



October 24, 2023

Jeffrey Zients  
Chief of Staff  
The White House  
1600 Pennsylvania Avenue  
Washington, DC 20500

Dear Mr. Zients,

The American Forest & Paper Association (AF&PA), the American Wood Council (AWC) and our member company CEOs want to express our serious concerns regarding the impending National Ambient Air Quality Standards for particulate matter (PM NAAQS) rule about to be finalized by the U.S. Environmental Protection Agency (EPA).

Unfortunately, EPA's planned tightening of the PM NAAQS close to background levels when U.S. air quality is among the best in the world – and without a workable implementation plan – threatens U.S. competitiveness and modernization projects in the U.S. paper and wood products industry and in other manufacturing sectors across our country. This would severely undermine President Biden's promise to grow and reshore U.S. manufacturing jobs, and ultimately make American manufacturing less competitive. It also would harm an industry that has been recognized as an important contributor to achieving the Administration's carbon reduction goals, including in future procurement for federal buildings.

The forest products industry employs about 925,000 hard-working Americans, accounts for approximately 5% of our nation's manufacturing GDP and is among the top 10 manufacturing sector employers in 43 states. Our mills support the American workforce, produce carbon-neutral bioenergy, and provide essential products that support recycling and sequester carbon in the built environment. The paper and wood products industry is a leader in sustainability and good stewards in communities across our nation.

The PM NAAQS rule as proposed would result in many more non-attainment areas in the U.S., where economic development would be impeded. But there is an additional, largely unrecognized outcome that is even more concerning for our industry. Specifically, setting the standard so close to background levels means that – even in cleaner attainment areas where many of our mills are located – there would not be sufficient "permit headroom" (the difference between the standard and background) to obtain a permit. This not only threatens many modernization projects in the forest products industry and many other industries; it

ultimately threatens U.S. competitiveness and high-paying jobs, largely in rural communities across the country. And it does not address the far larger sources of particulate matter. Indeed, the rule would impede sustainable forest management, and thereby would increase PM and greenhouse gas emissions from the largest source of PM – wildfires on public lands.

The attached maps show how lowering the PM NAAQS from the current level of 12.0 µg/m<sup>3</sup> to 9.0 µg/m<sup>3</sup> – close to average U.S. background levels (about 8 µg/m<sup>3</sup>) – not only significantly decreases attainment areas (green areas), but also increases nonattainment areas (red areas). It also would leave many other attainment areas without sufficient “permit headroom” (pink areas), where many of the manufacturing modernization projects across our country would be infeasible.

Given the scale of the potential impacts on our industry and others, we also strongly believe an achievable implementation plan must accompany any rule. This must include realistic modelling and permitting tools that accurately reflect real-world conditions and allow beneficial facility modernization projects to proceed. In addition, as required by the law, States need effective tools to exclude any contribution from wildfire emissions and international transport. EPA has the authority to align the effective date of any rule with the completion of a workable implementation plan but has not yet addressed implementation and must do so now.

AF&PA and AWC have a long track record of working cooperatively with EPA and using the power of facts and analysis to ensure sustainable regulations. We strongly urge you to consider the practical impacts and economic harm of moving forward with an unsustainable PM NAAQS rule. We also hope you will work with our industry on a practical solution that avoids the unintended outcomes outlined in this letter. We recognize the critical importance of the President’s goals to onshore and support U.S. manufacturing jobs. Setting the level of PM NAAQS near background levels would threaten facility closure and the loss of rural jobs, all while harming an industry which helps prevent catastrophic wildfire – the primary source of PM emissions – by manufacturing products which reduce carbon emissions and store carbon in the built environment.

Accordingly, we request the opportunity to discuss our concerns with you before a final rule is issued.

Sincerely,

Heidi Brock  
President & CEO  
American Forest & Paper Association

Jackson Morrill  
President & CEO  
American Wood Council

Craig Anneberg  
CEO  
North Pacific Paper Company, LLC

T. Furman Brodie  
Vice President  
Charles Ingram Lumber Co., Inc.

Dick Carmical  
CEO  
The Price Companies Inc.

John Carpenter  
President  
Nippon Dynawave Packaging Company, LLC

Howard Coker  
President & CEO  
Sonoco Products Company

Eric Cremers  
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PotlatchDeltic

Michael Doss  
President & CEO  
Graphic Packaging International, LLC

Mark Emmerson  
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Sierra Pacific Industries

Jim Enright  
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Pacific Woodtech

Christian Fischer  
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Lee Goodloe  
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Nate Jorgensen  
CEO  
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Arsen Kitch  
President and CEO  
Clearwater Paper Corporation

Mark Kowlzan  
Chairman & CEO  
Packaging Corporation of America

William Kress  
Chairman & CEO  
Green Bay Packaging Inc.

Kevin Kuznicki  
President, General Counsel, North America  
Billerud Americas Corporation

Brian Luoma  
President and CEO  
Westervelt

Sean McLaren  
Incoming President and CEO  
West Fraser

Brian McPheely  
Global CEO  
Pratt Industries, Inc.

Andrew Miller  
CEO  
Stimson Lumber

Colin Moseley  
Chairman  
Simpson Lumber Company, LLC

Derek Ratchford  
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Regina Gray  
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Jean-Michel Ribieras  
Chairman & CEO  
Sylvamo Corporation

Stuart Gray  
President and CEO  
Roseburg Forest Products

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Greif, Inc.

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Randy Schillinger  
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Hampton Lumber

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David Sewell  
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Howard Heckes  
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Masonite International Corporation

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Michael J. King  
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Kenneth Winterhalter  
CEO  
Seaman Paper Company of Massachusetts, Inc.

Attachment

cc: Natalie Quillian, White House Deputy Chief of Staff  
Jen O'Malley Dillon, White House Deputy Chief of Staff  
Steve Ricchetti, Counselor to the President  
John Podesta, Counselor to the President  
Gene Sperling, Counselor to the President  
Ali Zaidi, National Climate Advisor  
Lael Brainard, NEC Director  
Michael Regan, EPA Administrator  
Joseph Goffman, EPA Principal Deputy Assistant Administrator, OAR  
Shalanda Young, OMB Director  
Richard Revesz, OIRA Administrator  
Tom Vilsack, Secretary of Agriculture  
Randy Moore, Chief, Forest Service  
Debra Haaland, Secretary of Interior  
Gina Raimondo, Secretary of Commerce  
Jennifer Granholm, Secretary of Energy