

PUBLIC PARTICIPATION PLAN (PPP)

Sewer Infrastructure

Prepared For:
City of Cahokia Heights



Prepared By:



Date: 05/20/2026

**City of Cahokia Heights
Office of the Mayor
103 Main Street
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**Curtis McCall Sr., Mayor
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Water and Sewer Department
2525 Mousette Lane
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May 19, 2026

Via Electronic Mail

Joan Rogers, Environmental Scientist
Water Enforcement and Compliance Assurance Branch (ECW-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Emma Garl Smith
Office of Regional Counsel (C-14J)
U.S. Environmental Protection Agency, Region 5
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RE: City of Cahokia Heights Submission of Public Participation Plan (PPP), Consent Decree 01/20/2026
Section VI.B Compliance

Dear Ms. Rogers and Ms. Garl Smith:

On behalf of the City of Cahokia Heights, the City hereby submits the enclosed Public Participation Plan (PPP) for review and approval in accordance with the requirements of Section VI.B, Paragraphs 15 through 17, of the Consent Decree governing sanitary sewer system improvements and related regulatory obligations.

The submitted PPP establishes the City's framework for public communication, community engagement, accessibility, transparency, and regulatory coordination throughout implementation of Consent Decree-related wastewater, stormwater, and sewer infrastructure improvement activities. The Plan outlines procedures for public meetings, construction notifications, website postings, outreach initiatives, complaint resolution, accessibility accommodations, and public participation processes intended to support meaningful community involvement and long-term compliance implementation.

The City remains committed to satisfying the requirements of the Public Participation Plan and looks forward to continuing our relationship with the EPA. If you have any questions or concerns, please contact me, Mayor McCall, (618) 332-4258, mayor@cahokiaheightsil.us, or our legal counsel, Erica Spitzig, (513) 357-9310, espitzig@taftlaw.com.

I look forward to your review and response.

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Sincerely,
A handwritten signature in black ink, appearing to read "Curtis McCall Sr.", written over the word "Sincerely,".

Curtis McCall, Sr.
Mayor – The City of Cahokia Heights

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Enclosure

Cc:
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Table of Contents

Executive Summary	3
Introduction.....	3
Goals and Objectives.....	3
Stakeholders.....	3
Outreach Strategies.....	3
Public Involvement.....	4
Education and Prevention.....	4
Regulatory Reporting.....	4
Roles and Responsibilities.....	4
Evaluation.....	4
1. Purpose.....	6
2. Program Overview.....	7
3. Public Participation Goals	7
Transparency.....	7
Accessibility	7
Collaboration	7
Equity.....	8
Responsiveness	8
4. Stakeholder Identification	8
5. Community Engagement Strategies.....	8
5.1 Public Meetings	8
Meeting Requirements	9
5.3 Website and Digital Communications	9
5.4 Construction Notifications	10
5.5 Educational and Outreach Initiatives	10
6. Accessibility and Inclusive Outreach	11
7. Public Comment Procedures.....	11
Comment Management	12
8. Reporting and Transparency.....	12
Public Updates and Posted Materials.....	12
9. Performance Metrics	13

10. Roles and Responsibilities 13
 Mayor and City Administration 13
 City Communications and Public Works Department 13
 Cahokia Heights Water and Sewer Department 14
 Engineering Department - Regulatory and Compliance Coordination 14
11. Complaint Resolution Process 14
 Complaint Intake Methods 14
 Complaint Response Targets 15
12. Coordination with Regulatory Agencies..... 15
13. Plan Maintenance and Updates 15
14. Consent Decree Compliance Summary 16
Appendix A – Public Meeting Agenda Template 17
Appendix B – Communication Channels and Notice Methods 18
Appendix C – Accessibility and Outreach Commitments..... 19

Executive Summary

This Public Participation Plan (PPP) describes how the City of Cahokia Heights will inform, educate, and engage the public as it implements a municipal sanitary sewer consent decree with the U.S. Environmental Protection Agency (EPA) and the Illinois Environmental Protection Agency (IEPA). The PPP supports transparency, accountability, and meaningful community participation. Key elements include public meetings, community outreach, and partnerships with local agencies and institutions to advance wastewater, stormwater, and sewer infrastructure improvements, including initiatives to inform residents about projects such as basement backup relief. The City will also provide regular updates on planned and ongoing water and sewer projects that protect public health, improve water quality, and safeguard local water resources.

Introduction

The City of Cahokia Heights is implementing a long-term program to address sanitary sewer overflows as required under a consent decree. The program includes planning, design, construction, operation, and maintenance improvements over multiple years. The City is also a co-permittee under the St. Clair County, Illinois, MS4 program and must carry out relevant public education and outreach and public participation and involvement activities, while tracking metrics and reporting those activities annually to IEPA.

Goals and Objectives

PPP goals include informing the public, communicating health and environmental risks, providing opportunities for public input, building trust, and supporting compliance and long-term system sustainability.

Stakeholders

Stakeholders include residents, businesses, community organizations, environmental groups, elected officials, and the media.

Outreach Strategies

Outreach tools will include a dedicated project webpage, mailed notices/flyers, email distribution (where available), social media, media releases, community partner networks, and printed educational materials. The City will make information pertaining to the work conducted under the consent decree available for public review through its website and by providing hard copies upon request at City Hall and other public locations, such as the public library. Information posted will include, as applicable, project descriptions, schedules, anticipated impacts such as traffic or road closures, and how to submit questions or comments. These activities are intended to satisfy Paragraphs 15 through 17 of the Decree.

Public Involvement

The City will conduct public meetings regarding stormwater and sewer infrastructure improvements at least twice per year. Within three months of EPA approval of this PPP, and no later than December 15 of each year thereafter, the City will publish the next year's public meeting schedule on its website and distribute the schedule via flyers delivered to each occupied residential address in the City and via email where available. The City will also post the schedule and make copies available in public places such as City Hall and the City library. If meetings are rescheduled or additional meetings are added, the City will notify residents via flyers delivered to each occupied residential address in the City, email, and phone calls, and will provide notice at least two weeks prior to the new meeting date. Public input will be accepted during meetings and through written comments submitted online or in writing, and the City will document and respond to substantive comments as appropriate. These activities are intended to satisfy Paragraphs 15 through 17 of the Decree.

Education and Prevention

Education and prevention efforts will focus on proper disposal practices, water conservation, reporting sewer issues, and helping residents understand how to reduce impacts from sewer backups and storm events. In addition, the City will provide notices regarding sewer emergencies, planned sewer repairs, and stormwater and sewer infrastructure improvements by email where available, phone, flyers, and signage, and may use additional methods as needed. Notices will be provided, at a minimum, to residents of affected neighborhoods and to any other City residents who request to receive such notices. Notices will include, as applicable, the expected start and end dates, location, description of the emergency or work, and any road closures. Notice of planned repairs or improvements will be provided at least seven days in advance. These activities are intended to satisfy Paragraphs 15 through 17 of the Decree.

Regulatory Reporting

PPP implementation metrics will be documented and submitted to regulators as required by the consent decree. In addition, the City will track applicable public education and outreach and public participation and involvement activities relevant to its role as a co-permittee under the St. Clair County, Illinois, MS4 program and report those activities annually to IEPA.

Roles and Responsibilities

The City will implement the PPP through City administration, Public Works Department, the Water and Sewer Department, and regulatory and compliance coordination, with support from the Engineering Department as needed.

Evaluation

PPP effectiveness will be evaluated annually and updated as needed.

1. Purpose

This Public Participation Plan (PPP) establishes the framework for meaningful, transparent, and ongoing engagement between the City of Cahokia Heights, regulatory agencies, community stakeholders, and the public throughout implementation of the Consent Decree addressing wastewater and sewer infrastructure improvements.

The purpose of this plan is to:

- Promote transparency and accountability throughout implementation of Consent Decree Work;
- Make information pertaining to Work conducted under Section VI of the Consent Decree available for public review;
- Provide accessible and timely information regarding schedules, impacts, and progress of stormwater and sewer infrastructure improvements;
- Ensure the City conducts public meetings regarding stormwater and sewer infrastructure improvements at least twice per year;
- Establish procedures for notices regarding sewer emergencies, planned sewer repairs, and stormwater and sewer infrastructure improvements using the communication methods required by the Consent Decree;
- Encourage meaningful public participation and incorporate community feedback into implementation decisions where appropriate;
- Maintain compliance with Paragraphs 15 through 17 of the Consent Decree.

This PPP is intended to satisfy the Public Participation Plan requirements of Section VI.B, Paragraphs 15 through 17, of the Consent Decree by establishing a structured process for public access to information, twice-yearly public meetings regarding stormwater and sewer infrastructure improvements, and public notices regarding sewer emergencies, planned sewer repairs, and stormwater and sewer infrastructure improvements.

- Procedures for making information pertaining to Work under Section VI available for public review;
- Procedures for conducting public meetings regarding stormwater and sewer infrastructure improvements at least twice per year;
- Procedures for publishing the annual schedule of public meetings on the City website no later than December 15 of each year;
- Procedures for distributing the meeting schedule via flyers to each occupied residential address in the City and by email where available;
- Procedures for posting schedules in public places such as City Hall and the City library;
- Procedures for notifying residents of rescheduled or additional meetings at least two weeks in advance via flyers, email, and phone calls;
- Procedures for notices regarding sewer emergencies, planned sewer repairs, and stormwater and sewer infrastructure improvements by email where available, phone, flyers, and signage;

- Procedures requiring at least 7 days' advance notice for planned repairs or improvements.

2. Program Overview

The City of Cahokia Heights has entered into a Consent Decree with the United States and the State of Illinois to address sanitary sewer overflows, sewer system operation and maintenance, sewer rehabilitation, monitoring, public reporting, and related sewer infrastructure improvements.

The City is also a co-permittee under the St. Clair County, Illinois, MS4 program. As applicable to this Plan, that role includes support for Public Education and Outreach and Public Participation and Involvement activities, along with tracking relevant metrics and reporting those activities annually to IEPA.

- Sanitary sewer overflow prevention and response
- Sewer system rehabilitation and early action capital improvement projects
- Wet-weather and dry-weather investigation activities
- Monitoring, reporting, and mapping requirements
- Operations, maintenance, and staffing improvements
- Public notice and community engagement obligations

The Consent Decree program includes capital improvements, operational enhancements, public communications, regulatory reporting, and long-term system performance objectives intended to improve sewer system reliability, reduce SSOs, protect public health, and improve environmental outcomes for Cahokia Heights residents.

3. Public Participation Goals

The following goals guide the implementation of this PPP:

Transparency

Provide clear, understandable, and timely information regarding program progress, costs, schedules, impacts, and benefits.

Accessibility

Ensure information and engagement opportunities are accessible to all community members, including underserved and historically underrepresented populations.

Collaboration

Create opportunities for meaningful dialogue and feedback between the Water and Sewer Department, stakeholders, and the public.

Equity

Promote inclusive engagement practices that consider environmental justice communities, language access needs, transportation barriers, and digital accessibility.

Responsiveness

Document, evaluate, and respond to public comments and concerns in a timely manner.

4. Stakeholder Identification

Stakeholders may include, but are not limited to:

- City residents, including residents of affected neighborhoods
- Owners and occupants of properties affected by sewer emergencies, planned sewer repairs, or infrastructure improvements
- Businesses, schools, churches, and community institutions in affected areas
- Neighborhood and community organizations
- Residents requesting to receive sewer-related notices
- Regulatory agencies, including EPA and IEPA
- City elected officials and relevant City departments
- Contractors and project teams involved in implementing Consent Decree Work

The City shall maintain and update contact lists, distribution lists, and other reasonable records needed to provide the notices and public meeting communications required by this Plan and the Consent Decree.

5. Community Engagement Strategies

5.1 Public Meetings

The City shall conduct public meetings regarding stormwater and sewer infrastructure improvements at least twice per year. Meetings shall provide updates on ongoing and upcoming Work, expected community impacts, schedules, milestones, and opportunities for public questions.

- Status of sewer and stormwater infrastructure improvements
- Upcoming construction, repair, rehabilitation, and monitoring activities
- Expected neighborhood impacts, including traffic, access, and service disruptions where applicable
- Public health and environmental benefits of completed or planned Work
- How residents may obtain information, ask questions, and request notices

Meetings may be conducted in person or in another format that allows meaningful public participation, provided the City continues to satisfy the notice, accessibility, and frequency requirements of the Consent Decree.

Meeting Requirements

- Within three months after EPA approval of this PPP, and no later than December 15 of each year thereafter, the City shall publish the schedule of public meetings for the next year on its website.
- The City shall distribute the yearly schedule via flyers delivered to each occupied residential address in the City via its contracted third-party mailing service. This information may be included as part of the City's monthly newsletter. The City staff may hand deliver flyers where necessary.
- The City shall post the schedule and make copies available in public places such as City Hall and the City library.
- If any meeting is rescheduled or added after publication of the yearly schedule, the City will publish a notice on its website and shall notify residents by flyers delivered to each occupied residential address in the City and by phone calls.
- For any rescheduled or additional meeting, the City shall provide notice at least two weeks before the meeting date.
- Meetings shall be held in accessible locations and include an opportunity for public questions and input.

5.3 Website and Digital Communications

The City should maintain a publicly accessible website location for Consent Decree communications and shall use it to make information pertaining to Work conducted pursuant to Section VI of the Consent Decree available for public review.

- This Public Participation Plan and approved updates
- The annual public meeting schedule
- Notices of rescheduled or additional public meetings
- Deliverables, any revised deliverables, and final approved versions required to be posted under the Consent Decree, as applicable
- Approval and disapproval letters received from EPA and IEPA
- Annual updates to the Capacity, Management, Operations and Maintenance ("CMOM") program
- Semi-annual reports under the Consent Decree
- Public meeting materials and summaries, where available
- Project schedules, construction updates, and general descriptions of ongoing Work
- Information on how residents may request to receive notices
- Relevant approval and disapproval letters required to be posted under the Consent Decree, as applicable

In addition to website posting, the City shall use the following communication channels for notices required by the Consent Decree and may use additional methods to broaden outreach.

- Email, where available
- Phone calls
- Flyers
- Signage
- Website postings
- Additional methods the City elects to use, such as social media or text alerts

5.4 Construction Notifications

The City shall provide notices regarding sewer emergencies, planned sewer repairs, and stormwater and sewer infrastructure improvements to, at a minimum, residents of the affected neighborhoods and any other City residents who request to receive such notices. The notice shall include at least the following:

- For planned work, dates the work is to begin and expected to conclude
- Location of the emergency or work
- Description of the emergency or work
- Any road closures or access impacts

Required notice methods include the following, and the City may provide notice by additional means.

- Email, where available
- Phone
- Flyers
- Signage
- Any additional notice methods, such as direct mail, the City chooses to use

Notice of planned repairs or improvements shall be provided at least 7 days in advance.

5.5 Educational and Outreach Initiatives

To support implementation of this PPP, the City may conduct outreach and education that helps residents understand sewer system work, project schedules, potential impacts, and how to respond to sewer emergencies or planned repair activities.

Where appropriate, these outreach and education activities may also support the City's Public Education and Outreach responsibilities as a co-permittee under the St. Clair County, Illinois, MS4 program.

- Overview of Consent Decree obligations relevant to the public
- Planned sewer repairs and infrastructure improvements
- Expected neighborhood impacts and road closures
- How residents can sign up for notices and attend public meetings
- How to report sewer emergencies or related concerns to the City

Outreach activities may include the following:

- Flyers delivered to residences
- Website updates and posted notices
- Email distributions
- Public meetings
- Signage in affected areas
- Coordination with neighborhood and community organizations

6. Accessibility and Inclusive Outreach

The City shall seek to identify and reduce barriers to participation so that residents across Cahokia Heights, including residents in affected neighborhoods, can reasonably access information and participate in meetings and notice processes established by this Plan.

Strategies may include:

- Using multiple notice methods rather than relying on a single communication channel
- Providing information in plain language where feasible
- Selecting meeting locations and formats that are reasonably accessible
- Coordinating outreach in neighborhoods directly affected by emergencies or planned work
- Using available email, flyers, phone calls, and signage to broaden reach
- Add translation services upon request where practical

The City may refine its outreach practices over time based on experience, community feedback, and the locations of ongoing or upcoming sewer infrastructure work.

7. Public Comment Procedures

The City shall provide opportunities for residents to ask questions and provide comments at public meetings and through the communication channels used for this

Plan. Comments and questions may inform how the City communicates upcoming work, addresses neighborhood concerns, and improves future outreach.

Where appropriate, the meetings, notices, and comment opportunities described in this Plan may also support the City's Public Participation and Involvement responsibilities as a co-permittee under the St. Clair County, Illinois, MS4 program.

In addition to providing opportunities for residents to ask questions and provide comments at public meetings, City communications under this Plan will also include information about how residents can provide comments using the following methods:

- Email
- Phone
- Mail correspondence
- Other City communication channels identified on the City website

Comment Management

The Water and Sewer Department shall:

- Maintain reasonable records of comments and questions received through public meetings and other communication channels used under this Plan
- Review recurring concerns related to notices, schedules, access, and neighborhood impacts
- Use feedback, where appropriate, to improve future notices and meeting communications

The City should maintain a log or similar record of significant comments, questions, and follow-up items related to implementation of this Plan.

8. Reporting and Transparency

The City shall provide periodic public updates regarding Consent Decree implementation through its website, public meetings, required notices, and other communications used under this Plan.

Public Updates and Posted Materials

Publicly available updates and materials may include:

- Annual public meeting schedules
- Notices of additional or rescheduled meetings
- General project updates and schedule information
- Annual CMOM updates, semi-annual Consent Decree reports, and other deliverables required to be posted under the Consent Decree

- Final approved deliverables required to be posted under the Consent Decree
- Approval and disapproval letters required to be posted under the Consent Decree
- Meeting materials or summaries, where available

These materials shall be made publicly available through the City website consistent with the Consent Decree.

When posting materials for public review, the City should avoid including personal identifying information in publicly posted versions where redaction is appropriate.

9. Performance Metrics

The City may evaluate implementation of this PPP using practical indicators such as:

- Whether at least two public meetings are held each year
- Whether the annual meeting schedule is published by December 15
- Whether flyers, email notices, phone calls, and signage are used when required
- Whether notices are provided to affected neighborhoods and requesting residents
- Whether planned repair or improvement notices are issued at least 7 days in advance
- Whether website postings are current and reasonably accessible
- Whether applicable MS4 Public Education and Outreach and Public Participation and Involvement activities are tracked and reported annually to IEPA
- Number of people attending meetings
- Types of concerns based on the comments received from members of the public
- Level of engagement with website/social media posts

The City should review this PPP periodically and update it as needed to maintain compliance and improve implementation.

10. Roles and Responsibilities

Mayor and City Administration

Responsible for overall oversight of implementation of this PPP and ensuring that public participation requirements under the Consent Decree are carried out.

City Communications and Public Works Department

Responsible for:

- Preparing and distributing public notices required by this Plan
- Maintaining website postings and annual meeting schedules
- Coordinating flyer distribution, email notices, phone notifications, and signage
- Supporting public meeting logistics and communications

Cahokia Heights Water and Sewer Department

Responsible for:

- Providing project information, schedules, and location details for notices
- Identifying affected neighborhoods and expected impacts of planned work
- Supporting presentations and updates at public meetings
- Coordinating with contractors regarding field signage and neighborhood communications
- Receive inquiries from the public either in-person or logged through phone calls, emails or website.

Engineering Department - Regulatory and Compliance Coordination

Responsible for:

- Coordinating submission of the PPP and related deliverables to EPA and IEPA
- Tracking approval dates and implementation deadlines tied to this Plan
- Maintaining records supporting compliance with public participation obligations
- Supporting annual tracking and reporting to IEPA of applicable activities related to the City's role as a co-permittee under the St. Clair County, Illinois, MS4 program

11. Complaint Resolution Process

The City should maintain reasonable procedures for receiving and routing community concerns and questions related to sewer emergencies, planned sewer repairs, infrastructure improvements, and notices issued under this Plan.

Complaint Intake Methods

- Phone
- Email
- Mail
- Other City communication channels identified on the City website
- Questions raised at public meetings

Complaint Response Targets

- Provide 48-hour acknowledgement, Categorize and track complaints by assigned work order number for documentation and response management purposes
- Route inquiries to the appropriate City department, such as the Water and Sewer Department, or to the appropriate project contact, such as the City Engineer.
- Provide follow-up where appropriate based on the nature of the issue
- Use recurring concerns to improve future communications and notices

Complaint tracking records shall be maintained throughout program implementation.

12. Coordination with Regulatory Agencies

The City shall coordinate implementation of this PPP with EPA and IEPA consistent with the Consent Decree, including submission of the Plan for EPA review and approval after consultation with the State.

- United States Environmental Protection Agency
- Illinois Environmental Protection Agency

Public participation documentation and website postings under this Plan should be maintained in a manner that supports the City's compliance reporting and recordkeeping obligations.

13. Plan Maintenance and Updates

This Public Participation Plan shall be implemented after approval by EPA, following consultation with the State, and shall be updated as needed to maintain compliance with the Consent Decree and improve public communications.

The Water and Sewer Department may revise the plan periodically to:

- Reflect approved revisions to public participation procedures
- Address changes in communication practices or responsible City functions
- Incorporate lessons learned from implementation and resident feedback
- Maintain consistency with applicable Consent Decree requirements

Updated versions of this PPP shall be posted publicly in accordance with the Consent Decree.

14. Consent Decree Compliance Summary

This PPP is intended to address the public participation requirements set forth in Section VI.B of the Consent Decree as follows:

- Paragraph 15(a): This Plan establishes how the City will make information pertaining to Work conducted pursuant to Section VI available for public review, including website posting of required materials.
- Paragraph 15(b): This Plan establishes how the City will conduct public meetings regarding stormwater and sewer infrastructure improvements at least twice per year.
- Paragraph 15(c): This Plan establishes how the City will comply with Paragraph 17 notice obligations.
- Paragraph 16: This Plan addresses publication of the annual public meeting schedule, flyer distribution to each occupied residential address in the City, email distribution where available, posting in public places, and notice requirements for rescheduled or additional meetings.
- Paragraph 17: This Plan addresses notices regarding sewer emergencies, planned sewer repairs, and stormwater and sewer infrastructure improvements, including required notice methods, minimum recipients, content, and timing for planned repairs or improvements.

Appendix A – Public Meeting Agenda Template

1. Welcome and Introductions
2. Consent Decree Overview
3. Project Updates and Milestones
4. Construction Schedule and Impacts
5. Funding and Financial Overview
6. Community Benefits
7. Public Questions and Comments
8. Next Steps

Appendix B – Communication Channels and Notice Methods

Communication Method	Frequency	Audience
Website Updates	Monthly/ As Needed	General Public
Email Newsletter	Quarterly	Subscribers
Social Media Posts	As Needed	General Public
Public Meetings	Biannually/ Milestone-Based	Community Stakeholders
Construction Notices	As Needed	Affected Areas
Annual Report	Annual	Public and Regulators

Appendix C – Accessibility and Outreach Commitments

- Coordinate with community-based organizations.
- Utilize multiple communication methods beyond digital outreach.
- Conduct outreach within impacted neighborhoods.
- Ensure meeting accessibility for individuals with disabilities.
- Incorporate feedback from the community into project planning.