

Antonia Hover

From: Office of Commissioner Fay
Sent: Wednesday, December 18, 2024 11:56 AM
To: Commissioner Correspondence
Subject: Docket 20240032-SU
Attachments: Docket #20240032-SU; Docket 20240032-SU; RE. Docket #20240032-SU

Place the attached emails in Docket No. 20240032

Antonia Hover

From: james luscombe <jim@palmislandstays.com>
Sent: Monday, December 16, 2024 2:30 PM
To: Records Clerk
Cc: Office of Chairman La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo Smith; Office of Commissioner Graham; Office of Commissioner Fay
Subject: Docket #20240032-SU

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Dear Commissioners

My name is Jim Luscombe and I own and reside full time at 420 Bocilla Drive on Don Pedro Island with Kris Doubles. Our family home was built in the late 70's and we have been full time residents for 8 years. We live within the service district for the central sewer system being proposed by Environmental Utilities (EU). I request that you DENY EU's Application for Original Certificate or Authorization for the following reasons.

1: **Need:** If the County truly believed the logic of the applicants need assessment, the county would not be granting new permits on our islands for septic systems. This is not the case. Had the proposed system been in place post Hurricane Ian, this island would have been literally be swimming in SH+T. With no power, the proposed system fills and overflows. Septic tanks work 24/7. If the proposed system had been installed prior to the recent hurricanes Helene and Milton it would have been a TOTAL DISASTER. Many homes are still without power and would therefore be without sewer.

HOW CAN A LOGICAL PERSON EVEN CONSIDER REMOVING A SYSTEM THAT WORKS, HAS BEEN INSTALLED TO CODE AND FUNCTIONS 24/7 FOR SIMPLY THE COST OF AN ANNUAL PUMP OUT???

The only way you can justify moving ahead with this project based on NEED is for financial gain. Need has NOT been established. Studies have not been completed and the engineering lacking. To date, no evidence supports a requirement to abandon existing privately owned and well-maintained individual wastewater systems in the proposed service area. In fact, expert witnesses testifying at prior Administrative Hearings **refuted all arguments** that **Environmental Utilities LLC** put forward in attempting to support the need for service.

Going further, the Final Order from the PSC, denying **Environmental Utilities LLC's** previous application, indicated that the PSC fully understood and supported the community's countless factual data points refuting baseless claims for the necessity of **a private, profit-centered utility that would charge egregious usury rates** far in excess of what a county-provided system, with lifecycle amortized development, depreciation, and substantially lower non-profit rate structure, would cost taxpayers.

NEED.....NOT GREED!

2: Technical Expertise: I know and respect the applicant HOWEVER, he has no experience in wastewater management and has never completed a project of this magnitude. I spoke with him last year and he made it clear that he feels strongly that the best option for all involved is for the COUNTY to take it over. Another island resident had a meeting with the applicant and at that meeting the applicant advised that he had no intention of actually doing the project. There can be NO justification for moving ahead with this project based on Technical Expertise.

3: Fair and Equitable Rates & Charges: We the residents, have yet to be informed of the total actual costs. Hookup fees have been quoted from 10K to 20K. Another county project had projections of over \$30K per household. Unfortunately, this is just the tip of the iceberg. Our existing septic's have to be decommissioned. Many homes will require an electric upgrade to power the pumps: No estimate

Our lots will be torn up from the street to the house to lay the line and tankage. Cost of replacing landscaping: No estimate.

What will each resident be paid for the easement needed for them to do this: No estimate.

The best one is the ongoing cost. We will now have to pay an estimated \$200 plus monthly for wastewater. The average in the state of Florida is currently is published at \$61.24 for water and wastewater, excluding utility taxes.

With an average water bill of \$120 and an additional \$250 for wastewater for 4000 gallons, this easily makes our utility costs on Palm Island at **SIX TIMES THE STATE AVERAGE!** The applicant has stated that he will apply for the maximum increase allowed each year. The only way you can justify moving ahead with this project based on Fair and Equitable Rates & Charges is for financial gain. Period.

There can be NO justification for moving ahead with this project based on Fair and Equitable Rates and Charges.

4:Easements

Another consequence of Charlotte County abdicating its responsibility is that each property owner would be forced to grant easements and suffer through development-associated private property repairs without any compensation or benefit. i.e., The private developer can recoup its investment and receive an ongoing annuity comprised of excessively high rates. At the same time, the county leaves the tax-paying citizens to deal with the inflated expenses. This is no different from the egregious \$60 minimum monthly rates the Barrier Island residents pay Bocilla Utilities for reselling Englewood Water District water, whether or not they consume a drop. We will NOT provide the asked for Easements! The process of eminent domain will be contentious at best. The taking of private property for projects benefiting private entities is VERY CONTROVERSIAL.

5:Current and Proposed Costs

The individual homeowner cost of central sewer is unnecessary and considerable.

It is also worth noting that due to damage incurred from recent Hurricanes, homeowners on the islands have expended enormous sums to install new or repair existing septic systems at their homes. It is unconscionable that County Commissioners support the unnecessary abandonment of those systems and allow a private utility to egregiously profit off the tax-paying, voting citizens' backs.

6: Summary

In closing, despite the lack of necessity to replace the current on-site functional septic systems, Charlotte County, without transparent justification, is attempting to abdicate its duty to provide services to its tax-paying citizens by transferring its responsibility to an inexperienced "profit-centered" utility with an exceptionally high passthrough rate structure that will continually escalate and that citizens will be required to pay in perpetuity.

This project has not been proven necessary, has not been engineered to the level required, has not been shown to improve water quality in our area . If approved it will tear up our all ready broken environment from the past 3 hurricanes and place many of our island residents in financial stress.

The systems currently in place are working 24/7 as designed.

With the above in mind, the citizens of Charlotte County look to their Representatives to protect their collective interests, which without question includes preventing profiteering by private utility companies, as well as preventing developmental and operational risks associated with an inexperienced, unproven utility company such as Environmental Utilities LLC's.

Again, the citizens of Charlotte County look to each of you to represent and protect their interests and to withdraw support for Environmental Utilities LLC's application.

Thank you

Jim Luscombe
420 Bocilla Drive
Placida , FL 33946
727-515-0274

Antonia Hover

From: jbluscombe@gmail.com
Sent: Monday, December 16, 2024 2:38 PM
To: Records Clerk
Cc: Office of Commissioner Fay; Office of Chairman La Rosa; Office of Commissioner Graham; Office of Commissioner Clark; Office of Commissioner Passidomo Smith
Subject: Docket 20240032-SU

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Dear Commissioners

My name is Kris Doubles and I own and reside full time at 420 Bocilla Drive on Don Pedro Island with Kris Doubles. Our family home was built in the late 70's and we have been full time residents for 8 years. We live within the service district for the central sewer system being proposed by Environmental Utilities (EU). I request that you DENY EU's Application for Original Certificate or Authorization for the following reasons.

1: **Need:** For over a decade, our home owners association have been testing the waters surrounding our island. Hundreds of tests later, we have never been able to find any contaminated waters. E coli counts obtained over the past decade would indicate we do not have a problem. Spending 10's of millions of dollars to correct our water quality with a sewer system seems almost ridiculous. Charlotte county, Lee county and Sarasota county have all been in the news over the past year (as recently as last week) BECAUSE OF SEWAGE SYSTEM FAILURES. Pumps fail, lift stations fail. Various reports ranging from 10,000 gallons to will over 100,000 gallons of raw sewage going into our waterways because of the same system being proposed.

If the County truly believed the logic of the applicants need assessment, the county would not be granting new permits on our islands for septic systems. This is not the case.

Had the proposed system been in place post Hurricane Ian, this island would have been literally be swimming in SH+T. With no power, the proposed system fills and overflows. Septic tanks work 24/7.

The only way you can justify moving ahead with this project based on NEED is for financial gain. Need has NOT been established. Studies have not been completed and the engineering lacking.

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2: **Technical Expertise:** I know and respect the applicant HOWEVER, he has no experience in wastewater management and has never completed a project of this magnitude. I spoke with him last year and he made it clear that he feels strongly that the best option for all involved is for the COUNTY to take it over. Another island resident had a meeting with the applicant and at that meeting the applicant advised that he had no intention of actually doing the project. There can be NO justification for moving ahead with this project based on Technical Expertise.

3: **Fair and Equitable Rates & Charges:** We the residents, have yet to be informed of the total actual costs. Hookup fees have been quoted from 10K to 20K. Unfortunately, this is just the tip of the iceberg. Our existing septic's have to be decommissioned. Many homes will require an electric upgrade to power the pumps: No estimate

Our lots will be torn up from the street to the house to lay the line and tankage. Cost of replacing landscaping: No estimate.

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The best one is the ongoing cost. We will now have to pay an estimated \$200 plus monthly for wastewater. The average in the state of Florida is currently published at \$61.24 for water and wastewater, excluding utility taxes.

With an average water bill of \$120 and an additional \$250 for wastewater for 4000 gallons, this easily makes our utility costs on Palm Island at **SIX TIMES THE STATE AVERAGE!** The applicant has stated that he will apply for the maximum increase allowed each year. The only way you can justify moving ahead with this project based on Fair and Equitable Rates & Charges is for financial gain. Period.

There can be NO justification for moving ahead with this project based on Fair and Equitable Rates and Charges.

Another area of HUGE CONCERN, is the damage to our fragile environment. We are home to a challenged gopher tortoise population. Has a study been done to determine the risk to this protected population?

Collateral Damage: Our island has a thriving vacation rental market. Tearing up our landscape for a few years will ultimately cost businesses and owners millions of dollars in lost revenue. After a pandemic and Hurricane Ian, this is the last thing we need as a community.

After all is said and done under the proposed program, our waste will be transported to Rotonda where it is treated. The gray water containing high levels of nutrients and Nitrogen will then be diverted to "Fertilizer Water" used by local golf courses, to ultimately end up in the water table and back into our rivers and coastal waters. This solves nothing.

Sarasota has recently indicated that they should STOP hooking up septic to sewers UNTIL that have advanced waste water treatment systems in place. Advanced systems are designed to eliminate the nutrient waters that get recycled. This is a much more logical place for the County to start. Make Rotonda and advanced waste water treatment plant.

The process we are going through seems and feels totally wrong. There is no engineering study, there is no need and there are no precise costs to the owners being presented.

As a non-engineer but a concerned resident, this feels like a total sham and does not at any level pass the smell test.

Please make the right decision that is not based on a high profit permit to one individual, but on the best long term solution to our island that meets our needs now and in the future, has minimum environmental impact and is affordable to all.

Regards

Kris Doubles

A handwritten signature in black ink, appearing to read "Jim", with a horizontal line above and below the name.

Jim Luscombe

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Cell: 727-515-0274

www.palmislandstays.com

Antonia Hover

From: Marc Anderson <marcusdanderson@gmail.com>
Sent: Monday, December 16, 2024 1:12 PM
To: Records Clerk
Cc: Office of Commissioner Fay; Office of Commissioner Graham; Office of Commissioner Passidomo Smith; Office of Commissioner Clark; Office of Chairman La Rosa
Subject: RE. Docket #20240032-SU

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I do not feel there is any proven need for central sewer service. We did not request this sewer service on our island. I do not feel comfortable with a for-profit, private company to own/hold responsibility for what would be a public utility, if implemented. With no experience of operating or maintaining a sewer system, I do not agree with allowing EU LLC to be allowed to do such. The projected costs associated with this project to the individual property owner is absurd. This project will do lasting damage to our native tortoise population, the habitat that they live and thrive in and many other fragile animals that share this same habitat.

Owners at 140 N. Gulf Blvd.

Marc Anderson
Sallianne Zody
Brenda Zody