

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Monday, May 6, 2024 4:41 PM
To: '777mmk@gmail.com'
Cc: Consumer Contact
Subject: FW: DOCKET # 20240032-SU
Attachments: commission re sewer objections may 5 2024.pdf

Good Afternoon, Majorie Kelsey.

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

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From: Margie <777mmk@gmail.com>
Sent: Monday, May 6, 2024 4:11 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>; Consumer Contact <Contact@PSC.STATE.FL.US>
Cc: 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>; Marissa Ramos <mramos@psc.state.fl.us>; commissioner.Graham@psc.state.fl.us; Office of Commissioner Fay <Commissioner.Fay@psc.state.fl.us>
Subject: DOCKET # 20240032-SU

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Please find attached letter pertaining to above referenced DOCKET #20240032-SU
Please include/attach this letter in the docket.

Letter of comments pertaining to reference application.

I thank you for all the work you do for all the people of the great State of Florida!

Please contact me if you have any questions or concerns.

Marjorie Kelsey
9798 Little Gasparilla Island

138 Hattaway Drive
Altamonte Springs, FL 32701

(407) 718-1786

May 5, 2024

TO:

Clerk of the Commission clerk@psc.state.fl.us, contact@psc.state.fl.us

COPY TO:

Commissioner LaRosa: Commissioner.LaRosa@psc.state.fl.us

Commissioner Clark: Commissioner.Clark@psc.state.fl.us

Commissioner Passidomo: Commissioner.Passidomo@psc.state.fl.us

Commissioner Graham: Commissioner.Graham@psc.state.fl.us

Commissioner Fay: Commissioner.Fay@psc.state.fl.us

FROM:

Marjorie Kelsey

138 Hattaway Drive

Altamonte Springs, FL 32701

407-718-1786

RE: Docket #20240032-SU

Dear Public Service Commission,

Please include this letter of comment into above referenced Docket #20240032-SU

My name is Marjorie Kelsey and my family has owned property on Little Gasparilla Island for over 50 years at 9798 Little Gasparilla Island. I love and enjoy the island and all of Florida's exceptional coastal beauty. As a marine biologist/conservationist, it is my desire to protect its unique character and beauty. I am in favor of protection of the environment, but I question the ability of the proposed application for Central Sewer for Little Gasparilla island to reduce risk to the environment. To the contrary, I foresee a greatly increased risk to our sensitive ecosystem.

I am requesting the Public Service Commission deny the application to Environmental Utilities, for the following Reasons:

Septic risk not removed but pressure system adds additional risk

The current proposed system requires the replacement of current septic tank/drainfield systems with a low-pressure wastewater system. Essentially, you are not removing the risk associated with septic tanks, as the new system requires septic holding tanks for its operation. Each individual house will still have and maintain holding tanks. Rather than utilizing drainfields, you are now required to “run off” the wastewater into pipes that will move the wastewater through numerous lift stations and eventually piped off the island.

- The new septic holding tanks require electricity to function properly, thus increasing risk at each individual household. (the old systems function on gravity alone, reducing risk due to failure).
- The psi and lift stations/pumps for the new system relies on electricity, not only at the individual household, but through the series of lift stations. This greatly increases risk due to failure, not just for a single house, but for a conglomerate of houses and in some instances could detrimentally affect the entire island simultaneously. The risk is multiplied by a large factor.
- The system must remove the wastewater from the island and move it to the mainland. This requires electricity to maintain the psi underwater piping. With constant pressure on the system as the wastewater moves through our waterways, any failure of the piping or fittings of the system will result in wastewater release into the ecosystem without knowledge for ongoing lengths of time. Any breach of electricity puts our ecosystems at tremendous threat of potential environmental disaster.

Breaches of electricity are to be expected on an island such as Little Gasparilla Island, not only during the impacts of hurricanes, but during small storm events and even without environments factors at all. This puts the entire sewer system at risk and imposes the potential for environmental damage.

Essentially,

- You *retain* the risk of septic/holding tanks while *compounding* the risk because of the necessity for electricity.
- Substantially much greater risk is added with the addition of pumps and lift stations, and the need to transport hazardous wastewater via pipelines through sensitive marine ecosystems, both on the land and more so in the waterways, with the proposed new system.

When you consider that most of Little Gasparilla Island is mostly vacation homes that are occupied for only a fraction of time, where is the benefit? The drainfields are of little effect to the island's environment. There are no studies suggesting otherwise.

Affects to the Island's land areas

Now consider the required removal of current septic tanks and their current content. How do we remove these from the island? Will the county provide resources? How do we get their contents off the island? Individual owners deal with these issues occasionally over time. But for every homeowner dealing with pumping septic tanks all within a specified timeframe is going to be devastating to the island ecosystem.

So much attention is focused on the waterways. The island itself also hosts a delicate functional ecosystem that could be decimated by the construction of digging new pipelines, removing the content of old septic tanks, digging up old septic tanks, removing them from the island – affecting the entire island in one huge construction project.

The effects of construction alone offers an array of environmental risks that need to be studied before engaging in such a project.

Financial hardships

I might add, as a point of note, this island is still reeling from the devastating effects of hurricane Ian. This storm is not over for us. Many of us have spent huge amounts of money to rebuild and many are still rebuilding. To even propose such a project at this particular time is insensitive at the least. In the last 12 months, the county has approved and permitted the replacing of septic systems for many homeowners on the island, which is an enormous expense compared to mainland installs, with of course additional expenses to make them meet new codes and requirements (some upwards of \$40,000 to \$50,000 per system). Now the county proposes to require my neighbors to dig up these expensive systems and replace them.

Notwithstanding this, by comparing the costs proposed by the first application several years ago with the costs proposed in this latest application, there does not seem to be an adjustment for current costs/expenses/inflation. According to an expert in public utilities that I spoke with, the expectation per household for such a system runs double to triple for mainland installs at today's prices. Factor in the difference for installs on a bridgeless barrier island and the expectation jumps. Now factor in inflation over the next few years.

With a private contractor, it seems by the proposal, the bid winner will be given essentially a blank check with no limits on what can be charged to the homeowners for the buildout. The bid winner also gains the ability to lien the properties for nonpayment. How does this

work for the property owners? Where is the county's oversight and protection for the property owners?

Why impose such hardships on the owners of property still recovering from a devastating hurricane? Why is the county not applying for grants and programs to help fund such a project? Why is it arbitrarily being imposed carte blanc on the homeowners? Why a private company with carte blanc privileges and little or no recourse for the homeowners it services?

Miscellaneous Concerns

This company is required to prove it can finance the project. But the numbers are not accurate.

The named financier for the project needs to prove their ability to fund at the appropriate numbers.

Why is the homeowner being forced to enter into legally binding contractual agreements with a private company by force and not by will?

More importantly, where has this company proved their experience, education, or ability to perform this contract with the county? Or are they going to learn as they go, at the expense of the homeowners *and the increased risk to the environment* for any learning curves (mistakes) they incur?

Summary

There are so many questionable issues surrounding this application. I ask you to consider all these issues as you consider my request to the Public Service Commission to deny the application to Environmental Utilities. Engage in proper studies that include the barrier islands specifically and tie in the actual occupancy of this island and the water/wastewater usage of the populace. Include studies of the environmental impact to the island itself for such a project, especially pertaining to the construction impact. Then we can all move forward with great confidence that our dollars spent are doing the work we intend, protecting our precious Florida marine resources, waterways and beautiful barrier islands.

With great appreciation for your attention to this matter,

Marjorie Kelsey
138 Hattaway Drive
Altamonte Springs, FL 32701
(407) 718-1786