City of East St. Louis, Illinois

PUBLIC ENGAGEMENT PLAN
Long Term Control Plan Implementation

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1   Introduction

The City of East St. Louis (City), located in St. Clair County, Illinois, operates a system of storm and sanitary sewers, which serve approximately 18,000 people over approximately 11.5 square miles. This system includes areas of combined sewers, which convey storm water and sanitary wastewater. In addition to the sewer conveyance systems, the City has three combined sewer overflows. At times when the sewer capacity is exceeded, the excess flow, or combined sewer overflow (CSO), is discharged directly to a waterbody through an outfall pipe.

The City's three CSO Outfalls (001-003) are subject to the National Pollutant Discharge Elimination System (NPDES) program and are permitted through the Illinois Environmental Protection Agency (IEPA) under Permit No. IL0033472 (permit), which was most recently re-issued in September 2019[1]. The City entered into an Administrative Order on Consent (AOC) with the U.S. Environmental Protection Agency (USEPA) in May 2022 to address items required under the permit. One of the items required under the permit is the CSO Long Term Control Plan (LTCP), which was issued in December 2023.

Under the LTCP, Phase 1 (January 1, 2024 - December 31, 2027), the City will develop and begin to implement a public participation program. The City will develop a plan and schedule for providing information on any projects to take place during the implementation of the LTCP and a method to engage with the public. Any concerns by the citizens of the City and the City's response will be documented and retained. The LTCP indicates that implementation of the program includes a first public meeting by March 31, 2024, and quarterly public meetings forward from that date.

This Public Engagement Plan documents the City's public participation program outlined in the LTCP. In addition, this Public Engagement Plan integrates recurring and periodic actions required under the permit and AOC for the City's existing CSO Pollution Prevention Plan and CSO Public Notification Program.

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[1] Pending renewal by IEPA.

2   Engagement Goals

The City is committed to a transparent and inclusive public engagement process as part of its LTCP. The City's public engagement goals are summarized below.

- **Inform:** Provide clear and accessible information about CSO issues and LTCP initiatives.

- **Engage:** Create interactive opportunities for local residents, businesses, and other stakeholders to voice their concerns and insights.

- **Collaborate:** Partner with local organizations, agencies, and community leaders to strengthen outreach.

- **Respond:** Implement structured feedback loops to acknowledge and address public input.

- **Monitor and Adapt:** Assess engagement efforts and adjust strategies for continuous improvement.

3   Public Participation Objectives

In developing this engagement strategy, the City seeks to learn from the public in two key areas, while also taking the opportunity to educate residents about the City's responsibilities, goals, and regulatory commitments related to CSOs:

- **Public Improvements**: Understanding community concerns regarding potential infrastructure upgrades. Public engagement will explore how these enhancements impact daily life, why they are necessary to reduce CSO events, and where they are being prioritized. These discussions will serve to clarify the underlying regulatory drivers and public health protections tied to the City's long-term compliance with state and federal requirements.

- **Community Aspirations**: City officials will work to align community feedback with broader community goals—such as improving health and safety, expanding economic opportunity, and promoting sustainability. Discussions will help residents understand how CSO controls contribute to a cleaner, safer environment, while also offering space for new ideas and aspirations not previously identified.

The City will document and publicly share responses to community feedback in a transparent manner, reinforcing the commitment to accountability and public education.

4   Engagement Methodology

The City will use an interactive approach to enable broad participation:

- **Structured Discussions**: The City will hold quarterly public meetings through December 31, 2027 (during Phase 1 of the LTCP), to address permit and AOC requirements. These meetings will provide LTCP progress updates, specifically discuss CSO issues, and invite community feedback.

- **Facilitated Discussions**: Sessions will be guided by City staff to solicit general feedback, document resident input effectively, and address annual requirements for the CSO Pollution Prevention Plan (Permit SC-8.C.1) and the CSO Public Notification Program (Permit SC-8.G.2).

- **Comment Documentation and Transparency**: The City maintains a formal feedback repository on its website (www.cesl.us), accessible via a "CSO Public Comment" button at the bottom of the homepage. Comments submitted online are reviewed and logged, with the City's official response posted publicly to demonstrate how input informs LTCP decisions. For comments submitted outside the website (e.g., via email, written correspondence, or verbal comment during meetings), City staff will manually log the feedback into the same digital repository for completeness and transparency. The following image describes the steps included in CSO comment documentation and response.

HOW TO SUBMIT A CSO CONCERN OR COMMENT

Step 1: Choose Your Format

- Submit comments online via the City's feedback portal
- Send an email or letter to City Hall
- Attend a public meeting and share comments in person

Step 2: Submission

Submit your concern through your preferred method

Step 3: City Review and Response

City staff review all comments for accuracy and relevance

Step 4: Formal Response and Posting

The City posts formal responses within 60 days on the project weboage

Need Help? Visit the City's website or City Hall for assistance

5   Key Engagement Strategies

5.1   Public Awareness and Education:

- Develop accessible educational materials, including infographics, fact sheets, and digital content.

- Use multiple communication platforms such as the City's website and Facebook page, an informational flyer at the entrance of City Hall, and an agenda item on regularly scheduled City Council meetings.

- Identify and perform outreach to community groups that may be affected by the LTCP to increase awareness about CSO issues and mitigation efforts.

- Update the existing AOC fact sheet to reflect any changes or to announce that an item has been completed, post the fact sheet on the City's website and Facebook page, and provide a direct link to the AOC on the City's website.

- Coordinate with St. Clair County agencies and relevant water and sewer authorities to promote alignment on shared infrastructure issues and public messaging. The City will identify key coordination contacts and build on existing community engagement efforts already conducted by St. Clair County and its partners, avoiding duplication and reinforcing consistent outreach.

5.2   Community Engagement Activities:

- Conduct quarterly public meetings (through December 31, 2027) to provide updates and solicit feedback. Meetings may be hosted online.

- Perform at least annual (or more frequent) presentations providing a summary and status of the CSO control program, including the CSO Pollution Prevention Plan and CSO Public Notification Program. The annual meeting may be conducted during one of the quarterly meetings.

    o Within 60 days of the annual meeting, submit the following documentation to IEPA:

        ▪ That the public meeting was held.

        ▪ A summary of all significant issues raised by the public and the City's response to each issue.

        ▪ Identify any modifications to the CSO Public Notification Program as a result of the public information meeting.

    o If revisions are made to the CSO Pollution Prevention Plan, submit the revisions to IEPA within one month from the revision date.

- Leverage existing relationships with community-based organizations in East St. Louis—including the Red Cross, Salvation Army, and Urban League—to expand awareness and engagement. These organizations can serve as trusted messengers and logistical partners in addressing resident concerns. City staff can collaborate with these groups to disseminate educational materials, co-host events, or assist with response coordination when sewer overflow or storm-related impacts occur. By activating these partnerships, the City can enhance the reach and resilience of its CSO-related outreach efforts.

5.3   Public Comment and Feedback Mechanisms:

- Maintain the existing online feedback portal on the City's website allowing the public to submit comments and concerns.

- Provide multiple submission formats, including email, written correspondence, and in-person engagement. Post the available submission formats on the City's website, Facebook, and informational flyer at City Hall.

- The City will maintain a publicly accessible repository of comments and formal City responses, posted on the City's dedicated project webpage within 60 days of each meeting.

5.4   Transparency and Information Sharing:

- Maintain a dedicated project webpage with up-to-date information, frequently asked questions (FAQs), and engagement summaries.

- For the existing signs at each CSO outfall, perform signage audits every six months to confirm they remain clearly visible, accurate, and not vandalized. Damaged or missing signs will be repaired or replaced within two weeks of detection.

- Use the City's website and Facebook to keep the public informed about upcoming meetings and project milestones.

5.5   Automated Notification System

The City currently uses Code Red for time-sensitive notifications for those who sign up for the service on the City's website. The City may transition to an alternative platform in the future. Regardless of platform, these alerts notify the public of CSO event(s), in alignment with the AOC requirements.

6   Evaluation and Continuous Improvement:

The City will incorporate the following components into its public participation program:

- Utilize tools such as attendance tracking (via sign-in sheets) and feedback analysis to evaluate the effectiveness of engagement activities.

- Modify engagement strategies as needed based on public input and participation trends.

- Upon request, publish engagement summary reports on the City's website to communicate key outcomes.

7   Implementation Timeline

The following table outlines the status and proposed schedule for public engagement efforts.

Task Description		Status	Proposed Schedule
1	Automated notification system	Ongoing	Per event
2	Public feedback repository	Ongoing	June 2025[2]
3	Quarterly public meetings	Ongoing	Quarterly
3a	Post public comments and formal City responses on City project webpage	Ongoing	Within 60 days of each meeting
4	Annual public meetings	Ongoing (previous date 1/21/2025)	Annually, coincides with a quarterly public meeting
4a	Submit annual meeting documentation to IEPA	Ongoing	Within 60 days of each annual meeting
5	Update AOC fact sheet	Ongoing	Upon status change
6	Signage audits	TBD	April, October
6a	Repair or replace signage	TBD	Within 2 weeks of damage detection
7	Submit revised CSO Pollution Prevention Plan to IEPA	If needed	Within 1 month from revision date

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[2] Target date for accessibility revisions