

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DODGE

THIRD JUDICIAL DISTRICT
Case Type: Other Civil

State of Minnesota, by
Kasson Alliance for Restoration, Inc.,

Court File No. _____
Judge _____

Plaintiff,

v.

**AFFIDAVIT OF
KENTON E. SPADING**

City of Kasson, a Minnesota municipal
corporation,

Defendant.

STATE OF MINNESOTA)
)ss.
COUNTY OF RAMSEY)

Kenton E. Spading, being first duly sworn on oath states, or affirms, as follows:

1. I am a board member of the Kasson Alliance for Restoration, and am making this Affidavit in support of plaintiff's motion for a temporary injunction. Over the past several months, I have invested hundreds of hours in researching and documenting the Kasson Public School.

2. Kasson has had at least five schools during its history. The first three were constructed during the nineteenth century. The third Kasson public school was destroyed by fire in 1917.

3. To replace the third school, the Board of Education retained architect Nels Jacobson, Jr., of Owatonna to design a new building. Jacobson and his brother went on to design numerous schools along with other public and private buildings in Minnesota, elsewhere in the midwest, and in Florida. Roosevelt High School in south Minneapolis is one of them.

4. The Kasson Public School, completed in 1918, is the largest and most impressive structure in the city, covering most of a city block. The school itself consists of three two-story brick buildings with clay tile roofs. Its main entrance is neoclassical, while the remainder leans toward the Prairie School style. The buildings, connected by hallways, contain approximately 10,000 square feet in each wing and 8,000 in the central building.

5. The gymnasium in the center section of the school was used not only for sports but also for a wide variety of community events over many decades, such as spelling bees, concerts, theater productions, and assemblies.

6. In 1954, residents of the Kasson and Mantorville school districts responded to population changes by voting to consolidate. They approved a bond issue to erect a new high school north of town. The 1918 school continued to serve as an elementary school until approximately 1996, when a new elementary school was added to the high-school complex. After that, the old school was used for early childhood and community education until approximately 2004, when it was vacated.

7. The city acquired the school property in April 2006. In November 2006, the city council resolved to demolish the old Kasson Public School.

8. It is clear from a number of professional evaluations that the public school buildings are physically and structurally sound, and a good candidate for rehabilitation and reuse. For example, in 2004 the city of Kasson itself asked Kane and Johnson Architects of Rochester to perform a “space needs study.” The Kane and Johnson firm provided the city with a report summarizing its conclusions. That report appears on the city’s Web site at <www.cityofkasson.com>. A true and correct copy is attached to this Affidavit as Exhibit 1.

9. With respect to the Kasson Public School, the report states as follows:

The re-use of the old Elementary School for City Hall and Library use would serve to preserve and restore a major piece of Kasson History! The location of the building is ideal for City Hall as well as Library use and offstreet parking is available. The exterior of the building is in good condition considering its age and with minor work could be restored. The interior of the building would require major renovation but we anticipate that this could be more cost effective than construction of a new building on a new site.

City of Kasson Space Needs Study and Analysis submitted by: David I. Kane and Kevin T. Blondo, February 1, 2005, at 3. The report goes on to state with respect to the building’s suitability for alternative uses: “At this time, however, it seems clear that the building will accommodate the necessary functions” (i.e., renovation for use by the library and city hall offices). *Id.* at 4.

10. Representatives of the Kasson Alliance for Restoration have spoken with and contacted many different individuals and organizations with expertise in the reuse and

rehabilitation of historic buildings, including the Minnesota Historical Society. Among other things, the MHS staff proposed that a formal reuse study be conducted. Such studies are often employed in historic preservation cases, and their purpose is to identify the most viable reuse possibilities for a particular historic property. Until such a study has been performed, it certainly cannot be concluded that no viable alternative options are available for the Kasson Public School building.

11. Throughout the history of the United States, schools have played important social, cultural, and historical roles. This is unquestionably true of Kasson. In Kasson and other small communities, local needs for cultural exploration, exposure to fine arts, and adult education made that role even more significant. As a result, performances, concerts, athletic games, and myriad other events held at the school were social and cultural highlights, particularly before television became prevalent in the 1950s. Overall, the school has played a major role throughout the history of Kasson in defining and rallying the community. While the town has many churches, it has only one school system, which tends to unite people. The emotional impact of the demolition of the beloved public school would be immense, as would the loss of historical and aesthetic identity.

12. One product of my efforts at research and documentation about the school is a report that I prepared discussing some of the historical background. It is attached to this Affidavit as Exhibit 2.

FURTHER YOUR AFFIANT SAITH NOT.

Kenton E. Spading

Subscribed and sworn to or affirmed before me
on this _____ day of May, 2007

Notary Public