



January 23, 2025

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

Dear Sirs:

Docket No. 20240032-WS

This letter is being sent by Lemon Bay Conservancy in response to the application for certificate to provide wastewater service in Charlotte County by Environmental Utilities, LLC.

Lemon Bay Conservancy (LBC) is a 501 (c)(3) non-profit organization that works to protect the wildlife and natural habitats of Lemon Bay, Gasparilla Sound, and their watersheds through land preservation and restoration, water quality initiatives, environmental education, and advocacy for sustainable conservation policies.

LBC owns 13 lots on Thornton Key, part of Knight Island in Charlotte County. The Parcel ID numbers of these lots are as follows: 412020152001, 412020152013, 412020301006, 412020303001, 412020303002, 412020303019, 412020304002, 412020326002, 412020326001, 412020153013, 412020326003, 412020326004, 412020304003.

These lots are zoned BBI (bridge less barrier island) with a future land use of Coastal Residential. However any residential development of these lots and any lots owned in the future by LBC on Thornton Key will be impossible as any such development is contrary to the mission of LBC, reinforced by conservation easements that have been applied to the majority of the lots. Density units have also been removed from these lots.

As such, any assumption that LBC should or help pay for sewers is wrong. Further, charging conservation properties for sewers they would not use discourages conservation.

Assumptions made by Environmental Utilities about the economic feasibility of sewers in the future are clearly wrong as the likely use for properties on Thornton Key in the future are for conservation, not residential development.

Furthermore, the assumption that a centralized sewer system will significantly reduce nitrogen loading to Lemon Bay is unfounded. Charlotte County Utilities (CCU) facilities currently lack Advanced Wastewater Treatment (AWT). Without committed plans and a timeframe for AWT implementation, a centralized sewer system would merely shift the nitrogen burden. While it removes wastewater from the barrier islands, much of the nitrogen will be redistributed back into the coastal environment of Lemon Bay through the application of reclaimed water.

Sincerely,

Lemon Bay Conservancy - President

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