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October 22, 2007

BY U.S. MAIL AND FAX

J. Paul Loether, Chief of the National Register of Historic Places and National Historic Landmarks Division

National Register of Historic Places

National Park Service

1201 Eye St., NW

8th Floor (MS 2280)

Washington, DC 20005

Re: *Kasson Public School, 101 3rd Ave. NW, Kasson, MN*

Dear Mr. Loether:

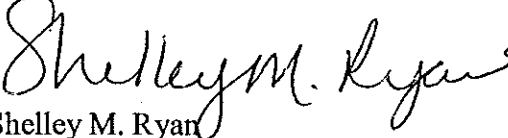
I am an attorney representing the City of Kasson, Minnesota ("City"). The City is the sole owner of a school located at 101 3rd Avenue N.W., Kasson, Minnesota ("School"). A nomination has been filed with the Minnesota State Historic Preservation Office to list the School on the National Register of Historic Places ("National Register") under eligibility Criteria A. The City opposes the nomination and pursuant to 36 C.F.R. 60.6(t), I hereby petition the Keeper of the National Register of Historic Places to substantively review and reject the nomination of the School to the National Register.

This petition is based on the following grounds. First, as set forth in the attached exhibit A, the City has determined that demolishing the School is in the public's best interest. The School is vacant, and City has invested significant time and effort into obtaining its residents' support for the costly and major renovation needed to ensure that the School can be safely and efficiently reused. Specifically, a \$3.9 million bond referendum was held in November 2006 to determine if the City's residents would finance converting the School into a public library and municipal building. The City's residents voted on and rejected the referendum. Only after this public vote did the City resolve to demolish the School. Thus, listing the School on the National Register for the purpose of preserving it would be inconsistent with the City's legislative determination and its residents' wishes.

Second, the School is not eligible for the National Register. Robert C. Vogel of Pathfinder CRM, LLC, a historian meeting the Secretary of the Interior's professional qualification standards in history and architectural history, has been retained by the City to advise it about the historical significance of the School. Mr. Vogel's resume is attached as exhibit B. In a preliminary investigation, Mr. Vogel determined that the School is not eligible to be placed on the National Register under any Criterion. After reviewing the nomination form submitted for the School, Mr. Vogel's professional opinion is that "while the technical and administrative information contained in the form appears to be complete and accurate, the nomination does not make an adequate case for the property's historical significance under Criterion A." In particular, the nomination form does not contain "any specific information relating to [the School's] direct (i.e., measurable) impacts on the life of the community." Mr. Vogel's opinion letter is attached as exhibit C.

In light of the City's reasonable and good faith efforts to preserve the School and the substantive deficiencies in the nomination, I respectfully request that you reject the nomination of the School to the National Register. If you have any questions about this petition, please do not hesitate to contact me at (952) 746-2705.

Sincerely,



Shelley M. Ryan

cc. Client
Mark R. Anfinson



TREE
CITY
USA

CITY OF KASSON

401 FIFTH STREET SE
KASSON, MINNESOTA 55944-2204
PHONE: (507) 634-7071
FAX: (507) 634-4737

October 10, 2007

State Historic Preservation Office

Britta L. Bloomberg, Deputy State Historic Preservation Officer
345 Kellogg Blvd. W.
St. Paul, MN 55102

Re: *Kasson Public School, 101 3rd Ave. NW, Kasson, MN*

Dear Ms. Bloomberg:

I am the City Administrator for the City of Kasson, Minnesota ("City"). On behalf of the City, I hereby certify that the City owns the old school building located at 101 3rd Avenue N.W., Kasson, MN ("School") and object to the listing of the School on the National Register of Historic Places ("National Register").

The City objects to the listing of the School on the National Register because it has determined that demolishing the School is in the public's best interest. The School is vacant and requires major renovation in order to be safely and efficiently used. Because the City did not have the funds, a \$3.9 million bond referendum was held in November 2006 to determine if the public would support and finance rehabilitating and converting the School into a public library and municipal building. The City's residents voted on and rejected the referendum. With no other possible use for the School or available financing, the City Council passed a resolution to demolish the School on November 27, 2006.

Shortly thereafter, the City was designated as the Responsible Government Unit for determining whether an Environmental Assessment Worksheet ("EAW") was required to demolish the building. The City retained historian Robert C. Vogel to prepare findings and make recommendations concerning the need for an EAW based on the historical significance of the School. In his preliminary report, Mr. Vogel opined that an EAW was not required because, among other reasons, the School is not eligible to be placed on the National Register. On May 23, 2007, the City resolved to adopt Mr. Vogel's findings and make a Negative Declaration that an EAW is not required or found to be in the public's best interest. There have been no challenges to the City's May 23, 2007 Resolution or Negative Declaration. Listing the School on the National Register for the purpose of preserving it would therefore be inconsistent with the City's legislative process and its residents' wishes.

★ KASSON - A MINNESOTA STAR CITY ★
AN EQUAL OPPORTUNITY EMPLOYER

EXHIBIT

TAB

A

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October 10, 2007

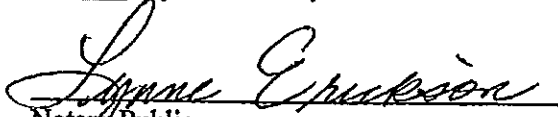
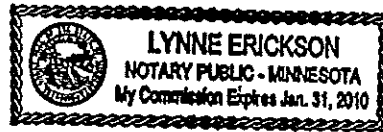
If you have any questions about the City's objection or comments to the listing of the School on the National Register, please do not hesitate to contact me at (507) 634-7071.

Sincerely,



Randy D. Lenth
City Administrator, City of Kasson

Subscribed and sworn to before me
this 11th day of October, 2007


Notary Public

CURRICULUM VITAE

Robert C. Vogel

Historian, Architectural Historian, Preservation Planner

Current Positions

Senior Historian and Managing Partner, Pathfinder CRM, LLC, 2004 to present.

Responsibilities include conducting studies of historical, architectural, archaeological, cultural, and engineering resources; archival research, field investigations, and planning; project management, report preparation, and other consultant services.

Preservation Planning Consultant, City of Newport, MN (pop. 3715), 1993 to present.

Preservation Planning Consultant, City of Farmington, MN (pop. 19,000), 1995 to present.

Preservation Planning Consultant, City of Edina (pop. 47,425), MN, 2001 to present.

Professional Experience

Principal, Robert C. Vogel & Associates, St. Paul, MN, 1978 to 2004. [Company currently operates under the name Pathfinder CRM, LLC.]

Historian and Vice President, Bear Creek Archeology, Inc., Decorah and Cresco, IA, 1989 to 1998.

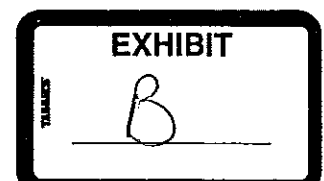
City Historic Preservation Officer, City of Cottage Grove, MN (pop. 30,582), 1983 to 2002.

Assistant Archaeologist, UNDAR-West, University of North Dakota, 1981.

Historian/Graduate Research Assistant, University of Minnesota-Twin Cities, Wilford Archaeology Laboratory, 1980 to 1981.

Education

M.A., Geography, University of Minnesota-Twin Cities, 1980. Minor: History.



B.A., Geography and History, University of Minnesota-Twin Cities, 1975.

Graduate training in historical archaeology, Northwestern State University of Louisiana, 1978.

Publications

Author/editor of more than 80 journal articles, book chapters, book reviews, and technical reports. A selected bibliography follows.

- In press (With Jeffrey S. Girard) "History & Archaeology of the Pierre Robleau Household and Bayou Pierre Community: Perspectives on Rural Society and Economy in Northwestern Louisiana at the Time of the Freeman & Custis Expedition." Chapter in forthcoming proceedings volume of the *Freeman & Custis Red River Expedition of 1806 Symposium*, to be published by Louisiana State University Press.
- 2003 "Paul Bouet Laffitte: A Borderlands Life." *East Texas Historical Journal* 41:15-27. Winner of the C. K. Chamberlain Award presented by the East Texas Historical Association.
- 2003 *History of Washington County, Minnesota: A Bibliographic Guide*. White Pine Press, St. Paul, MN.
- 2002 *A Brief History of the Ramsey County Children's Preventorium on Lake Owasso, 1915-1953*. White Pine Press, St. Paul.
- 2002 "Rebel Without a Cause: The Adventures of Louis Aury." *The Laffite Society Chronicles* 8(1):2-12.
- 2000 "The Upper Mississippi Valley Borderlands: The Historic Context for Early Contact Period Sites in Iowa." *Journal of the Iowa Archaeological Society* 47:61-72.
- 2000 "Jean Laffite, the Baratarians, and the Battle of New Orleans: A Reappraisal." *Louisiana History* 41:261-276.
- 2000 "Cottage Grove: Heritage Preservation Planning in a Suburban Community." *CRM* 23(7):17-20.
- 1998 *Historic Property Guidelines for Cottage Grove*. Advisory Committee on Historic Preservation, City of Cottage Grove, MN.
- 1998 *Jean Laffite in American History: A Bibliographic Guide*. With Kathleen F. Taylor. White Pine Press, St. Paul, MN.

- 1995 *The World War II Ordnance Department's Government-Owned Contractor-Operated (GOCO) Industrial Facilities: Twin Cities Ordnance Plant Historic Investigation*. U.S. Army Materials Command Historic Context Series, Report No. 8A. Fort Worth District Corps of Engineers.
- 1995 "The Yatasi of Northwest Louisiana: An Ethnohistorical Perspective." *North Louisiana Historical Association Journal* 26:10-33.
- 1993 (With David G. Stanley) "The Rick Lewis Site (21WA0055): An Historic Dugout Site in Washington County, Minnesota." *The Minnesota Archaeologist* 52:60-65.
- 1992 "Patterson and Ross' Raid on Baratavia, September, 1814." *Louisiana History* 33:157-170.
- 1991 *Historic Portages in Minnesota: An Archaeological and Landscape History Approach*. Privately printed, St. Paul, MN.
- 1990 "Jean Laffite, the Baratarians, and the Historical Geography of Piracy in the Gulf of Mexico." *The Gulf Coast Historical Review* 5:63-77.
- 1989 *Down by Grey Cloud: The Mississippi River in Cottage Grove History*. Perspectives in Cottage Grove History series no. 5. Advisory Committee on Historic Preservation, Cottage Grove, MN.
- 1988 15 articles in *A Dictionary of Louisiana Biography*, edited by Glenn R. Conrad. University of Southwestern Louisiana Press, Lafayette.
- 1980 "An Archaeological Reconnaissance of the Minneapolis Campus of the University of Minnesota." *The Minnesota Archaeologist* 39:106-110.

Conference Papers and Invited Presentations

Presented numerous invited papers, lectures, and presentations at professional meetings, including:

- 2005 "The Hartley Bridge Site (13AM404) in Historic Context: A Possible Dakota Sioux Village on the Upper Iowa River in Allamakee County, Iowa." Paper presented at the Council on Minnesota Archaeology Symposium, Current Research in Upper Midwest Archaeology in St. Paul, MN.
- 2005 "Fantasy Archaeology: The Search for Laffite's Treasure." Paper presented at the Annual Meeting of the Louisiana Historical Association in Lafayette, LA

- 2002 "Archaeological, Heritage and Cultural Programs." Presentation to the 2002 Environmental Performance Summit in Denver, CO.
- 2001 "Dr. John Sibley: Louisiana's Pioneer Ethnohistorian." Paper presented at the Annual Meeting of the Louisiana Historical Association in Hammond, LA.
- 1996 "Paul Boüet Laffitte and Caddoan-European Relations in the Red River Borderlands." Paper presented at the Caddo Conference in Natchitoches, LA.
- 1995 "The Upper Mississippi Valley Borderlands Culture Complex." Paper presented at the Historical Archaeology Conference of the Upper Midwest in Red Wing, MN.
- 1994 "Corn Belt Archaeology: Evaluating the Research Value of Euro-American Farmstead Sites in Iowa." Paper presented at the Annual Meeting of the Iowa Academy of Sciences in Davenport, IA.
- 1994 "A Geographical Sketch of Pirate Habitat on Louisiana's Gulf Coast, 1811-1821." Paper presented at the Annual Meeting of the Louisiana Historical Association in New Iberia, LA.
- 1987 "Dr. John Sibley and the Texas-Louisiana Borderlands." Paper presented at the Plains Anthropological Conference, Session in Honor of Mildred Mott Wedel in Wichita, KS.
- 1987 "The Indian Slave Trade in the Borderlands." Paper presented at the Plains Anthropological Conference in Columbia, MO.
- 1986 "The Rio Hondo Land Claims: Reconstructing a Borderlands Landscape." Paper presented at the Annual Meeting of the Louisiana Historical Association in Shreveport, LA.
- 1977 "Historic Yatasi Settlement Patterns." Paper presented at the Caddo Conference in Natchitoches, LA.

Technical Reports

Primary author or contributor to more than 400 cultural resource management reports, plans, and studies. Representative reports are listed below.

- 2006 *Historical & Architectural Survey of Downtown Fort Dodge, Iowa.* Unpublished report prepared for the City of Fort Dodge.
- 2006 *Survey of Historic Residential Properties in Pine Island, Minnesota.* Unpublished report prepared for the City of Pine Island.

- 2006 (With D. W. Benn) *Cultural Resources Literature Review and Preliminary Assessment of Nine Dams Within the Illinois Portion of the Rock River Basin, Rock Island District*. Unpublished report prepared for the Rock Island District Corps of Engineers as sub-consultant to Bear Creek Archeology, Inc.
- 2005 *Barns of Southeastern South Dakota Survey*. Unpublished report prepared for the South Dakota Historic Preservation Office.
- 2005 *Survey of Historic Buildings in Downtown Pine Island, Minnesota*. Unpublished report prepared for the City of Pine Island.
- 2005 *Intensive Survey of Flood Damaged Properties in Elkport, Iowa*. Unpublished report prepared for the City of Elkport under contract to the Upper Explorerland Regional Planning Commission.
- 2004 *Survey of Historic Landscapes in the City of Newport, Minnesota*. Unpublished report prepared for the City of Newport.
- 2004 *Iowa Historic Property Documentation Study of the Fifth Avenue Bridge (Also Known as the Taverner Bridge) in the City of Decorah, Iowa*. Unpublished report prepared for the City of Decorah.
- 2004 *Historical and Architectural Documentation of the Iowa River Power Dam, Iowa City, Johnson County, Iowa*. Unpublished report prepared for the City of Iowa City as sub-consultant to Bear Creek Archeology, Inc.
- 2003 *Historical and Architectural Resources of Wayzata, Minnesota*. Unpublished report prepared for the City of Wayzata.
- 2002 *Historic Site Survey and National Register of Historic Places Evaluation of the Jackson Dam, Jackson, Minnesota*. Unpublished report prepared for the Rock Island District Corps of Engineers as sub-consultant to Bear Creek Archeology, Inc.
- 2002 *The Heritage of Women & Children in Newport, Minnesota*. Unpublished report prepared for the City of Newport.
- 2001 *Historical Study of the Grey Cloud Trail Causeway, the Grey Cloud Bridge, the Michaud Mound Group, and the Grey Cloud Island Drive Fill at Lower Grey Cloud Island*. Unpublished report prepared for the City of Cottage Grove.
- 2000 *Preliminary Inventory of Heritage Resources from the Recent Past: The "Ozzie & Harriet Project."* Unpublished report prepared for the City of Cottage Grove.

- 1999 *Phase I Archeological, Architectural, and Historical Survey Related to the U.S. Highway 30/67 Camanche Avenue Improvements, City of Clinton, Iowa.* Unpublished report prepared for the Iowa DOT as sub-consultant to Bear Creek Archeology, Inc.
- 1998 *An Architectural/Historical Reconnaissance Survey of the Valley Junction Area in West Des Moines, Iowa.* Unpublished report prepared for the City of West Des Moines by Bear Creek Archeology, Inc.
- 1998 *Human Impacts on the Ecology of Northeastern Minnesota.* Unpublished background paper prepared for the Minnesota Department of Natural Resources, Division of Forestry.
- 1997 (With James C. Hippen) *Phase II Cultural Resources Investigation of the Coralville Dam on the Iowa River, City of Iowa City, Iowa.* Unpublished report prepared for the City of Iowa City by Bear Creek Archeology, Inc.
- 1996 *Historical and Geographical Survey of the Sugarloaf Site, Cook County, Minnesota.* Unpublished report prepared for the Sugarloaf Interpretive Center Association, Duluth, MN.
- 1995 (With David W. Benn) *Historic Properties Management Plan for the Mississippi River, Pools 11 Through 22, Rock Island District Corps of Engineers.* Bear Creek Archeology, Inc.
- 1995 *Historic Documentation of the Fargo Water Treatment Plant, Fargo, North Dakota.* Unpublished report prepared for the City of Fargo by Bear Creek Archeology, Inc.
- 1992 *Survey and Evaluation of the Rotating Beacon in Indian Mounds Park, St. Paul, Minnesota.* Unpublished report prepared for the Metropolitan Airports Commission by Bear Creek Archeology, Inc.
- 1992 *Survey of Historic Farmsteads in Lyon County, Iowa.* Unpublished report prepared for the Lyon County Historic Preservation Commission.
- 1991 *Survey of Historic Landscapes in Cottage Grove, Minnesota.* Unpublished report prepared for the City of Cottage Grove.
- 1991 *Historical and Architectural Survey of Selected Properties in Clermont, Iowa.* Unpublished report prepared for the Clermont Historic Preservation Commission.
- 1990 *The New England of the West: A Survey of Historic Properties Associated with Early American Settlement in Cottage Grove,*

Minnesota (1838-1870). Unpublished report prepared for the City of Cottage Grove.

- 1989 *Archaeology, Geomorphology and Historic Surveys in Pools 13-14, Upper Mississippi River*. David W. Benn, principal investigator. Unpublished report prepared for the Rock Island District Corps of Engineers by the Center for Archaeological Research, Southwest Missouri State University.
- 1988 *Archaeology & Geomorphology in Pools 17 and 18, Upper Mississippi River*. David W. Benn and E. Arthur Bettis, III, principal investigators. Unpublished report prepared for the Rock Island District Corps of Engineers by the Center for Archaeological Research, Southwest Missouri State University.
- 1988 *Geomorphological Investigations: Mississippi River Pool 21, Illinois and Missouri, with Archaeological & Historical Overviews*. Jeffrey D. Anderson, principal investigator. Unpublished report prepared for the Rock Island District Corps of Engineers as sub-consultant to Donohue & Associates.
- 1981 *Cultural Resource Investigation of Lands Affected by a Flood Control Project at Chaska, Minnesota, Along the Minnesota River*. Elden Johnson, principal investigator. Unpublished report prepared for the St. Paul District Corps of Engineers by the Wilford Archaeology Laboratory, University of Minnesota-Twin Cities.

Other Professional Activities

Steering Committee, 2007 National Preservation Conference, National Trust for Historic Preservation, 2004 to 2007.

Board of Directors, National Alliance of Preservation Commissions, 2005 to present (Treasurer, 2006).

Publications Committee, Louisiana Historical Association, 2004 to 2006.

Historical/Cultural Team, Minnesota Forest Resources Council, 1996 to 1998.

Board of Directors, Louisiana Historical Association, 1993 to 1996.

Fellow, Association of Iowa Archaeologists, 1992 to 2000.

Cultural Resources Work Group/Planning Team, Mississippi National River and Recreation Area, St. Paul, MN, 1990 to 1992.

Board of Directors, Preservation Alliance of Minnesota, Minneapolis, 1986 to 1989
(Vice President, 1988).

Memberships in Professional Organizations

American Society of Architectural Historians
Iowa Archaeological Society
Louisiana Historical Association (board of directors 1993-1996)
National County on Public History
Organization of American Historians
Society for Industrial Archaeology

Public Service

Chairman, Parks and Recreation Commission, City of Spring Grove, MN, 2005 to present.

Citizen Advisory Committee, Rice Creek Watershed District, New Brighton, MN, 2000 to 2002.

Cable Television Advisory Commission, City of New Brighton, MN, 1995 to 1996.

Supervisor (District II), Ramsey County Soil and Water Conservation District, 1997 to 1998.

President and CEO, South Washington County Cable Communications Corporation, St. Paul Park, MN, 1986 to 1990.

Washington County Community Social Services Board, 1987 to 1988.

Parks, Recreation, and Natural Resources Commission, City of Cottage Grove, MN, 1980 to 1990 (chairman, 1981 to 1990).

References

Mr. Larry Bodahl, City Administrator, City of Newport, 596 Seventh Avenue, Newport, MN 55055; (651) 459-5677.

Dr. Michael J. Foret, Ph.D., Department of History, University of Wisconsin-Stevens Point, Stevens Point, WI 54481; (715) 346-2404.

Mr. John Gertz, Historic Preservation Specialist, City of Eden Prairie, 8080 Mitchell Road, Eden Prairie, MN 55344; (952) 949-8454.

Contact Information

Mail: Pathfinder CRM, LLC, 168 W. Main Street, Spring Grove, MN 55974-0503

Telephone: (507) 498-3810

FAX: (507) 498-5861

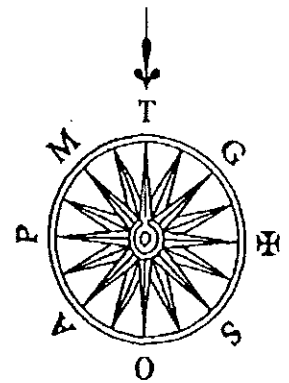
Internet: rcvogel@springgrove.coop

Website: www.pathfindercrm.com

Pathfinder CRM, LLC

Cultural Resource Management & Heritage Preservation Consultants

Minnesota Office 168 W. Main Street
P.O. Box 503
Spring Grove, Minnesota 55974-0503
507-498-3810 (voice & fax)
800-206-8704 (toll free)



October 8, 2007

Secretary
State Review Board
State Historic Preservation Office
Minnesota Historical Society
345 Kellogg Boulevard W.
Saint Paul, MN 55102-1906

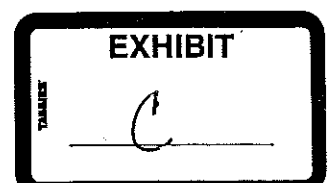
RE: Kasson Public School National Register Nomination

Dear Sir or Madam:

At the request of the Kasson City Council, I have reviewed and carefully read the National Register of Historic Places registration form prepared for the Kasson Public School. In my professional opinion, while the technical and administrative information contained in the form appears to be complete and accurate, the nomination does not make an adequate case for the property's historical significance under Criterion A.

Specifically, the claim of local historical significance is tenuous. The associative themes described in the statement of significance (public education, rural teacher training, agricultural extension, public health, and community social services) reflect the routine functions of a small town public school. Mere association with the "broad patterns of our history in the areas of education and social history" is not enough, in and of itself, to justify a determination of National Register eligibility, and no documentary evidence is presented that substantiates the claim of pivotal importance for any of these activities, at least from a local history perspective. Indeed, if the old school building's National Register eligibility can be justified solely on the basis of its historical function as a public school, without presenting any specific information relating to its direct (i.e., measurable) impacts on the life of the community, one wonders how any public property could ever be determined not eligible for registration.

www.pathfindercrm.com

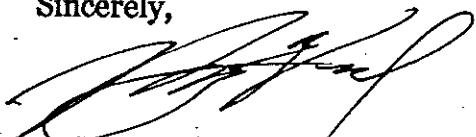


State Review Board
October 8, 2007 - page 2

Furthermore, I do not believe that it is appropriate for the State Review Board to act on the nomination at this time. While it may be good practice for the State Historic Preservation Office staff to err on the side of caution and assume that the school might have some potential for preservation, the City of Kasson has already made a reasonable and good faith effort to recycle and find an adaptive use for the building. As the owners of the Kasson School, the citizens of Kasson are the best judges of the property's historical significance and community value, and on November 7, 2006, a majority of voters decided that the property could not realistically be preserved.

The people of Kasson have spoken: the highest and best use of the old school property is to demolish the old building. Unfortunately, a group of citizens has taken the city to court in an attempt to forestall the demolition, and the National Register nomination is part of their strategy to nullify the results of the 2006 referendum. I believe it is in the best interests of the state for the Kasson School nomination to be denied, or at least postponed until after the district court's decision on the citizens group action to halt demolition.

Sincerely,



Robert C. Vogel
Managing Partner & Senior Historian

cc: Mayor and City Council, City of Kasson
Shelley M. Ryan, Hoff, Barry & Kozar, P.A.

