



1200 Warner Road  
St. Paul, MN, 55106

12/17/2025

Jodie Steffes  
Community Development Director  
3750 Bridge St NW  
St. Francis, MN 55070

**Re: Conditional Approval of City of Saint Francis Wild & Scenic River Ordinance Amendment**

Dear Jodie:

Thank you for sending your proposed Wild & Scenic River ordinance amendment to the DNR for conditional approval review. I am pleased to inform you that the proposed amendment is substantially compliant with the statewide WSR Rules (MR 6105.0010 – 6105.0250) and the rules specific to the Rum River (MR 6105.1400 – 6105.1500), and hereby approved, provided the conditions of approval in this letter are met.

**Ordinance Evaluation**

We have reviewed sections 1 – 15 that you propose to amend, received on 12/09/2025, for compliance with applicable state rules. Our conditional approval only applies to the specific sections listed below.

Attached is the proposed amendment with my comments, color-coded as follows (*delete any color-coded category that you are not using for this review*):

Non colored Comments. These include suggestions to improve administration or shoreland protection.

**Conditions of Approval**

The following conditions must be met before the DNR will issue final approval:

The City is proposing to exempt buildings less than 200 square feet from obtaining a zoning permit. This is fine, except in the Rum Scenic District. The Rum Scenic district Section 10-53-03 – Compliance, requires a permit for the construction of buildings. We understand that the state building code does not require a building permit for buildings less than 200 sf, however, such a permit also ensures that OHWL and bluff setbacks are met. To ensure that small buildings meet these setbacks, the City needs to require a zoning permit for all buildings in the Rum Scenic District. Alternatively, administrative and enforcement procedures that ensure such buildings meet these setbacks will also be acceptable. ordinances. Please provide the procedures or guidance to DNR for review prior to a final approval.

## Next Steps

Following are the steps for completing and receiving final DNR approval for your amendment:

1. Revise the amendment based on the conditions listed above under conditional approval.
2. The City Council adopts the amendment revised according to the listed conditions.
3. Email the completed Ordinance Processing Checklist (attached) and the documents identified on the checklist within 10 days of City Council adoption to:
  - a. Ryan Toot; [ryan.toot@state.mn.us](mailto:ryan.toot@state.mn.us)
  - b. [Ordinance.review.dnr@state.mn.us](mailto:Ordinance.review.dnr@state.mn.us)
4. We will review the amendment adopted by the City Council for consistency with the above conditions.
5. If the adopted amendments are consistent with the conditions, I will send you a "final approval" letter. State rules require DNR final approval of Wild & Scenic ordinances and amendments for those ordinances to be effective.

A Wild & Scenic ordinance is an important land use regulation that helps to protect surface water quality, near-shore habitat, and shoreland aesthetics of Minnesota's wild and scenic rivers. We appreciate your efforts to protect these resources for all present and future Minnesotans. Ryan Toot is available to assist with ordinance technical guidance and to consult with you on land and other water-related projects.

Sincerely,



Megan Moore  
District Manager

Attachments:

Proposed Ordinance with DNR comments  
Ordinance Processing Checklist

c: Ryan Toot, DNR Area Hydrologist  
[Ordinance.review.dnr@state.mn.us](mailto:Ordinance.review.dnr@state.mn.us)  
Beth Richmond, Planner: [beth@hkgi.com](mailto:beth@hkgi.com)