

October 31, 2023

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

Dear Mr. Zients,

The undersigned associations urge you to ensure the Environmental Protection Agency maintains existing National Ambient Air Quality Standards for fine particulate matter (PM<sub>2.5</sub>). A proposed discretionary revision to this standard, which is under review by the Office of Information and Regulatory Affairs, could put nearly 40% of the U.S. population in areas of nonattainment.<sup>1</sup> Doing so would risk jobs and livelihoods by making it even more difficult to obtain permits for new factories, facilities and infrastructure to power economic growth. This proposal would also threaten successful implementation of the Infrastructure Investment and Jobs Act, the CHIPS and Science Act and the important clean energy provisions of the Inflation Reduction Act.

Our members have innovated and worked with regulators to lower PM<sub>2.5</sub> concentrations significantly, and further progress is being made as part of the energy transition investments. The EPA recently reported that PM<sub>2.5</sub> concentrations have declined by 42% since 2000, driven by major emissions reductions from both mobile sources and the power sector.<sup>2</sup> As a result, America's air is cleaner than ever. The current standard for PM<sub>2.5</sub> is set at 12 µg/m<sup>3</sup>; yet, the EPA is considering a standard as low as 8 µg/m<sup>3</sup>. Such a standard would be lower than ambient concentrations in many parts of the country and far more stringent than the 25 µg/m<sup>3</sup> European Union standard.

Approximately 84% of PM<sub>2.5</sub> emissions in the U.S. comes from fires, road dust, agriculture and other nonpoint sources that are difficult and costly to control.<sup>3</sup> For example, this year's Canadian forest fires had a far more dramatic effect on air quality in the U.S. than any industrial sources. However, the cost of complying with this regulation would fall predominantly on the private sector. It would hinder the ability of our member companies to create jobs, innovate and invest. A recent analysis conducted by Oxford Economics and commissioned by the National Association of Manufacturers found that the proposed standard would reduce GDP by nearly \$200 billion and cost as many as 1 million jobs through 2031.<sup>4</sup>

For each level of increased stringency of the standards, the burdens on states and manufacturers increase exponentially. At 8 µg/m<sup>3</sup>, the lowest level considered by the EPA, more than 20% of all U.S. counties would be out of attainment and thrown into permitting gridlock. The most affected states would be Texas, California, Michigan, Ohio,

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<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> U.S. EPA, Our Nation's Air: Trends Through 2022, [https://gispub.epa.gov/air/trendsreport/2023/#air\\_trends](https://gispub.epa.gov/air/trendsreport/2023/#air_trends).

<sup>3</sup> U.S. EPA, Policy Assessment for the Reconsideration of the National Ambient Air Quality Standards for Particulate Matter, May 2022, [https://www.epa.gov/system/files/documents/2022-05/Final%20Policy%20Assessment%20for%20the%20Reconsideration%20of%20the%20PM%20NAAQS\\_May2022\\_0.pdf](https://www.epa.gov/system/files/documents/2022-05/Final%20Policy%20Assessment%20for%20the%20Reconsideration%20of%20the%20PM%20NAAQS_May2022_0.pdf)

<sup>4</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).

Pennsylvania, Georgia, Nevada, Arizona and Illinois.<sup>5</sup> However, 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.

Lowering the current standard so dramatically would create a perverse disincentive for American investment. The EPA's proposal could force investment in new facilities to foreign countries with less stringent air standards, thereby undermining the administration's economic and environmental goals.

We urge you to ensure the EPA maintains the existing fine particulate matter standards to ensure both continued environmental protection and economic growth.

Sincerely,

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National Cotton Council

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<sup>5</sup> American Petroleum Institute, NAAQS on Particulate Matter, <https://www.api.org/-/media/files/policy/ozone-naaqs/2023-particulate-matter-booklet.pdf>

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cc: The Honorable Lael Brainard, Director of the National Economic Council  
The Honorable Michael Regan, Administrator, U.S. Environmental Protection Agency  
Steve Ricchetti, Counselor to the President  
Ali Zaidi, National Climate Advisor  
John Podesta, Counselor to the President  
Gene Sperling, Senior Advisor to the President