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### One Year Later and Still Waiting for Change

Last month, Cahokia Heights celebrated its first anniversary as a newly merged city, combining the former Metro East communities of Centreville, Alorton and Cahokia, located across the Mississippi River from St. Louis. Proponents of the merger claimed residents would see improvements in the [flooding and sanitary sewer crises](#) plaguing these communities, but many have been left waiting for real change, including those [facing the most extreme impacts](#). Residents continue to bear the unacceptable burden of raw sewage and flood water inundating their lawns and streets and even their homes, with little to no improvements for many despite increasing attention and commitments from government and [wide reporting on these decades-long problems](#) for well over two years. Creative and aggressive community-led solutions are needed to address these water crises, but it's difficult to see how these solutions will come about if the same local officials in charge of these failing systems remain at the center.

#### Historical failures

Over the span of several decades, the municipalities and utilities that predated Cahokia Heights did not take the steps necessary to adequately operate, maintain and repair the sanitary sewer, stormwater, and drinking water systems under their control. Despite clearly deteriorating systems, they failed to hire staff qualified to identify the root causes of these problems and design adequate fixes. The utilities also failed to leverage the hundreds of thousands of dollars from paying customers to permanently fix the broken systems.

As a result of these decisions, the deterioration intensified, leading to the crises residents continue to bear the brunt of today. Moreover, the problems continue even as Cahokia Heights (which absorbed Commonfields) now pays its water utility staff [about three to four times](#) what an average local resident sees – with many of those staff the *same people* who ran the systems in the past.

Notably, until the last few years, no level of government, from local to federal, meaningfully stepped up to help these communities.

## Community engagement continues to fall short

After years of relentless advocacy by residents in Centreville and other surrounding communities, significant state and federal funding is now available—in theory. Agencies have also finally begun to enforce environmental laws through several [administrative orders](#) that require Cahokia Heights, Illinois American Water, and nearby East St Louis to take a number of steps to identify and address the water crises.

While the increased federal and state attention after such a long absence is notable, we have serious concerns that all levels of government continue to take an approach that does not adequately center the residents who have successfully garnered this attention in the first place. Without meaningful community engagement and collaboration, even well-intentioned solutions run the risk of repeating the mistakes of the past.

The U.S. Environmental Protection Agency's (U.S. EPA) own [Equity Action Plan](#)—issued last month in response to President Biden's [Executive Order 13985](#) requiring federal agencies to advance equity, civil rights, racial justice and equal opportunity—calls on the U.S. EPA to prioritize community-led projects and “provide robust support to help communities overcome [barriers to engagement] and ensure their ability to meaningfully engage the EPA and other government agencies, participate in decision-making processes, and benefit from federal funding opportunities and investments.” The Illinois Environmental Protection Agency (Illinois EPA) [also recognizes](#) the need to ensure “equity in the administration of the State’s environmental programs, and the provision of adequate opportunities for meaningful involvement of all people with respect to the development, implementation and enforcement of environmental laws, regulations, and policies.”

Unfortunately, the approach taken by both agencies does not meet their own standards and fails to provide community members with opportunities to ask questions or engage directly with enforcement or decision-making processes.

Illinois EPA began engaging the community in 2020 in response to residents’ organizing and demands for help, but their resident engagement did not mirror the frequency or depth of their consultations with local elected officials and utilities. On several occasions, Illinois EPA representatives arrived unprepared to meetings led by the [Centreville Citizens for Change](#) (CCC). One example happened in late summer 2021, when Illinois EPA representatives could not provide basic information about the U.S. EPA’s drinking water order, despite the agency’s state and federal obligations to ensuring safe drinking water in the state.

Rather than deepen their engagement with local residents, in February 2022 the Illinois EPA informed the CCC that they would no longer attend the organization’s resident-led meetings and asserted that they would be able to provide better and more frequent responses over email instead. Not only do email updates effectively eliminate residents’ ability ask questions in real time, but they serve to undermine any meaningful involvement by this community, where many residents do not use email to communicate due to age and lack of access to the internet and/or

email, among other factors. Such limited “communication” with these residents is far from meaningful engagement, especially given that the problems persist virtually unabated.

U.S. EPA’s engagement has similarly failed to center impacted residents. While the U.S. EPA has been formally investigating these issues since at least January 2021, they only met in-person with residents for the first time last month, despite holding regular meetings with local municipalities and utilities for over a year. This limited engagement with residents, who are experts in their own water systems, resulted in key gaps in the U.S. EPA’s enforcement. For instance, the sanitary sewer overflow order gives Cahokia Heights the discretion to continue to use the same engineering firm that has repeatedly failed to fix the decades-long sewage overflows. Similarly, the drinking water order failed to require monitoring in the Piat Place neighborhood, despite the neighborhood’s repeated water main breaks and related water problems over the past several years. U.S. EPA finally acknowledged the gap in the drinking water order in April 2022 and ordered Illinois American Water to conduct monitoring in Piat Place.

### **Lack of qualified and trained utility staff**

The emphasis on hearing from local elected officials and utility representatives is particularly concerning in light of evidence that the City is not currently prepared to take on the challenge of fixing its water systems. The predecessor municipalities and utilities systematically lacked qualified and trained water department staff, despite knowing that portions of the water infrastructure have reached the end of their useful life, that many of the lift stations serving the area needed to be updated to meet industry standards, and of state findings that local stormwater ditches were in poor condition. Several of these staff have been hired again by Cahokia Heights.

Some staff responsible for the sewage and stormwater systems lacked relevant experience when hired and were not provided the appropriate training or technical assistance to do their jobs. For example, the former Public Works Supervisor for the City of Centreville from May 2019 through May 6, 2021 was hired without any prior experience operating or maintaining a sanitary sewer system; nor was he told by then Mayor Marius Jackson that maintaining and operating the City’s sewer system would be an integral part of his duties. Equally concerning, during the summer of 2019, a few months into his new job at the City, that supervisor was in the Ping Pong area of North Centreville when he ran into an Illinois EPA official in the field. According to the Centreville supervisor, the Illinois EPA official was noting work that should have been completed by the city. This was the first time the supervisor was aware of the City’s responsibilities to keep major drainage ditches clear to prevent flooding, despite Mayor Jackson’s awareness of contractual obligations dating back to the 1990’s and [inspections by the Illinois Department Natural of Resources](#) grading the conditions of the ditches in the area as “Poor.”

While this may seem like one significant example of a lapse in training in a previous administration, this lack of experience over systems that affect the lives of thousands of

residents in Cahokia Heights continues. For example, the Cahokia Heights administration continues to allow this same level of inexperience and devastation. The same Public Works Supervisor not only moved over to Cahokia Heights, but is now head of the Demolition program, which will be installing new water infrastructure without input or guidance from engineers or hydrologists. When asked if he had experience doing so, the supervisor noted he did from family projects. When asked how he planned to install culverts and pipes (a significant number for which money was already allocated), his plan simply included riding around the city and installing culverts where he thought they were needed. There was no mention of including engineers or surveyors in the process, using inspection reports to guide the installation, or developing a prioritization list.

The City of Cahokia Heights claimed that the merger would put the City in a better position to tackle these important issues. However, these examples demonstrate that the City is not addressing the major lack of technical experience of its staff to maintain and operate the system. While they are bringing on some new staff, it is not clear what experience these individuals will have or whether they will be more qualified than the existing staff. What we do know is that as recently as May 2022, City staff were seen [releasing raw sewage into stormwater ditches](#) as they bypassed broken lift stations with a hose with holes in it.

The City's apparent failures to comply with federal orders also calls into question their ability to take on these issues. The City has blown through deadlines, prepared plans that contain a serious lack of specificity, and has fallen short of implementing system improvements that prevent wet- and dry-weather sanitary sewage overflows (SSOs). In fact, the U.S. EPA's own [March 2022 inspection report](#) noted that sewage had been continuously discharging on North 82nd for nearly a month, and [sewage was also flowing](#) there during another U.S. EPA inspection on May 5, 2022.

### **A new way forward is urgently needed**

Centreville residents understand the broken water systems in ways no outside representative, investigator, scientist, or lawyer can. In recognition of that lived experience and knowledge, government at all levels must consult with impacted residents to develop and vet all plans for fixing the sewage, flooding, and drinking water problems.

Cahokia Heights, the Illinois EPA, and the U.S. EPA, along with all other local, state, and federal agencies, must start by being more transparent about the steps being taken to fix these problems and address the residents' living conditions. Residents, as well as the public, should not be in the dark about actions being taken, what actions or areas are being prioritized, how funding will be spent, or timelines for improvements.

None of the progress that has been made to date would have happened without the residents' advocacy. They've fought for these improvements and are entitled to be at the heart of the solutions.