

EU's Responses to PIE's First Set of  
Interrogatories, Nos. 15-19

14. With respect to each expert witness identified in response to Interrogatory # 2, state his or her opinions derived from each inspection, analysis, examination, or test conducted.

RESPONSE:

*Jonathan H. Cole P.E.*

1. *The most economical collection system for this area is a Low pressure sewer system.*
  2. *The most economical force main crossing for flows from the entire island is at Cape Haze. (Option 2)*
15. Has Environmental Utilities (“Applicant”) conducted any water quality testing of the waters in and around the proposed service area? If so, please identify the results of the water quality testing and identify (a) the location where each test was conducted; (b) the laboratory that conducted the testing; (c) the results of the testing; (d) the date the test(s) was conducted and (e) state whether there were any test results that were out of established limits (identifying the specific test result that was allegedly out of range).

RESPONSE: *No.*

16. Is the Applicant’s proposed service area located within the Urban Service Area as that phrase is defined by the Charlotte County Comprehensive Plan? If any portion of the proposed service area is located outside the Urban Service Area, please identify which portions of the proposed service area is located outside the Urban Service Area?

RESPONSE: *No.*

17. What “clear and convincing evidence” is there to establish that a health problem exists in a built but unserved area for which there is no other feasible solution as set forth in FLU Policy 3.2.4 of the Charlotte County Comprehensive Plan?

RESPONSE: *The Sewer Master Plan.*

18. Does the Applicant agree that the “The County shall not expand the scope of potable water or sanitary sewer service to the bridgeless barrier islands” as set forth in the Charlotte County Comprehensive Plan, Future Land Use Element Appendix I? If not, why not?

RESPONSE: *Yes, but as the County states, that obligation is left to private utilities.*

19. Please identify, with particularity, the scientific evidence and/or support for the proposition that the properties being served by septic tanks “contributes to the degradation of water quality of Lemon Bay and the Gulf of Mexico, exacerbating red tide and algae outbreaks.”

RESPONSE: *The Sewer Master Plan.*


**AFFIDAVIT**

STATE OF FLORIDA)  
COUNTY OF CHARLOTTE)

I hereby certify that on this 11 day of November, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jack Boyer, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory numbers: 15 - 19 from PIE'S FIRST SET OF INTERROGATORIES TO ENVIRONMENTAL UTILITIES, LLC (Nos. 1 - 19) in Docket No. 20200226-SU, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 11 day of November, 2021.



  
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Notary Public  
State of Florida, at Large

My Commission Expires:

4/27/2023