

June 3, 2024

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

RE: DOCKET NO. 20240011-WU
Riverdale Utility Holding, Inc.
2120 Corporate Square Boulevard, Suite 3
Jacksonville, FL 32216

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2024 JUN 11 PM 12: 22
COMMISSION
CLERK

Dear Commissioner,

My wife and I are homeowners in the Riverdale area of St. Johns County, Florida. We are NOT in favor of Riverdale Utility Holdings building a new water plant in the area and are formally requesting that your office rejects the application.

Here are some of our reasons:

- St. Johns County has water and sewer already available to the properties proposed to be developed in this application from Water Plant Road, approximately 55,000 feet northeast of the property.
- Riverdale Utility Holding's original application included sewer. They have subsequently modified their request to only be Water and they have indicated plans for septic tanks on every property. Given Florida's concern over septic runoff into the St. Johns River, this high density of septic systems in close proximity to the river would likely have a negative effect on the health of the St. Johns River. Since the county has existing facilities with capacity and availability they could use, that option seems to be a logical choice.
- The applicant obtained a storm water mitigation approval from St. Johns River Water Management District back in 2018 for only phase 1 of this project (42 single family homes) based on connecting the proposed houses into the county's existing water and sewer systems. This material change to their plan does not seem to be in line with the approval previously granted and we believe that the storm water permit should be reconsidered or perhaps a new application is warranted. There are no approvals for future phases to increase the number of homes from 42 to more than 2,500 which appears to be their current plan.
- In order to make this utility financially viable, it would require a significant number of houses to be built in the area. Based on their submitted financials, by 2035 to obtain their 80% design capacity they would have to connect to 2,861 houses in an area that has less than 100 houses today. Riverdale's infrastructure cannot handle a high density residential development like this:

- The roadway leading to this new development is a designated 2-lane scenic highway which cannot support that much additional traffic
- The nearest gas station is 13 miles away
- The nearest grocery store is 14 miles away
- The nearest hospital is 19 miles away
- The nearest fire station is 10 miles away
- The roads in the area regularly flood, the added impermeable space for the ~3k houses will only exacerbate the issue.
- St. John's county's comprehensive future land use plan for this area is agricultural, not high-density residential. The nearest residential development in the plan is over 10 miles away
- The numbers in their application are very inconsistent.
 - Exhibits E & G state only 42 single family homes
 - Exhibit H states 298 single family homes
 - Exhibits Q thru W state that 2,861 houses would be connected to meet the 80% design capacity by 2035

A new water utility system in this area just does not make sense in our opinion; especially given that it can be serviced by the existing county facilities.

Thank you for your consideration on this matter.

Sincerely,
Vernon Miller
Kathleen Miller
871 County Rd 13 South
St. Augustine, FL 32092
904-446-8376

Vernon Miller 6/3/24
Kathleen Miller 6/3/24