

Lisa Smith

From: Office of Commissioner Passidomo
Sent: Tuesday, January 25, 2022 8:05 AM
To: Commissioner Correspondence
Subject: Docket No. 20200226
Attachments: Docket #20200226-SU; Docket #20200226SU; Docket #20200226-SU; RE Docket #20200226-SU; Fwd Docket #20200226-SU; Docket #20200226-SU

Please place the attached in Docket No. 20200226.

Thank you!

Lisa Smith

From: Paul Sarofim <psarofim@yahoo.com>
Sent: Tuesday, January 25, 2022 1:07 AM
To: Records Clerk; Office of Commissioner Clark
Cc: Office of Commissioner La Rosa; Office of Commissioner Passidomo
Subject: Docket #20200226-SU

To Commissioner Larosa, Commissioner Clark, Commissioner Passidomo, and Clerk of the Commission:

My name is Paul Sarofim and I own 9254 Little Gasparilla Island, which is within the proposed sewer service area for Little Gasparilla Island. **I am formally objecting to the sewer proposal and request that the PSC deny the Application for Original Certificate of Authorization for Environmental Utilities, LLC (EU) for a central sewer system for Little Gasparilla Island.**

The proposed connection charges for the sewer system have ranged from \$11,000 to \$20,000 and it does not appear that sufficient engineering studies have been conducted to verify the pricing provided is even needed or justified. The proposed monthly sewer charges are VERY high compared to other utility rates. For the residents of Little Gasparilla Island, we already pay high monthly rates for the water system. I currently pay around \$75 per month for water with little water usage. Adding the proposed monthly sewer charges would bring the monthly water and sewer charges to over \$250 a month which is a ridiculous monthly charge for water and sewer compared to other local utilities.

With the 300 +/- homes on LGI, most being vacation rentals, I would assume that usage would be <50% of normal usage, thus the lack of need for a central sewer system, especially one being implemented by EU.

In conclusion, due to the lack of technical expertise of the applicant, and inability to provide fair and equitable rates, I formally request that Environmental Utilities, LLC Application to provide sewer service to Little Gasparilla Island be denied.

Sincerely,

Paul Sarofim

Property Owner: 9254 Little Gasparilla Island

Psarofim@yahoo.com

Lisa Smith

From: Robert <rwharvie@gmail.com>
Sent: Tuesday, January 25, 2022 12:12 AM
To: Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject: Docket #20200226SU

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

rwharvie@gmail.com

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 septic tanks 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 out 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 as 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 than 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,

Robert Harvie

Lisa Smith

From: Debbie Daugherty <ufdaugherty@yahoo.com>
Sent: Monday, January 24, 2022 9:07 PM
To: Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject: Docket #20200226-SU

To Commissioner Larosa, Commissioner Clark, Commissioner Passidomo, and Clerk of the Commission:

My name is Debbie Daugherty and I own 9850 Little Gasparilla Island, which is within the proposed sewer service area for Little Gasparilla Island. **I am formally objecting to the sewer proposal and request that the PSC deny the Application for Original Certificate of Authorization for Environmental Utilities, LLC (EU) for a central sewer system for Little Gasparilla Island.**

I have over 20 years experience in water and wastewater utilities and a Bachelors and Masters in Environmental Engineering from the University of Florida. I am currently the Water/Wastewater Engineering Director for Gainesville Regional Utilities. There is no doubt in my mind that proceeding with this particular party (EU) for providing private central sewer is the wrong move for our island. EU does not have the technical expertise to properly construct, operate and maintain a sewer system. Allowing EU to move forward with a central sewer system will result in situations that will be more damaging to the environment. While a central sewer system has its merits for improving the environment, selecting the appropriate party and technology is essential for success of the project. From the information presented so far, EU is proposing a pressurized sewer system, however, previous engineering reports and other utilities experience show that a vacuum system would provide a more reliable sewer system for our island.

We are currently customers of Little Gasparilla Water Utility, which is owned and operated by the same parties that are applying as Environmental Utilities, LLC. The owners have minimal experience operating a water system and no experience operating a wastewater system. The water system on Little Gasparilla Island is constructed poorly and not operated responsibly by these parties. The owners of the water system do not respect owners property rights and place water lines wherever they want without proper communication with the homeowner nor obtaining proper easements for their water lines. While the project to bring sewer services to the island has merit, Environmental Utilities is not the appropriate party to complete a project of this nature. Part of EU's proposal for the central sewer system is "claiming ownership" of a utility easement on private property without compensating the homeowner. Charlotte County should continue to seek other experienced parties to provide sewer service to Little Gasparilla Island or pursue funding to extend County sewer service to our residents. Septic to Sewer conversion projects are being successfully completed across the state of Florida. Converting these barrier islands to a central sewer system would be a strong project for Charlotte County to propose for infrastructure grants and funding. Millions of dollars are going to be available for these types of projects in the coming years, which would reduce the financial burden for connection charges for the residents of Little Gasparilla Island.

The proposed connection charges for the sewer system have ranged from \$11,000 to \$20,000 and it does not appear that sufficient engineering studies have been conducted to verify the pricing provided. The proposed monthly sewer charges are VERY high compared to other utility rates. For

the residents of Little Gasparilla Island, we already pay high monthly rates for the water system. I currently pay around \$75 per month for water with little water usage. Adding the proposed monthly sewer charges would bring the monthly water and sewer charges to over \$250 a month which is a ridiculous monthly charge for water and sewer compared to other local utilities.

Mr. Boyer, the owner of Environmental Utilities, has been very vocal as a resident on Little Gasparilla Island that he has no intentions of completing this project, nor does he care about improving the environment on our island, he is solely making the petition to be granted the sewer service rights then sell them for his own financial gain. He has told other island residents that he is "locking in his retirement" expecting to make millions and retiring. I personally want someone who cares about the future of our island to be involved in such an important public health and safety project for Charlotte County and Little Gasparilla Island. The residents and property owners in Charlotte County deserve fair and equitable rates and monthly charges for sewer service, not to be a private individual's retirement plan.

In conclusion, due to the lack of technical expertise of the applicant, lack of respect for homeowner property rights of the applicant, and inability to provide fair and equitable rates, I formally request that Environmental Utilities, LLC Application to provide sewer service to Little Gasparilla Island be denied.

Sincerely,

Debbie Daugherty

Water/Wastewater Engineering Director

Gainesville Regional Utilities

Property Owner: 9850 Little Gasparilla Island

ufdaugherty@yahoo.com

Lisa Smith

From: David W Adams <dadams@bj-law.com>
Sent: Monday, January 24, 2022 5:12 PM
To: Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Cc: Records Clerk
Subject: RE: Docket #20200226-SU

From: David W Adams
Sent: Monday, January 24, 2022 4:43 PM
To: 'Commissioner.LaRosa@psc.state.fl.us' <Commissioner.LaRosa@psc.state.fl.us>; 'Commissioner.Clark@psc.state.fl.us' <Commissioner.Clark@psc.state.fl.us>; 'Commissioner.Passidomo@psc.state.fl.us' <Commissioner.Passidomo@psc.state.fl.us>
Cc: 'clerk@psc.state.fl.us' <clerk@psc.state.fl.us>
Subject: RE: Docket #20200226-SU

Dear Commissioners:

This is a second supplemental notice from David Adams. I own property at 8356 Little Gasparilla Island. I just received the email below.

As you can see from the message below, the average operating cost for a Charlotte County Septic to Sewer project is \$67.22 per residence per month.

I would like PSC staff to investigate whether EU is willing to match the average monthly operating cost that Charlotte County charges for other conversions.

Denying the application and allowing Charlotte County to complete and operate the septic to sewer conversion will save rate payers over \$100 per month (maybe more), based on the numbers that have been published to residents.

Thank you,

David Adams

From: Wannall, Caroline Caroline.Wannall@charlottecountyfl.gov
Sent: Monday, January 24, 2022 4:48 PM
To: David W Adams dadams@bj-law.com
Subject: RE: Little Gasparilla proposed Sewer project

A typical sewer charge for a residential sewer customer using 4,000 gallons is \$67.22. We estimate the average household uses approximately 4,000 a month.

Please let me know if you have any additional questions.



Caroline Wannall

Public Relations Manager
Charlotte County Utilities
941-764-4304

CharlotteCountyFL.gov

[Facebook.com/ccutilities](https://www.facebook.com/ccutilities)

Delivering Exceptional Service

Lisa Smith

From: Joann Guagliardo <jguag@verizon.net>
Sent: Monday, January 24, 2022 5:06 PM
To: Office of Commissioner Passidomo
Subject: Fwd: Docket #20200226-SU

> Good afternoon,

>

> We, Frank and Joann Guagliardo and Richard and Susan Jenkins are joint homeowners of several properties on Little Gasparilla Island (LGI) which is in the proposed service area in Environmental Utilities (EU) central sewer proposal.

>

> We object to this proposal and formally request that the PSC deny EU's application for original certification of authorization for wastewater service.

>

> We as homeowners do not need this service or request this service. In addition, no water quality testing has been done in our area to prove a need for this service.

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> Many things concern us as a homeowner of LGI, including:

> -it is very expensive and burdensome for the homeowner. Connection of this system has been estimated to be between \$13,000 and \$20,000 per homeowner.

> -The average monthly bill is estimated at \$178. Extremely costly in comparison to our current septic tank system.

> -An electric panel separate from our home will also be needed with additional cost.

> -We as the homeowner will also need to invest in a generator to avoid sewage back up in the event of power outages.

> -There is no contract and no point of general oversight. No single point of recourse for us as the homeowner in the event of overruns or project failures.

> -EU has not addressed how the system will be serviced in the event of failure due to a storm or any other reasons.

> -Potential sewer spills in the Intercoastal.

>

> These reasons demonstrate that EU does not have both the financial ability and technical expertise to undergo this project. There is too much unknown to the homeowner and too much burden both costly and environmentally harmful to our property. We currently have dealings with this owner and there are constant issues and unnecessary costs.

>

> Sincerely,

>

> Frank and Joann Guagliardo

> Richard and Susan Jenkins

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>

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> Sent from my iPhone

Lisa Smith

From: Linda Bawel <lbawel@me.com>
Sent: Monday, January 24, 2022 5:00 PM
To: Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject: Docket #20200226-SU

Linda Bawel
141 S Gulf Blvd
Placida, FL

Clerk of the Commission,

We are seasonal residents and do not rent our home, just like the majority of homes on Palm Island. We are only here about 20 to 30 days a year. We are asking asking the PSC to deny the Application for Original Certificate of Authorization requested by EU to be the private entity to install centralized sewers.

On the island majority of tanks are seasonal use only. There is not a large demand. There would be mass chaos trying to install such a complicated project on our barrier island accessible by ferry only. EU has not managed, nor done such work as required. As home owners, we are at his mercy of the quality of work being performed and the rates he would have full authority to charge. I am not entirely opposed to sewers but I am opposed to EU.

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