Lisa Smith	CORRESPONDENCE 1/24/2022 DOCUMENT NO. 00512-2022
From: Sent: To: Subject: Attachments:	Office of Commissioner Passidomo Monday, January 24, 2022 8:11 AM Commissioner Correspondence Docket No. 20200226 Palm Island Sewer; Docket #20200226SU; SUBJECT Docket #20200226-SU Notice of Objection to the Central Sewer System Proposal for Palm Island and Request the PSC to Deny the Application for Original Certificate of Authorization the Proposed Central Sewer System for Palm Island; Docket#20200226-SU; Docket #20200226-SU; Docket # 20200226-us; Little Gasparilla Sewer; Docket #20200226-SU; docket #20200266-SU; Docket #20200226-SU Environmental Utilities Proposed Sewer; Docket #20200226-SU; Docket #20200226-SU; Docket# 20200226-SU; 2020026 SU; Re. Docket#20200226-SU; #20200226-SU; #20200226-SU; RE. Docket #20200226-SU; Don Pedro Island Sewer; Deny EU's application for original certificate Docket # 20200226-SU; Re Objection to EU proposal for sewers - Palm Island; Island sewer support

Please place the attached in Docket No. 20200226.

Thank you!

From:	James Davis <drjwdavis@mac.com></drjwdavis@mac.com>
Sent:	Sunday, January 23, 2022 4:53 PM
To:	Office of Commissioner Passidomo
Subject:	Palm Island Sewer
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Hello,

I am a home owner on Don Pedro Island and would like to express my opposition to the proposed sewer service.

The opacity on the finances of this company and the proposed project are a concern. We are giving them a blank check to charge us whatever the want to install the sewer and the opportunity to change us any thing that they want to in reoccurring charges. They have no experience in a project of this scope and no track record of even finishing what they have started.

If sewers are needed, there has to be a better way to go about it than to hire a company with no technical expertise for such a project.

I also do not feel the need for sewers on the island has been established. There seems to be no benefit to the homeowners who will fund the cost of the entire project. The needs of the island need to be determined by a company that is not going to profit from the sewer system.

Please deny EU's application for wastewater service

Thank You James W and Christie Davis 161 S Gulf Blvd Placida, FL 33946

From:	quaintfox@aol.com
Sent:	Sunday, January 23, 2022 4:45 PM
То:	Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of
	Commissioner Passidomo
Subject:	Docket #20200226SU
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

From: Catherine Harvie 9878 Little Gasparilla Island Placida, FL 33946

Quaintfox@aol.com 407 694 5816

January 23, 2022

To: Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850

Dear Commissioners of the Public Service Commission,

I am a property owner at 9878 Little Gasparilla Island Placida FL 33946 which is a property within the service area of the proposed central sewer system (hereafter referred to as "project"), Docket #20200226SU. I formally object to and request that PSC deny Environment Utilities (EU) application for Original Certificate of Authorization for the proposed central sewer system.

Installation of proposed central sewer system will impose multiple hardships on the property owners on the LGI both financially, and logistically as well as have a potential for causing environmental damage.

Original estimate of hook-up cost for the project was about \$20K per unit. Even though after the rates and tariffs were finally submitted by the applicant, the requested Service Availability Charge per ERC was reduced to total estimated \$13,221, other financial and logistical consideration cannot be ignored.

Every homeowner on the LGI will be obligated to pay a monthly sewer ONLY bill in the amount currently estimated at \$178.78. This amount is basically two times the amount of what residents pay in Rotonda, the closest to LGI mainland location, and for Rotonda residents their bill includes BOTH water and sewer. In the meantime, the average cost to EU per unit per month is \$97.18.

Due to installation on a barrier island the project will not utilize central pump stations and each owner will be required to have individual "grinder" pumps installed which is an additional cost ranging from \$1,100 to over \$6,000 per pump (here are a couple of sample pricing/requirements, we are not sure which exact grinder pump would be required by project installers Liberty Pumps 2448LSG202 \$5,807.76 Grinder Package, Simplex | Zoro.com, Gol Pumps Sewage-Grinder Pump, 460V, 3PH, 3in., SS304, Max. Flow 20640 GPH, Horsepower 7-1/2 HP, Port Size 3 in, Model# GPQ-732 | Northern Tool, Liberty Pumps PRG102M \$1,155.75 Grinder Pump, Manual, 230V | Zoro.com). Moreover, a "grinder" pump requires a dedicated 230-240V electrical panel installed by a licensed electrician at owner's expense, and if the owner has maxed out their main electric grid with other large-draw items, the panel will need an expensive upgrade to accommodate the new panel.

Grinder pumps have limited capacity (typically, 60 gal), so if there is a power outage, which happens on LGI A LOT and often for prolonged periods of time (sometimes for over a week, if it's due to a large storm) the pump will get over filled and cause sewage back up. This can be avoided by installing a back-up power generator, however this is another cost from about \$700 for a manual start generator to over \$10,000 for a stand-by one. Given that a lot of owners on the LGI don't live there full time, and even those who do live on LGI full-time are under evacuation orders during hurricanes that cause lengthy power outages, manual start generators are not an option since there would be no one to start them. Stand-by ones are exponentially more costly and their installation involves even more costs and logistical difficulties due to frequent flooding during high tides and storms.

Project installation would also require mandatory hook-up as per Charlotte County regulations within 1 year of availability with no grandfathering of existing septic tanks even if they are of recent installation. Homeowners would find themselves financially responsible for removing and crushing and filling the septic area regardless of septic tank age and/or condition as well as clearing landscape/removing trees to gain access for septics to be removed.

With all these costs required to hook up to the project and no pay-overtime plans homeowners may be forced to take personal loans to cover the lump-sum costs of connection to the project regardless of their financial circumstances/ability to pay these loans back on time.

Moreover, some properties have access constraints (such as no road to the property), permanently or semi-permanently submerged immediately adjacent grounds, etc. that will further complicate how applicant gains access for project installation without leaving a single property boundaries or causing structural and/or environmental damage. Most current utility easements are located in the road right-of way. The applicant (EU) has claimed ownership of a utility easement solely for the purpose of the project that will go from the sewer equipment, located near the house to the connection in the road without compensating the homeowner, causing further financial damages to homeowners by negatively affecting their property values.

Applicant is NOT a contractor and has NOT won a bid to install a sewer. Homeowners have no say in who will be contracted for the project installation. Applicant has the right to outsource the installation to a contractor of their choice, no performance bond is required, so there is no single point of recourse for the homeowners in case of project failure. Moreover, multiple agencies (County, DEP, etc.) are responsible for their specific areas under regulation/permitting, which creates a nightmare for determining the exact entity to be held responsible if the project runs on of money or fails entirely.

If the project installation is successfully completed the homeowners are still facing problematic system maintenance issues and emergency repairs. At this point the applicant has not addressed how the project will be serviced for regular maintenance issues or emergency failures/repairs due to weather and/or other adverse conditions. By being located on a barrier island the equipment is exposed to harsh environmental factors such as salt air and increased humidity as well as frequent flooding during high tides and/or storms which greatly reduces the life of equipment. For instance, average exterior A/C unit lasts about 5 years. The project equipment will likely need replacing about every 5 years as well at homeowners' responsibility and expense.

Additionally, no water quality testing has been done in our area to prove a need for sewer. Construction activities required to install the project will negatively affect the habitat and interfere with endangered species such as the gopher tortoise. Widespread construction and vehicle access will also damage the protected plant species of sea grapes and sea oats which, in turn, protect the dunes that form the barrier Little Gasparilla Island from erosion. Destroying dune-stabilizing plants will expose the properties to greater damage during storm and high tide flooding. For comparison: just to install a wooden dune walk-over requires DEP permitting and the installer must ensure that such walk-over does not damage the dunes and the stabilizing plants. Imagine what havoc would a sewer installation wreak on a barrier island with just golf cart or pedestrian use-created paths, no paved roads, or current vehicle access!

In the event of damage to the project equipment a sewer spill will pollute the adjacent waters of the Gulf and the Intracoastal. We just had that happen in the Tampa area when their sewage system failed (60,000 gallons of wastewater overflow into Tampa Bay waterways | wtsp.com). That will damage the environment much more that a subaqueous crossing from one or more septic systems that develop leaks.

To summarize: this project imposes a great financial burden and too much responsibility on homeowners. In addition it causes tremendous logistical difficulties and has a grave potential for large-scale environmental damage. For these reasons, I formally object to and request that PSC deny Environment Utilities (EU) application for Original Certificate of Authorization for the proposed central sewer system.

Respectfully,

Catherine Harvie

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From: Sent: To: Subject:	robert.der.der@gmail.com Sunday, January 23, 2022 4:27 PM Office of Commissioner Passidomo SUBJECT: Docket #20200226-SU Notice of Objection to the Central Sewer System Proposal for Palm Island and Request the PSC to Deny the Application for Original
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

My name is Robert Der and I own a home and reside on Palm Island at:

171 South Gulf Boulevard Placida, FL 33946-3294

My mailing address is:

P.O. Box 3294 Placida, FL 33946-3294

I am writing you to formally object to the proposed central sewer system for waste water service for Palm Island and request the PSC to deny the Environmental Utilities (EU) Application for Original Certificate of Authorization for the Proposed a Central Sewer System which includes Palm Island. Please understand that Palm Island is a bridgeless barrier island where access is only by a small ferry/barge system with very limited capability to transport large and heavy equipment that will be required for the project. This would significantly increase the project timing and cost and significantly reduce the ability of the islanders to get on and off the island during construction. I think this application lacks sufficient detail and analysis from an inexperienced small operator with a questionable reputation. I believe EU is hoping to obtain approval of the application for Original Certificate or Authorization for the Proposed a Central Sewer System for the following reasons:

1. NEED FOR SERVICE. I am not aware of any scientific or environmental studies have ever been conducted to determine that there is a need for a central sewer system for Palm Island. I am a seasonal resident of Palm Island and am here only just over six months a year. Many home owners, including renters, stay on Palm Island much less than six months a year. I estimate that the total occupancy duration for our homes, including renters for the rental homes, would average substantially less than six months, probably closer to three months, per year. Palm Island has primarily residential properties with only Palm Island Resort (Resort) at the north end of Knight Island as the ONLY commercial entity on the island. The Resort consists of privately owned condo units and homes for rent as well as some owner occupied private residences with a restaurant and a couple of small shops. There are no additional stores, restaurants or other businesses that would dictate a need for a centralized municipal sewage treatment facility. Palm Island Resort owns and operates its own sewage treatment facility. The Resort and sewage facility should continue to provide for and take care of the Resort's needs. While the Palm Island homes have been on septic systems for years, the local water has been periodically tested and the results consistently do not show that the current residential septic systems are negatively impacting the water quality and local environment. I believe a possible leak from the proposed

underwater pipeline carrying the waste material poses a much higher risk. I, also, believe the construction of the central sewer system would have a negative effect on local habitat and endangered species like the gopher turtles.

The installation of the new sewer system would require us homeowners to:

Pay a huge connection fee Pay a large monthly fee Pay a large monthly fee that could be twice as high as some nearby areas Impact on current utilities such as electrical upgrades and a need for a interruptions (Palm Island experiences multiple power outages each year) Additional costs for yard and landscaping work due to sewer hookup

generator for power

We should not be trying to fix something that is not broken. Due to the lack of demonstrated scientific evidence for the need for a centralized sewer system and the significant costs to be incurred, I strongly recommend that EU's application must be denied or rejected.

2. FINANCIAL ABILITY. EU has not provided sufficient and fully transparent information regarding its ability to finance this multi-million dollar and multi-year project. EU is a newly formed small company with no track record or financial statements to indicate that they would be capable of obtaining financing for and reliably managing a project of this magnitude and complexity. The requirement for performance bonds is a common business practice for construction projects and in this specific case of an inexperienced and small company like EU, this should be mandatory and nonnegotiable! I believe there is substantial risk that EU would not have the technical expertise or financial resources to obtain a performance bond, much less reliably completing the project.

If for some unfathomable and unbelievable reason, the application is granted, the application should be nontransferable. This would prevent EU from flipping the rights to the project as it may not have any intention or capability of completing the project. This would prevent an unqualified company like EU to flip the application to another company for a large fee and a quick profit.

Due to the small size of the company and lack of demonstrated financial resources and questionable intent and ability to execute on the project, I strongly recommend that EU's application must be denied or rejected.

3. TECHNICAL EXPERTISE. It is apparent that EU does not have technical expertise or skill set to put in a central sewer system. The only experience the owners of EU claim is the distribution of water to Little Gasparilla Island. That company has a history of poor service and dissatisfied customers. A water supply company that accepts treated water from another mainland utility and then distributes it, reads the meters, and collects the payments, is vastly different from the complexity and magnitude of designing, installing, maintaining and running a municipal sewage system on a barrier island. I understand that EU plans to contract with an engineering/construction firm to design and build out the proposed system. I question if the two owners of EU would even be qualified to draft the technical specifications for a request for a proposal to build the system or evaluate the proposals once they arrive. The EU owners have no experience or qualifications in designing, building and management of a project of this size and complexity. Due to EU's lack of technical expertise, experience and resources, I strongly recommend that EU's application must be denied or rejected.

4. FAIR AND EQUITABLE RATES & CHARGES. From the start, EU has not been transparent or fully analyzed the the costs and resulting rates and charges for the proposed central sewer system. Initially, EU boldly and without merit requested to have the Authorization separated from any information on proposed installation costs or rates. The PSC thankfully denied the request. Following the denial, EU suggested a

possible connection fee of \$20,000 per dwelling. It seems that this was simply a guess they hoped to get approved. Now, EU is "guessing" a much lower connection fee of \$13,000 per dwelling. EU has yet to present transparent and realistic cost estimates, calculations and related assumptions based on certified preliminary designs and specifications to justify rates and charges. Reliable cost estimates cannot be calculated without an adequate preliminary design and cost calculations from a licensed and qualified engineering firm with experience in designing and overseeing the construction of central sewer systems. Due to EU's lack of a preliminary design and cost calculations from or evaluated by a qualified engineering firm, the financial information provided by EU cannot be relied on. As a result, any rates and charge information based on EU provided information could be wildly inaccurate and should not be relied upon. Due to the lack of reliability and transparency of EU's cost estimates and are not based on valid engineering projections, I strongly recommend that EU's application must be denied or rejected.

Thank you for your consideration.

Best regards,

Robert Der

Mobile telephone numbers: USA: +1-630-373-7886 China: +86-136-6196-0494 Email: robert.der.der@gmail.com or derro@yahoo.com

From:	Jamkelly5 <jamkelly5@aol.com></jamkelly5@aol.com>
Sent:	Sunday, January 23, 2022 4:06 PM
То:	Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of
	Commissioner Passidomo
Subject:	Docket#20200226-SU
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

#### Commissioners,

I am writing in regards to the proposed central sewer system application by Environmental Utilities (EU). We are seasonal residents and our home is fairly new. This will be our third winter on Palm Island. I'm sure you are aware of the cost of a new septic system for an individual home -not a small price. We followed all the rules and regulations requested by the state and county. Our system is properly maintained by a licensed septic contractor who is recognized by the state and county. Now you're saying that all of the time and money we've invested is for nothing? I failed to see how a central sewer line would benefit us and feel we are being blindsided by another huge unnecessary cost for a system we don't want or need.

Also the lack of information regarding the finances of EU is concerning. And the huge change in their estimated hook up cost is troubling. Does this company, which runs a water treatment plant, not a septic company, have the expertise to take on a project of this magnitude? There are so many unknowns with EU that are very concerning.

Also, there have been no environmental concerns regarding the existing septic systems on Palm Island, and this proposed line is not something the residents want or need.

Palm Island is a special place. The residents truly care about the beautiful environment in which they live, and the animals they share it with. The disruption the construction of a sewer line would cause could be devastating to some of those animals – particularly the gopher tortoise, a protected species. It will also be disruptive to the lives of the residents, who rely on small roads and a car ferry to access the mainland. Sharing that ferry and those roads with construction crews and equipment will be problematic.

We urge you to look at the facts, and listen to the voices of the residents on the island whose lives will be impacted, and deny EU a permit.

Thank You, Jim & Lori Kelly 189 N. Gulf Blvd. 651-260-7449

Sent from the all new AOL app for iOS

From:	Dona Cabela <cdjean20@gmail.com></cdjean20@gmail.com>
Sent:	Sunday, January 23, 2022 3:49 PM
To:	Office of Commissioner Passidomo
Subject:	Docket #20200226-SU
Attachments:	Letter to PSC against island sewer.docx
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Hello:

Please see attached letter in regards to my formal request to deny the application for original certificate of authorization for the proposed central sewer system.

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Thank you Respectfully Chaz & Dona Cabela

From:	nelsondot@earthlink.net
Sent:	Sunday, January 23, 2022 2:30 PM
То:	Records Clerk
Cc:	Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject:	Docket # 20200226-us
Follow Up Flag: Flag Status:	Flag for follow up Flagged

Dear Clerk and Commissioner's,

This is Mary Dorothy Kirkland and I am a homeowner within the proposed service are on Little Gasparilla Island. I am formally requesting that the PSC deny EU's application for wastewater service.

#### Below are some concerns and impacts to us as owners:

Average Residential Bill: \$178.78, which is roughly twice the amount that a ratepayer on the mainland in Rotonda pays per month for water and wastewater combined. Note that the average cost to EU per customer per month is \$97.18. Electric: the system pump requires a separate electric panel, installed by a licensed electrician at the expense of the owner. More electric: If the owner has maxed out their main electric grid with pool equipment or other large-draw items, the panel will need an expensive upgrade to accommodate the new panel.

Generator: the grinder pump has a limited capacity (60 gal) and in the event of a power outage will be unable to function for long. Homeowners will need a generator to keep the system running to avoid sewage back-up. Tree removal: Landscaping and hardscaping around the septic area will need to be cleared at the expense of the homeowner to gain access to crush & fill the septic tank. No pay-over-time plan: Ratepayers may need to take loans to cover the cost of connection Mandatory Hook-up: Charlotte County regulations require all homes to connect to central water and wastewater within 1 year of availability. No grandfathering of septic systems: regardless of age or condition.

I am concerned about financial hardship and ability as well as fair and equitable rates and charges.

Thank you for your attention to this serious issue.

Mary Dorothy Kirkland

Nelson Kirkland <nelson@centralfloridamediagroup.com></nelson@centralfloridamediagroup.com>
Sunday, January 23, 2022 2:17 PM
Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of
Commissioner Passidomo
Nelson & Dot Kirkland
Little Gasparilla Sewer
Flag for follow up Flagged

I own a house on Little Gasparilla Island and I would like to voice my objection to the proposal and ask the PSC to deny the EU Application for Original Certificate of Authorization.

- 1. I question the need for the service.
- 2. I question the applicants financial ability to install and sustain, I mean shouldn't this be a government project if it's so vital?
- 3. Has the applicant any technical expertise or could the commission be responsible for a major environmental catastrophe if the applicant messes up.
- 4. The rates that have been tossed around for homeowners are ridiculous.

--Best regards, R . Nelson Kirkland 9768 Little Gasparilla Island

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From:	Candyce Cohen <candycecohen@gmail.com></candycecohen@gmail.com>
Sent:	Sunday, January 23, 2022 2:10 PM
To:	Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject: Attachments:	Docket #20200226-SU ATT00001.htm; ATT00002.htm; ATT00003.htm; ATT00004.htm; ATT00005.htm; ATT00006.htm; ATT00007.htm; PSC Letter Docket #20200226-SU .pdf; ATT00008.htm
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Distinguished commissioners LaRosa, Clark, Passidomo and Clerk of the Commission,

Good morning. I have been a homeowner on Don Pedro Island in Charlotte County since 1990, and a full-time resident since 1995. I am formally requesting the Public Service Commission DENY Environmental Utilities LLC's (EU's) application for wastewater service for the following reasons:

#### 1. NEED FOR SERVICE

Water quality testing in and around Lemon Bay and northern Charlotte Harbor has not established the need to replace septic systems with a central sewer system. To address this concern, EU emailed interested parties information from a Florida Atlantic University study on septic system impact on the "urbanized Indian River Lagoon" area on the east/Atlantic coast of Florida. EU has also referenced via email that the islands to the north (in Sarasota County) and to the south (in Lee County) are on central sewer.

- The population density from Indian River and surrounding coastal counties are significantly greater running from 20% to 85% greater population density than Charlotte County.
- I also note the Indian River Lagoon is listed as the waterway with the 4<sup>th</sup> highest volume of untreated sewage spills in the state from Florida DEP analysis spanning 2009 – 2018, and therefore should not be conflated with Lemon Bay and Charlotte Harbor.
- As Mr. Boyer has also communicated the islands north and south have central sewer, to be clear both those counties have 280% greater population density than Charlotte County.
- Don Pedro, Knight and Little Gasparilla Island differs significantly from our neighbors on the east coast. Besides population
  density referenced above, the islands do not support high-rise/multifamily nor commercial development (beyond a single resort
  on the north end). Extensive commercial development is not zoned for and not contributing to the need for central sewer. In
  fact, our zoning ensures this will not change.
- Anecdotally, we have seen on other islands up and down the coast, when sewer is installed developers "lobby" county and city
  commissions to alter zoning to increase development which would fundamentally change the nature of the islands and the
  Florida native environment we have today.

Given these concerns, I request EU's application be DENIED.

#### 2. INCREASED RISK OF SEWAGE SPILLS DUE TO POWER INTERRUPTIONS (vs AGEING INFRASTRUCTURE)

While future local water quality studies may one day show some nutrient leakage from septic tanks, central sewer adds risk for environmental nightmares beyond an individual home's septic tank collapsing here and there. Checking Florida headlines and Florida DEP Public Notice of Pollution (PNP) tracking of sewage and wastewater spills[1] over the past few years[2]

In 2019, the Department of Environmental Protection reported 2,779 wastewater spills in Florida, compared with 1,282 reported spills in 2007 There was a large jump in 2017, the year of Hurricane Irma, of a reported 3,452 wastewater spills. ... Pathogens in wastewater are known to cause lung and intestinal infections.



https://projects.wuft.org > humanhazard > major-spills-fro...

https://www.floridatoday.com > story > news > 2021/12/16

Thousands of gallons of raw sewage spilled in Titusville, Palm ...

Dec 16, 2021 – Thousands of gallons of raw sewage leaked in Titusville, Palm Bay ... according to the Florida Department of Environmental Protection.

https://www.abcactionnews.com>news>region-pinellas

At least 1,300 gallons of sewage leaks into St. Pete waters

Jul 20, 2021 — This is also not the only wastewater leak that has happened recently around the Tampa Bay area. The Florida Department of Environmental ...

Major spills from Florida's sewage treatment plants are on the ...

# Aging infrastructure and storms contribute to massive spills

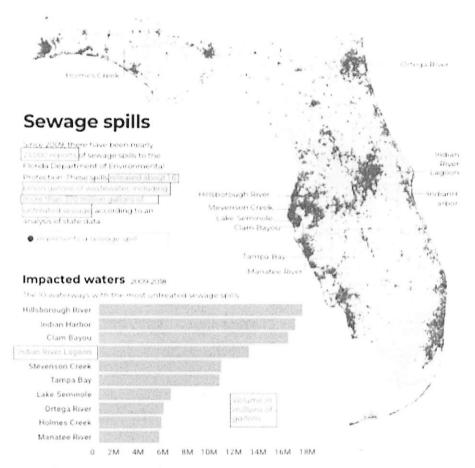
BY JOSH SALMAN. JENNIFER BORRESEN, DAPHNE CHEN AND DAK LE / GATEHOUSE MEDIA

, Sarasota Herald-Tribune

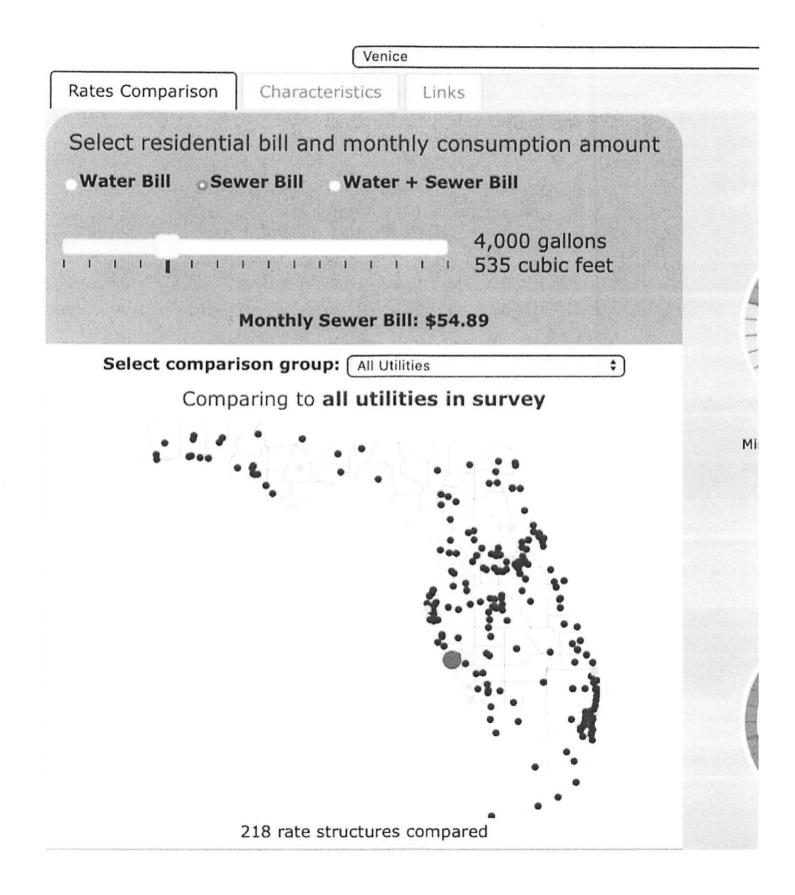
M ore than 900,000 gallons of raw sewage flowed into Sarasota Bay after a violent December storm forced open a city pipe.

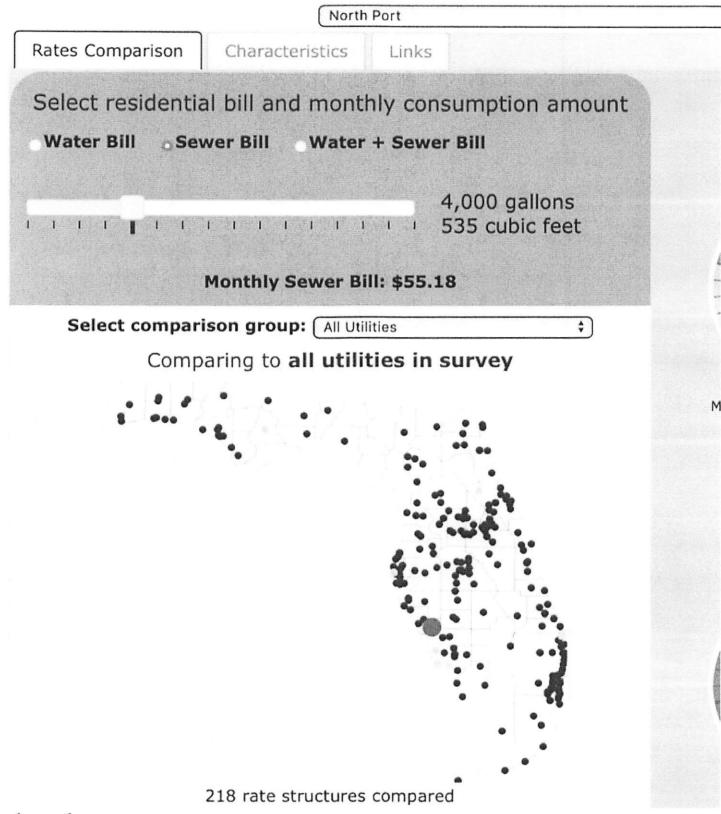
Summer rain in Daytona Beach and equipment failure in Jacksonville each prompted more than a quarter-million gallons of human waste to spill from sewers last year.

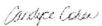
In Boca Raton, a pressurized pipe gushed out nearly 50,000 gallons of untreated wastewater, while another 55,000 gallons spewed from a DeFuniak Springs manhole into nearby Bruce Creek.



SOURCE Fillings Department of Environmental Protection







From:	terymiklos@aol.com
Sent:	Sunday, January 23, 2022 1:28 PM
To:	Office of Commissioner Passidomo
Subject:	docket #20200266-SU
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Subject: Docket #20200226-SU

I am Terry Miklos property owner of 40 N. Gulf Blvd. on Palm Island in Placida, FL. This island is unique in that it is one of the few islands left with no bridge access. Residents may gain access to the island by boat or by car ferry. Once on island most vehicles are golf cart

I am formally requesting that PSC deny EU's application for wastewater service for the following reasons:

1. EU has absolutely no experience in this field.

2. As a result of this lack of experience EU has not been able to give us an accurate cost analysis break down of cost per owner or per unit.

3. As a result of this lack of experience EU has given a monthly estimate service fee of 178.78 per month which is almost twice as much as anyone on the mainland with no limit on any increases.

4. As a result of this lack of experience EU is going to tear up our streets and our island to an extent that would destroy the island and island life for an unspecified amount of time. Construction would disrupt ferry access by residents significantly resulting in hindering access to our homes day and night for an unspecified amount of time. In addition, construction will destroy our custom landscaping leaving homeowners to restore their landscaping to its prior condition at homeowners expense.

5. As a result of EU's lack of experience and potential funding EU is requiring all homeowners to hook up within a year at a significant estimated cost that cannot be financed making homeowners on fixed incomes unable to meet the requirement.

6. As a result of this lack of experience if the commission allows EU to lay large sewage pipes across the ICW it could result in an environmental disaster in the event they were to fail due to this lack of experience.

7. As a result of this lack of experience there is a huge concern as to who is overseeing this contract. Agencies such as County, DEP, or Army Corp are experienced, supervised, pull permits and are under a performance bond. What recourse do we the homeowners have for cost overruns or failure in the event they can't perform?

8. As a result of EU's lack of experience homeowners have not received any information in the event of a hurricane or power outage which could cause significant sewage backup into the system resulting in a sewage spill.

9. As the result of EU's lack of experience we have received no information outlining service and maintenance of the system.

10. As a result of EU's lack of experience they have not taken into consideration new, upgraded and well maintained septic systems installed at a significant expense. In addition, they have not provided information or cost analysis for the MANDATORY removal of these septic systems at the owners expense.

11. As a result of EU's lack of experience EU will claim ownership for an easement on my property without permission, compensation, or going through proper channels.

For all the reasons stated above EU is clearly not qualified to perform such a project and should not be considered for approval. I am formally requesting that the PSC deny EU's application for wastewater service.

Respectfully,

**Terry Miklos** 

terymiklos@aol.com

From:	Dale Novak <dnovak@novakcreative.net></dnovak@novakcreative.net>
Sent:	Sunday, January 23, 2022 1:21 PM
To:	Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject:	Docket #20200226-SU / Environmental Utilities Proposed Sewer
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

January 23, 2022

Florida Public Service Commission LaRosa, Clark, Passidomo Clerk of the Commission

Re: Docket #20200226-SU / Environmental Utilities Proposed Sewer

Dear Commissioners:

As I am sure you are aware, the barrier islands known as Don Pedro, Palm Island, Knight Island & Little Gasparilla, and the homeowners thereof, are in the process of being subjected to a central sewer system as proposed by Jack Boyer of Environmental Utilities (EU).

As a property and homeowner on Don Pedro Island, we are without reservation opposed to this proposal as detailed below.

1) There is absolutely no "environmental" need for the system. Most of the septic systems on the island have been updated and further, most are tested yearly to meet environmental standards (both state and county). There has also been numerous new homes built on the islands in the last several years. Those new homes have met or exceeded the requirements for an environmentally efficient waste disposal system.

2) Our water quality has <u>NOT</u> been effected by the septic systems on the islands. The primary driver of the pollution and water issues is flowing down the Caloosahatchee river via releases from Lake Okeechobee. This is well documented by Captains for Clean Water, an environmental group based in Fort Myers — of which we are Members.

3) The EU has no experience — and no track record for providing sewer service. How it is possible for a company to have no experience in a project of this scale and complexity, and be considered and approved to provide this service is beyond words. It seems so immensely illogical that it's akin to handing the controls of a 747 full of passengers to a person with no flying experience. It is absolutely absurd. Have the Commissioners considered the possible outcomes, or possible solutions, if the EU goes bankrupt during this process, or fails to meet any memorable timetable? Or, if the systems they are proposing simply fail to work? What happens if the

system fails and dumps millions of gallons of waste water into our waterways? Will the EU be able to financially absorb and correct a failure of that magnitude — or will they just pass the cost on the the property owners? What about storm damage? Will the EU be able to restore service in a timely manner entirely at their cost — or once again, is their plan to pass on those expenses to the property owners? It appears that the entire EU proposal is based on passing <u>ALL OF THE COSTS</u> on to the property owners. Imagine FPL doing that after every storm or failure of the electrical grid.

4) The EU has shown zero accountability to demonstrate their ability to reasonably finance their proposal other than to suggest that all the costs will be burdened to the property owners. It is absolutely implausible to think that every property owner on the barrier islands can simply write checks for unknown amounts in perpetuity. The response by the EU to this complexity thus far is for the property owner to simply "get a loan" to pay for it. Again, this is beyond any sort of logical explanation. We don't own a money printing press.

5) Some homes have been recently built. The investment cost to install brand new septic systems could easily range from \$25,000 to \$50,000. These homes and builders have followed every rule and procedure, including permitting, to install these systems. Why does the Charlotte County continue to allow homes to be built, and for septic/drain fields to be added, if they are environmentally defective? It is incredibly irrational to think that a recently built home, or an older home with a brand new system installed, that was properly permitted, would now be asked to light a match to the money they spent on that system without compensation by the EU or County to remove it. Imagine if you purchased a brand new gasoline powered car for \$50,000 and were now being "dictated to" by Charlotte County and a private company that you must purchase an electric car — and your brand new car was to be crushed and sold for scrap. Does that sound reasonable and fair? That is exactly what's happening here.

6) The EU has no technical expertise in the venture. Zero. This is a disaster just waiting to happen and Charlotte County will be on the hook for the accountability of their actions in this matter when the entire process starts to unravel and fail. The EU will <u>NOT</u> be able to recover financially from a mass failure of the system without passing on <u>ALL</u> of the costs to the property owners. This is a brand new "for profit" venture with no guardrails whatsoever.

7) The EU has not demonstrated or provided any forecast of service costs other to suggest some canyon size ranges of proposed costs. "We don't know what it will cost yet" seems to be the answer — which is no answer of course. Plus, there is the connection cost which, again, seems to be a wide range from about \$10,000 to \$30,000 depending on the complexity. There's also the question of property rights with no compensation for the homeowner and the intrusion to their property. The fact that this unproven system, by a start-up company with no experience, will dictate that every homeowner be required to hook up to the system seems unconstitutional to me — given that it's a private company.

8) There seems to be a mandate that would also require every homeowner to install a back-up generator system to be able to prevent a back-up of the system in the event of a power interruption ... which happens often on the island. Again, the fact that a private company will "force" me to install a very expensive generator system just to ensure that their private system doesn't fail is just piling on the absurdity. Does any of this seem logical — to anyone?

We love these barrier islands. It's a unique lifestyle for sure. We understand that living out here is a personal choice. I think that the vast majority of property owners are uniquely in sync with our sensitive environment. We want what's best for our waters, which we all enjoy. For us, we just don't see the EU proposal to be based on any scientific fact, or more importantly, that they have zero experience in building or operating a sewer utility company. We all know what this entire proposal is actually about — the EU making money as a private company. It's not about helping our waterways or environment. It's about profit. It always is.

We ask, respectfully, that the State consider the property owners who choose to live on the islands, have a voice in this matter. In fact, we demand it. As such, we ask that the PSC deny the EU's application for central wastewater service.

Regards,

Dale & Julie Novak 611 Bocilla Drive Don Pedro Island 920.664.1088

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From:	Brad Roberts <bradr@classiccoatings.com></bradr@classiccoatings.com>
Sent:	Sunday, January 23, 2022 1:01 PM
To:	Office of Commissioner Passidomo
Subject:	Docket #20200226-SU
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

January 23, 2022 Dear Commissioner Passidomo,

My name is Brad Roberts and I am a resident at 450 S. Gulf Blvd in Placida Florida. We live on Don Pedro Island and are strongly opposed to allowing EU to proceed with the installation of sewers on our island. Not that we are opposed to sewers but we are opposed to EU and their owner to manage a project of this size given his lack of experience in this field.

It is my opinion that this is a job that the county should be doing if it needs to be done. The county has people on staff that have much more experience in this area than anyone at EU. Given Mr. Boyars record with the Little Gasparilla Water Company, I find it hard to believe that the county is even considering EU to apply for the Certificate of Authorization.

Please record my opposition to this matter and encourage you to vote down this Certificate of Authorization for EU.

**Brad Roberts** 150 S. Gulf Blvd Plucida Florida 33916 Pon Pedro Island

Cell: 920-912-6906

From: Sent: To:	Gregory A. Hearing <gregory.hearing@gray-robinson.com> Sunday, January 23, 2022 12:45 PM Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo</gregory.hearing@gray-robinson.com>
Subject:	Docket #20200226-SU
Importance:	High
Follow Up Flag: Flag Status:	Flag for follow up Flagged

My name is Greg Hearing. I am a homeowner on Little Gasparilla Island (LGI). I am writing to express my strong opposition to the EU's application for wastewater service covering LGI and other local barrier islands.

LGI is a unique part of what little is left of old Florida. There are no roads, no commercial operations and no tourism on the LGI. It is important to keep LGI that way for generations to come. The EU's application would disturb the natural habitat of the island and start it down the inevitable road to commercialization. We islanders love the island and take very good care to preserve it, including annually servicing and inspecting our septic tanks. The County charges us a fee for our tanks and makes sure they are inspected and safe for the environment annually. In fact, we have yet to see any water quality study of LGI area water which indicates that we are harming the environment. We are more concerned that a subaqueous sewer pipe system crossing the bay from LGI to the mainland poses a much more significant threat to the area water quality than our septic tanks. One serious spill by a subaqueous pipe system will ruin the bay. Hundreds of small leaks along the pipeline would do the same and may not even be discoverable.

We believe the EU is only arguing that our septic tanks harm the environment for its own clear economic advantage. The EU, which didn't win the right to provide wastewater service to LGI by a public bid process, stands to make a lot of money off the islanders if its application is approved. The hookup fee alone will be devastating to the islanders not to mention that the monthly fee will be more than twice what it is on the mainland in Placida for water and wastewater combined. Moreover, islanders would have to use their own electric to run the system and many homes may not have the capacity to do so bringing the cost up for such islanders even more. We believe that the EU doesn't have the experience or the economic stamina to take on what is a classic local government function. If we have to go to a sewer system, the County should install and maintain it rather than letting an inexperienced private entity that is way in over its head financially and technically attempt to do it. The County would likely have to come in after the fact and clean up the mess. It is my understanding that the EU has never built out and/or run a sewer system. In contrast, the County is an expert at it. So, if LGI has to go to a sewer system due to environmental concerns, then the County should install and operate it. That way, it will be handled well and be financially manageable for island residents.

Thank you in advance for your time and thoughtful attention to this important island issue.

Respectfully,

Greg Hearing 9706 LGI Placida, Fl. 33946 813-928-1334

**Gregory A. Hearing** 

Shareholder Board Certified in Labor and Employment Law, Education Law and Civil Trial by The Florida Bar T 813-273-5000 F 813-273-5145

GrayRobinson, P.A. • 401 East Jackson Street, Suite 2700, Tampa, Florida 33602

## GRAYROBINSON

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From:	Wayne Ator <wator@comcast.net></wator@comcast.net>
Sent:	Sunday, January 23, 2022 12:33 PM
To:	Records Clerk; Office of Commissioner Passidomo
Cc:	Cassie Ator
Subject:	Docket# 20200226-SU
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Dear Commissioners,

As a 40 year resident on Palm Island I am vehemently opposed to EU proposal. We do not have a sewage problem on this island. It seems inconceivable to me that this County would approve a fly by night proposal with no ideas of costs by someone who has no expertise! Even more so the person to whom he will sell this contract!

This will affect many residents who make up most of the highest tax base in our county. There is no bonding and therefore no assurance the job could ever be completed leaving us literally high and dry.

Due to FPL frequent interruptions in power we are also at the mercy of an electric pump in times of outage which could result in major backups throughout the island.

PSC must deny the EUs application for wastewater service. You are acting very irresponsibly in the trust which we placed in you when we voted!

Sincerely Wayne S., Cassie A. Ator wator@comcast.net 390 North Gulf Blvd, Palm Island (POBox 3147, Placida, FL 33946

Sent from my iPhone

From:	Vicki Elsberry <vickielsberry@gmail.com></vickielsberry@gmail.com>
Sent:	Sunday, January 23, 2022 12:13 PM
To:	Office of Commissioner Passidomo
Subject:	2020026 SU
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

I have sent a letter to la Rosa but don't know how to forward it to you. So sorry I'm technically challenged. Could you please see a copy of my letter. I truly want to make every commissioner aware of the failure of this attempt at providing sewer to Little Gasparilla Island. Sincerely

Vicki Elsberry.

Sent from my iPad

From: Sent: To:	Pete Hosmer <petehosmer@comcast.net> Sunday, January 23, 2022 12:00 PM Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo</petehosmer@comcast.net>
Subject:	Re. Docket#20200226-SU
Follow Up Flag: Flag Status:	Flag for follow up Flagged

My name is Pete Hosmer and I am the property owner of Lot #14 on Don Pedro Island for over 47 years. I am writing to you today in opposition to the proposed EU central sewer system. Specifically, I do not feel there is a need for this service since everything on the Island is working perfectly. Also, I am concerned about the technical expertise of the EU. This is not a project for some individual company with little experience. If it is deemed necessary, then it should be a county project.

I am also concerned about the financial responsibility of EU and all of the associated charges and rates.

So, I am objecting to this proposal and respectfully ask you to deny the Application for Original Certification of Authorization.

Thank you, Pete Hosmer petehosmer@comcast.net

From: Sent: To: Subject:	Jack Steen <turnersteen@icloud.com> Sunday, January 23, 2022 11:44 AM Office of Commissioner La Rosa; Office of Commissioner Passidomo; Office of Commissioner Clark; Records Clerk #20200226-SU</turnersteen@icloud.com>
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Dear Commissioners LaRosa, Passidomo, Clark and Clerk of the PSC

I have been a property owner for 31 years on Don Pedro Island. I object to the County granting an application for a wastewater license to Environmental Utilities LLC.

This application is on the agenda for February 8, 2022- #20200226-SU

I am not objecting to the sewer per se. If there is a need due to environmental issues I would be in favor of a sewers system to replace our septic tanks. My concerns stem from the lack of experience and financial background of the applicant in question.

If there are studies that show a need for a system, I would be in favor of a county run utility with ongoing maintenance and service with the best interest of the homeowners, county and environment at the forefront of your decision making.

Please deny this request.

Thank you,

Jack Steen

jacksteen1953@gmail.com

301 South Gulf Blvd #416

Don Pedro Island

Mailing address

P.O. Box 451

Placida, Florida 33946

616.450.5796

From:Sarah Turner <sarah@turnersteen.com>Sent:Sunday, January 23, 2022 11:40 AMTo:Office of Commissioner PassidomoSubject:#20200226-SUFollow Up Flag:Flag for follow upFlag Status:Flagged

Dear Commissioner Passidomo,

I am a property tax payor for 31 years on Don Pedro Island. My name is Sarah Turner and my husband and I purchased our place in January of 1991. I am objecting to the granting of an application for a wastewater license to Environmental Utilities LLC.

This application is on the docket for February 8, 2022- #20200226-SU

I am not objecting to the sewer per se. If it is needed and is proved by taking water samples around the island, I am ok with a sewer being necessary. The problem that I have is that the company that is applying for a license to build and operate this utility. EU LLC has no experience in this area and I am worried about the financial and technical wherewithal. What if the project hits a few snags? This is highly likely. Shouldn't this be contracted or bid situation? The person who applies first gets it? Doesn't the county have a lot of responsibility here?

Please vote down this request.

Thank you,

Sarah Turner

sarah@turnersteen.com

301 South Gulf Blvd #415

Don Pedro Island

Mailing address

P.O. Box 451

Placida, Florida 33946

616.915.3143

From: Sent: To:	Vicki Hosmer <vbhosmer@comcast.net> Sunday, January 23, 2022 11:29 AM Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo</vbhosmer@comcast.net>
Subject:	RE. Docket #20200226-SU
Follow Up Flag: Flag Status:	Flag for follow up Flagged

My family has owned Lot #14 on Bocilla Way on Don Pedro Island since 1974. We are now four generations on the Island. We live in Sarasota so are not full time residents of the Island, but over the last 47 years have enjoyed many hours on the Island.

We were very concerned upon learning of the application by EU for wastewater service to the Island. A concern is the expertise of the applicant. We find no history of EU previously completing a job of this size. Another major concern is the cost factor. I am a retired school teacher. We were told the estimated cost of look up would be \$20K per our small unit. We also understand there would be additional costs of electrical hook up, need for a generator and larger than average monthly bills. This is a huge amount apparently payable on demand and does not seem to be a reasonable amount. Several years ago we had a sewer hook up in our Sarasota home done by Sarasota County. The cost of that hook up was 1/3 this amount.

No water quality testing has been done in our area to prove the need for sewer. EU has not provided plans for a potential water spill in the Intercoastal; system maintenance and what would be done in potential service failure during a storm.

I urge you to deny the application by EU for wastewater service to Don Pedro Island.

Thank you, Vicki B. Hosmer vbhosmer@comcast.net

From:	terry kent <terryakent1031@gmail.com></terryakent1031@gmail.com>
Sent:	Sunday, January 23, 2022 10:39 AM
To:	Office of Commissioner Passidomo
Subject:	Don Pedro Island Sewer
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Commissioner Passidomo, My Name is Terry Kent 470 Bocilla Dr. Don Pedro Island

Up front I want to voice my opinion on why we do not want a sewer at this present time.

After reading over the proposal my first comment is "This proposal is a solution looking for a problem."

Why I am against this:

A. I do not believe at this time we have a problem on sewerage that needs addressing. No proven reason why we need it.

B. If we need a sewer that should be up to the county to address and to tax us accordingly .

C. Uncertain Hook-up Cost: When EU first presented to PIE, the connection fee was estimated at approx. \$20K per unit. When the rates and tariffs were finally submitted by the applicant, the requested Service Availability Charge per ERC was reduced to total estimated \$13,221.

D. No contract...normally for this type of construction there is a general bid. EU is not a contractor that has won a bid to install sewer.

E. No performance bond required.

F. EU has not shown that he has the expertise for this type of project.

G. The scope of this project would be large...disruption of traffic flow on the island would be horrible. We are accessed only by ferry.

H. No compensation for the easements that would be from the house to the road.

Commissioner, I would ask that you deny this 1/2 baked idea be shelved until we have a problem that needs to be solved. And not let someone who thinks we have a problem for him to solve. Please deny the EU application.

Thank you, Terry Kent

From:	daulenti43@gmail.com
Sent:	Sunday, January 23, 2022 10:33 AM
То:	Records Clerk
Cc:	Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject:	Deny EU's application for original certificate Docket # 20200226-SU
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

My name is Richard Aulenti and I live at 120 N. Gulf Blvd. on Knight Island. My wife and I have lived in our home for the past 18 years.

Location:

We live on Knight Island which is accessed by driving onto a barge and crossing over the Intercoastal. 8 cars maximum allowed and weight restrictions enforced. The barge is pushed across the Intercoastal by way of a Tugboat. Heavy winds, low water tides, commercial and emergency vehicles, bikes and walk on passengers are also involved which makes the crossing complex.

Sand roads.

Mainly single family homes

Many lots are held by a Conservancy and will remain undeveloped.

No high density high rises.

No commercial structures outside of the Resort Resort has 3 stories maximum and they have their own sewer system.

Need:

Our septic is routinely maintained and working perfectly. It was engineered as per Charlotte County's building code. It works.

New single family homes are being built on Island and new septic systems are being built to Charlotte County's specifications. If Charlotte county did not feel these systems worked why would they issue a permit?

Hardship:

Many homeowners are retired.

We live on a fixed income.

To finance replacing a WORKING septic with an untried sewer and pay two thousand dollars a year in monthly fees would cause many Islanders to have to sell.

Competence:

The applicant has no evidence of prior experience with wastewater removal.

The applicant needs to prove financial capability. What if he goes bankrupt?

The applicant needs to provide a performance bond for a project.

The applicant has a questionable track record.

Who will be responsible for systems failing?

We request you Deny EU's Application.

Thank you. Richard Aulenti daulenti43@gmail.com

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Sent from my iPad

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From:	Jean Schultz <themumma2@aol.com></themumma2@aol.com>
Sent:	Sunday, January 23, 2022 10:09 AM
To:	Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of
Subject:	Commissioner Passidomo Re: Objection to EU proposal for sewers - Palm Island
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

I would like to formally record my OBJECTION to the EU proposal for Palm Island sewers.

Please DENY the Application for Original Certificate of Authorization for this proposed central sewer systemmon Palm Island.

A sewer system should be publicly administered - not contracted to a private entity with no practical technical experience in that field.

I am also concerned about the financial stability and historical business track record of the principals who are requesting the application.

Abdicating to a private entity makes it far less likely that fair and equitable rates/charges would be guaranteed for the residents of Palm Island. We already have too many unchecked monopolies.

Thank you for your time.

Jean Schultz 80 Palm Dr Placida, FL 33946

Sent from the all new AOL app for iOS

From:	Chuck Soderquist <sodo1@live.com></sodo1@live.com>
Sent:	Sunday, January 23, 2022 9:56 AM
To:	Office of Commissioner Passidomo
Subject:	Island sewer support
Follow Up Flag:	Flag for follow up
Flag Status:	Flagged

Dear Sirs,

I would like to express my support for central sewer be brought to Palm Island and Little Gasparilla Island. There is no single issue which would benefit the environments of these Islands more.

### Chuck Soderquist

Phone # 941-270-7992 E-mail <u>Sodo1@live.com</u> PO Box 958 Englewood, Fl. 34295