

**Charlie Smith**

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**From:** Office of Commissioner Passidomo  
**Sent:** Wednesday, May 29, 2024 2:04 PM  
**To:** Commissioner Correspondence  
**Subject:** Docket No. 20240032  
**Attachments:** Re: Docket #20240032

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please place the attached in Docket No. 20240032.

Thank you!

## Charlie Smith

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**From:** McCoy, Thomas <thomas.mccoy@vanderbilt.edu>  
**Sent:** Wednesday, May 29, 2024 1:10 PM  
**To:** Records Clerk  
**Cc:** Office of Chairman La Rosa; Comissioner.Clark@psc.state.fl.us; Office of Commissioner Passidomo; Office of Commissioner Graham; Office of Commissioner Fay  
**Subject:** Re: Docket #20240032

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I am writing this letter on behalf of myself, Thomas R. McCoy, and my spouse, Judith A. McCoy. We own and reside in our home at 9720 Little Gasparilla Island. We have owned our house on LGI since 1994 and have been full time residents there since 2007. We are writing to formally object to the request by Environmental Utilities for authorization to construct a low pressure wastewater collection system on LGI. For environmental reasons, we would strongly endorse any proposal by a suitable government or not-for-profit entity to construct a traditional full sewer system on LGI. But we strongly object to EU's current proposal for three reasons.

First, the proposed low-pressure wastewater only collection system will remove from the island only the clear water outflow from septic tanks, leaving the solids to be stored in a septic holding tank at each residence until the tank is pumped periodically and the solids transported off the island by a tank truck on a ferry barge. Currently LGI homeowners struggle to arrange pump-out of existing septic tanks, experience long waiting lists for such plump-outs, and confront a cost around \$1,400 for each pump-out. EU's approach also would leave the septic tank and the stored solids subject to overflow caused by the tidal and storm flooding that regularly occurs on the island. The proposed clear water collection system is not an adequate response to the environmental needs posed by existing septic systems on the island,

Second, applicant EU is not competent to conduct the construction and maintenance of a sewer system on the island. EU has no experience at all with any aspect of constructing and maintaining a sewer system. EU's poor performance in the construction and maintenance of the existing potable water supply system on LGI suggests that it should not be entrusted with the construction and maintenance of a much more environmentally sensitive sewer system. EU's water system on the island is plagued by inadequate pipe capacity, poor pipeline location and construction, frequent pipeline breaks, and frequent water outages followed by "boil water" notices to all affected residences.

Third, the current proposal will subject the homes on LGI to substantial and unnecessary costs. The periodic pump-outs required by the proposed system is a hidden cost that will be substantial as noted above. That cost would be avoided by a traditional full sewer system for both solids and liquids. Unlike most sewer systems that are operated by a governmental unit or utility district, the proposed system is designed to generate a substantial profit for its private owner-operator, thus significantly increasing the homeowner's cost beyond the cost of a nonprofit public utility. And because EU is a private for-profit business, construction and operation of the system would not qualify for the wide range of state and federal grants which significantly reduce the costs to homeowners served by traditional not-for-profit sewer systems.

In short: the proposed sewer system is not the system the LGI environment needs, EU is not the provider LGI owners should be forced to accept in order to meet LGI's environmental needs, and the cost structure

proposed is not the cost structure to which LGI owners should be subjected in order to meet the environmental needs. We urge the PSC to reject EU's current application.

Thomas McCoy  
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