



AMERICAN WOOD COUNCIL

January 10, 2024

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

Subject: Follow-Up: Urgent Concerns Regarding PM NAAQS Rule

Dear Mr. Zients,

Following our October 24th letter expressing concerns about the impending National Ambient Air Quality Standards for particulate matter (PM2.5 NAAQS) rule (attached), we would like to emphasize again the urgency and importance of discussing these matters with you before this proposed rule is finalized.

The potential impacts of the proposed PM2.5 NAAQS rule on our industry and manufacturing sectors across the country are significant, and we believe that a collaborative dialogue is essential to finding practical solutions and avoid the unintended consequences outlined by our previous letter. Our members are eager to engage in a conversation with you to provide additional insights, address any questions, and hopefully pursue an outcome that can still achieve the Administration's goals without significantly harming our industry's ability to operate.

We understand the complexity of these issues and appreciate your attention to this matter. Please let us know a convenient time for a discussion, and we will ensure our team is prepared to provide detailed perspectives on the challenges presented by the proposed rule.

Thank you for your consideration, and we look forward to the opportunity to further discuss these critical concerns.

Sincerely,

Jackson Morrill
President & CEO
American Wood Council

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



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/m³ to 9.0 µg/m³ – close to average U.S. background levels (about 8 µg/m³) – 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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Michael Doss
President & CEO
Graphic Packaging International, LLC

Mark Emmerson
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Pacific Woodtech

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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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Smartlam

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Sylvamo Corporation

Regina Gray
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Ole Rosgaard
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Stuart Gray
President and CEO
Roseburg Forest Products

Randy Schillinger
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David Sewell
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WestRock Company

Michael Haws
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Howard Heckes
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Devin Stockfish
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Steven Henry
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Matt Swinnie
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ARAUCO North America

Warren Hood
CEO
Hood Industries

Mark Ushpol
Executive Vice President, Food & Consumer
Packaging
Ahlstrom

Tom Insko
President and CEO
Collins

Richard Verney
Chairman & CEO
Monadnock Paper Mills, Inc.

Jeff Jones
Transformation & Corporate Services
Director
DS Smith

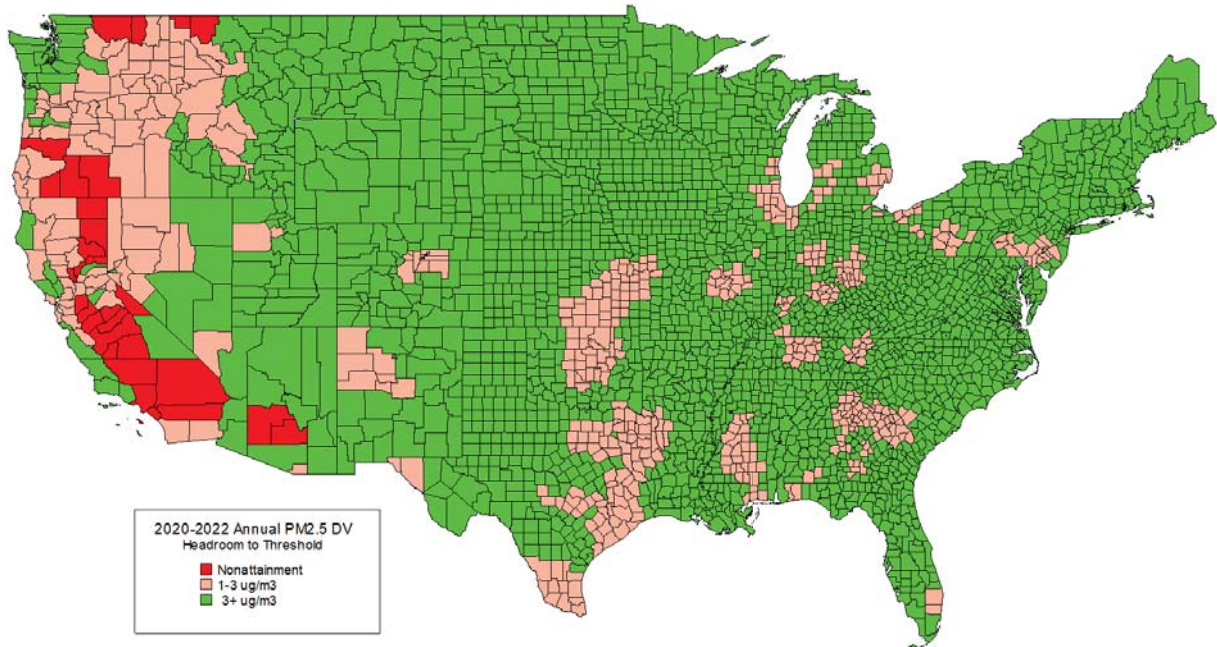
Kenneth Winterhalter
CEO
Seaman Paper Company of Massachusetts, Inc.

Michael J. King
CEO
Pactiv Evergreen

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
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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

Current PM_{2.5} NAAQS (12.0 µg/m³) leaves room for economic growth

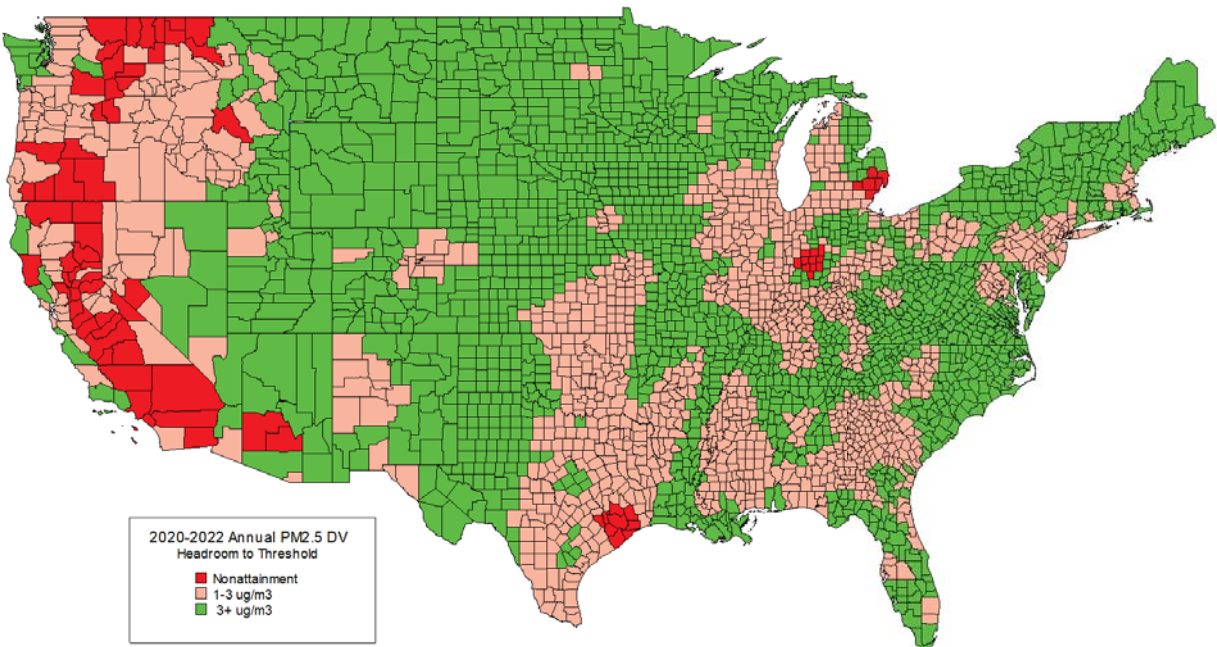


Source: Alpine Geophysics

Non-monitored county values are calculated using inverse distance weighting average of five closest monitored values

Immediate Impact of PM_{2.5} NAAQS at 11.0 µg/m³

Limits economic growth in many areas of the country

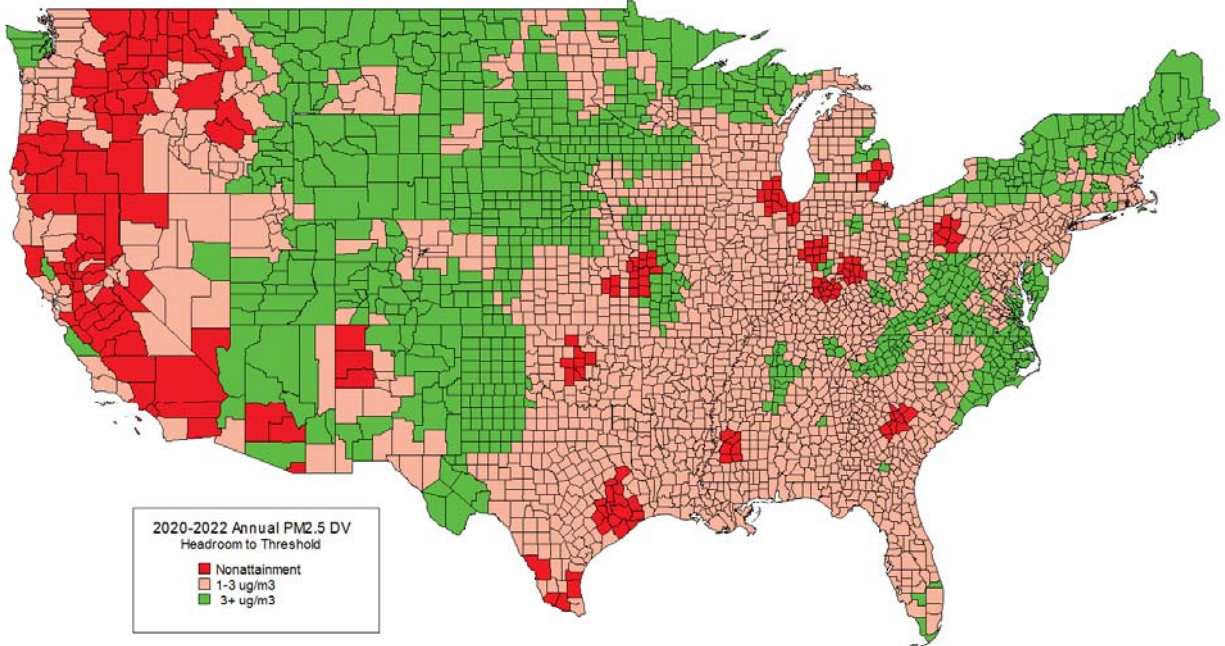


Source: Alpine Geophysics

Non-monitored county values are calculated using inverse distance weighting average of five closest monitored values

Immediate Impact of PM_{2.5} NAAQS at 10.0 µg/m³

Many new or expanded manufacturing projects unachievable in red/pink colored areas

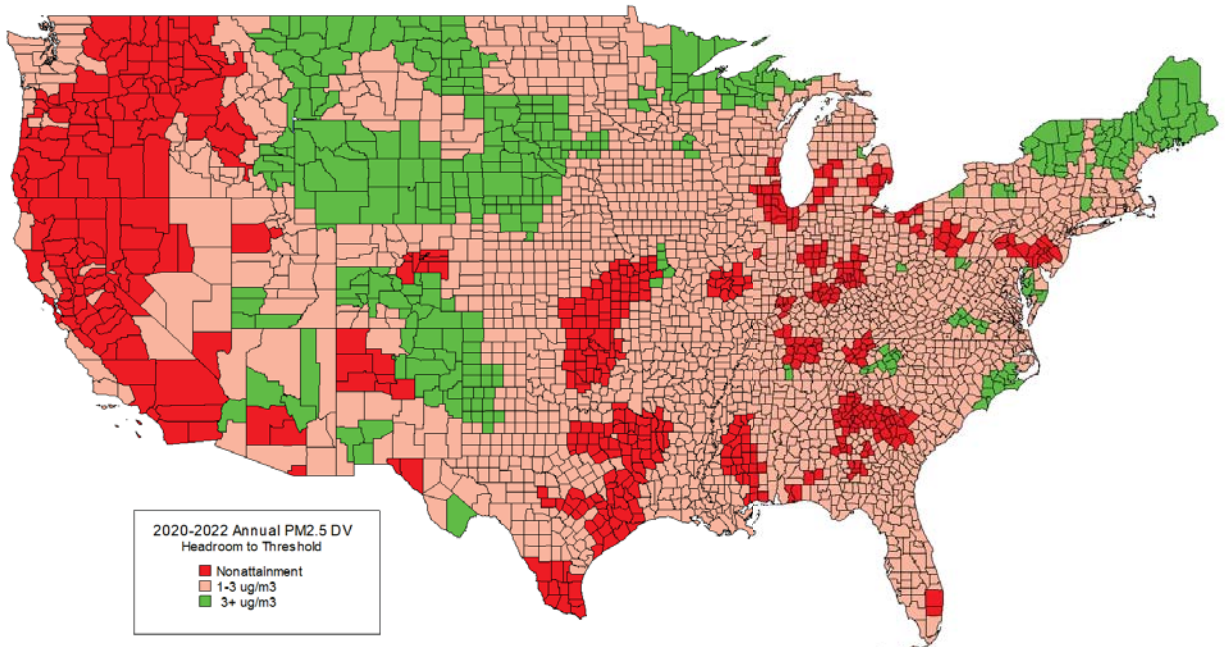


Source: Alpine Geophysics

Non-monitored county values are calculated using inverse distance weighting average of five closest monitored values

Immediate Impact of PM_{2.5} NAAQS at 9.0 µg/m³

Many new or expanded manufacturing projects unachievable in red/pink colored areas



Source: Alpine Geophysics

Non-monitored county values are calculated using inverse distance weighting average of five closest monitored values