

Nov. 16, 2023

Mr. Jeff Zients  
White House Chief of Staff  
1600 Pennsylvania Ave. NW  
Washington, DC 20500

Dear Mr. Zients,

The undersigned state and regional associations representing sectors and industries across the U.S. economy urge you to maintain the existing National Ambient Air Quality Standards for particulate matter (PM<sub>2.5</sub>). A proposed revision to this standard is under review by the White House Office of Information and Regulatory Affairs. This proposal could put nearly 40% of the U.S. population in areas of nonattainment,<sup>1</sup> risking jobs and livelihoods across the nation and making it significantly more difficult to obtain permits to build new factories, bridges and roads that will power our economic growth. Implementation of the Infrastructure Investment and Jobs Act, the CHIPS and Science Act and the Inflation Reduction Act have the potential to infuse substantial investments into our states and communities, but all of that is now threatened by the permitting restrictions that would flow from this proposal. This regulation will put nearly every goal to encourage manufacturing in our states and regions at risk and could prevent the American economy from reaching its full potential.

Our members have innovated and worked with regulators to lower PM<sub>2.5</sub> emissions significantly. The Environmental Protection Agency's 2022 Air Trends and National Emissions Inventory report shows that PM<sub>2.5</sub> concentrations have declined by 42% since 2000,<sup>2</sup> driven by major emissions reductions from both mobile sources and the power sector. As a result, our air is cleaner than at any point in modern time. The current PM<sub>2.5</sub> standard is set at 12 µg/m<sup>3</sup>; yet, some are advocating a standard as low as 8 µg/m<sup>3</sup>—which is lower than naturally-occurring levels in many parts of the country. This proposal is also far more stringent than the guidelines in place in Europe, where the current EU standard is 25 µg/m<sup>3</sup>—more than twice the current level in the U.S.

The vast majority of PM<sub>2.5</sub> emissions in the U.S. (84%) come from wildfires, road dust and other nonpoint sources.<sup>3</sup> As we have seen this year, the Canadian wildfires have had a more dramatic effect on air quality in the U.S. than any industrial sources. Nonattainment designations will be influenced heavily by these past three years of wildfire emissions, making compliance with existing standards—let alone any new standards—much more difficult. In many areas, there may not be sufficient offsetting emission-reduction options, and as a result, investments across the country could be brought to a grinding halt. Even without the new air quality data, the EPA's Regulatory Impact Analysis failed to identify sufficient controls for all areas of the country to attain any of the proposed standards.<sup>4</sup> In fact, the EPA has already proposed to

---

<sup>1</sup> U.S. Air Quality Standards and the Manufacturing Sector (April 2023), [https://documents.nam.org/COMM/NAM\\_Air\\_Quality\\_Standards\\_Analysis\\_Web\\_Version.pdf](https://documents.nam.org/COMM/NAM_Air_Quality_Standards_Analysis_Web_Version.pdf)

<sup>2</sup> [https://gispub.epa.gov/air/trendsreport/2023/#air\\_trends](https://gispub.epa.gov/air/trendsreport/2023/#air_trends)

<sup>3</sup> *Id.*

<sup>4</sup> EPA PM<sub>2.5</sub> RIA, see [https://www.epa.gov/system/files/documents/2023-01/naaqs-pm\\_ria\\_proposed\\_2022-12.pdf](https://www.epa.gov/system/files/documents/2023-01/naaqs-pm_ria_proposed_2022-12.pdf)

disapprove a California state plan for failing to demonstrate that it can attain the current 2012 standard.<sup>5</sup>

Despite the vast majority of emissions coming from nonpoint sources, the cost of complying with this regulation will fall solely on our members. It will impact our ability to create jobs, innovate and invest in America. A recent analysis conducted by Oxford Economics and commissioned by the National Association of Manufacturers found that if the proposed PM2.5 regulations are implemented, GDP will be reduced by nearly \$200 billion and nearly 1 million current jobs will be put at risk. In addition, these numbers may actually understate the problem because they do not include the most recent air quality data.

Notably, these economic impacts will be localized rather than evenly dispersed across the country. Some states will be hit harder than others, but all states will miss out on new manufacturing facilities and jobs due to the permitting roadblocks mandated as a result of tighter standards. Under the proposed rule, close to 650 counties, equivalent to 22% of all U.S. counties, could be placed out of attainment. Even in areas that would meet the EPA's proposed standards, current PM2.5 background levels are so close to the proposed standards that no room would be left for new economic development, virtually ensuring severe economic consequences. The inability to invest in America as a result of this proposal creates perverse outcomes, in which new facilities could be located in foreign countries with more lax air standards due to these administrative hurdles—undermining the economic and environmental goals of your administration.

In practice, these proposed standards are aspirational in that they are set at background levels, which effectively means that any industrial emissions could put a locality out of attainment. While our members continue to innovate, making cleaner products and pioneering cleaner processes, no one can comply with a regulation that sets the standard at effectively zero.

We strongly encourage your administration to maintain the existing standards, which will ensure that we remain among the countries with the cleanest air in the world while also supporting much needed economic growth.

Sincerely,

Chris V. Isaacson  
President and CEO  
Alabama Forestry Association

Patrick Cagle  
President  
Alabama Mining Association

Kati Capozzi  
President and CEO  
Alaska Chamber

Deantha Skibinski  
Executive Director  
Alaska Miners Association

Danny Seiden  
President and CEO  
Arizona Chamber of Commerce and Industry

Randy Zook  
President and CEO  
Arkansas State Chamber of Commerce

---

<sup>5</sup> See <https://www.govinfo.gov/content/pkg/FR-2022-10-05/pdf/2022-21492.pdf> in which the EPA states the following: "We now propose that the State has not demonstrated that it is capable of fulfilling the remaining aggregate tonnage commitments necessary to attain the 2012 annual PM2.5 NAAQS in the SJV by December 31, 2025."

Lance Hastings  
President and CEO  
California Manufacturers & Technology  
Association

Loren Furman  
President and CEO  
Colorado Chamber of Commerce

Chris DiPentima  
President and CEO  
Connecticut Business & Industry Assn, Inc.

Lisa B. Himber  
President  
Maritime Exchange - Delaware River & Bay

Brewster B. Bevis  
President  
Associated Industries of Florida

Lloyd Avram  
President and CEO  
Georgia Association of Manufacturers

Sherry Menor-McNamara  
President and CEO  
Chamber of Commerce Hawaii

Alex LaBeau  
President  
Idaho Association of Commerce & Industry

Benjamin J. Davenport  
Executive Vice President  
Idaho Mining Association

Mark Denzler  
President and CEO  
Illinois Manufacturers' Association

Mark A. Biel  
Chief Executive Officer  
Chemical Industry Council of Illinois

Brian Burton  
President and CEO  
Indiana Manufacturers Association

Mike Ralston  
President  
Iowa Association of Business and Industry

Alan Cobb  
President and CEO  
Kansas Chamber of Commerce

Frank Jemley III  
President and CEO  
Kentucky Association of Manufacturers

Tucker Davis  
President  
Kentucky Coal Association

Will Green  
President and CEO  
Louisiana Association of Business and Industry

Greg Bowser  
President and CEO  
Louisiana Chemical Association

Tommy Fauchaux  
President  
Louisiana Mid-Continent Oil and Gas Association

Mike Moncla  
President  
Louisiana Oil and Gas Association

Adam Haddox  
Executive Director  
Louisiana Pulp and Paper Association

Patrick Strauch  
Executive Director  
Maine Forest Products Council

Mary Kane  
President and CEO  
Maryland Chamber of Commerce

Brooke Thomson  
President  
Associated Industries of Massachusetts

John Walsh  
President and CEO  
Michigan Manufacturers Association

Jami Des Chenes  
Executive Director  
Michigan Chemistry Council

Jason Geer  
President and CEO  
Michigan Oil and Gas Association

Jim Holcomb  
President and CEO  
Michigan Chamber of Commerce

Doug Loon  
President and CEO  
Minnesota Chamber of Commerce

John McKay  
President and CEO  
Mississippi Manufacturers Association

Ray McCarty  
President and CEO  
Associated Industries of Missouri

Todd O'Hair  
President and CEO  
Montana Chamber of Commerce

Bryan Slone  
President  
Nebraska Chamber of Commerce & Industry

Ray Bacon  
Executive Director  
Nevada Manufacturers Association

Michael Skelton  
President and CEO  
Business & Industry Assoc. New Hampshire

Michele N. Siekerka, Esq.  
President and CEO  
New Jersey Business & Industry Association

Carla J. Sonntag  
President and CEO  
New Mexico Business Coalition

Heather C. Mulligan  
President and CEO  
The Business Council of New York State, Inc.

Harold King  
President  
Council of Industry (Hudson Valley)

Peter Ahrens  
Executive Director  
Buffalo Niagara Manufacturing Alliance

Gary Salamido  
President and CEO  
NC Chamber

Ross M. Smith  
President  
North Carolina Manufacturers Alliance (NCMA)

Arik Spencer  
President and CEO  
Greater North Dakota Chamber

Ryan Augsburger  
President  
Ohio Manufacturers Association

Steve Stivers  
President and CEO  
Ohio Chamber of Commerce

Jenn Klein  
President  
Ohio Chemistry Technology Council

Pat Tiberi  
President and CEO  
Ohio Business Roundtable

Robert Brundrett  
President  
Ohio Oil and Gas Association

Chad Warmington  
President and CEO  
State Chamber of Oklahoma

Brook A. Simmons  
President  
The Petroleum Alliance of Oklahoma

Angela Wilhelms  
President and CEO  
Oregon Business & Industry

David N. Taylor  
President and CEO  
Pennsylvania Manufacturers' Association

Darlene J. Robbins  
President  
NE Pennsylvania Manufacturers & Employers Assoc.

Matt Gabler  
Executive Director  
Pennsylvania Forest Products Association

Peter Vlahos  
President  
Pennsylvania Aggregates & Concrete Assoc. (PACA)

John Olson  
President  
Pennsylvania Builders Association

Luke Bernstein  
President and CEO  
Pennsylvania Chamber of Business & Industry

Steven Kratz  
President  
Pennsylvania Chemical Industry Council

Rachel Gleason  
Executive Director  
Pennsylvania Coal Alliance

Daniel Weaver  
President and Executive Director  
Pennsylvania Independent Oil and Gas Association

Ted Harris  
Executive Vice President  
Pennsylvania Petroleum Association

Matt Smith  
President  
Greater Pittsburgh Chamber of Commerce

David M. Chenevert  
Executive Director  
Rhode Island Manufacturers Association

Bob Morgan  
President and CEO  
South Carolina Chamber of Commerce

Sara H. Hazzard  
President and CEO  
South Carolina Manufacturers Alliance

David Owen  
President  
South Dakota Chamber of Commerce and Industry

Kwinn Neff  
President  
South Dakota Mineral Industries Association

Bradley Jackson  
President and CEO  
Tennessee Chamber of Commerce

Candace Dinwiddie  
Executive Director  
Tennessee Forestry Association

Chuck Laine  
President  
Tennessee Mining Association

Tom Midyett  
President  
Tennessee Paper Council

Glenn Hamer  
President and CEO  
Texas Association of Business

Richard A. "Tony" Bennett  
President and CEO  
Texas Association of Manufacturers

Todd R. Bingham  
President and CEO  
Utah Manufacturers Association

Brian Somers  
President  
Utah Mining Association

Rikki Hrenko-Browning  
President  
Utah Petroleum Association

William Driscoll  
Vice President  
Associated Industries of Vermont

Brett Vassey  
President and CEO  
Virginia Manufacturers Association

Kristofer Johnson  
President and CEO  
Association of Washington Business

Rebecca McPhail  
President  
West Virginia Manufacturers Association

Kurt Bauer  
President and CEO  
Wisconsin Manufacturers and Commerce

Robert Jensen  
Executive Director  
Alliance of Wyoming Manufacturers

Travis Deti  
Executive Director  
Wyoming Mining Association

Andrew Shall  
President  
Graphic Media Alliance (OH, MI, KY)

Keith A. Christman  
President  
Decorative Hardwoods Association

Jaret Gibbons  
Executive Director  
Appalachian Region Independent Power  
Producers Association (ARIPPA)

CC: The Honorable Lael Brainard, Director of the National Economic Council  
The Honorable Michael Regan, Administrator, EPA  
Steve Ricchetti, Counselor to the President  
Ali Zaidi, National Climate Advisor  
John Podesta, Counselor to the President  
Gene Sperling, Counselor to the President