



June 26, 2026

Cameron Berthiaume
Minnesota Pollution Control Agency
7678 College Rd, Ste 105
Baxter, MN 56425

via online submittal

Subject: Public Comment on Draft Permit MN0050636 – Section 6.15.2

Dear MPCA Permitting Staff,

The City appreciates the opportunity to comment on the draft permit for the Cimarron Park Wastewater Treatment Plant (Permit MN0050636).

Section 6.15.2 – Emergency Response Plan Requirements: Section 6.15.2, as currently written, does not provide sufficient detail or enforceable requirements to adequately address flood risk and emergency response planning for this facility and the Cimarron Park community. The current requirements focus narrowly on rapid infiltration basin (RIB) saturation response and do not provide a comprehensive or proactive framework for flood preparedness.

To adequately protect water resources and public safety, the permit should be strengthened to require:

- A comprehensive flood response plan addressing flood risks to the entire facility, with defined trigger elevations, operational thresholds, and specific response actions for varying flood stages.
- Proactive implementation requirements, including use of forecast conditions and defined decision-making protocols.
- Development of monitoring and forecasting system in coordination with the Valley Branch Watershed District (VBWD).
- Identification of responsible roles and responsibilities for proactive response and mitigation.
- Coordination and approval of the emergency response plan by Washington County Emergency Management.

Enhancing Section 6.15.2 with these elements will provide a more robust and enforceable framework for managing flood risks to the facility and potential displacement of the Cimarron Park residents.

Thank you for your consideration. Please feel free to contact me at 651.747.3905, or at NMiller@lakeelmo.gov, with any questions you may have regarding Lake Elmo's comments.

Sincerely,

Nicole Miller
City Administrator

cc: Dustin Kalis, Fire Chief
Jason Stopa, Community Development Director
Pete Tholen, Public Works Director
Nathan Stanley, PE, City Engineer