

August 22, 2023

The Honorable Brenda Mallory  
Chair  
White House Council on Environmental Quality  
730 Jackson PI NW  
Washington, DC 20506

Dear Chair Mallory:

We write as representatives of environmental justice, climate, civil rights, anti-poverty, conservation, and faith-based organizations. We are concerned about the human health, economic, climate, and forest impacts associated with the ongoing expansion of industrial-scale production of wood pellet biomass and forest degradation across the US South. We urge you to convene an interagency dialogue with impacted communities as a starting point to ensure a unified approach across all relevant agencies as it relates to the wood pellet industry.

President Biden's Executive Order on Environmental Justice, signed on Earth Day of this year, called for an "all of government approach," stating that "the pursuit of environmental justice is a duty of all executive branch agencies." Effectively addressing this industry's air, land, economic, and climate impacts will require a coordinated and unified effort.

The industrial wood pellet industry in the United States is a [significant and rapidly escalating](#) environmental justice concern. The production of wood pellets and associated logging of forests in the US South for export degrades the health, economies, and living conditions of many low-income communities and communities of color in the US South.

Wood pellet [plants are disproportionately located in low-income](#), majority-Black communities with populations at high risk of health problems such as cancer, asthma, and serious respiratory diseases. Wood pellet plants have a pattern of noncompliance with the Clean Air Act and emit high levels of fine particulate matter. This is why [leading public health organizations](#) in America have voiced their opposition. Due to high industry volatility and uncertainty, taxpayer support from federal agencies would be irresponsible and place communities at risk of stranded assets.

Wood pellet plants contribute to significant forest degradation in the US South, destroying ecosystems that provide natural protection for communities against extreme weather, such as flooding. This worsens the climate resilience and flood preparedness of the low-income communities already experiencing the devastating impacts of climate change. Additionally, wood pellet plants exacerbate climate change. [Burning forests for energy releases more carbon emissions than the coal they're intended to replace](#). Over [800 scientists](#) have warned governments worldwide that burning trees in place of coal will accelerate climate change while compromising forests' natural ability to help communities become more climate resilient.

The ongoing promotion and subsidization of biomass as a clean, renewable energy source that supports rural economic development ignores the full scope of the environmental justice impacts that the wood pellet industry is having across the South. The wood pellet industry is poised to accelerate production over the next several years. If left unaddressed, this industry will

significantly undermine President Biden's environmental justice legacy and worsen the impacts of climate change.

**We urge you to hold a special interagency session on the health, forest, economic, and climate resiliency impacts of the rapidly-expanding wood pellet biomass industry. Such a meeting should include residents of impacted communities, community-based partner organizations, as well as representatives of the Department of Energy, the Environmental Protection Agency, the Department of Agriculture, the Department of Health and Human Services, the Department of Commerce, the Department of the Interior, the President's National Climate Task Force and others that CEQ may deem appropriate.**

An inter-agency session would ensure that the voices of impacted environmental justice communities are considered across the federal government regarding policies and actions related to the wood pellet industry. This is especially important as Federal agencies consider the weighty issues of climate change, forests, and environmental justice. And it would ensure that Federal agencies are unified in their approach to implementing President Biden's historic environmental justice agenda.

Thank you for your consideration.

Sincerely,

Concerned Citizens of Cook County (GA)  
Concerned Citizens of North Hampton County (NC)  
Concerned Citizens of Richmond County (NC)  
Dogwood Alliance (Regional)  
EEECHO (MS)  
Greater Greener Gloster (MS)  
New Alpha Community Development Corporation (SC)  
Peoples Justice Council (AL)

#### **National and Regional Endorsing Organizations**

As You Sow  
Center for Biological Diversity  
Center for Coalfield Justice  
Center for Common Ground  
Chesapeake Climate Action Network  
Climate Communications Coalition  
Earth Ethics, Inc.  
Forest Keeper  
Forest Web  
Heartwood  
John Muir Project  
Mighty Earth  
National Wildlife Federation  
Natural Resources Defense Council  
Whitney M Slater Foundation  
Partnership for Policy Integrity  
Pivot Point

Rachel Carson Council  
Regional Association of Concerned Citizens  
Southern Environmental Law Center  
Sport and Sustainability International  
Stand.earth  
Standing Trees  
The Enviro Show  
Third Act

**State and Local Endorsing Organizations**

350 Triangle  
Alabama Interfaith Power & Light  
Athens County's Future Action Network  
Citizens' Climate Lobby - Wilmington Chapter  
Clean Water for North Carolina, Inc.  
Cultivator, Inc.  
EcoGrounds Management Systems  
Environmental Protection Information Center- EPIC  
FL Chapter of Elders Climate Action  
Friends of Bell Smith Springs  
Georgia Interfaith Power and Light  
Good Solar Organization  
Locust Point Community Garden  
Maryland Latinos Unidos  
NC Citizen  
NC Climate Justice Collective  
NC Climate Solutions Coalition  
NC Council of Churches  
NC Interfaith Power & Light  
Kingdom Living Temple  
Protect Our Woods  
Spruill Farm Conservation Project  
Tennessee Heartwood  
Toxic Free NC

Cc: Jalonne White-Newsome, Director of Environmental Justice, CEQ