

July 15, 2024

Ms. Debra Shore, Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
77 W. Jackson Blvd.  
Chicago, IL 60604

Re: Request for public hearing regarding One Earth Sequestration, LLC application for Class VI permit

Dear Ms. Shore:

The undersigned organizations formally request a public hearing as part of the Class VI permit process regarding One Earth Sequestration, LLC (OES).

As articulated by the EPA Administrator in various statements, we trust that our collective goal is for maximum public input into the proceedings and decision-making process. We anticipate substantial public interest in participating at this hearing. In addition to this formal request, we request the following specific commitments:

1. A public hearing to be scheduled in both, Bloomington-Normal, and Champaign-Urbana, Illinois. The OES application Area of Review (AOR) and Emergency Response Plan describe geographic impact or emergency planning applicable to three counties (McLean, Champaign, and Ford Counties) in which the individual listed communities are located. Residents and stakeholders in each county must have the opportunity to fully participate in the public hearing process within their unique geography, and the individual county seats. For example, asking Champaign County rural residents to travel upwards of 60 miles one-way (e.g. Bloomington, IL) would pose an unnecessary burden and will limit their participation.

Furthermore, as EPA is well aware, the OES application affects the U.S. EPA designated sole-source Mahomet Aquifer's recharge area, which is of prime concern to residents in McLean, Champaign and Ford Counties. Multiple hearings would not present an undue hardship to EPA Region V based in Chicago, as these communities are easily accessible via Amtrak or car.

2. Hearings must be scheduled at a place and time to allow for participation by residents who have day-time work and study commitments. We suggest 6:30 pm, along with a virtual option for each meeting to maximize attendance. Given the anticipated interest in this permit, please reserve a large enough space at each location to accommodate at least 250 people. We also ask that you allow at least three minutes for each speaker, and accept written comments. Because Champaign and McLean Counties have sizable Hispanic populations, please provide a translator for those whose first language is

Spanish. Similarly, the U.S. EPA should consider providing a sign language interpreter to ensure effective communication with attendees who may be deaf or hard of hearing.

3. The agency should post all permit documents (unredacted) on a readily-accessible webpage of the Region V's website, and include guidance on that page that explains how to submit comments. Information should be posted on the webpage in Spanish, in addition to English.
4. EPA should notify the general public of the date, time, location, and how to participate in the public hearing not less than 30 days in advance of each hearing. The hearing will be only as valuable as residents are made aware of them. We suggest hearing notifications be placed not only in daily or weekly publications, but also local radio, TV and social media streams, in addition to the U.S. EPA's webpage dedicated to the OES proceedings.

Notice also should be provided in Spanish, in addition to English, to ensure all potentially affected parties are appropriately notified, and include local Hispanic news outlets, such as Hola Bloomington. Should the EPA wish, our group would be happy to work with your communications department to recommend local media outlets.

5. The U.S. EPA must respond, in writing, to public comments within 30 days of the hearing, and post both public comments and agency responses on the designated website. A copy of those responses should be sent by email or regular mail to all who signed in at the hearing. Responses should identify how public comments led to their decision to approve, conditionally approve, or deny OES' permit.

Thank you in advance for consideration of this request for public hearings along with our additional requests. We would be happy to speak with you to provide more information or facilitate local outreach and planning.

We respectfully request a written response to this letter.

Sincerely,

On behalf of the following organizations:

**Eco-Justice Collaborative**  
c/o Pam Richart, Co-Director  
919 West University Avenue  
Champaign, IL  
[prichart@ecojusticecollaborative.org](mailto:prichart@ecojusticecollaborative.org)

**Illinois People's Action**

c/o Don Carlson, Executive Director

P.O. Box 76

Bloomington, IL 61702

[don.illinoispeoplesaction@gmail.com](mailto:don.illinoispeoplesaction@gmail.com)

**Prairie Group, Illinois Chapter of the Sierra Club**

c/o Lois Kane, Executive Committee

Urbana, IL 61801

[lois2@comcast.net](mailto:lois2@comcast.net)

**Prairie Rivers Network**

c/o Andrew Rehn, Director of Climate Policy

605 South State Street, Suite 1

Champaign, IL 61820

[arehn@prairierivers.org](mailto:arehn@prairierivers.org)

cc: **Class VI Wells/Carbon Sequestration/Climate Change**

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