Jenae Thornberry

From: Jenae Thornberry on behalf of Records Clerk
Sent: Wednesday, February 12, 2025 8:04 AM

To: 'Bruce Kelsey'
Cc: Consumer Contact

Subject: RE: Docket 20240032-SU Charlotte County Meeting comments

Good Morning,

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.

Jenae Thornberry

Commission Deputy Clerk I Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee, FL 32399 JThornbe@psc.state.fl.us (850) 413-6457



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From: Bruce Kelsey
 Sent: Wednesday, February 12, 2025 4:35 AM
 To: Records Clerk <CLERK@PSC.STATE.FL.US>

Subject: Docket 20240032-SU Charlotte County Meeting comments

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Please give my attached comments to the staff and commissioners that attended the Environmental Utilities hearing in Charlotte County.

Bruce C Kelsey

email bruceckelsey@yahoo.com

Application for certificate to provide wastewater service in Charlotte County by

Environmental Utilities, LLC. DOCKET 20240032-SU

Name	Bruce C Kelsey	
Address	s <u>579 Peacock Trl</u>	
	Haines City, FL 33844	
	"	

email bruceckelsey@yahoo.com

To submit your comments about this docket to the Florida Public Service Commission, please complete this comment form and return it by mail, or scan and email to the Commission Clerk at clerk@psc.state.fl.us. Correspondence will be placed in the docket file.

CUSTOMER COMMENTS

I appreciate the hearing at Charlotte County. Surely the commissioners and staff saw the abundant opposition from the island residents.

In summary, the proposed system is a greater risk to the environment and not justified due to the mostly part time vacation and week end homes are only occupied about 1/3 of the time. The Application said no test samples were taken for the islands but according to comments, environmental agencies found the surrounding waters to be pristine. The estimated wastewater should have been based on the potable water supplied. Also according to comments, Charlotte County has discontinued installing low pressure systems in new areas on the mainland. More details as follows:

- 1) Greater risk due to concentrating all of the sewerage into into a main line on islands that are subject to flooding and major storm damage. Numerous substantial spills from similar systems in other areas were mentioned at the hearing. The risk of a massive main line failure is far greater than some of the septic tanks leaking. Also a slow main line leak on the islands or under the inland waterway could go undetected for years.
- 2) Mostly part time vacation and week end homes on the islands. Mr. Boyer also stated at the meeting, "only7% of the homes are full time".

The Lapointe study assumed the average wastewater from island septic tanks to be the same as the mostly full time use septic tanks on the mainland. The assumed Nitrogen per person was also based on a 1984 study of septic tanks "within 100 ft from fresh water lakes in Florida." Application Exhibit JBR-1 Page 17 of 446)

please see the attached page

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DOCKET 20240032-SU

COMMENTS Bruce C Kelsey

Estimated wastewater should have been based on the potable water supplied to the island homes. Lapointe assumed an ECR of 290 gal of wastewater per home per day but the county has only reported an average of 133 gal of potable water a day for homes with septic tanks on the main land. The Swain prefiling reduced the ECR to 90 gal a day and it probably is less due to the part time homes. Mr Boyer also owns one of the water companies and could have and should have reported the potable water supplied.

Mr. Bell's prefiled testimony said the system must be designed for sufficient flow to daily flush the lines. The conceptual design did not consider the part time homes and most of the time the main lines would not have sufficient flow or pressure to prevent sedimentation in the lines.

No samples taken in the Barrier Islands

Dr. Lapointe's 2016 study of pollutants found in Charlotte Harbor said it "did not include sampling on the barrier islands" However, <u>according to comments at the hearing, environmental agencies have taken samples and found the waters around the Barrier Islands to be pristine!</u>

<u>Safer and cheaper alternatives.</u> According to comments at the hearing, Aerator Treatment Units (ATUs) installed at each home would be far cheaper to install and maintain and have far less risk than the proposed low pressure system. <u>A number of ATUs have been installed on the islands and approved by the county</u>. There are other individual systems that may also qualify for grants.

A power outage or failure of the proposed system could shut down all or part of the islands and cause back ups for an extended period of time.

According to operators of systems in other cities and counties, grinders require high maintenance and are easily jammed.

The above comments are based on my owning property on Little Gasparilla Island for 55 years, having been a professional engineer registered in Florida for 35 years and having worked with pipelines in the phosphate industry for 15 years.