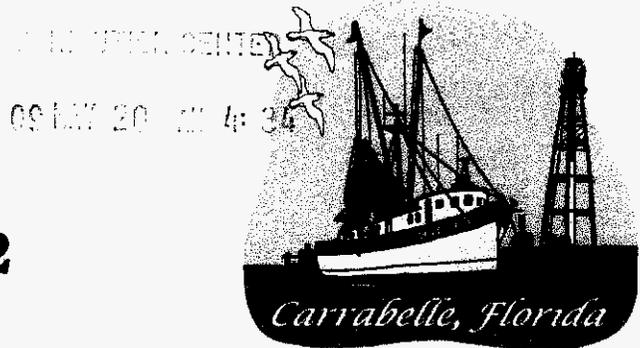


From the desk of

Mel Kelly

P.O. Box 913

Carrabelle, FL 32322



May 17, 2009

Public Service Commission
 Office of Commission Clerk
 2540 Shumard Oak Boulevard,
 Tallahassee, FL 32399-0850.

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CLERK

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Ladies and Gentlemen:

In your interests of public service toward Franklin County, I must ask you to please chose to reject this poorly developed request for centralized sewer service to the St. George Island commercial district (with vague numbers of customers, and high-hope promises of future residential expansion beyond that central core area.) The application submitted for this permit is an insult to your Commission, seeming to promise that, if you "approve this right now I'll give you the really important details later when I figure them out!" I believe that very spurious preparation speaks clearly to the poorly conceived and casually tentative environmental effort for the Island businesses, residents and visitors.

As the former Mayor of the nearby City of Carrabelle, I am better acquainted than many with advanced wastewater treatment facilities. Our City has the newest, most advanced and largest capacity system in the County (and even beyond.) Our system went on line during my term of office. So I understand the need for proper capacity, adequate cost structures and emergency planning. Since Carrabelle is also a coastal community, I further understand the need for environmental safety and protection, including special attention to nitrate issues on the island. I believe the proposal put forth by WMSI has not been adequately developed and researched by the proponent, nor is able to explain or defend the above issues!

I believe you can clearly see that scenario in the vague promises made within the permit application, such as ... "WMSI submits the following requirements are unnecessary...a cost study supporting proposed rates and changes...projected costs of the system...projected costs of operating the system...projected capital structure..." I find it incredible to believe that any responsible business could enter into any project effort without at least preliminary estimates on those above items, which ARE the business! Can you imagine going to a banker asking for project support without such vital information? As a former business owner/operator, I KNOW such irresponsible preparation would be laughed out of any legitimate loan office. As I see it, WMSI is asking for your money, or "ok" first, then when it becomes convenient they will provide the necessary details to justify the "loan monies," or in your case, the permit approval. They have no valid ERC numbers ("approximately 400") nor capacity information nor treatment quantity information nor clear construction plans and access. But they demand that you approve their request, grant variances to your own application requirements, and then wait for their eventual planning work to be finally be undertaken and completed in order to provide some legitimate costs basis for this hurry-up application request.

Remember the old adage... "Act in Haste; Repent in Leisure?" This application seems to demonstrate that warning!

St George Island is an environmentally fragile barrier island. In a perfect world, there would be no businesses, no homes, no paved roads and no development. Visitors would find just the park for everyone and the opportunity for silent sports; to fish and hike and birdwatch and kayak and canoe and cherish the resource for the incredible site it is. But that luxury was not to be, and homes and developments came early to the island. With those constructions came the need for people comforts, including roads and water service and septic tanks and businesses to cater to the public and residents.

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I didn't take long to develop the island. In places, such as on the streets of the so-called "skinny minis," it has a heavy density. The business core has numerous restaurants and public access facilities, including a well-used large public meeting room atop the local fire station. Now, almost as an afterthought, the water provider has suddenly submitted this permit to treat the wastewater which is being generated by the local development. A good idea? Perhaps. A necessary idea? Perhaps. A timely idea? Perhaps. But a well-thought out and developed idea? NO!

Water service came first from this private developer because, as anyone who knows utilities recognizes, that's where the money is to be made. Waste is a regular byproduct of water service, but produces a much less glamorous and much less profitable product. But in many ways, it is a much more difficult product and requires special skills and understanding to manage, to sell and to sustain. It requires a higher level of protection in such a fragile environment. On an island where septic tanks have been laid open to the ravages of several recent storms, and where the island's bowl-like center traps stormwater for weeks, a sewage treatment facility will not be an easy responsibility.

And the importance of public comment, research and understanding has been trampled in the haste to rush this permit through your process. Perhaps WMSI will emerge victorious when proper groundwork has been laid, when adequate study and options have been explored and thoroughly investigated, and when they are able to provide the preliminary answers to "simple" questions such as "How much will it cost per customer ERC?" "How many customers and how many gallons of waste are needed to make it a viable option for the owner and the users?" "How will the environmental issues be managed and secured to the optimum safety of all?"

Just like the rapid development of the island in response to private interests, this application suggests a service that might or could but can't and shouldn't be permitted by you as of now. As the Florida Public Service Commission, you are entrusted with oversight on behalf of all of us who can't always speak for ourselves. Only by your firm decision to postpone any action on this permit application can help to guarantee that due process has been granted area residents and all the information has been gathered for a truly educated decision.

On this fragile barrier island, there is no need to rush ahead in less than six weeks to permit a system that will affect all who live and visit there and the surrounding residents and seas as well. Millions of dollars will be spent in planning and construction and operation. Six weeks is not enough time to look carefully at that proposal that is guaranteed to have a lifelong effect on St. George Island.

There is a reason we all grew up with that saying "Act in Haste; Repent in Leisure." It proves to be true!

Sincerely,


Mel Kelly
Proud Mayor of Carrabelle, FL. (2005-2007)

Cc: Marsha E. Rule
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