

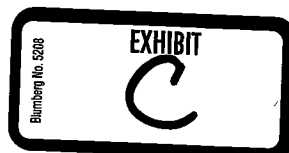
**FINDINGS AND RECOMMENDATIONS
RELATING TO THE NEED FOR AN
ENVIRONMENTAL ASSESSMENT WORKSHEET:
OLD ELEMENTARY SCHOOL BUILDING
KASSON, MINNESOTA**

Report prepared for the City of Kasson

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Introduction & Background Information

This report was prepared by Pathfinder CRM, LLC under contract with the City of Kasson to prepare findings relating to the need for preparation of an Environmental Assessment Worksheet (EAW) in relation to the Old Elementary School Building. The report also addresses issues related to the subject property's historic preservation value.

The Old Elementary School Building Today

The subject property is masonry construction, with concrete and terra-cotta tile walls and floors. The exterior walls are finished with red and brown face brick in English bond pattern, with architectural terra-cotta trim. The building is H-shaped in its ground plan and two stories in height. The low-pitch hipped roofs have wide overhanging eaves supported by decorative brackets. The roofline above the main entrance is dominated by a shaped parapet with terra cotta coping and cornice moldings. The layout is symmetrical and features a central unit that held the main entrance, offices, and lunchroom, with a combined auditorium/ gymnasium on the second floor, connected to two perpendicular classroom wings by a lateral corridor. The exterior of the building is distinguished by its imposing scale, formal architecture, and rigidly symmetrical fenestration. Its most important character-defining details are found in the classically-inspired main entrance and bracketed eaves. The building has been altered somewhat from its historic appearance by the replacement of the original doors and windows; some of the window openings have been closed up and most of the interior spaces have also been altered to some extent. Although structurally sound, it has stood vacant for a number of years and is beginning to show signs of deterioration. The property covers almost an entire city block and is situated in a residential neighborhood a few blocks north of the central business district. The historic Kasson Water Tower is located northwest of and adjacent to the old school.

History of Decision to Demolish the Old School Building

Built in 1917-18, the Kasson Public School replaced an earlier schoolhouse on the same site, which was destroyed by a fire. It functioned continuously as a public school until the Kasson-Mantorville School District built a new elementary school building on the edge of the city in 1996. The City of Kasson took possession of the vacant property in March 2006.

Early in 2005 the City of Kasson took steps to address the feasibility of renovation and adaptive reuse of the old school property as part of a space needs

study. On 26 April 2006, after reviewing architectural plans for renovation, the City Council resolved to finance rehabilitation of the old school building with general obligation bonds, which required a public referendum. On 7 November 2006, voters rejected a \$3.9 million bond issue (1026 to 904) that would have financed conversion of the old schoolhouse into a municipal building and public library. The City Council passed a resolution to demolish the school on 27 November 2006.

A citizens group, the Kasson Alliance for REstoration (KARE), was incorporated on 29 January 2007 to advocate for the building's preservation. KARE petitioned the Environmental Quality Board (EQB) to request the City of Kasson to undertake an environmental review of the project's impact on the Kasson Elementary School. (It was also reported in the *Rochester Post-Bulletin* that members of KARE intended to seek a court injunction to restrain the city from proceeding with demolition of the building, which it was endeavoring to have placed on the National Register.) On 3 May, as part of its 2007 National Preservation Month observance, the Preservation Alliance of Minnesota announced that it had selected public school buildings as one of the state's most endangered historic property types and called out the Kasson elementary school as an example. Demolition has been tentatively scheduled for July 2007.

Report Organization

The subject of this report is referred to as the "Old Elementary School Building," although its proper historic name is the Kasson Public School. The terms "historic property" and "historic resource" are used interchangeably within the narrative, though use of either term should not be construed as implying *historical significance*—the National Register concept of significance is discussed below in more detail.

After a brief introductory section, the report is organized around the following findings and conclusions:

- 1) Preparation of an Environmental Assessment Worksheet (EAW) is not mandatory because the Old Elementary School Building is not listed in the National Register of Historic Places;
- 2) The Old Elementary School Building has not been determined eligible for the National Register by the State Historic Preservation Officer;
- 3) The Old Elementary School Building was not identified as significant in previous historical and architectural studies;
- 4) The Old Elementary School Building does not meet the National Register criteria for evaluation;

- 5) Demolition could proceed even if the property was determined eligible for the National Register;
- 6) The City of Kasson has made a reasonable and good faith effort to find an alternative to demolition; and
- 7) Architectural recordation is the preferred mitigation strategy.

Because several of the findings are interrelated, some of the discussion overlaps and a number of critical laws, regulations, and technical publications are referred to in the text. As a convenience to the reader, complete citations are given in the "List of Information Sources Consulted" which follows the narrative.

Preparer's Qualifications

This report was prepared by Robert C. Vogel of Pathfinder CRM, LLC. Pathfinder is a cultural resources management (CRM) consulting firm with offices in Spring Grove, MN, Springfield, MO, and Santa Fe, NM. Through its Minnesota office, the company provides a wide range of historic preservation services, including public history, architectural history, archaeology, and historic preservation planning. Pathfinder CRM's oldest parent company, Robert C. Vogel & Associates, has been in business since 1978.

Vogel is the firm's Senior Historian and Managing Partner. An historical geographer (M.A., University of Minnesota) with more than twenty-eight years professional experience in the historic preservation field, he meets the Secretary of the Interior's professional qualifications standards in History and Architectural History and has successfully completed more than 500 cultural resource management projects throughout the United States. From 1981 until 2002, Vogel was the City Historic Preservation Officer for Cottage Grove, MN; and he is currently retained by cities of Newport (since 1992), Farmington (since 1995), and Edina (since 1999) as their staff preservation planner. He is the author of more than sixty scholarly and professional monographs, journal articles, book chapters, reviews, and conference papers, and has contributed to more than 500 reports of cultural resource management and historic preservation studies. Vogel has served on the board of directors of the Preservation Alliance of Minnesota and the National Alliance of Preservation Commissions and is a frequent presenter at regional and national conferences. A summary of his resume can be viewed online at the Pathfinder CRM website (www.pathfindercrm.com).

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Finding #1: Preparation of an Environmental Assessment Worksheet is Not Mandatory Because the Old Elementary School Building is not listed in the National Register of Historic Places.

Minnesota Rule 4410.4300 subpart 31 states that an EAW is mandatory only when a project will result in the destruction of a property that is "listed on the National Register of Historic Places or the State Register of Historic Places."

The National Register of Historic Places was created in its present form by the National Historic Preservation Act of 1966, as amended. (The policies and procedures of the National Register program, which is administered by the U.S. Department of the Interior National Park Service, are found in the Code of Federal Regulations, Title 36, Part 60.) Properties are listed in the National Register through nominations by the state historic preservation officers, who are appointed by the governors of the states. The National Register itself is maintained by the National Park Service. According to the records of the Keeper of the National Register (National Park Service) and the Minnesota Historical Society, the subject property is not currently listed in the National Register. Therefore, preparation of an EAW is not required by state statute.

Finding #2: The Old Elementary School Building Has not Been Determined Eligible for the National Register by the State Historic Preservation Officer.

In Minnesota, the state historic preservation office or SHPO function is housed in the Minnesota Historical Society, with the Society's director designated as the state's preservation officer; her deputy heads up the preservation office staff and administers the National Register program in the state. The office is funded from both federal and state sources. The National Historic Preservation Act gives the SHPO responsibility for carrying out a statewide survey of historic properties, for maintaining inventories of such properties, and for nominating properties to the National Register. (To date, the Minnesota SHPO has identified more than 65,000 historic resources statewide, of which approximately 1500—encompassing more than 6500 individual properties representing all of the state's 87 counties—have been nominated to the National Register.) Because Federal environmental regulations apply to properties which have been *determined eligible* for the National Register, as well as those which have been formally listed, the SHPO plays a pivotal role in evaluating properties, i.e., determining whether they meet defined criteria of historical, architectural, archaeological, or cultural significance.

The following passage (excerpted from the Code of Federal Regulations, Title 36, Part 60) describes the criteria for evaluation which guide the SHPO and others in evaluating the eligibility of properties for nomination to the National Register:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

For the Old Elementary School Building to qualify for a SHPO determination of National Register eligibility it would need to be shown to meet at least one of the National Register criteria by being associated with an important historic context and retaining historic integrity of those physical features necessary to convey its significance. The subject property was included in the SHPO's National Register survey of Dodge County and it was not recommended for consideration as a potential National Register nominee.

The SHPO's survey and evaluation activities have been ongoing since the 1970s and properties are routinely re-surveyed and re-evaluated as new information becomes available. As of 16 May 2007, the Minnesota SHPO had not issued a National Register Determination of Eligibility (DOE) for the Old Elementary School Building.

Finding #3: The Old Elementary School Building Was Not Identified as Significant in Previous Historical and Architectural Studies.

In 1980-81, the Minnesota SHPO carried out a survey of Dodge County to identify and gather information on historic resources worthy of preservation. (In historic preservation parlance, *survey* means the process of searching for and recording historic buildings, sites, structures, objects, and districts; surveys are conducted at a variety of scales and the basic work product is an organized compilation of the information on specific properties that was collected by the survey, known as an *inventory*.) The Dodge County survey was carried out by Dr. Robert Frame, a professional historian and architectural historian who was then a member of the state preservation office staff. Frame made a thorough examination of a number of buildings in Kasson and concluded that several properties were historically significant and therefore eligible for the National Register. The SHPO initiated the nomination process for the Kasson Water Tower, the historic Jacob Leuthold House, the Eureka Hotel, and the old Kasson Municipal Building, which were registered in 1982. The Old Elementary School Building (which was later assigned state inventory number DO-KSC-014) was included in Frame's study but was apparently not considered worthy of preservation, as no nomination documents were ever prepared.

Prior to the SHPO National Register survey of Dodge County, David Gebhard and Tom Martinson compiled a statewide sourcebook on noteworthy architectural specimens under the auspices of the University of Minnesota and the Minnesota Society of Architects. Published in 1977 as *A Guide to the Architecture of Minnesota*, (and still in print), their book devotes a section to important architectural landmarks in Kasson (pages 286-287) but does not mention the Old Elementary School—however, the authors noted the presence of the Eastlake-styled Kasson School which dated from the 1860s (and was later converted to residential use), located on the corner of 1st Street NW and 3rd Avenue NW, directly across the street from the 1918 schoolhouse. Gebhard and Martinson's omission of the Old Elementary School Building is somewhat puzzling, given that the late Prof. Gebhard (who taught architecture at the University of California-Santa Barbara until his death in 1996) was a leading authority on Prairie School architecture in the Midwest, while Martinson, a professional planner and urban historian, was national director of the Society of Architectural Historians.

Finding #4: The Old Elementary School Building Does Not Meet the National Register Criteria for Evaluation.

At the request of the city, Pathfinder CRM assessed the National Register eligibility of the Old Elementary School Building. Because of time constraints, our assessment was limited to a review of the available records and a walk-through inspection of the property. Our evaluation followed the standards and guidelines for the National Register program which have been published by the U.S. Department of the Interior as part of the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*. Further guidance was provided by the National Park Service bulletin, *How to Apply the National Register Criteria for Evaluation*.

As part of our assessment of the Old Elementary School Building's historic preservation value, we reviewed the report by Kenton Spading, *Historical Review: Kasson Public School and the Architect Nels S. Jacobson Jr.*, that was prepared for the Kasson Alliance for REstoration (KARE). While this report represents an informative and worthwhile contribution to public history, it does not, in our opinion, make a strong case for the building's National Register eligibility; nor does it meet the Secretary of the Interior's standards for the evaluation of historic properties, which are the required basis for determinations of National Register eligibility. Granted, this may not have been Mr. Spading's principal motive for writing the report, but the "Historical Review" is the only public record we were able to find that addressed the property's perceived National Register eligibility.

National Register Criterion "A" (associative value) recognizes that properties can be considered historically significant if they are associated with events that have made a significant contribution to the "broad patterns" of state and local history. The Old Elementary School Building was undoubtedly a source of community pride and helped define Kasson's self-image; it also provided the setting for the educational beginnings of many of the city's residents and remains a focal point for community memory. However, as the National Register Bulletin on applying the National Register criteria points out:

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered significant as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

We know of no specific events of outstanding importance that occurred at the Kasson school and could find no documentary evidence to suggest that the

school played a pivotal role in community development in any area other than public education. Regarding its potential significance in illustrating the broad pattern of local public school history, the subject property is not the only public school building in Kasson; indeed, it is not even the sole surviving public schoolhouse more than fifty years old. In our opinion, absent a specific link to an important event, the building cannot be considered historically significant on the basis of its simple association with the history of public education in Kasson.

With regard to National Register Criterion "C" (design and construction value), the Old Elementary School Building is in all respects typical of public school buildings erected in Minnesota during the early twentieth century. When it was built in 1917-18, state law mandated that public schools provide better educational opportunities for children in both urban and rural communities. The building's major design elements reflect Progressive Era educational reforms which adopted the "work-study-play" school model developed by John Dewey, William W. Wirt, and others. This approach to schoolhouse design emphasized centralization and professional control, architectural standardization, rigid organization of interior spaces, and specifications relating to building health and safety measures (e.g., fireproof construction, improved classroom lighting and ventilation). To a lesser extent, the building also mirrors contemporary architectural fashions and the state of the economy on the eve of the First World War.

The design of the school building is based upon the standard "alphabet plan" schoolhouse that was widely built throughout the United States between 1900 and 1945. (The building type takes its name from the "H" shape of the footprint, perhaps the most common form adopted by alphabet plan schools; other popular forms were "I", "T" and "C".) Alphabet plan school buildings in Minnesota exhibit a wide range of architectural styles, including Beaux-Arts, Neoclassical Revival, Collegiate Gothic, and Art Moderne, and their standardized plans reflect the early-twentieth century consensus among educators and architects as to the best design for urban schoolhouses. The decorative elements of the Old Elementary School Building combine aspects of Beaux-Arts neo-classicism with the more modern Arts & Crafts Movement-inspired Prairie School style. The school's architects appear to have been selected because of their familiarity with legislatively-mandated schoolhouse design standards. To the degree that the architects were involved in the school's basic plan of construction, Nels and David Jacobson were employed primarily to serve as structural engineers and draftsmen—the architectural form of the building having already been developed and implemented by educators and politicians. Clearly, the design was intended to be accepted by school authorities rather than to educate public taste in the "frozen music" of high-style architecture: the combination of Beaux-Arts and Prairie style decorative

treatment was merely facadism, a skin-deep embellishment of a standard-plan schoolhouse.

In conclusion, the Old Elementary School Building is an example of the "H" plan public schoolhouses built in the first quarter of the twentieth century but is not considered to be of exceptional importance architecturally. While it may have some historical value for illustrating the architectural standardization of early twentieth century public school buildings, it lacks individual distinction, and while it exhibits some detailing that shows the influence of the Beaux-Arts (sometimes referred to as City Beautiful Classicism), Neoclassical Revival, and Arts & Crafts movements, when compared with National Register-listed schoolhouses it lacks many of the distinctive characteristics that are commonly found on school buildings recognized as significant specimens of period style architecture. The architect, Nels Jacobson, is not generally recognized as a leading architect or master builder, though the firm of Jacobsen & Jacobson eventually became fairly prominent and had many public commissions. (Inclusion of some of the company's surviving records in the Northwest Architectural Archives at the University of Minnesota should not be taken as a scholarly judgment on their contributions to Minnesota architecture.)

Before moving on, the City Council (and other readers) should be cautioned that historic preservation is not a science: the evaluation of historical significance is always a subjective judgment and, unlike some forms of natural resource assessment, no numerical or categorical evaluation system exists for determining the relative historical and architectural value of old buildings. In our opinion, the Old Elementary School Building should not be considered historically significant under National Register Criteria "A" or "C" –but this judgment is by no means unequivocal and we acknowledge the possibility that other preservation professionals, perhaps equipped with more detailed information relating to the building's historic context, might be able to demonstrate to an impartial audience how the building meets one of the National Register criteria for historical significance.

Finding #5: Demolition Could Proceed Even if the Property was Determined Eligible for the National Register.

The National Register was designed to be and is administered chiefly as a planning tool. In the absence of some form of local preservation overlay zoning, inclusion of a property in the National Register does not protect it against any adverse effects caused by projects which do not use Federal funds or require permits from Federal government agencies. It is our understanding that the City of Kasson will not use Federal funds to demolish the property and the project does not require a permit from or approval by a Federal agency. Therefore, the proposed demolition is not a Federal "undertaking" and it is not subject to SHPO review and compliance with Section 106 of the National Historic Preservation Act or any other laws or regulations dealing with cultural resources, such as the National Environmental Policy Act. (The Section 106 review and compliance process is covered in the regulations pertaining to the Advisory Council on Historic Preservation in the Code of Federal Regulations, Title 36, Part 800, subpart B.)

In the event the Old Elementary School Building was determined eligible for listing in the National Register by the Minnesota SHPO prior to demolition, completion of an EAW would be discretionary and would probably not result in substantially different findings of fact. At this juncture, however, having complied with the applicable laws and administrative rules, the City Council could adopt any course of action it deemed appropriate with respect to the former school property.

Finding #6: The City of Kasson Has Made a Reasonable and Good Faith Effort to Find an Alternative to Demolition.

The Old Elementary School building is a legacy of the public school system in Kasson and it served the community well for over eighty years. However, it is functionally obsolete and the City can no longer afford to maintain it in its current condition without diverting resources which are needed for other community services. While adaptive use would obviously be preferable to demolition, by virtue of their unique design and structural characteristics schoolhouses like this one are not inherently easy or cheap to recycle for new uses. The 2005 *City of Kasson Space Needs Study*, prepared for the city by Kane and Johnson Architects, Inc., advocated preservation of the Old Elementary School Building and offered a viable alternative to demolition. Subsequent to the space needs study, there was evidence of popular support for rehabilitation of the property; indeed, city officials appear to have created a public policy environment that was decidedly sympathetic towards preservation interests. Unfortunately, local preservationists failed to make an adequate case for the merits of reusing the old school property. In light of the results of the November 2007 referendum, the City of Kasson no longer needs the building.

KARE and others who advocate preservation of the property have not yet produced a legitimate plan for financing its acquisition and redevelopment, nor has any party come forward with a plan to market the property for rehabilitation. Granting additional time for the further exploration of alternatives to demolition is not a panacea. First and foremost, buildings stand the best chance for preservation when they are in use. Redevelopment plans often involve a considerable passage of time during which the historic property may be further degraded by deterioration, vandalism, or other destructive impacts. Too often, reuse schemes for functionally obsolescent properties such as schoolhouses result in adverse impacts which compromise their historic integrity – the landscape is littered with old buildings that were mutilated so that they could be “saved” from demolition. Interim protection treatment options, such as “mothballing” the building while awaiting adoption of a reuse plan, may be technically feasible but could entail significant costs that would need to be borne by the taxpayers – money that could be channeled toward other, more cost-effective local heritage preservation initiatives, such as completion of a comprehensive, city-wide survey of buildings over 50 years old, establishment of a municipal heritage preservation commission, and development of a preservation ordinance and comprehensive plan.

In our opinion, the City of Kasson has made a reasonable and good faith effort to explore a range of preservation and adaptive use options, beginning with the 2005 space needs study and culminating in the November 2006 referendum.

Finding #7: Architectural Recordation is the Preferred Mitigation Strategy.

Although there is no statutory definition of mitigation with respect to historic properties in Minnesota, mitigation by architectural recordation is today the standard of practice for dealing with historic properties that must be substantially altered or demolished. Obviously, the impacts of demolition cannot be avoided or minimized in this case: unlike wetlands or other environmentally sensitive natural resources, old buildings and other cultural resources cannot be replaced with substitute environments. Historic buildings slated for demolition are sometimes moved to new sites with compatible surroundings where they can be preserved and rehabilitated—though, with respect to properties already listed in the National Register, buildings must be de-registered prior to moving because the National Register criteria limit the consideration of moved properties. In any case, moving a structure the size of the Old Elementary School Building would be prohibitively costly, if not technically impossible.

Frequently, when demolition must occur, historic buildings are recorded so that a body of information will remain about them. Architectural recordation usually consists of measured drawings and photographs that document existing conditions, reproductions of the relevant historic plans and photographs, and written information that reconstructs the property's physical history as well as its association with important events. Recordation materials should be produced by qualified professionals and meet established archival standards. Oftentimes, architectural documentation materials are also digitized for easy, on-demand duplication and to make the products accessible to a wider audience through the Internet.

We strongly recommend mitigation of the Old Elementary School Building by conducting architectural recordation prior to demolition. The first step in implementing this mitigation strategy will be to quickly develop an architectural recordation plan for adoption by the City Council. The mitigation plan should specify the desired documentation materials with reference to the relevant historical and architectural standards and designate the final depository for the recordation products. The mitigation plan could also address the need for historical interpretation and public education, though priority needs to be given to recording architectural features that will be lost when the building is demolished.

List of Information Sources Consulted

The published and unpublished sources which were consulted in the preparation of this report are listed below.

Code of Federal Regulations, Title 36, Part 60 (National Register of Historic Places) and Part 800 (Advisory Council on Historic Preservation). Electronic Code of Federal Regulations, <http://ecfr/gpoaccess.gov>.

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Minnesota Historical Society. Images of the Kasson Public School from the MHS Photographic Collection. Visual Resource Database Collection, online at <http://collections.mnhs.org/visualresources>.

Minnesota Rules Chapter 4410. Online at www.revisor.leg.state.mn.us.

National Register Bulletin: How to Apply the National Register Criteria for Evaluation. Revised. Washington: U.S. Department of the Interior, National Park Service; electronic form www.cr.nps.gov/nr.

Rochester Post-Bulletin. "Former Kasson School Makes Endangered List" and "1918 Kasson School Replaced One That Burned," by Heather J. Carlson, 4 May 2007, online at <www.postbulletin.com>.

The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. As published in the Federal Register Vol. 48, No. 190, Thursday, 29 September 1983.

Spading, Kenton. *Historical Review: Kasson Public School and the Architect Nels S. Jacobson Jr.* Report submitted to the Kasson City Council on behalf of the Kasson Alliance for REstoration (KARE), 11 April 2007. Online at <www.kassonalliance.org>.