

City of St. Francis, MN
23340 Cree St NW
St. Francis, MN 55070

February 8, 2019

Attn: Jason Spiegel, North Metro Area Hydrologist
Minnesota Department of Natural Resources
1200 Warner Rd
St. Paul, MN 55106

To Whom It May Concern,

The City of St. Francis is requesting variances that will continue in perpetuity from several state rules pertaining to the Rum River Scenic District. The City is requesting variances from the following rules:

1. *6105.0110 Zoning Dimensions*

a. *Subpart 2B*

This section requires that lots within a scenic river district be at least four acres in area and measure at least 250 feet in width at both the building line and the water line (for lots abutting the river).

b. *Subpart 3B(1)*

This section requires a setback of 150 feet from the normal high water mark for all structures, essential services, and streets located in a scenic river district.

2. *6105.0100 Subpart 3: Permitted and Conditional Uses*

This section lists essential services and single-family residential, forestry, agricultural, and public recreational uses as permitted uses within the scenic river land use district.

The proposed variances requested pertain only to land in T34N – R24W:

Section 28:	N1/2 of NE1/4 of NW1/4	20.00 acres
	NW1/4 of NW1/4	40.00 acres
Section 29:	S1/2 of NE1/4	80.00 acres
	NE ¼ of NE1/4	40.00 acres
	NW1/4 of NE1/4 SE of Riverbank Lane only	17.00 acres
	S1/2 of NW1/4	80.00 acres
	S1/2 of N1/2 of NW1/4	40.00 acres
	S1/2 east of the river	about 177.00 acres
Total acreage:		494.00 acres

This land is shown on Map 1 Wild and Scenic Boundaries with the blue crosshatching. The City of St. Francis is requesting that, in the areas specified above, the Minnesota Department of Natural Resources:

- Allow riparian lots with minimum areas of 20,000 square feet.

- For non-riparian lots, allow the minimum required lot area to be determined by the densities shown on the 2040 draft Future Land Use Map (attached as Map 2).
- Allow minimum lot widths as measured from the building line and the ordinary high water line of 70 feet.
- Allow a setback of 75 feet from the ordinary high water line for riparian lots.
- Allow attached housing products as permitted uses.
- Allow development to be processed through the Planned Unit Development (PUD) approach.

Additional information explaining these requests in greater detail is provided later in the application.

Justification of Request

It is the City's understanding that the intent of the state's wild and scenic designation is to protect rivers with outstanding scenic, recreational, and natural qualities by reducing overcrowding and poorly planned development, preventing pollution, providing ample space on lots for sanitary facilities, and preserving the natural beauty of the area while maintaining property values. The Rum River was added to the state's Wild and Scenic Rivers Program in 1978. The portion of the river flowing through St. Francis is designated as "scenic."

When the Rum River Management Plan was created 40 years ago, certain areas of the City of St. Francis were designated as "urban" because they had already been "considerably developed, have or soon will have public sewer and water available" and were exempted from certain land use restrictions created by the plan. This means that the separation of land between urban and rural was dependent upon the sewer availability at the time the Rum River Management Plan was created and the state of development of the land. If the Rum River Management Plan were to be created today, the lands in northern St. Francis that are currently classified as "rural" would most likely be included as "urban" lands due to the availability of city services and the growth plan for the area.

Following the creation of the Rum River Management Plan, the City established two zoning overlay districts to manage all the land included in the Rum River Management Plan within city boundaries; an "urban" Rum River Management overlay district and a "rural" Rum River Management overlay district. Each district was designed to protect the scenic qualities of the Rum River while providing lot standards and requirements that guided urban and rural development, respectively.

"Application of the rule to the petitioner would result in hardship or injustice"

Population Growth

The City of St. Francis is growing and urbanizing. Lands that were once rural in nature are beginning to experience development pressure. Over the last several decades, the City has extended its urban service area, and the sewer and water lines are now planned to extend throughout the entire "rural" area by 2030. This means that any new development in this area

would occur on public sewer and water, not on well and septic. The City is applying for variances from the statewide standards in order to develop at urban-appropriate densities in a logical growth pattern that still protects the scenic qualities of the river. Without these variances, the projected growth for the City is more likely to leapfrog the “rural” scenic river district area entirely and instead occur outside the City’s urban service area, including in the townships to the north. This would increase development pressure on areas less suited for urban development due to their lack of urban infrastructure and could result in an inefficient growth pattern for the City and the region.

As shown in Table 1, the City of St. Francis is projected to grow from a population of 7, 218 in 2010 to 12,600 in 2040 – a 75% change. The number of households is expected to increase from 2,520 in 2010 to 5,100 in 2040 – a 102% change.

Table 1. Population and Household Projections. Source: Metropolitan Council

	2010	2020	2030	2040	Total Change	% Change
Population	7,218	8,200	10,400	12,600	5,382	75%
Households	2,520	3,100	4,100	5,100	2,580	102%

The City needs to accommodate this growth in a logical, efficient, and financially effective manner. The City has planned for a majority of this growth to occur within the north central section of St. Francis along the Rum River which contains nearly 500 acres of land located in the “rural” overlay district. The land within the “rural” overlay district makes up roughly 14% of the total land located within the City’s urban service area. This percentage increases to 27% when examining only lands available for development within the urban service area. The City’s growth has been planned for this area mainly due to the shape of the City itself and the abundance of wetlands located throughout St. Francis.

Map 3 shows the two significant wetland complexes (denoted by red lines) located on either side of the central portion of the City, much of which has already been developed. These wetlands, combined with St. Francis’s unique rectangular shape, create a barrier for higher density development to occur further to the east or west. Developed lots outside of this central area are large and are generally served by individual well and septic systems. It would not be economically feasible to extend City sewer and water beyond these wetlands. Therefore, there are only two potential growth points remaining in the City with the ability to develop at higher densities on City utilities, and both are located in central St. Francis in the Rum River Management district. These areas are the only opportunities for St. Francis to logically accommodate the City’s growing population over the next two decades.

The 2030 Comprehensive Plan shows in Map 4 that by 2008, the urban service area had already been extended all the way to the City’s northern border on the western side of the river, which includes land located in the “rural” district. In the proposed 2040 Comprehensive Plan, the phased growth areas in Map 5 show that the entire “rural” district area is planned to be included in the urban service area by 2030. This means that any new growth occurring in the rural area will be able to hook up to City services and will not have to rely on individual well and septic systems.

Density

Map 6 shows the community designation map created by the Metropolitan Council for St. Francis. The “rural” areas in the City are located in the area that the Metropolitan Council has designated as “rural center.” Rural Centers are local commercial, employment, and residential activity centers serving rural areas in the region. These areas should strive for higher-density commercial uses and compatible higher-density residential land uses to ensure efficient uses of existing infrastructure investments. The Metropolitan Council designates that overall average density in this area should be at least 3 units per net acre between 2020 and 2040. Land use and housing policies established by the Metropolitan Council for Rural Center areas are listed below. Currently, the City is unable to meet this level of density due to the lot size requirements established by the Minnesota wild and scenic rivers program.

Rural Center Land Use and Housing Policies:

- *Plan for forecasted population and household growth at overall average densities of at least 3-5 units per acre.*
- *Strive for higher-density commercial uses and compatible higher-density residential land uses in the commercial core of the community to ensure efficient uses of existing infrastructure investments.*
- *Work with adjacent jurisdictions to execute orderly annexation agreements where forecasted growth exceeds land capacity within existing city boundaries.*
- *Work to focus forecasted growth in areas with existing infrastructure capacity to protect existing farm land and prime agricultural soils for the long term.*
- *Adopt ordinances that coordinate development with infrastructure availability.*
- *Identify areas that will accommodate post-2040 growth forecasts and implement strategies to preserve these areas for future growth. Plan for necessary infrastructure improvements.*
- *Designate land in the comprehensive plan to support household growth forecasts and address the community’s share of the region’s affordable housing need through development and redevelopment at a range of densities.*
- *Use state, regional, and federal sources of funding and/or financing and development tools allowed by state law to facilitate the development of new lifecycle and affordable housing.*
- *Plan for future staged growth through 2040 and beyond to accommodate a variety of housing choices based on local needs.*

The north central area of St. Francis, particularly on the east side of the River, is suitable for higher density development due to its location nearer to the downtown and high school. This type of development is likely to increase walkability to destinations, decrease residents’ need to drive, decrease travel time, and decrease the amount of roadway infrastructure overall. However, this is the area where the most “rural” land is located, preventing development at higher densities. If the land were to remain subject to “rural” requirements, the City’s roadway infrastructure will become much more inefficient due to the necessity of providing access to fewer houses located farther apart.

Map 7 shows the areas of the “rural” district and their corresponding densities that are planned in the proposed 2040 Comprehensive Plan. The proposed densities in the “rural” area range from 2-3 units per acre to 7-12 units per acre and would be achievable with the requested variances.

The table below shows the development potential of the “rural” district both with and without the requested variances. The requested variance(s) would increase the City’s ability to accommodate its projected population and household growth by allowing development at higher densities on this land.

Table 2. Development Potential. Source: HKGi.

Map Area ¹	Total Acres	Buildable Acres	# “Rural” Units Allowed (1 unit per 2.5 acres) ²	% 2040 Forecasted Growth Accommodated ³	2040 Planned Density (units)	# Units – Low Potential	# Units – High Potential	% 2040 Forecasted Growth Accommodated ³
A		18.3	7	0.3%	2-3	36	54	1.4% to 2.1%
B		171.8	68	2.6%	3-7	515	1,202	20.0% to 46.6%
C		25.1	10	0.4%	7-12	175	301	6.8% to 11.7%
D		46.8	18	0.7%	2-3	93	140	3.6% to 5.4%
E		49.7	19	0.7%	3-7	149	347	5.8% to 13.4%
Total	494	311.7	122	4.7%		968	2,044	37.5% to 79.2%

¹ corresponds to Map Areas on Map 7.

² based on an estimate of 1 unit per 2.5 acres.

³ calculated using the forecasted household change (shown in Table 1).

The City is already experiencing development pressure at densities higher than currently allowed in this area as City utilities are extended and developers realize the potential that these lands hold. However, these developers are unable to develop at the densities needed to make financial sense for the projects due to the restrictions on the “rural” district. These difficulties could result in development “leapfrogging” around the “rural” area, creating a less efficient development pattern in order to accommodate growth.

Wastewater Treatment Facility

Following the City’s growth plans and population estimates, the City of St. Francis invested in a new Wastewater Treatment Facility in 2015. The City completed a 2014 Wastewater Treatment Facility Plan which determined that the existing facility was going to be undersized by 2035 for the proposed design flows and landings. The Facility Plan discovered that the most efficient route for the City would be to construct a new facility that would be able to meet MPCA’s stricter standards as well as the increase in wastewater generated from the City’s population, household, and business growth.

The new wastewater treatment facility was created in the public interest to meet the higher standards set by the MPCA, to protect the environment and the natural quality of the water bodies in St. Francis and beyond, to provide enough capacity to eliminate the use of individual septic systems in new development in central St. Francis, and to provide capacity for residents

utilizing individual systems to hook up to City services in the event that their private systems failed.

The new facility’s size was based on population estimates by the state demographer and assumptions that growth would occur in northern St. Francis (Table 3). The Facility Plan estimated that the wastewater treatment facility would need to have the capacity to serve a population of 8,624 by 2035, a combination of population growth within the City and the desire of surrounding communities and cities, possibly including Oak Grove, Nowthen, and Bethel, to connect to St. Francis’s system. This is an increase of roughly 3,000 people. This projected population growth supported the feasibility of investment into a new plan that would meet MPCA standards.

Table 3. Service Population Projections. Source: St. Francis 2014 Wastewater Facility Plan.

Service Population Projections City of St. Francis, Minnesota		
Year	City of St. Francis	Anoka County
2010 (Census)	4,240	330,844
2012	4,480	336,414
2013	4,928	346,880
2020	6,104	373,074
2030	7,784	405,645
2035	8,624	418,840
Source: Minnesota Office of Geographic and Demographic Analysis/State Demographic Center and City Staff		

Because the facility was built to serve a population larger than the current population in preparation for the City’s forecasted growth, St. Francis residents are currently subject to an abnormally-high tax burden than what is typical for similar communities. The City’s population growth is expected and needed to reduce the tax burden to a reasonable rate. Under the current “rural” standards, wastewater costs will not only remain high for community members, but will increase at an abnormal rate.

Table 4. Comparison of Sewer Fees by City.

	Average household monthly bill (assuming 4,000 gallons/month)
St. Francis	\$53.46
Oak Grove (The Ponds area)	\$39.50
East Bethel	\$30.50
Hastings	\$34.52
Ramsey	\$24.08
Forest Lake	\$3.89 - \$32.14 (min. and max.)
Greenfield	\$48.21
Farmington	\$36.00

Table 4 shows that the current sewer fee for St. Francis residents is higher than the sewer fees charged in similar communities located on the outer edge of the metropolitan area. On average, the St. Francis sewer fee is about \$20 more per month than the fees charged by the other communities listed. These charges will remain high unless the City experiences enough development in the “rural” district to bring these costs down.

Large Parcels

The Rum River Management Plan identified nearly 500 acres of land in north central St. Francis as “rural.” As has already been discussed, restricting the development density potential for this large of an amount of land has a direct impact on the City’s ability to meet its growth needs. The lands that were included in the Rum River Management Plan 40 years ago were designated by parcel, instead of by establishing a buffer distance around the river based on the natural features and area topography. Most of the land surrounding the Rum River in northern St. Francis at the time was used for agricultural uses, meaning that the parcels of land were generally large. By designating entire parcels to be included in the “rural” district, the Rum River Management Plan ended up restricting development on lands that did not always directly impact the river.

As shown on Map 8, there are portions of land in St. Francis located 2,300 feet, or almost ½ mile, from the river that are classified as rural due to large parcel sizes. Other areas located as close as 320 feet from the river are not regulated by the scenic district at all. For example, the area highlighted by the red square on Map 8 is located roughly 400 feet from the river and is zoned as part of the City’s B-1 Central Business zoning district, meaning that smaller lots, 45-foot tall structures, and commercial and office uses are all permitted. Meanwhile, some lands located more than 2,000 feet from the river are subject to the scenic district regulations, significantly hindering their development potential.

The City of Ramsey, located along the Rum River, provides another example of how the determination of the scenic district by parcel has impacted the city’s development. Map 9 shows that for the most part, the lands along the Rum River located in the scenic district in the City of Ramsey are fairly small, following parcel lines. Because most of the existing lots along the river when the scenic district was developed were smaller and residential in nature in Ramsey, instead of the large agricultural lots in St. Francis, the boundary of the scenic district was located fairly close to the Rum River. In some areas, the scenic district boundary extends only 170 feet from the river. In areas where there are larger lots along the river in Ramsey, more land is located in the scenic district. The smaller lots along the river in Ramsey still allow for the protection of the scenic qualities of the river while the development potential of lands further away from the river remains unhindered by the scenic district. Because so much of the land within the scenic district in St. Francis is currently large agricultural lots, a significant portion of this land is actually located quite far from the river. There is a significant hardship to the City of St. Francis by restricting development densities so far from the river. Development on land located that far from the river would not disturb the scenic nature of the river.

“Variance from the rule would be consistent with the public interest”

With these variances, the City is hoping to provide the opportunity for quality, higher-density development while continuing to maintain the river’s scenic quality. This type of development will increase the tax base, decrease wastewater treatment facility costs for residents, and accommodate the City’s forecasted population growth in a logical and efficient growth pattern that will discourage piecemeal or leapfrog development and decrease the potential for rural large lot sprawl. However, this development should not come at the cost of the Rum River.

The river is an important resource for the City with its environmental and economic qualities and amenities, including opportunities for residents to enjoy the City’s natural resources. Much of the land along the river is currently used for agricultural uses. The development of this area for primarily residential uses served by City utilities would decrease the amount of potential negative environmental effects that may occur as a result of the current agricultural use(s) of the land and would help to positively impact the goals of the wild and scenic program. With new developments, design standards can be implemented to protect and preserve the natural features important to maintaining the scenic qualities of the river. These design standards could be uniquely applied to each case through the PUD approach.

The City hopes the DNR will agree that the variances requested, along with the proposed conditions attached to the variances, protect the welfare of residents, business owners, and the City as a whole, as well as protect the water quality and the scenic nature of the Rum River.

“Variance from the rule would not prejudice the substantial legal or economic rights of any person or entity”

The City is requesting these variances for all the land listed in the Rum River Management Plan within City limits not designated “urban.” These variances would enhance the development potential of all parcels located in the “rural” district which would benefit all property owners along the river without raising one above the other.

With the proposed variances, the City is suggesting that attention be given to river preservation based on the landscape and natural features along the river instead of on property boundaries. Requiring river preservation elements based on the presence of natural features along the river (bluffs, tree cover) will help to create a uniform natural state along the river that would not prejudice the legal or economic rights of any person or entity.

Variance Request Explanations

Lot Area – the City is requesting that the required minimum lot area for riparian lots in the “rural” area of the scenic river district be 20,000 square feet, which meets the current minimum lot area for riparian lots in the “urban” area of the scenic river district. The City is requesting that the minimum area for non-riparian lots be determined by the densities shown on the 2040 draft Future Land Use Map. Utilizing more flexible net density requirements to determine minimum lot areas will allow the City the opportunity to cluster development utilizing the PUD approach

in a way that creates more compact development patterns that preserve greater amounts of open space.

Lots developed in this area will utilize public utilities, so there is no need for the lots to be large enough to provide ample space to site a septic system. The analysis above demonstrates that a significant amount of development potential, which is needed to accommodate the City's growing population, is lost by adhering to the "rural" lot size requirements. In addition, the large lot sizes currently required in the "rural" district prevent the City from growing in a logical pattern and may encourage development to leapfrog. More flexibility among lot sizes will enable the City to preserve larger areas of open space near the river while still supporting developments that are cost-efficient for developers.

Lot Width – the City is requesting that the minimum lot width for lots in the "rural" district be reduced from 250 feet at the building and water lines to 70 feet. This request is related to the area variance above and is intended to create usable lots with practical proportions. Smaller lot widths enable more flexibility in subdivision design which can provide for the preservation of larger areas of open space or scenic views. Lot widths of 70 feet are consistent with a logical and economic urban development pattern with sewer and water infrastructure.

OHW Setback – the City is requesting a setback of 75 feet from the ordinary high water line for riparian lots. This request is connected to the area and lot width variance requests listed above. Adjusting any one of these lot standards requires an adjustment to the other two. The proposed variance is consistent with the "urban" scenic river district requirements. Due to the topography of the Rum River in this area, a setback of 75 feet would allow much of the development to take place on top of the riverbank behind a ridge. Map 10 shows the relation between the ridgeline along the Rum River and the requested 75' setback from the OHW. With buildings no more than 35 feet tall, most of the development would be hidden from view of the river at this distance.

Permitted Uses – the City is requesting that attached housing products be permitted in the "rural" district. The current regulations allow single-family housing as the only permitted residential use in the "rural" district. It is the City's understanding that "single-family housing" refers to detached units only and does not include attached single-family housing units. Instead of lot area and lot width, the limiting factors for the development of any multi-family or attached housing units will be the amount of impervious surface allowed and the densities shown on the 2040 draft of the Future Land Use Map.

The City of St. Francis is dedicated to meeting the needs of its population, one of which is housing choice. As the City grows, residents will require a variety of housing options to meet their needs. Because the majority of St. Francis's population growth is projected to take place in the "rural" district over the next two decades, it is important that the types of development allowed in this area will meet the diverse housing needs of the City's residents. Attached housing products such as attached single-family houses or duplexes meeting the standards specified in MN Rules 6105.0110 and the Rum River Management Plan would not negatively impact the quality of the Rum River or its scenic nature, and so should be permitted uses in the "rural" district.

Planned Unit Development – the City is requesting that development in the “rural” district be allowed to be processed as a Planned Unit Development. PUDs are currently allowed in the “rural” district only as a means of permitting clustered development. In addition to allowing clustered development, the PUD approach the City is proposing would enable the City to apply standards unique to specific development site characteristics that preserve the river’s scenic qualities and other natural features while assisting developments to meet market demand and achieve a reasonable density. The PUD process would allow the City flexibility in regulations that do not affect the Rum River’s scenic quality such as front and side yard setbacks. A variance would be required for any deviation from approved Wild & Scenic standards. The PUD approach to processing development is allowed in the “urban” scenic river district in St. Francis.

Proposed Conditions

The City of St. Francis understands that this is a substantial variance request that would impact a large amount of land near the Rum River. Knowing that, and understanding that the City must take proactive steps to maintain the scenic quality of the Rum River, especially if additional development is to be allowed in this area, the City offers the following conditions to be attached to variance approval, as well as others the DNR may require:

1. Any development occurring in the “rural” district will be required to utilize public utilities. As shown on Maps 11 and 12, the 2040 Existing Sanitary Sewer plan and the 2040 Existing Watermain System plan, the City has planned for the extension of sewer and water to the north and is prepared to provide public utilities to properties in this area as it develops.
2. Require developing riparian lots in the “rural” district to establish and maintain a 60-foot wide average (30’ wide minimum) buffer from the ordinary high water line of the river consisting of native vegetation. Where a 60-foot buffer already exists, this shall be protected in perpetuity. This requirement goes beyond the existing vegetative requirements found in the wild and scenic program and the corresponding requirements in the St. Francis City Code and will bolster the existing vegetative cover along the banks of the Rum River to help protect the pristine views from the river. The native plant buffer, which may include trees, will also help to enhance water quality and decrease erosion potential which is a significant concern along the Rum River due to the nature of the soil. Map 13 is provided to demonstrate how this requirement would reestablish a vegetative buffer along the Rum River in areas where natural vegetative patterns no longer exist today due to agricultural practices and other land development.
3. Clear cutting of trees over 4 inches in diameter shall be prohibited within 150 feet from the OHW.
4. Within the setback area from the ordinary high water line (75 feet), grading will be prohibited. Selective grading (no mass grading) will be allowed between 75 feet and 150 feet from the OHW. Small deviations to this requirement may be allowed depending on building location. For example, in those instances where a building is located exactly 75 feet from the ordinary high water line, grading shall be prohibited from the river-side

edge of disturbance to the ordinary high water line and selective grading shall be permitted between the river-side edge of disturbance and 150 feet from the ordinary high water line.

5. The maximum total area of all impervious surface on each lot shall be 30%.

I hereby acknowledge that the facts and assertions discussed above are accurate and correct to the best of my knowledge.



Beth Richmond, City Planner, St. Francis

The City Council of the City of St. Francis passed a resolution on December 3, 2018 approving the submittal of this variance application to the Minnesota DNR. The signed resolution is included in this application as Attachment 1.

History of the Agency's Action

The wild and scenic river rules have impacted development along the Rum River in St. Francis since the creation of the Rum River Management Plan in 1978. Because of the density restrictions included in the rules, developers have struggled to create development plans meeting lot requirements. Most recently, two developments, in 2004 and 2005, respectively, inquired as to whether the DNR would remove the scenic designation from their property. The DNR declined to remove the designation for both projects, and neither development ended up moving forward.

Although the 2004 project was never completed, it was recently revisited and served as the catalyst for the application before you today. The City received a development application for a 220-unit phased development project on the east side of the Rum River. While the first phase of the project was not located in either scenic river district, the second phase is currently under City review and is located in the "urban" scenic river district. Future phases will be located in the "rural" scenic river district. During the review of the second phase, the DNR brought to the City's attention that future phases of this development as shown on a conceptual development plan would not meet the scenic river requirements. Jason Spiegel, the area hydrologist, informed the City that if future phases of the development proceeded in the manner shown on the concept plan, he would be required to object to the project and make a case for appeal if needed.

This information had far-reaching impacts not only for the development in question, but for the City's overall plan for growth in northern St. Francis which was being developed concurrently as part of the 2040 Comprehensive Plan update process. Once the City understood the implications of the "rural" district requirements for development in northern St. Francis, we spoke with the DNR to discuss options to pursue that could allow the density to increase in this area including variances from and amendment(s) to the wild, scenic, and recreational river requirements as found in Chapter 6105 of the Minnesota Administrative Rules. It is the City's understanding that the DNR has never received this type of request for the wild and scenic river program before. DNR staff determined that the City could apply to the DNR for a variance from the wild, scenic,

and recreational river rules. This variance application has been prepared in response to this finding.

Information Regarding the Agency's Treatment of Similar Cases

The DNR has not received a request of this nature before. Therefore, there are no similar cases which can help to provide guidance. The DNR typically does not allow land in the wild and scenic program to change designations unless it can be proven that the designation was incorrect at the time of designation. However, the City is not requesting to remove lands from the wild and scenic jurisdiction, only to vary from the requirements of the scenic district that make development in northern St. Francis difficult and which are no longer necessary to protect the river's scenic quality due to the land's location far from the river and the introduction of City sewer and water to the area.

Contact Information of Persons Adversely Affected

The City of St. Francis is not aware of anyone who would be adversely affected by the grant of this petition.