

**Comments of Environmental Law & Policy Center at EPA’s Public Hearing on  
Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating  
Units Proposed Rule**

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My name is Callie Sharp. I am an associate attorney at the Environmental Law & Policy Center (or ELPC), headquartered in Chicago, Illinois. ELPC is a Midwest-based nonprofit public interest organization dedicated to action and advocacy for improving environmental quality and protecting natural resources.

The Midwest produces more electricity from coal plants than any other region of the country. As such, our residents bear the full range of carbon pollution’s harms to human health, the Great Lakes, and our overall environmental quality.

Fossil fuel-fired power plants emit more carbon pollution than any other stationary source.<sup>1</sup> In 2023, domestic power plants alone released 1.4 billion metric tons of CO<sub>2</sub>.<sup>2</sup> This is more than the total annual greenhouse gas emissions of nearly every other nation on Earth and is greater than the collective greenhouse gas emissions of over half of the world’s countries.<sup>3</sup>

Domestic power sector CO<sub>2</sub> emissions in 2023 resulted in over \$290 billion dollars in climate damages.<sup>4</sup> This amount is greater than the annual gross domestic product of over three-quarters of the world’s countries.<sup>5</sup>

A major impact of greenhouse gas emissions is rising global temperatures. The urgency of this issue is evidenced by looking across the last decade. Every one of the top ten hottest years in

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<sup>1</sup> New Source Performance Standards for Greenhouse Gas Emissions From New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule, 89 Fed. Reg. 39798, 39,799 (May 9, 2024).

<sup>2</sup> EPA, *GHGRP Power Plants*, EPA GREENHOUSE GAS REPORTING PROGRAM, <https://www.epa.gov/ghgreporting/ghgrp-power-plants#trends> (last visited July 7, 2025).

<sup>3</sup> *GHG Emissions of All World Countries*, EDGAR, [https://edgar.jrc.ec.europa.eu/report\\_2024](https://edgar.jrc.ec.europa.eu/report_2024) (last visited July 7, 2025).

<sup>4</sup> See *U.S. Energy-Related Carbon Dioxide Emissions, 2023*, Fig. 1 Data, U.S. ENERGY INFO. ADMIN. (Apr. 25, 2024), <https://www.eia.gov/environment/emissions/carbon/>; EPA, Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances, Tbl. A.5, EPA (Nov. 2023), [https://www.epa.gov/system/files/documents/2023-12/epa\\_scghg\\_2023\\_report\\_final.pdf](https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf).

<sup>5</sup> World Bank Data Catalog, *GDP Ranking*, <https://datacatalog.worldbank.org/search/dataset/0038130> (last visited July 7, 2025).

recorded history have happened in the last 10 years, with 2024 and 2023 taking the top two spots, respectively.

This year appears to follow that trend. Look at June's heat wave. We are seeing heat-related hospitalizations and deaths on the rise. Train services have been disrupted. Roads are buckling and cracking.

The impacts of greenhouse gases also include more frequent and intense precipitation, increased instances of drought and wildfires, and reduced food and water security.

Greenhouse gas air pollution has been linked to increased negative health impacts, such as heart disease, stroke, chronic obstructive pulmonary disease, lung cancer, and more.<sup>6</sup> Climate change may also expand the range and active-seasons of insects and ticks that carry diseases like Lyme disease.<sup>7</sup>

Another impact is an increase in extreme storms and floods, which result in loss of life, unstable insurance markets, and property loss. For example, between 1980 and 2024, there were 403 weather and climate disasters in the United States costing more than \$1 billion each. The total cost of these 403 events is over \$2.9 trillion dollars. These statistics do not even factor in the loss of life and costs associated with climate disasters over the last year and a half, such as Hurricanes Helene & Milton, and the devastating flooding this past weekend in Texas. The 1980-2024 annual average is 9 events. However, the annual average for the most recent 5 years is 23 billion-dollar weather disasters per year.<sup>8</sup> Extreme climate disasters will only continue to increase in frequency and intensity.

We will offer further written comments illustrating that the proposed repeal is not supported by EPA's rationale. We urge EPA to rescind its proposal, and instead move forward with implementing the carbon pollution standards, which will enable the power sector to address its significant role in these problems.

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<sup>6</sup> *Climate Change and Noncommunicable Diseases: Connections*, WORLD HEALTH ORG., Nov. 2, 2023, <https://www.who.int/news/item/02-11-2023-climate-change-and-noncommunicable-diseases-connections>.

<sup>7</sup> EPA, *Climate Change and Children's Health and Well-Being in the United States: Executive Summary*, 1–2 (Apr. 2023), available at [https://www.epa.gov/system/files/documents/2023-05/Climate\\_Change\\_and\\_Children%27s\\_Health\\_Report\\_Executive\\_Summary\\_.pdf](https://www.epa.gov/system/files/documents/2023-05/Climate_Change_and_Children%27s_Health_Report_Executive_Summary_.pdf)

<sup>8</sup> *Billion-Dollar Weather and Climate Disasters*, NOAA, <https://www.ncei.noaa.gov/access/billions/> (last visited July 7, 2025).