

**Lisa Smith**

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**From:** Hannah Barker  
**Sent:** Tuesday, March 15, 2022 2:28 PM  
**To:** Commissioner Correspondence  
**Subject:** Docket Correspondence  
**Attachments:** RE Docket #20200226-SU; RE Docket #20200226-SU; RE Deny EU's application Docket# 20200226-SU; RE Docket #20200226-SU opposition; RE Docket #20200226-SU; RE Docket #20200226-SU; RE Docket # 20200226-SU; RE Docket #20200226-SU; RE Docket #20200226-SU; RE Docket #20200226 - SU; RE Docket #20200226-SU

Good afternoon,

Please place the attached emails in Docket No. 20200226.

**Hannah E. Branum**  
Executive Assistant to Commissioner Clark  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6004

## Lisa Smith

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**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:53 AM  
**To:** 'Fred Brown'  
**Subject:** RE: Docket #20200226-SU

Dear Mr. and Ms. Brown,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to [FloridaPSC.com](http://FloridaPSC.com), where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** Fred Brown <[fredwbrown@hotmail.com](mailto:fredwbrown@hotmail.com)>  
**Sent:** Friday, January 21, 2022 12:15 PM  
**To:** Office of Commissioner Clark <[Commissioner.Clark@psc.state.fl.us](mailto:Commissioner.Clark@psc.state.fl.us)>  
**Subject:** Docket #20200226-SU

Commissioner Clark:

As an owner of three properties on Don Pedro/Palm Island I am requesting the PSC deny the EU application for wastewater service.

I cannot believe that this is even being considered given that our current septic system has worked great over the years and currently we have no monthly fees. I am aware of issues where (St. Petersburg) sewer systems

will back up and sewage will go in the roads and the Gulf. I have never heard of any issues with septic spillage for the over 35 years we have enjoyed Palm Island.

It appears to me that certain people are pursuing this project only for profit at the expense of exploiting all the residences of Don Pedro/Palm Island with unnecessary hook up charges and monthly fees. I do not see how anyone on the Commission would even consider adding to the financial burden for costs to replace something that is working fine unless they too are receiving a kick-back. Even considering awarding this project to Mr. Boyer, who is inexperienced in sewer, and can provide no actual costs or monthly fees for this is inconceivable at best. Just because the resort's septic is aging and needs to be replaced, let them update and replace their own. All the residents on Don Pedro should not have to pay. Please represent the people of Don Pedro Island and don't make people pay for something that is not needed to represent the financial benefit of a few.

Thank you

Fred & Susan Brown  
[fredwbrown@hotmail.com](mailto:fredwbrown@hotmail.com)  
[sjbdav@hotmail.com](mailto:sjbdav@hotmail.com)

## Lisa Smith

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**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:52 AM  
**To:** 'Gil Collver'  
**Subject:** RE: Docket #20200226-SU

Dear Mr. Collver,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** Gil Collver <gil.collver@outlook.com>  
**Sent:** Friday, January 21, 2022 9:51 AM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>; Office of Commissioner La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner Passidomo <Commissioner.Passidomo@psc.state.fl.us>  
**Subject:** Docket #20200226-SU

As a homeowner at 380 Kettle Harbor on Don Pedro Island I am writing to state my concerns and objections to the Public Service Commission regarding the potential approval of Environmental Utilities LLC (EU) Application for Original Certificate of Authorization to install a sewer system on our island. First and foremost in my objections is the simple fact that there is no evidence that the existing septic systems on the Islands are causing any environmental damage and in fact routine studies have been conducted under the direction of the local homeowners association Palm Island Estates (PIE) and the Island Conservancy that confirm that fact. Next among my objections to approving the EU application is that sewer systems as a regulated public utility are almost universally provided by public entities, cities, counties, townships etc. which entities have

experience, public accountability, internally managed public rights of way and experienced competence in constructing, operating and maintaining such systems unlike this applicant which has none of these attributes. I am also concerned about the mandate to connect to a sewer system when a resident already has paid for and maintained a septic system that is functioning correctly and doing no harm. Even if the decision were to be approval of a sewer system driven by future concerns of environmental impact it should not be forced on residences with existing functional septic system.

And perhaps of most importance and subsequently most concern is the issue of fair and equitable rates and charges. Considering that this applicant has never constructed a sewer system there are no verifiable comparisons to determine the accuracy of the costs being put forth and the subsequent rates and charges. Consequently it cannot be confirmed that the proposed monthly rate of \$178.78 which is roughly twice what a ratepayer on the mainland pays for both water and sewer is justified. Logical thinking leads to the conclusion that construction of a sewer system on the island should not be more than on the mainland with the exception of whatever additional costs would be incurred to transport the sewage across the inter coastal waterway to the mainland. A cost which the county system also incurs in numerous situations where sewer lines have to cross creeks, canals and the ICW.

Gilbert Collver  
380 Kettle Harbor Drive  
PO Box 3594  
Placida, FL 33946  
[gil.collver@outlook.com](mailto:gil.collver@outlook.com)  
269-788-5656

**Lisa Smith**

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**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:52 AM  
**To:** 'Cori Palmere'  
**Subject:** RE: Deny EU's application Docket# 20200226-SU

Dear Ms. Palmere,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** Cori Palmere <cori.palmere@gmail.com>  
**Sent:** Friday, January 21, 2022 8:34 AM  
**To:** Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>  
**Subject:** Fwd: Deny EU's application Docket# 20200226-SU

**Subject: Deny EU's application Docket# 20200226-SU**

Dear Commissioners,

My name is Cori Palmere. My husband, Jim Palmere, and I live at 31 South Gulf Blvd. on Don Pedro Island. We are within the service district for the central sewer system being proposed by Environmental Utilities (EU). We strongly urge you to DENY EU's application for Original Certification or Authorization for the following reasons

1. Need - The need for service at this time is not warranted. No water testing has been done to determine there is currently a problem with our septic systems. Many of the homes on the island are not used year round. We have chosen to live here because of the quiet way of life. Most streets are not paved. We have wildlife all around us. We have no crowds on the beach. There are so many stories of once peaceful barrier islands becoming overdeveloped with high rise hotels, businesses and crowds. Putting in central sewers is the first step in changing our island forever. We are also concerned about the potential hazard of a leaking or broken sewer line that would connect our island to the mainland under the Intracoastal waterway

2. Financial- There has been no information provided to us regarding EU's ability to finance this project. The ability of EU to finance and manage this enormous project does not seem like something taxpayers should be worried about, and yet we are very worried about it. EU has no experience. It seems unimaginable that a project that will cost millions of dollars would be granted to a company with no experience. Have engineering firms been contacted to educate EU with the challenges of building a project of this magnitude on a bridgeless island with only small ferries as transport system? Additionally the cost of connection to the sewer by the homeowner has been estimated as high as \$20,000. There has been no plan shared about a pay-over-time option. It would be a financial hardship for some and personal loans would have to be taken out. I also understand that a generator would be needed by each homeowner to run the grinder pump in the event of a power outage. Some homes would need extensive electrical upgrading to accommodate this generator. And the list goes on.

Thank you for your service and taking the time to consider our concerns. Please accept this as our request to DENY EU's application Docket #20200226SU.

Sincerely,  
Cori Palmere  
[cori.palmere@gmail.com](mailto:cori.palmere@gmail.com)  
Jim Palmere  
[jim.palmere@gmail.com](mailto:jim.palmere@gmail.com)

## Lisa Smith

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**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:51 AM  
**To:** 'Mike Riley'  
**Subject:** RE: Docket #20200226-SU opposition

Dear Mr. Riley,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** Mike Riley <mikenriley@comcast.net>  
**Sent:** Thursday, January 20, 2022 5:55 PM  
**To:** Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>  
**Subject:** FW: Docket #20200226-SU opposition

Sorry Sir, I had the wrong address for you on original email transmission.

Thank you

Mike

**From:** Mike Riley [<mailto:mikenriley@comcast.net>]  
**Sent:** Thursday, January 20, 2022 5:23 PM  
**To:** 'clerk@psc.state.fl.us' <[clerk@psc.state.fl.us](mailto:clerk@psc.state.fl.us)>; 'commissioner.LaRosa@psc.state.fl.us' <[commissioner.LaRosa@psc.state.fl.us](mailto:commissioner.LaRosa@psc.state.fl.us)>; 'commisioner.clark@psc.state.fl.us' <[commisioner.clark@psc.state.fl.us](mailto:commisioner.clark@psc.state.fl.us)>;

'commissioner.passidomo@psc.state.fl.us' <commissioner\_passidomo@psc.state.fl.us>

**Subject:** Docket #20200226-SU opposition

January 18, 2022

Reference: Docket #20200226 – Environmental Utilities, Inc. (EU)

To Whom it may concern:

My name is Michael Riley and I own and live on Don Pedro Island at 220 Kettle Harbor Dr. which is a property within the service area of the proposed central sewer system, Docket #20200226-SU

**I am in opposition to this application and REQUEST THAT THE PSC DENY Environmental Utilities application for an Original Certificate of Authorization.**

My arguments against this application go to the 4 criteria used to grant the application:

1. **NEED FOR SERVICE:**

**Don Pedro island has no necessary or urgent need for the proposed central sewer system.** No documentation has been given that there is a problem or pollution in our waterways or canals. To my knowledge, No water or ground testing has been done by the applicant. All waste water is currently handled with Septic systems, that must be approved and permitted by Charlotte County prior to installation. In addition, all individual septic systems must be pumped out and tested on a regular basis to insure proper, safe, and adequate operation per Charlotte County code. There have been no pollution or spills, small or disastrous, that I am aware of, in the 12+ years I have lived on the island. Several independent companies are used to pump and test these systems, all approved by Charlotte County.

Understanding that the Charlotte County long range plan calls for removal of septic systems, a private sewer system is not the answer. It would be in everyone's best interest to have a public entity handle any sewer system so there is transparency, guaranteed cost control, unquestionable financial ability to build and operate, and avoid the need for stakeholders to 'pay a profit' to a private individual for a "utility".

**Bocilla Islands Conservancy, Inc.** (a 501(c)(3) public charity on island) owns and maintains conservation land and easements as well as providing awareness of potential environmental issues (pertaining to flora, fauna, protection of endangered species, removal of invasive plants, and water pollution) on our islands. In 2020, they sold and/or donated 81 mini reefs as part of the '1,000 reef challenge' participated in by numerous cities and communities on or near the barrier islands in south west Florida. They plan on doing another campaign to try to get an additional 100 reefs in place on our island in the near future. These mini reefs help keep our waterways clean and create a habitat for growing smaller fish and sea life.

The Charlotte County Director of Utilities supported EU's application with a written letter to the PSC, but I am not sure that the Charlotte County Administration does. This Director of Utilities recently and suddenly resigned his position (around the time depositions for EU were held)...and according to emails between him and Jack Boyer he was a close ally and friend of Jack Boyer. This alone lends itself to the applicants fitness.

2. **FINANCIAL ABILITY:**

The applicants ability to adequately and safely build and finance the proposed central sewer system is questionable, at best. EU as a company does not have the financial capability to fund a project of this magnitude without a "contribution for aid in construction". Whether this contribution is from a bank or financial institution (loan) or another unidentified entity (potential partner or owner) is not known. The latest statement (in depositions) is that the owner of EU, Mr. Jack Boyer will finance the entire project personally, but his personal

financial statements or financial capability are only available to the PSC staff. I am a former CPA with utility rate making experience and I am unable to get copies to evaluate. There are too many unknowns and financial information is strategically being withheld by attorney Martin Freidman.

The applicant has not done adequate engineering studies to be able to justify the estimated costs of this project. EU is attempting to get the certificate first, then spend the money to do the engineering studies – in other words ‘the cart before the horse’, as the certificate has enough value in itself to allow EU to move forward in trying to get ‘contributions in aid of construction’ Aid. The actual cost of installation of the system is unknown and the estimated initial cost to hook up to this system has varied from \$20,000 to 11,000 to 13,221 since the application was filed – definitely an inadequate study and an estimate that could vary significantly, generally higher. EU needs to do additional and complete engineering studies to enable them to know the actual cost – before applying for certification.

### 3. TECHNICAL EXPERTISE:

Jack Boyer (owner of EU) has experience with operating a small water utility on Little Gasparilla Island for many years, but NO EXPERIENCE WITH WASTE WATER. Mr. Boyer hired Martin Friedman, a well-connected utility attorney, to handle his application, so he can probably hire competent advisors, constructors, etc. to build and operate a central sewer system. Unfortunately, it is the stakeholders, the residents of the Islands, that must bear the cost of these highly paid consultants and advisors.

Mr. Boyer’s experience as a water small utility operator supposedly includes tapping into the Don Pedro State Park water system and selling their (the State parks water supply) water to his customers (the residents of Little Gasparilla Island) and hooking up new water customer residents on Little Gasparilla Island without adequate licensing and delaying payment for the Charlotte County hookup fees per Charlotte County’s agreement. Obviously he has experience in how to make money for himself whether ethical or not.

The system EU is proposing is supposedly the lowest cost to build but the highest cost to maintain. Looking at other island communities including the Florida Keys, as well as personal experience operating a pumping station in multiply businesses I owned, a vacuum system seems to be the best and preferred type. EU is proposing a system requiring a pumping station at each residence to push the waste. This type system includes a small tank and a grinder pump at each residence. Being located on a barrier island, we have a lot of corrosion from the salt air causing the pumps to be replaced, possibly on 5 year interval’s.

Being on a bridgeless barrier island we are subject to many things the mainland is not. We have a ferry to contend with that operates from 6:30 am to 10:00 pm (slightly later on weekends) and does not operate if winds exceed 45 mph. We are also subject to more electrical outages than the mainland. EU has not addressed how the sewer system will be serviced in the event of a major storm failure or adverse conditions. If our electrical service is out for an extended period of time, the small storage tank at each residential pump, could overflow creating a localized spill or leak, which could become catastrophic in a major storm. A generator would be required (at the homeowners expense) to keep the sewage moving, where we do not have this issue with our current approved septic systems. There is also the increased risk of a central sewer system leak into the intra-coastal waterway with a potential leak at the subaqueous crossing – pollution at its best. Look back at the hurricane that hit Ft Myers Beach community which was devastated by waste water and closed for over 10 days after the hurricane because there was not a backup generator in place to move the waste off island.

### 4. FAIR AND EQUITABLE RATES & CHARGES:

This is a total unknown. EU has done inadequate engineering studies to properly evaluate ‘actual’ costs, only supplying estimates, which have changed dramatically over the period of application. The hookup fees have varied from \$20,000 per residence to \$13,221 and this does not include the cost of a customer installed separate electric panel and landscape/hardscape modifications or changes to install a grinder pump and to crush and fill the septic tank area.

Even using his estimates, which should be considered the lower end of the cost structure, the proposed rates are \$178.45 per month for sewer service only. This is roughly two times the rate Rotonda pays – and that rate includes **both water and sewer**.

I currently pay \$78 to \$90 per month for water only and that is with me personally and strictly controlling my volume, which runs between 1,800 and 2,200 gallons per month (well below the 3,000 average customer water consumption). I consider our water rates to be excessive [even though these rates were approved by the PSC] and as proposed, our water/sewer combined rates would be in the neighborhood of \$275 to 300 per month – very excessive.

Other items that I feel are important in my opposition to this application:

Without proof of need, discussed above in item 1, there is an inherent cost to each resident because we will be required to hook up to the central sewer within 1 year. Many residents have recently built and installed new septic systems and many have repaired or replaced the drain fields to ensure safe adequate operation. This proposal allows for no “grandfathering” of newer septic system or recently repaired systems.

If approved, there is no single point of contact for general oversight of this private sewer system. The PSC only approves certification and then only regulates rates and charges. Multiple other agencies including Charlotte County, DEP, Army Corps, etc. oversee or regulate their specific areas so we have no one point of contact.

If the county builds and operates the sewer system, they are the one point of contact for all issues....again, a private entity is not in the best interest of the residents and stakeholders.

The Palm Island Transit ferry is a significant problem not only in construction but also maintenance. The ferry is just about at capacity during season, and this would cause further delays (of over an hour), just in access to and from the island by increasing the construction traffic, probably for several years.

The individual residence pump and holding tank is planned to be on the homeowners/stakeholders property and EU is trying to claim an easement from the sewer pump and holding tank to the road connection without compensation.

Many of us on the island do not have the excess cash funds to pay for hookup. EU’s application does not allow for a deferred payment plan, only a cash up front program.

Development always carries a toll on communities, whether time, delays, cost, noise pollution, air pollution, loss of life style, etc. Island residents enjoy a quiet environment with open space, but pay for it in time delay waiting to cross to the mainland by ferry. This project will for many years cause substantial trees and landscaping to be removed, increased dust pollution and traffic from construction, increased noise from heavy equipment, invasion of our own property in crushing our existing tanks and installing a new tank, pump, lines, and electrical, and an excessive cost increase for waste water removal. This does not even take into consideration each homeowners loss by a general easement grant to EU without compensation to the homeowner.

Once again, I formally request the PSC to deny EU’s application for a private sewer system on Don Pedro Island.

Thank you

Michael Riley  
[mikenriley@comcast.net](mailto:mikenriley@comcast.net)

**Lisa Smith**

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**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:50 AM  
**To:** 'Robby Anderson'  
**Subject:** RE: Docket #20200226-SU

Dear Mr. Anderson,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** Robby Anderson <roby.anderson1323@gmail.com>  
**Sent:** Thursday, January 20, 2022 5:12 PM  
**To:** Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>  
**Subject:** Docket #20200226-SU

Dear Commissioner Clark,

My name is Captain Rob Anderson. I am writing to formally request the PSC deny EU's application for wastewater service for Don Pedro Island. I have been visiting this area for over 18 years. As a resident of the island for the last several years, I cannot begin to fathom all of the negative impacts this project would create.

My main concern is the environmental impact this project will have/create. With no water quality testing to validate a need for a sewer, it seems unreasonable to disrupt the environment by removing trees & digging up areas that are home to many gopher tortoises(endangered), birds, rabbits, snakes, bobcats and many more. Why would we displace and endanger these animals and destroy their habitat for a project with no problem to solve? Another potential significant environmental impact of this project would harm the very thing that brings people

to this beautiful area, water. The risk of a central sewer leak into the intracoastal waterway would have devastating impacts on the marine ecosystem that has already been demolished and forced to fight back time and time again over the last several years due to the horrifying red tide events in this area.

Another major concern I have is around the uncertainty around what it would cost to hook-up the sewer by a company that has not won a bid to install a sewer system in the past. Installing a sewer system can be difficult enough with many years of experience, the complexities of the location and terrain features of the island would challenge the most veteran of sewer installation companies. I would compare this situation to boarding a plane with no clear idea of the fare & baggage cost, crewed by a pilot, co-pilot, and staff with no experience, to a destination with the most unfavorable and challenging flying conditions. Would you get on that flight?

The last concern I have around this project is how will the system be maintained in the event of a storm or other adverse or emergency scenarios? In the event of a power outage - which can sometimes be caused by high winds - the system will only be able to function for so long until imminent failure. Such failure would be devastating to the homes and the environment of Don Pedro Island. Additionally, being in the salt water environment like we are, the sewer systems and required generators would have a fraction of the lifespan they would otherwise further inland.

In summary, the environmental impacts, uncertainty, and reliability of the proposed project cause great concern to myself and many others on the island. Again, I have written this letter to formally request the PSC deny EU's application for wastewater service for Don Pedro Island given the reasons above.

Don Pedro Island is a beautiful place. I suggest you come and check it out for yourself! Give me a call and I would be happy to take you out on the boat and show you all the beauty and wildlife this place has to offer. Help us protect it.

Captain Rob Anderson  
(813) 774-1513  
[robby.anderson1323@gmail.com](mailto:robby.anderson1323@gmail.com)

## Lisa Smith

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**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:50 AM  
**To:** 'Michelle Brown'  
**Subject:** RE: Docket #20200226-SU

Dear Ms. Brown,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** Michelle Brown <shellybrown091@gmail.com>  
**Sent:** Thursday, January 20, 2022 5:10 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>; Office of Commissioner La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner Passidomo <Commissioner.Passidomo@psc.state.fl.us>  
**Subject:** Docket #20200226-SU

Hello Commissioner LaRosa, Commissioner Clark, and Commissioner Passidomo,

My name is Michelle Brown and I am emailing you in regards to the proposed central sewer. I have been a resident on Palm Island/Don Pedro Island for 2 years but vacationing here for over 27 years. I strongly oppose the proposed central sewer for the following reasons:

First, a sewer spill in the Intracoastal would be devastating to the local waters. As you probably know, the water quality in Charlotte County suffers tremendously from red tide. As a U.S. Coast Guard Licensed Captain that spends majority of my time on the water, I have personally seen the long-term horrible effects of bad water quality such as thousands of dead fish, dead manatees, dead birds, dead sea grass, sick humans and house pets, and a significant decline in tourism. I

strongly advise against the proposed central sewer since the risk of a central sewer leak with an underwater crossing would be much greater than the risk of one or more septic systems developing leaks and spilling in the Intracoastal.

Next, gaining access to homes to install the new system and destroy the existing septic tanks would be a demanding, destructive, and expensive task. Some, if not most, properties on the island have physical constraints or landscaping that will complicate how the applicant gains access to each property. If the project were to move forward, these physical constraints would need to be damaged along with any trees or landscaping around the septic tanks that are currently in place. This will not only be very expensive to each homeowner, but also have negative effects to the wildlife, such as the endangered gopher tortoise, and destroy their habitat.

Lastly, the residents on Palm Island/Don Pedro Island have many concerns and unanswered questions regarding system and installation quality, system maintenance, and emergency preparedness. EU is not a contractor that has won a bid to install sewer systems. There is no performance bond required and we have no single point of recourse in the event of cost overruns or project failure. EU does not have experience installing sewers, especially in non-traditional neighborhoods and environments such as those on Palm Island/Don Pedro Island, which makes me extremely concerned for the quality of the system and installation. As you may know, the only way on and off the island is via boat or car ferry that operates only during certain hours. The applicant has not addressed how the system will be serviced in the event of failure during a storm or other adverse conditions.

Charlotte County regulations require all homes to connect to central water and wastewater within 1 year of availability. I speak for myself and several other residents of Palm Island/Don Pedro Island when I say that there are no benefits to the homeowners or the environment in moving forward with a central sewer. No water quality testing has been done in our area to prove a need for a central sewer. The costs of the mandatory generators, electric equipment, and land destruction are uncertain and estimated to be extremely high which could make the island unaffordable for many residents. The potential of a mass sewer leakage into the Intracoastal would be detrimental to the local waters and wildlife which would directly affect tourism and small businesses on and off the island.

Based on the above reasoning, I am formally requesting that the PSC deny EU's application for wastewater service.

Thank you for your consideration and please feel free to contact me with any questions or comments.

Sincerely,  
Captain Michelle Brown  
[shellybrown091@gmail.com](mailto:shellybrown091@gmail.com)  
727-710-0747

**Lisa Smith**

---

**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:49 AM  
**To:** 'johnspurvis@yahoo.com'  
**Subject:** RE: Docket # 20200226-SU

Dear Mr. Purvis and Ms. Moore,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** johnspurvis@yahoo.com <johnspurvis@yahoo.com>  
**Sent:** Thursday, January 20, 2022 2:47 PM  
**To:** Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>  
**Subject:** Fw: Docket # 20200226-SU

Sent from Yahoo Mail for iPad

On Thursday, January 20, 2022, 2:45 PM, [johnspurvis@yahoo.com](mailto:johnspurvis@yahoo.com) <[johnspurvis@yahoo.com](mailto:johnspurvis@yahoo.com)> wrote:

Sent from Yahoo Mail for iPad

Recall this e-mailed message

On Thursday, January 20, 2022, 12:08 PM, John/Gayle Purvis <[morpur@aol.com](mailto:morpur@aol.com)> wrote:

We are John Purvis and Gayle Moore and we are property owners and residents at 380 Bocilla Dr on Don Pedro Island. We are requesting that the PSC deny the application by Environmental Services to construct wastewater services here ( 20200226-SU ). We do not believe that Environmental Services has the technical expertise or the financial strength to complete such a project on a barrier island where the only access is by barge. We are in favor of a central sewer on our island but we strongly believe that Charlotte County should be constructing it. Environmental Utilities has not offered to purchase a performance bond and we doubt it's ability to complete this project within its projected cost estimate. Please do not allow the need for sewer to override our rights and concerns by allowing a poorly financed and poorly thought out plan proceed. Let Charlotte County step up to its responsibilities and construct this much needed sewer.

John Purvis  
[johnspurvis@yahoo.com](mailto:johnspurvis@yahoo.com)  
863-532-0099

Gayle Moore  
[morpur@aol.com](mailto:morpur@aol.com)  
863-532-0091

Sent from the all new AOL app for iOS

## Lisa Smith

---

**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:49 AM  
**To:** 'David Cohen'  
**Subject:** RE: Docket #20200226-SU

Dear Mr. Cohen,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** David Cohen <david.paul.cohen@gmail.com>  
**Sent:** Thursday, January 20, 2022 1:20 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>; Office of Commissioner La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner Passidomo <Commissioner.Passidomo@psc.state.fl.us>  
**Subject:** Docket #20200226-SU

January 20, 2022

Clerk of the Commission [clerk@psc.state.fl.us](mailto:clerk@psc.state.fl.us)  
Commissioner LaRosa: [Commissioner.LaRosa@psc.state.fl.us](mailto:Commissioner.LaRosa@psc.state.fl.us)  
Commissioner Clark: [Commissioner.Clark@psc.state.fl.us](mailto:Commissioner.Clark@psc.state.fl.us)  
Commissioner Passidomo: [Commissioner.Passidomo@psc.state.fl.us](mailto:Commissioner.Passidomo@psc.state.fl.us)

**SUBJECT: Docket #20200226-SU**

Dear Commissioners,

My name is David Cohen and I am a property owner on Don Pedro Island, residing full-time on my current property since 1998 and living previously, part-time on another property on the same island since 1990.

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

1. **Technical Expertise:** I call into question the technical expertise of the applicant in providing this service. The proposed method, or any method whatsoever, has never been done by the actual people that are owners of the EU. There is no record of this type or scope of project being done by actual EU personnel as opposed to vague associations with other sewage projects.

2. **Undue AND uncertain fees and rates:**

- a. **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 a total estimated **\$13,221**. This large fluctuation, while still not guaranteed, is a further indication of the complete lack of experience by the EU in providing factually-derived costs (e.g., are all their costs initially overstated by 50%?)
- b. **Projected Average Residential Bill: \$256.66**, which is more than twice the amount that a ratepayer on the nearby mainland area of Rotonda which pays per month for both for water and wastewater combined. Note that the average cost to the EU per customer per month is \$97.18 giving an 84% profit to the EU.

- **At 10,000 gallons, the cap comes into play and is \$472.**

- **There is no allowance for incoming water that does not go through sewage treatment such as watering or landscaping. Personally, much more water is consumed this way at my residence and I near this cap.**

**I will simply state categorically that these preliminary estimates are outrageous and not sustainable by many families living on the island, especially those who are retired and living on fixed incomes.**

- c. **Electric:** the system pump requires a separate electric panel, installed by a licensed electrician at the expense of the owner.
- d. **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.

- e. **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.
- f. **No pay-over-time plan:** Ratepayers may need to take loans to cover the cost of connection, yet there is no provision being setup or even contemplated for this.
- g. **Mandatory Hook-up:** Charlotte County regulations require all homes to connect to central water and wastewater within 1 year of availability.
- h. **No grandfathering of septic systems:** regardless of age or condition.

3. **Ongoing Undue Burden with no recourse to every property owner:** This is a very complex solution, requiring not only the initial hook-up by EU, but electrical work as well having to provide emergency power, at the effort and expense of each property owner. This is not practical given the demographic of the islands (avg age, retirement status, high number of rental properties, high number of part-time residents). Therefore, the solution being proposed places an undue burden on each and every property owner that is extremely likely to result in many sewage leaks in the event of a prolonged power outage.

a. Having a significant power outage over the course of any given year is very high, in fact it is routine for the islands in question. Relying on each owner to provide, care for and fuel emergency power, potentially during a catastrophe such as a hurricane when such fuel would be in short supply, if even available, invites a terrible environmental impact way beyond even many potential individual septic tank failures. Again, power outages are frequent – the most recent shutting down most of the island for 19 hours just last month.

b. The high amount of rental property and older residents makes the servicing of the required equipment, both routine and in an emergency, very problematic. Do you wish to see several hundred property owners searching for fuel for septic service in addition to trying to preserve food and electrical medical equipment in the aftermath of an emergency situation? The applicant has not addressed how the system will be serviced in the event of failure during a storm or other adverse conditions.

- c. Salt air takes a heavy toll on mechanical and electrical equipment here. Equipment will need replacing when it fails, possibly as frequently as every 5-years. This proposal places too much on-going responsibility on the homeowner at too great a cost.

4. **Need for service:** I have not seen or heard of any environmental impact studies that address this specific location's need for such a service, urgent or otherwise, at this time. Rather, my wife and I as well as many island residents have actually installed small artificial reefs to counter the effects of both red tide and pollution run-off from hundreds of miles away.

a. I would argue that any study offered by the EU does not reflect the reality of these islands specifically and generalizing studies from vastly different demographics is very dangerous.

5. **Future potential Impact on the very nature of these islands:** There are not going to be any new bridgeless barrier islands offering the limited development and zoning restrictions and tranquility these bring than currently exist. Based on a history of Florida's barrier islands, changes to zoning allowing denser commercial and residential developments are likely to occur, even furthering the impact referred to in number 2 above.

6. **Negative impact on wildlife and endangered species.** There has not been an environmental study on the impact of this project along with projected service failures on the potential for destruction of habitat and interference with endangered species such as the Gopher Tortoise, Indigo snakes, nesting Bald Eagles and so on. Further, the risk of a central sewer leak with a subaqueous crossing in the intercoastal waterway is far greater than that of one or more septic systems developing leaks – a point which cannot be emphasized too much.

**7. FINANCIAL ABILITY and Government Oversight of the applicant:**

- a. As an unproven LLC in the area of sewage treatment, the EU will not have access to public funds available for clean water and other related funds to in any way offset costs.
- b. Other than vague references to investors, provable long-term viability of the EU has not been investigated and the findings of such an investigation made public. There are no publicly available financial records for the EU since inception.
- c. The publicly registered address of business for the EU is a private single-family house, currently occupied by family.
- d. There is no bond or any other guarantees that cover the costs associated with total project failure or on-going mismanagement.
- e. There are no clearly defined and quantifiable project goals of quality and workmanship, clean-up of resulting damages to property that occur during the implementation and on-going running of EU business.
- f. There is no publicly available approach the EU will take to manage cost overruns.
- g. There is no guarantee that the EU or its current owners will even be in existence for any length of time.

8 **NO OVERSIGHT:** If this project fails in any way, it is the property owners that will have to remedy the situation. There is no official government body WITH OVERSIGHT AND ENFORCEMENT AUTHORITY for this immensely expensive project that has potentially catastrophic environmental and financial impact that would affect the residents, the islands and surrounding waters and even mainland properties and coastlines if this project is not correctly implemented and maintained.

i. The EU is not a contractor that has won a bid to install sewer.

ii. While the PSC approves certification solely based on 4 criteria and regulates rates and charges none of the other agencies involved have overall oversight and enforcement authority on this project. Each of the other agencies (Charlotte County, DEP, Army Corps of Engineers, etc.) is responsible for supervising only their specific area where regulation and/or permitting is involved. There is no performance bond required and the residents have no single point of recourse in the event of cost overruns or project failure.

I thank each of the commissioners for taking these issues under advisement and urge in the strongest possible manner that the PSC deny EU's Application for wastewater service.

Respectfully Submitted,

David Paul Cohen

Full time resident

8 Pointe Way, Don Pedro Island, FL 33946

Mobile number: 201-600-1450

Email: [davidpaulcohen@gmail.com](mailto:davidpaulcohen@gmail.com) or [dpcohen@comcast.net](mailto:dpcohen@comcast.net)

## Lisa Smith

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**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:48 AM  
**To:** 'Angie Ridings'  
**Subject:** RE: Docket #20200226 - SU

Dear Mr. and Ms. Ridings,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC-- Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3rd at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

-----Original Message-----

From: Angie Ridings <a.ridings@att.net>  
Sent: Thursday, January 20, 2022 12:53 PM  
To: Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>  
Cc: Pat Ridings <pridings1109@gmail.com>  
Subject: Docket #20200226 - SU

Dear Commissioner Clark,

As an interested party in property located on Little Gasparilla Island, We object to the Application of Certificate by Environmental Utilities (EU) for the proposed central sewer system based on the following:

1. Environmental Impact. Little Gasparilla is a Barrier Island with no connecting roadways or bridges to the mainland of Florida, you arrive only by boat. There are no commercial facilities, no roadways or retail development on the island, only our modest homes. It is old Florida, not Boca Grande. If a sewer pipeline is installed across the intracoastal waterway, how will a pipe leak in the middle of the waterway be detected? Who will be responsible for cleanup of such an environmental catastrophe? Who will be responsible for maintenance and/or equipment failure of such proposed sewer line? A private company with no employees or experience? To our knowledge, no water testing has been performed to determine the actual need of a sewer line vs. the septic systems currently in place. The waste

management system in Florida is already overtaxed. If a central sewer system is installed, how will the mainland system handle additional households from the barrier islands, along with any additional development occurring on the mainland itself? Millions of gallons of raw sewage have been spilled into waterways by damaged lines throughout the State of Florida; therefore, is a sewer pipeline across the waterway the correct solution for our island and the environment?

2. Financial Stability/Experience of EU. Environmental Utilities (EU) is a “for profit” private company with no financial history and unknown sewer utility management experience regarding environmentally sensitive endeavors such as tying a sewer line from the mainland to a private barrier island. EU should be required to provide a history of all sewer projects of this magnitude, especially since it involves environmentally sensitive areas including the intracoastal waterway. Do they have such history? No, they do not. In addition, how will EU financially complete this project? What happens when EU runs out of money or goes bankrupt prior to the completed project? Where does that leave the homeowners? Where is our recourse?

3. Unknown Cost to Homeowners. There are so many unknown/hidden costs to the homeowners with this proposal. An estimated upfront hookup fee of \$15,000-20,000 per homeowner has been rumored regarding the system connection and current septic removal. Since there are no “roads” on the island how will large equipment transverse the island to fill or remove all septic tanks without destroying private property? Who pays for that damage? In addition, no estimated cost of monthly rates, no estimated amount of maintenance costs and no estimated operational costs have been provided. What happens when equipment needs to be replaced in five years due to the nature of island living? Will this be our expense directly or indirectly through rate hikes? Power outages occur frequently on the island, what happens if the system uses a grinder pump? The system will be unable to operate without power, resulting in a sewer back-up. Is that more environmentally friendly than septic? Will homeowners be required to purchase and have generators in place to ensure EU’s system is operational during power outages? Will the homeowners pay for the charges to run those generators? In addition, if there is an upfront fee required, there should be other payment options available to homeowners such as payments spread over time. Rates should be fair and equitable, not just to the benefit of a private company who can increase rates whenever they want.

4. 2017 Sewer Master Plan. If this sewer project is state mandated, why is this environmentally sensitive project being proposed by an unknown inexperienced sewer utility management company (EU) and not handled by the County and/or State of Florida?

5. Location of Lift Station(s) and Sewer Lines. No map has been provided indicating the location of any lift stations, lines, etc. The island is private; therefore, no easements. Homeowners should be provided with a map(s) of the proposed location of all lift stations, lines, etc. and given ample time to review such plans prior to any approval or commencement. IF this project is approved, EU should be required to pay all homeowners current market value for any and all easements they may require for implementation.

Possible Alternatives:

1. Perform a Water Quality Test to determine if such a system is necessary.
2. Property owners commit to have current septic systems inspected, and upgraded/improved (if necessary).
3. County to initiate, complete and maintain the project vs. a “for profit” private company with no financial history or sewer utility management experience.

As a stakeholder in the proposed service area, it is important to have all of the relevant information regarding the proposed central sewer, including but not limited to, the proposed rates, connection fees, maintenance and operational costs, homeowners recourse, and the type of system intended for installation. We therefore request that EU’s request be denied.

Sincerely,

JP Ridings

pridings1109@gmail.com  
Angela Ridings  
a.ridings@att.net

## Lisa Smith

---

**From:** Office of Commissioner Clark  
**Sent:** Tuesday, March 15, 2022 11:47 AM  
**To:** 'donesch53@gmail.com'  
**Subject:** RE: Docket #20200226-SU

Dear Mr. and Ms. Esch,

Thank you for contacting me regarding the Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC– Docket No. 20200226. I know how concerning it can be when presented with a possible change regarding utilities.

I have had the opportunity to hear from many of you over the past few months, both in person at our service hearings, and through the countless emails I have received. I want to stress how valuable the customer perspective is to me. Tomorrow the parties in this case will be filing briefs, laying out their arguments, and we are scheduled to make a decision the morning of Tuesday, May 3<sup>rd</sup> at our monthly Agenda Conference. If you would like to watch the Agenda Conference you may go to FloridaPSC.com, where it will be live streamed.

Thank you, again, for contacting me. I appreciate the opportunity to hear your concerns.

Sincerely,

Gary F. Clark  
Commissioner  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(850) 413-6038

**From:** donesch53@gmail.com <donesch53@gmail.com>  
**Sent:** Thursday, January 20, 2022 12:22 PM  
**To:** Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>  
**Subject:** Docket #20200226-SU

Dear Commissioner Clark,

Our names are Sherry and Don Esch and we are property owners on "Palm Island" and have been since 2011.

We first purchased a condominium in Palm Island Resort and were later able to find a property out of the resort that we could afford and we purchased in 2015. We purchased an additional vacant lot on the island in 2016. These properties were purchased in anticipation of enjoying a

peaceable retirement within our financial means which finally occurred at the end of 2019. We are opposed to the proposed sewer project for several reasons that I have listed below:

- **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. This represents a significant unplanned expense in our retirement.
- **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. Again, this would be a new and recurring monthly expense that was not anticipated in our retirement. In addition, it seems excessive given local comparisons.
- **Electric:** the system pump requires a separate electric panel, installed by a licensed electrician at the expense of the owner. This is an additional expense that was not anticipated in our retirement.
- **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. This is awful. One would expect any utility service sanctioned by the county to have proper back-up systems and work without fail.
- **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. We came to this place for its natural beauty and feeling of "old Florida". The disruptions to the landscaping would harm the 'look and feel' of the island and diminish our property values. Again, the expense to crush and fill our existing septic tanks is unanticipated in our retirement budget.
- **No pay-over-time plan:** Ratepayers may need to take loans to cover the cost of connection. This is another financial hardship this change would impose.
- **No grandfathering of septic systems:** regardless of age or condition.
- **No "contract" and no single point of general oversight:** EU is not a contractor that has won a bid to install sewer. The PSC approves certification solely based on the 4 criteria above

and regulates rates and charges. Each of the other agencies (County, DEP, Army Corps, etc.) is responsible for supervising only their specific area where regulation and/or permitting is involved. There is no performance bond required and we have no single point of recourse in the event of cost overruns or project failure.

- Access to homes: Some properties have physical constraints that will complicate how the applicant gains access to the property without leaving the boundaries or damaging the grounds.
- Disruption of traffic: Vehicles have only one point of entry/egress -- the car ferry. With normal traffic, service and construction trucks, delays at the ferry line in season can be an hour or more. This project could result in years of traffic issues.
- New easement giveaway: Most utility easements are placed in the road right-of-way. EU has claimed ownership of a utility easement that will go from the sewer equipment, located near the house to the connection in the road without compensating the homeowner.
- System maintenance and emergencies: The applicant has not addressed how the system will be serviced in the event of failure during a storm or other adverse conditions.
- Lifespan of the equipment: Salt air takes a heavy toll on mechanical and electrical equipment here. Equipment will need replacing when it fails, possibly at 5-year intervals. This proposal places too much responsibility on the homeowner at too great a cost.
- Environmental concerns: No water quality testing has been done in our area to prove a need for sewer. This project brings the potential for destruction of habitat and interference with endangered species such as the gopher tortoise.
- Potential of sewer spill in the Intracoastal: The risk of a central sewer leak with a subaqueous crossing is greater than the risk of one or more septic systems developing leaks.

In short, this project would bring significant financial hardship to us as property owners, not only for the expenses related to the construction, hook-up and operation of the new plant but also in terms of diminished property value and the inconvenience of transportation on the island. Second, the applicant has not demonstrated competence in building and operating a system of the sort contemplated. Our island is too precious to trust to any company without a significant track record of competence and accomplishments. Third, the expenses and proposed service rates seems disproportionately high relative to others in the area. Finally,

while we generally support the conversions of septic systems over time to city sewer facilities, it would seem that this project was conceived in haste given the high cost and relatively low number of conversions to be completed all in the absence of testing data to demonstrate that the facility is actually needed here.

We are formally requesting that the PSC deny EU's application for wastewater service.

Sincerely,

Don and Sherry Esch

[Donesch53@gmail.com](mailto:Donesch53@gmail.com)