group is permitted and their intended expansion goes through, this facility will increase logging by 9,600 acres per year, and emit 73,2782 tons per year of CO₂e, the equivalence of over 155,580 extra cars on the road. The continual permitting of industries that are scientifically proven to be carbon polluting impedes Governor Cooper's executive order 80 to reach a 40% emissions reduction goal by 2025.

Similar to other wood pellet production facilities in North Carolina, which are all located in environmental justice-designated communities³, Robeson County's population is 38% American Indian, 25% African-American, and 5% Latino/Hispanic, and the county is already ranked worst in the state for health outcomes. According to NC DEQ's own Community Mapping Tool, there are at least a dozen pollution sources already in Robeson County. Other impacts include the proposed Atlantic Coast Pipeline and a related compressor station, as well as a proposed liquified natural gas plant operated by Piedmont Natural Gas. The production of black wood pellets has not been proven to be effective, and existing research on the similar process of torrefaction shows it to be expensive and dangerous. ⁴ NC DEQ should not allow Robeson County to be a testing ground for this untested and dangerous technology.

The COVID-19 State of Emergency is having wide-reaching effects across our state and disrupting residents' everyday lives. People over 65, those with heart disease, hypertension, diabetes and those with immunocompromised systems are being encouraged to stay home and avoid public spaces by the Governor. Robeson County is home for many of these high risk individuals making it difficult for them to choose between protecting themselves from COVID-19 and participating in a public meeting. They may also have difficulty writing public comments while worrying about COVID-19.

We urge you to grant a 90 day extension period and reschedule the public hearing for Registration Number

¹<https://www.ncdhhs.gov/divisions/public-health/coronavirus-disease-2019-covid-19-response-north-carolina>

² <https://www.aegplc.com/operations/lumberton-manufacturing-hub/>

³ <https://www.liebertpub.com/doi/10.1089/env.2017.0025>

⁴ "Why Hasn't Torrefaction Taken Off? | Biomassmagazine.com." 23 Jul. 2019, <http://biomassmagazine.com/articles/16329/why-hasnt-torrefaction-taken-off>. Accessed 3 Mar. 2020.

10636R00 to allow NC DEQ, local officials, and impacted residents time to fully research the cumulative impacts of this untested technology and to reduce the impact and exposure of residents to COVID-19.

Thank you for the opportunity to comment on this permit.

Please acknowledge the receipt of this letter.

Sincerely,

Robeson County based organizations:

Concerned Citizens of Maxton (Robeson County)
Lumbee Riverkeeper
RedTailed Hawk Collective
Robeson County Coalition to Protect our Sacred Lands and Waters
Robeson County Cooperative for Sustainable Development
Friends of the Earth

North Carolina Organizations:

Cape Fear Group of the Sierra Club
Clean Air Carolina
Dogwood Alliance
NC Climate Solutions Coalition
Southern Environmental Law Center
Southern Forests Conservation Coalition
Spruill Farm Conservation Project