

**Antonia Hover**

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**From:** Office of Commissioner Passidomo  
**Sent:** Tuesday, April 23, 2024 2:59 PM  
**To:** Commissioner Correspondence  
**Subject:** Docket No. 20240032  
**Attachments:** Docket #20240032-SU - Application for certificate to provide wastewater service in Charlotte County by Environmental Utilities, LLC.; Docket #20240032-SU ; Docket #20240032-SU; Docket #20240032-SU

Please place the attached in Docket No. 20240032.

Thank you!

## **Antonia Hover**

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**From:** Naval Architect <naval\_architect@hotmail.com>  
**Sent:** Tuesday, April 23, 2024 1:58 PM  
**To:** Records Clerk; Office of Chairman La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo; Office of Commissioner Fay; Office of Commissioner Graham  
**Subject:** Docket #20240032-SU - Application for certificate to provide wastewater service in Charlotte County by Environmental Utilities, LLC.  
**Attachments:** Comer-Franklin Letter Docket #20240032.pdf

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Commissioners – Please find our input regarding the subject matter attached. Best Regards

*Joe Comer*  
251-709-0799

Joseph H Comer III  
Marsha L Franklin  
8934 Gulf St.  
Placida, FL 33946  
(Mailing address PO Box 422, 33946)

23 April 2024

Florida Public Service Commission  
2540 Shumand Oak Blvd.  
Tallahassee, FL 32399-0850

Via email - Clerk@psc.state.fl.us, Commissioner.LaRosa@psc.state.fl.us,  
Commissioner.Clark@psc.state.fl.us, Commissioner.Passidomo@psc.state.fl.us,  
Commissioner.Fay@psc.state.fl.us, Commissioner.Graham@psc.state.fl.us

Subject: **Docket #20240032-SU** - Application for certificate to provide wastewater service  
in Charlotte County by Environmental Utilities, LLC.

Dear Commissioner.LaRosa, Commissioner.Clark, Commissioner.Passidomo,  
Commissioner.Fay and Commissioner.Graham:

We are new owners to Little Gasparilla Island this year and have recently heard of the subject  
proposal that seems un-necessary and a system not widely used or proven. Please consider  
the following:

#### Environmental

There has been no study in our area that proves the need for a new system. A low pressure  
system, not being a central system that handles both liquid and solids would be a major  
destruction to the habitat and the endangered residence of the gopher tortoise.

What would be the impact of the removal of all the drain field mounds? There will be significant  
damage to public and private landscape and hardscape in the removal of old systems and the  
installation of the proposed new LPS system.

#### Sewer Spill

Our current septic system permitted #SW 85-264E on 7/17/1985 was inspected before we  
purchased the house this year and found to be in very good operating condition only needing a  
'pump out' for which was immediately scheduled. To this day, this has not been accomplished  
because of the limited capacity of the 'honey wagon'. As we understand the proposed LPS  
system, this problem of timely pump-out capability would still exist. The cost and the delay for  
every day maintenance would not improve.

Walking the island, there is no noticeable sewage odor, not like when passing some public  
systems ashore. Even with heavy rains there are no spills which regularly occur at public  
systems.

Power outages are experienced often on Little Gasparilla Island especially during storms and  
hurricanes which occurred for a long period of time during Hurricane Ian. This will require  
homeowners to install emergency generators or incur the hardship and cost of living off island  
until the situation is resolved.

### Mandatory Hook-up

Current Charlotte County regulations require homes to connect to central water and wastewater within one (1) year of availability and would assume this would apply to the proposed LPS system for which there would be enormous homeowner costs for installation. Most properties only have room for their current septic system, so the old system would have to be removed and the proposed system installed leaving the homeowner without service for some long period of time. If the existing tank were to be used, few properties would meet the ten (10) foot radius around the manhole.

### Easements

Normal utility easements occur in public roadways, however on Little Gasparilla Island many roadways are private pathways, sand and one lane wide. Many homes do not front on these pathways and often septic systems are at the rear of the property so the LPS will have to cross private property with no regard for homeowner rights. There will be a cost to litigate these easements.

### Transportation

Little Gasparilla Island is only accessible by boat. And we like it that way! However, a major construction project like this would take years to complete. Using Hurricane Ian two (2) years ago as an example, re-construction is still underway with some project completions not in sight. Construction equipment, material, labor would all have to come over by boat/barge. Not something most would look forward to after recent experiences.

It appears a new sewer system of any kind is not needed on Little Gasparilla Island. The subject proposed LPS system would have an associated exorbitant cost to homeowners as well as the operator and would translate into a huge monthly homeowner utility costs. There is no apparent benefit to the subject proposed LPS system or any 'new' system.

We request that you vote to reject the subject application and do the same on any future similar ideas.

Sincerely



Joseph H Comer III  
Marsha L Franklin



## Antonia Hover

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**From:** Lynn Provost <lynn@thedockdoctors.com>  
**Sent:** Tuesday, April 23, 2024 1:53 PM  
**To:** Records Clerk; Office of Chairman La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo; Office of Commissioner Fay; Office of Commissioner Graham  
**Subject:** Docket #20240032-SU

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Property Owner on Don Pedro Island, 121 Bocilla Dr.

Jeffrey & Lynn Provost

Mailing: 8725 Placida Rd. Suite 7-510

Placida FL 33946

941-662-8701

We are writing to formally request PSC to deny the Environmental Utilities application for wastewater service. Please consider the following:

- There has not been an official study with comprehensive data to illustrate the need for this.
- Being that we live on a bridge less, barrier island, after a catastrophic event like Hurricane Ian, we were the last to receive power reconnection after the storm. Had this type of sewer system been in place at that time, it would have not been functional without electricity hence homeowners would not have been able to return home for an extended period of time. The traditional gravity fed systems that are in place on the island can still function without the necessity of power.
- If Charlotte Counties reasoning for allowing this application to be considered is truly for environmental purposes they should consider a completely different type of system such as the Advantex Wastewater Treatment Systems. We have attached a link to their web site for your information. <https://www.orenco.com/products/treatment-systems> Advantex is a very environmentally sound product and is ideal for small sites and environmentally sensitive areas. These units are dependable, proven technology for treating residential septic tank effluent to better-than-secondary standards, including nitrogen-reduction. I (Jeff) have personally been involved with the installation of several of these systems with my business and personal residences in Vermont where the soils are very poor and environmental guidelines are extremely restrictive. This type of system could be incorporated for new construction projects and replacement systems to make the change over time.
- There definitely should be some scrutiny on the fact of conflict of interest between our County Commissioner, Bill Truex being personal friends with the applicant, Jack Boyer.
- I (Jeff) have had communications with Jack Boyer during his prior application process for this same purpose. It is very clear that he does not have the desire or the structure in place to perform the project. His goal is simply to obtain the rights to do the project and then set his price to sell the rights to the highest bidder.
- The situation has gotten worse since Hurricane Ian with regard to the financial impact of rising insurance and inflation of property taxes over the past several years. If the County is requiring a sewage treatment system be put in place, they should assume some of the obligation versus putting the entire burden on the property owners and ridding themselves of a project of this magnitude.

Thank you for consideration and reviewing our concerns and thoughts on this application.

Regards,

Jeff & Lynn Provost

Sent from my iPad

## Antonia Hover

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**From:** Olga Kroslak <gogijoe76@hotmail.com>  
**Sent:** Tuesday, April 23, 2024 1:43 PM  
**Cc:** Records Clerk; Office of Chairman La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo; Office of Commissioner Fay; Office of Commissioner Graham  
**Subject:** Docket #20240032-SU

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My name is Joseph Kroslak. My wife and I own two properties on Little Gasparilla Island, located at 9424 and 9426 Rum Runner Rd.

We are formally requesting that the PSC DENY EU'S APPLICATION FOR WASTEWATER SERVICE.

We are appealing to you with due respect because we feel that it is your responsibility as public servants to protect the interest of the taxpayers and homeowners, and not that of private enterprise.

Here a few reasons why we are against this service:

1. There is no evidence that supports a NEED for this service. The vast majority of existing septic systems that homeowners have are functional when maintained properly.
2. ENVIRONMENTALLY, this project brings the potential for destruction of habitat and interference with endangered species
3. We feel it is unfair that we will be forced to give up our private property rights for free. According to 14.0, "the Customer shall grant or cause to be granted to the Company, and without cost to the Company, all rights, easements, permits, and privileges which are necessary for the rendering of wastewater service.
4. The COST of central sewer is very high and certainly comes at a very bad time for islanders. Many of us are still dealing with the many after-effects of Hurricane Ian and have had to lay out large sums of money for rebuilding, etc. Please don't saddle the homeowners with additional financial burdens.
5. Included in the above point is the need for a separate electric panel, a generator, tree removal around the septic area, etc, which all comes at the homeowner's expense.
6. The experience and ability of EU is certainly questionable as it is not a major operator with solid infrastructure support behind them.
7. We love our beautiful island just the way it is, including the privacy we have. Providing utilities to our island will draw more development and more population.

Once again, PLEASE, consider our request for denying central sewer service to our island!

We thank you for your consideration.

Joseph and Debby Kroslak

## Antonia Hover

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**From:** jim luscombe <jbluscombe@gmail.com>  
**Sent:** Tuesday, April 23, 2024 12:04 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  
**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:** 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.  
**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. 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 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 systems 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

Jim Luscombe and 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

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