American Forest & Paper Association

April 8, 2026

The Honorable Mike Johnson
Speaker of the U.S. House of Representatives
H-232, The Capitol
Washington, D.C. 20515

Dear Speaker Johnson,

The American Forest & Paper Association supports the House Committee on Energy and Commerce's recent actions to modernize our air permitting system that is increasingly outdated and overly rigid. Unless addressed, these challenges will essentially block permitting approval for projects that support American manufacturing and family-wage jobs. We believe swift passage of the FENCES Act (H.R. 6409), FIRE Act (H.R. 6387), and the RED Tape Act (H.R. 6398) is a critical opportunity to continue the Committee's commitment towards smart, streamlined regulations that support American manufacturers.

The American Forest & Paper Association (AF&PA) serves to advance public policies that foster economic growth, job creation and global competitiveness for a vital sector that makes the essential paper and packaging products Americans use every day. The U.S. forest products industry employs more than 925,000 people, largely in rural America, and is among the top 10 manufacturing sector employers in 44 states. Our industry accounts for approximately 4.7% of the total U.S. manufacturing GDP, manufacturing more than $435 billion in products annually. AF&PA member companies are significant producers and users of renewable biomass energy and are committed to making sustainable products for a sustainable future through the industry's decades-long initiative — *Better Practices, Better Planet 2030*.

For decades, the partnership between the states, business community and local public officials has achieved remarkable results in improving air quality. According to EPA data, total emissions of the six principal air pollutants regulated under the Clean Air Act have fallen by 78% since 1970, even as the U.S. gross domestic product climbed by 321%. The air is getting cleaner and will continue to do so. Yet it is becoming increasingly more difficult for companies to secure air permits to build projects that grow their businesses, keep workers employed, and fund tax bases for critical public services.

For example, getting approval for a paper mill boiler modernization project is very challenging. Typical projects using current EPA models that exaggerate impacts often require at least 2 $\mu g/m^3$ of $PM_{2.5}$ of headroom. So, if the background air quality is more than 7 $\mu g/m^3$ (a value that can be overstated due to atypical events like wildfires or international transport), it is hard to get permit approvals. EPA and Congress should work to bring sound, realistic modeling tools to the air permitting program.

Even in areas with air deemed healthy, stringent air quality rules over the past fifteen years have shrunk the margin between background pollutant concentrations and air quality standards –

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leaving little headroom for businesses to demonstrate that their projects can be permitted. Moreover, EPA permitting models significantly over-predict a planned facility's actual emissions. EPA's failure to address these critical issues creates a permitting "gridlock" effectively blocking even new, state-of-art facilities.

Left unchecked, these trends could leave businesses across America with no reasonable choice but to grow elsewhere, or not at all. This would forego local economic expansion, new product development, or even more efficient and cleaner projects – a loss for both the economy and the environment. Instead, needed business development and well-paying jobs will move offshore to countries with weaker environmental standards and lax worker safety laws.

Accordingly, we support the House of Representative's attention to these critical Clean Air Act implementation and permitting issues. These efforts will foster ongoing air quality improvements while preventing unnecessary burdens that reduce economic growth and tax revenues vital to local communities. Specifically, we support the full passage of the following implementation and permitting legislation:

- H.R.6409: To amend the Clean Air Act to clarify standards for emissions emanating from outside of the United States, and for other purposes.
- H.R.6387: To amend the Clean Air Act to require revisions to regulations governing the review and handling of air quality monitoring data influenced by exceptional events or actions to mitigate wildfire risk.
- H.R.6398: To amend the Clean Air Act relating to review by the Environmental Protection Agency of proposed legislation.

We believe these important reforms will improve permitting of new projects, fostering economic growth and new American jobs along with tax revenue vital to local communities. AF&PA supports these bills and their swift passage through the House of Representatives.

Best regards,



Paul Noe
Vice President Public Policy
American Forest & Paper Association

cc: The Honorable Brett Guthrie, Chairman of the House Committee on Energy & Commerce