

January 6, 2026

The Honorable Lee M. Zeldin
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Zeldin:

The undersigned organizations applaud the Environmental Protection Agency for the recent acknowledgement that the 2024 revision to the National Ambient Air Quality Standard (NAAQS) for PM_{2.5} was unlawful. EPA failed to complete the statutorily-required “thorough review” of the relevant air quality criteria before issuing the 2024 revision, and also failed to adequately weigh the substantial costs associated with its choice to revise the existing standard. EPA’s discretionary mid-cycle review of the PM_{2.5} NAAQS also posed significant risks of widespread economic harm, which EPA ignored in error.

The groups signing this letter represent a majority of the American economy, who previously came together in 2023 to warn the White House and EPA of the severe economic consequences of finalizing a discretionary revision to the standard that could place nearly 40 percent of the U.S. population in nonattainment areas.¹ An Oxford Economics analysis of EPA’s draft proposal found that the revised standard could reduce GDP by nearly \$200 billion and eliminate up to one million jobs through 2031.

Our members are already experiencing permitting obstacles across the country as a direct result of the revised standard. Although the United States continues to maintain some of the lowest PM_{2.5} levels in the world,² the new threshold was set so stringently that it is, in many regions, simply unattainable while still allowing for economic growth. Projects that were readily permissible under the prior, already rigorous standard are now being scaled back or potentially relocated to areas with sufficient compliance headroom to accommodate future expansion.

We appreciate EPA’s prompt action to correct an unlawful rule and one that threatens significant economic consequences nationwide. The revised PM_{2.5} standard was unnecessary, failed to account for key information, and should be vacated.

The Aluminum Association
American Coke and Coal Chemicals Institute
American Farm Bureau Federation
American Forest & Paper Association
American Fuel & Petrochemical Manufacturers
American Iron and Steel Institute
American Petroleum Institute
American Road & Transportation Builders Association
Associated Builders and Contractors
The Fertilizer Institute
Industrial Energy Consumers of America
Institute of Makers of Explosives
Interstate Natural Gas Association of America
National Wooden Pallet & Container Association
Steel Manufacturers Association

¹ <https://www.uschamber.com/assets/documents/gei/PM2.520Industry20letter.pdf>

² <https://www.who.int/tools/air-quality-standards>