

State Review Board for the National Register of Historic Places

Marvel Anderson, Member-At-Large

Doug Birk, Historic Archaeologist

Carole Clark Isakson, Member-At-Large

Robert Claybaugh, Architect

David Ebnet, Historian

Gregory Gaut, Historian

Pat Gustafson, Member-At-Large

Christina Harrison, Prehistoric Archaeologist

Linda Mack, Member-At-Large

Merlin Peterson, Member-At-Large

Katherine Solomonson, Architectural Historian

Victoria Young, Architectural Historian

Vacant, Member-At-Large

Vacant, Architect

4/2006; 9/2006; 4/2007; 9/2007

HOFF, BARRY & KOZAR, P.A.

ATTORNEYS

775 Prairie Center Drive
160 Flagship Corporate Center
Eden Prairie, Minnesota 55344
Telephone: 952.941.9220
800.989.9220
Facsimile: 952.941.7968
Internet: www.hbklaw.com

SHELLEY M. RYAN

Direct: 952.746.2705
sryan@hbklaw.com

October 15, 2007

Marvel Anderson
State Review Board Member
Minnesota Historical Society
State Historic Preservation Office
345 Kellogg Blvd. West
St. Paul, MN 55102-1906

Re: Kasson Public School National Register Nomination
Our File No: 3200-250

Dear Board Member:

Enclosed for your review prior to the State Review Board meeting on Tuesday, October 16, 2007, please find the City of Kasson's submissions objecting to the nomination of the Kasson Public School building to the National Register of Historic Places.

Sincerely,



Shelley M. Ryan
HOFF, BARRY & KOZAR, P.A.

SMR:wmp

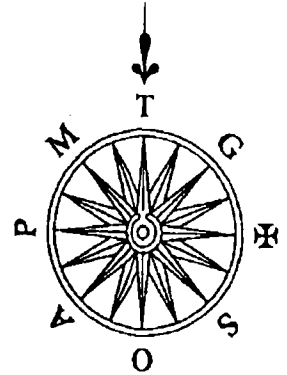
Enclosures

cc: Mark R. Anfinson, Esq.
Client

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.

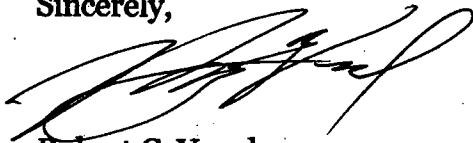
Specifically, the claim of local historical significance is tenuous. The associative themes described in the statement of significance (public education, rural teacher training, agricultural extension, public health, and community social services) reflect the routine functions of a small town public 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.

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.

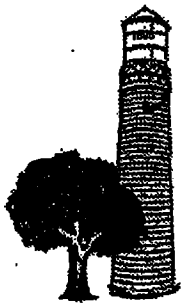
The people of Kasson have spoken: the highest and best use of the old school property is to demolish the old building. Unfortunately, a group of citizens has taken the city to court in an attempt to forestall the demolition, and the National Register nomination is part of their strategy to nullify the 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.



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.

Page 2
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