

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Civil Other/Ballot Omission

Declaratory Judgment

Bruce Clark, Peter Butler, and Ann Dolan,

Honorable Leonardo Castro

Petitioners,

Case No. 62-cv-19-857

v.

City of Saint Paul, Minnesota;

and

Shari Moore, in her official capacity
Saint Paul City Clerk;

and

**DECLARATION OF
JENNEFER KLENNERT**

Joseph Mansky, in his official capacity
Ramsey County Elections Manager,

Respondents.

Jennefer Klennert, hereby states and declares as follows:

1. Currently, I am a Senior Client Manager for Foth Infrastructure & Environment, LLC, providing Strategic Planning for Public Solid Waste Clients. I have been employed with Foth for 5 years.
2. I have consulted other municipalities on many trash programs. This includes the City of Peoria, IL, Sheboygan, WI, Bloomington, IL, Dubuque, IA, Milwaukee,

WI, Ramsey/Washington Recycling & Energy Board, Ramsey County, Washington County, Hennepin County, Minneapolis, MN. Prior to Foth, I managed over 600 public sector clients as the Management of Municipal & Community Relations for Advanced Disposal and Waste Management.

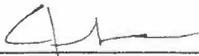
3. I worked as a consultant for the City of Saint Paul on organized trash collection, including providing assistance in preparing for negotiations and contracting with licensed trash haulers, navigating the organized collection statute (Minn. Stat. § 115A.94), creating a work plan task matrix, and assisting in public education and outreach.
4. The new organized trash collection (“OTC”) system is still in development and still in transition in practicality. It takes approximately one to two years for any system to stabilize. OTC in Saint Paul is still in the infancy stages.
5. The open hauling system that was in place prior to OTC cannot be reverted to for many reasons, including but not limited to, those discussed below:
6. There is no ability to go back to the system as it was set up with haulers prior to implementation of OTC because the licensed trash haulers in Saint Paul have consolidated dramatically. Six of the thirteen haulers that existed prior to OTC have sold to other companies and are no longer able to provide services to Saint Paul residents.
7. Haulers have invested a tremendous amount of time and actual out of pocket and capital (including new trucks) to adjust to OTC. Haulers also have purchased updated equipment based on their new routes because different truck styles work

better in different geographic areas. They may not have access to equipment to service other parts of the City.

8. A Work Plan Task Matrix was developed as part of the OTC planning and implementation process. During the planning it was determined that no less than ten months was required to appropriately educate the public and implement the changes needed to go from an open trash hauling system to OTC. A similar work plan task matrix would be required to implement any future phases of “switching” back to open trash hauling. The same type of planning process and most of the tasks will need to be followed again by multiple parties for any type of change.
9. Moreover, “switching” to open hauling in a short amount of time is not possible. For example, if approximately 74,000 households would need to set up service accounts within the next 30 days, with an 8 hour day, and 20 business days, this computes to 468 households needing to sign up for service per hour (3,744 per day).
10. Each of these service accounts will then need to be placed on the appropriate route to ensure that service is received on the first day. It took the haulers approximately five months to map the City and determine routes.

I declare under penalty of perjury that everything I have said in this declaration is true and correct.

Dated: 6-11-2019



Jennefer Klennert