

**Antonia Hover**

---

**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Tuesday, April 30, 2024 1:14 PM  
**To:** 'azuresea11@yahoo.com'  
**Cc:** Consumer Contact  
**Subject:** FW: Docket #20240032 Letter for Submission to the Public Service Commission  
**Attachments:** PSC Letter.pdf

Good Afternoon, Rod Stokes.

We will be placing your comments below in consumer correspondence in Docket No. 20240032, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

*Toni Hover*  
Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6467

*PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are considered to be public records and will be made available to the public and the media upon request. Therefore, your email message may be subject to public disclosure.*

**From:** Rod Stokes <azuresea11@yahoo.com>  
**Sent:** Friday, April 26, 2024 3:32 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>; Office of Chairman La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner Passidomo <Commissioner.Passidomo@psc.state.fl.us>; Office of Commissioner Fay <Commissioner.Fay@psc.state.fl.us>; Office of Commissioner Graham <Commissioner.Graham@PSC.STATE.FL.US>  
**Subject:** Docket #20240032 Letter for Submission to the Public Service Commission

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Sir/Madam,

Please find attached my letter requesting that your commission deny the application for wastewater service by Environmental Utilities, Inc.

Sincerely,  
Rod Stokes  
(863) 712-5739

Rod Stokes  
8892 Gulf Street  
Little Gasparilla Island  
Placida, FL 33946  
Phone: (863) 712-5739

► **Florida Public Service Commission**

Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6100

---

**RE: DOCKET #20240032-SU**

**Dear Public Service Commission,**

My name is Rod Stokes, and my mother Kathleen Stokes is has owned and maintained a family home for 25 years on Little Gasparilla Island, Placida, Florida which is within the proposed service area of Environmental Utilities, Inc.'s (EU) application for Wastewater Service. Please consider this letter as a formal request for the Public Service Commission to deny Environmental Utilities, Inc.'s application.

There are many reasons for the Commission to deny EU's application, including but not limited to, public need for a sewage system on the Charlotte County Barrier Islands, costs of the homeowner were the commission to approve the application, the level of experience of the owner and personnel of Environmental Utilities, lack of disaster preparedness measures proposed, and the possible environmental impacts of such a central sewage system.

The first reason to deny the application is the most important. **THERE IS NO PUBLIC NEED IN THE PROPOSED SERVICE AREA FOR A CENTRAL SEWER SYSTEM!** Environmental Utilities, Inc. was denied application for exactly the same system two years ago after expert witnesses refuted the arguments EU put forth as reasons the system was needed. Two years later, nothing has changed, and the proposed service area remains the same. Given the chance, few if any homeowners in the service area would voluntarily connect to EU's system especially considering the cost (see next paragraph below). An additional concern is the requirement for the homeowner to deed an easement to EU for the installation and maintenance of the system on the property without any compensation to the homeowner from EU or Charlotte County. This is not usual business practice where easements on homeowner's properties are concerned, but an extraordinary concession to EU which is completely unnecessary.

Second, the costs of the proposed system would be exorbitantly expensive to the homeowners which this application purports to help. Estimated costs are between \$13,000-\$20,000 for the initial connection to the system, and a recurring annual cost to exceed \$3500! Please remember that the homeowner would be responsible for the cost of removing the present septic system as well, which will run into the thousands of dollars. This unbelievably high rate for service would essentially drive many homeowners to sell their homes as they would not be able to afford the cost. EU's proposed system would also damage homeowner's chances to obtain a fair price for their properties at the time of sale. What prospective buyer would want to assume the costs of wastewater on these barrier islands if they can buy a similar property elsewhere with no such burden? Finally, the

---

proposed sewer system put forth by EU would not work in the event of a power outage. This will require the homeowner to purchase and maintain a generator and the requisite fuel needed to ensure the system does not back up and overflow during times of power outage. The cost of this proposed project to homeowners is absurd!

The third reason the application should be denied becomes apparent when looking at the level of experience Environmental Utilities, Inc. has in wastewater. No one in the company has any wastewater utility operation experience. Running a utility like this is not a simple matter but requires expertise in many areas. EU has limited knowledge, having never worked in the industry. Due to possible environmental impacts of the sewer system failure, this is not a project for a novice company with no experience but is better suited to a governmental agency like Charlotte County. EU presently supplies water to Little Gasparilla Island and has a rather imperfect record of service to the public. There have been numerous breaches of the system, and the company is slow to alert the users to any boil water notices. In my opinion, this is not the kind of organization you should trust to handle such an important project which could adversely affect public health.

Reason number four to deny the application of EU is their lack of disaster planning for such a sewer system. In 2022, Hurricane Ian knocked out electrical service to the entire island of Little Gasparilla for an extended period. Homeowners who remained on the island relied on their septic systems and made it through the disaster until electricity could be restored. With the proposed system, which will not work in the absence of power, the chances for surface waters to be contaminated during such an event would rise exponentially increasing the chances that residents would be exposed to Cholera and *Vibrio* infections, causing a possible public health crisis. Is EU going to purchase and maintain a generator to move wastewater to the connection point with the County? Will they have personnel present during emergency situations such as a hurricane to maintain the system? These important questions need answers.

Finally, the fifth reason to deny EU's application is the environmental impact of installing the system. There are endangered Gopher tortoises on the islands which need to be taken into consideration. Has Charlotte County or EU performed an environmental impact study on how the project would affect the land, water, and wildlife of the area? This needs to be done before proceeding with any infrastructure. In EU's application for wastewater service, they include what is purported to be environmental evidence of a need for a sewer system by Brian Lapoint, Ph.D. His submission is compelling on its surface, but in it he admits that no samples or studies he references are from the barrier islands of Charlotte County. Each environmental location is unique with respect to nutrient influx, current patterns, and tidal flushing. To infer that the findings of his studies in St. Lucie estuary and others (many of which are on the other coast of Florida), apply to Charlotte County Barrier Islands is not sound science, and no reason to approve EU's application. Ask anyone who boats or fishes the waters around the islands, sea life is abundant and thriving.

It is an overwhelming burden to have to continually defend our properties from unnecessary, potentially exorbitantly expensive utility proposals such as the one for which EU is applying for the second time in two years. The Public Service Commission's job is to protect the public from unneeded projects exactly like this one. I implore your commission members to vote to deny Environmental Utilities, Inc. application and allow the residents of the Charlotte County Barrier Islands to get back to the job of putting their lives and homes back together after the devastation of Hurricane Ian. Thank you in advance for your attention to this extremely important matter.

Sincerely,

Rod Stokes

April 26<sup>th</sup> 2024

---