

Antonia Hover

From: Office of Commissioner Fay
Sent: Monday, March 31, 2025 10:23 AM
To: Commissioner Correspondence
Subject: Docket No. 20240032-SU
Attachments: Docket #20240032-SU DENY; DENY EU APPLICATION - RE: Docket #20240032-SU;
DENY EU APPLICATION - RE. Docket #20240032-SU; Please Deny EU Application Docket
Docket #20240032-SU; DENY EU APPLICATION - RE. Docket #20240032-SU; DENY EU
APPLICATION - RE. Docket #20240032-SU

Place the attached emails in Docket No. 20240032

Antonia Hover

From: Candyce Cohen <candycecohen@gmail.com>
Sent: Monday, March 31, 2025 1:51 AM
To: Office of Commissioner Clark; Office of Commissioner Passidomo Smith; Office of Commissioner Graham; Office of Chairman La Rosa; Office of Commissioner Fay
Cc: Records Clerk
Subject: Docket #20240032-SU DENY
Attachments: CCohen - Docket #20200226-SU.pdf

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Dear Commissioners,

My name is Candyce Cohen and I am a full-time resident of Don Pedro Island since 1995. I have spoken out twice in the past few years against the Environmental Utilities Sewer proposal which impacts my cherished home and community on Don Pedro Island. While I last wrote to you in 2021, frankly the EU application hasn't changed much except I've been working two jobs to try to recover financially to recover from 3 major hurricane landfalls in the last 2 years. Now, I am once again writing you requesting you DENY the Environmental Utilities proposal to provide sewer "service" to my cherished island community.

The EU proposal falls short of the PSC's focus to ensure our services are delivered in a safe, reasonable and reliable manner.

- EU simply has NO EXPERIENCE delivering sewer solutions and, to hear the residents of Little Gasparilla Island, their delivery of water solutions has been sub-standard. EU has not offered any indication of how they would course correct to offer reliable service to this larger service area with a more complex service.
- A lot pressure system on a bridgeless, barrier island is asking for disaster. The Helene and subsequent Milton storm surges taught us all that Mother Nature can wreak havoc on systems. There is no way a system under pressure should be anywhere near environmentally sensitive areas. A single break during Milton would result in a contained spill where the EU proposed solution would expose, under pressure, the entire island's sewage to the Lemon Bay waters.
- Further the Low Pressure solution proposed by EU invite environmental disaster on an island without power for a couple days - Milton and Helene destroyed many generators as they were housed on the ground level. This is the WRONG SOLUTION for the environmentally sensitive areas we call home.
- Charlotte County's West county treatment center is not an advanced wastewater treatment facility - so moving the island's sewage to this facility to be treated would SUBSTANTIALLY WORSEN OUR WATER QUALITY by releasing red-tide fueling, nitrogen-rich gray water to the numerous golf courses

lining Lemon Bay. Charlotte County Utilities should prioritize upgrading the AWT standards removing red-tide fueling nutrient from wastewater before any action to dismantle low-density OSTDS.

- In the last 5 years in Charlotte County alone, nearly ~450 sewage spills totaling almost another 3m gallons of which 555k gallons made it into our waterways, but it must be the one off septic tanks causing water quality issues? Except there are no documented water quality issues around our island. Issues have been noted near golf courses that use CCU's gray water .. which just flows right back into Lemon Bay.
 - CCU took out \$110m state loans and grants to fund the East Port upgrades forecast in 2026.
 - If Island septic issues are such a priority, then CCU would've prioritized upgrading West Port to AWT as well before 2034.
- Central sewer provided not by a qualified, experienced utility but rather an inexperienced, private, for-profit entity is UNSAFE for our environment. The nature of a Limited Liability Corporation providing this service provides no recourse to the public or the county for any costly environmental mistakes. The nature of a private, for-profit LLC versus a governmental body providing these services means no government or private environmental Clean Water grants will be offered to such an entity or it's customers as the LLC could close doors after collecting funds with limited recourse.
- The costs proposed, both upfront of nearly \$45K by many estimates and the ongoing few hundred dollars a month, are excessive when compared to any other utility service area in the state ... and most in the country. Several retirees or those on fixed incomes will be forced to move as these upfront on monthly costs are beyond reasonable.

Please consider all the input you have heard, read and collected from those actually in the service area, and not just relatives of the applicant's family, who have substantially requested the PSC once again DENY this EU application.

Respectfully submitted,

Candyce Cohen
Full-time Resident since 1995 in the proposed service area
8 Pointe Way, Don Pedro Island, FL 33946
candycecohen@gmail.com
(201) 600-1083

Attaching my previous letter as EU has made minimal changes to their proposed solution since Docket #20200226-SU

From: **Candyce Cohen** <candycecohen@gmail.com>

Date: Sun, Jan 23, 2022 at 2:06 PM

Subject: Docket #20200226-SU

To: <clerk@psc.state.fl.us>, <Commissioner.LaRosa@psc.state.fl.us>, <Commissioner.Clark@psc.state.fl.us>, <Commissioner.Passidomo@psc.state.fl.us>

Distinguished commissioners LaRosa, Clark, Passidomo and Clerk of the Commission,

Good morning. I have been a homeowner on Don Pedro Island in Charlotte County since 1990, and a full-time resident since 1995. I am formally requesting the Public Service Commission DENY Environmental Utilities LLC's (EU's) application for wastewater service for the following reasons:

1. NEED FOR SERVICE

Water quality testing in and around Lemon Bay and northern Charlotte Harbor has not established the need to replace septic systems with a central sewer system. To address this concern, EU emailed interested parties information from a Florida Atlantic University study on septic system impact on the "urbanized Indian River Lagoon" area on the east/Atlantic coast of Florida. EU has also referenced via email that the islands to the north (in Sarasota County) and to the south (in Lee County) are on central sewer.

- The population density from Indian River and surrounding coastal counties are significantly greater running from 20% to 85% greater population density than Charlotte County.
- I also note the Indian River Lagoon is listed as the waterway with the 4th highest volume of untreated sewage spills in the state from Florida DEP analysis spanning 2009 – 2018, and therefore should not be conflated with Lemon Bay and Charlotte Harbor.
- As Mr. Boyer has also communicated the islands north and south have central sewer, to be clear both those counties have 280% greater population density than Charlotte County.
- Don Pedro, Knight and Little Gasparilla Island differs significantly from our neighbors on the east coast. Besides population density referenced above, the islands do not support high-rise/multifamily nor commercial development (beyond a single resort on the north end). Extensive commercial development is not zoned for and not contributing to the need for central sewer. In fact, our zoning ensures this will not change.
- Anecdotally, we have seen on other islands up and down the coast, when sewer is installed developers "lobby" county and city commissions to alter zoning to increase development which would fundamentally change the nature of the islands and the Florida native environment we have today.

Given these concerns, I request EU's application be **DENIED**.

2. INCREASED RISK OF SEWAGE SPILLS DUE TO POWER INTERRUPTIONS (vs AGEING INFRASTRUCTURE)

While future local water quality studies may one day show some nutrient leakage from septic tanks, central sewer adds risk for environmental nightmares beyond an individual home's septic tank collapsing here and there. Checking Florida headlines and Florida DEP Public Notice of Pollution (PNP) tracking of sewage and wastewater spills[1] over the past few years[2]

I note while EU would hopefully not struggle with Ageing Infrastructure, it would have to contend with **POWER OUTAGES**.

• The system proposed by EU requires electrical pump stations distributed to each homesite. In addition to the **significant cost** of supporting these, an extended Florida Power outage could lead to a devastating raw, untreated sewage dump in our waters - hundreds of times greater than individual septic tanks. Even with EU requiring each homeowner install/upgrade electrical service and generators, during power outages, fuel is precious and difficult to obtain.

• We have a hurricane season every year and have had numerous instances of multi-day outages on island. To add risk of environmental damage due to difficulty providing electricity to individual septic pumps island-wide is a risk that should weigh heavily in the consideration.

• Power outages are common throughout the year even outside the 6-month long hurricane season. In the last month we have had two significant outages one which resulted in a 19-hour outage across most of the island.

Given these concerns, I request EU's application be **DENIED**.

2. FINANCIAL ABILITY

The principals of Environmental Utilities (EU) are well-known to island residents with no observable financial stability or standing to undertake a project of this nature typically undertaken by municipal and governmental bodies. EU has not referenced any efforts to seek available water quality grants such as the Florida water-quality SWAG grants or the federal DEP 319 grants designated for septic to sewer projects.

• As a limited liability corporation, EU LLC will not pass basic due diligence to be deemed a qualified recipient of the environmental, governmental or even philanthropic grants available to support such projects. Grantors will be required to act as fiduciaries in granting taxpayer or donor funds. The principals of the LLC have little to no oversight and would logically be considered "high-risk" potential recipients of grants.

- The principles of a limited liability corporation can “walk away” at any time with no liability – with grant monies in their pockets and no recourse to taxpayers or foundations.

- Further, as an LLC entity can “walk away” from the project at any time, there are no requirements to report any monies paid to that date. As there is no governmental body is taking responsibility for this project, islanders are left susceptible to undue risk of financial loss from a “limited liability” entity.

- With the size and resources of EU being limited, their capabilities to negotiate, oversee, and run such a large logistical infrastructure project are incredibly limited. Contract management, purchasing, construction oversight and execution would be much better overseen by a governmental entity which has the critical mass to cover such logical functions across a county/state entity.

Given these concerns, I strongly request EU's application be **DENIED**.

3. **TECHNICAL EXPERTISE**

Environmental Utilities (EU) is an LLC whose principals are well known to many island residents through a couple decades of business practices -- none of which is in providing wastewater solutions. Our natural environment is too important to risk to an inexperienced, limited liability entity experiment with providing services in lieu of the currently working septic solutions.

- Citing a loose “relationship” with Knight Island Utilities which operates at Palm Island Resort does not ensure experience or knowledge nor does it instill confidence in island residents who have observed and smelled the failing treatment of sewage at the current Knight Island Utilities location.

- EU's principals currently operate Little Gasparilla Water Utility which, while not wastewater, the numerous anecdotal customer complaints on this entity show an indication of their ability to provide and support utility services.

Given these concerns, I request EU's application be **DENIED**.

4. **FAIR & EQUITABLE RATES & CHARGES**

Charges estimated for individual residential homeowners are nothing short of outrageous and unsubstantiated by facts.

- A connection charge (Service Availability Charge) originally estimated at \$20K/unit was reduced to \$13,221/unit upon further analysis which begs the question if all rates overestimated by 50%?! The average estimated monthly residential usage (of 4k/gallons) is \$256.66 – and this **is in addition to** the highest water rates paid to a private for-profit water utility on the island.

- The estimated wastewater costs are significantly more than four times the cost of wastewater for our mainland neighbors. EU has shared an estimated \$256.66 monthly charge for use of 4000 gallons which compares to \$54.89 in nearby Venice, FL and \$55.18 in nearby North Port, FL (both in Sarasota County)[3]. FL Water and Wastewater Rates Dashboard (upd Sept 2020)

Charlotte County collects our tax dollars, but has abdicated responsibility to provide service with even the minimal oversight and services for island residents who are in Charlotte County.

- The proposed solution requires expensive electrical upgrades as well as generators to help protect wastewater processing in the event of the all too frequent power outages we see throughout each year. In a hurricane season, access to fuel and fuel at stations with electrical power are rare commodities. EU is looking to force homeowners eliminate their safe working septic systems in favor of a wastewater solution provided by an inexperienced provider susceptible to failure with our all too frequent power outages.

- As EU will not be able to avail themselves of 319 or SWAG grants that would be available to a municipal or governmental entity, the entire burden of cost will fall on homeowners who already pay taxes into the county covering countywide utility infrastructure.

Given these concerns, I request EU's application be **DENIED**.

In summary, I am asking that the Environmental Utilities LLC application addressed by Docket #20200226-SU be **DENIED** on these points:

- No proven need for replacement of existing septic tanks.

- No studies in local waters (the studies cited were performed in Florida's waterway with the 4th highest impact from untreated sewage spills).
- Current low-density and no multi-family zoning in our area.
- Increased risk of untreated sewage spills due to reliance on electricity in an area with common power interruptions.
- EU's corporate structure as a "LIMITED LIABILITY" corporation will not pass basic due diligence for federal and state 319 or SWAG grants leaving the entire burden of cost on the homeowners.
- EU does not have demonstrated expertise in providing central sewer solutions.
- EU's rates and charges have been guesswork at best evidenced by
 - The 50% overestimated connection fee originally provided
 - The estimated **ongoing** monthly costs of more than 465% of our mainland neighbors)
 - The extensive costs to run lines from main roads, fill and remove existing septic, upgrade electrical service, provide, and maintain generators for common power outages, and grant uncompensated easements across privately held land adds further to each homeowner's costs.

Thank you for your service, taking the time to read my concerns and your serious contemplation and review of the EU LLC proposal which drives so many of us to reach out and communicate our concerns with you.

Best regards,
 Candyce Cohen
 Don Pedro Island Resident,
 8 Pointe Way, Don Pedro Island
 Charlotte County FL
 Financial Technology Consultant
 Cell: 201-600-1083
 Email: candycecohen@gmail.com

[1] <https://prodenv.dep.state.fl.us/DepPNP/reports/viewIncidentDetails?page=1>

[2] <https://stories.usatodaynetwork.com/sewers/>

[3] <https://dashboards.efc.sog.unc.edu/fl>



Gmail

Docket #20200226-SU

Candyce Cohen <candycecohen@gmail.com>

Sun, Jan 23, 2022 at 2:09 PM

To: clerk@psc.state.fl.us, Commissioner.LaRosa@psc.state.fl.us, Commissioner.Clark@psc.state.fl.us,

Commissioner.Passidomo@psc.state.fl.us

Bcc: pie@palmislandestates.org, david.paul.cohen@gmail.com

Distinguished commissioners LaRosa, Clark, Passidomo and Clerk of the Commission,

Good morning. I have been a homeowner on Don Pedro Island in Charlotte County since 1990, and a full-time resident since 1995. I am formally requesting the Public Service Commission DENY Environmental Utilities LLC's (EU's) application for wastewater service for the following reasons:

1. NEED FOR SERVICE

Water quality testing in and around Lemon Bay and northern Charlotte Harbor has not established the need to replace septic systems with a central sewer system. To address this concern, EU emailed interested parties information from a Florida Atlantic University study on septic system impact on the "urbanized Indian River Lagoon" area on the east/Atlantic coast of Florida. EU has also referenced via email that the islands to the north (in Sarasota County) and to the south (in Lee County) are on central sewer.

- The population density from Indian River and surrounding coastal counties are significantly greater running from 20% to 85% greater population density than Charlotte County.
- I also note the Indian River Lagoon is listed as the waterway with the 4th highest volume of untreated sewage spills in the state from Florida DEP analysis spanning 2009 – 2018, and therefore should not be conflated with Lemon Bay and Charlotte Harbor.
- As Mr. Boyer has also communicated the islands north and south have central sewer, to be clear both those counties have 280% greater population density than Charlotte County.
- Don Pedro, Knight and Little Gasparilla Island differs significantly from our neighbors on the east coast. Besides population density referenced above, the islands do not support high-rise/multifamily nor commercial development (beyond a single resort on the north end). Extensive commercial development is not zoned for and not contributing to the need for central sewer. In fact, our zoning ensures this will not change.
- Anecdotally, we have seen on other islands up and down the coast, when sewer is installed developers "lobby" county and city commissions to alter zoning to increase development which would fundamentally change the nature of the islands and the Florida native environment we have today.

Given these concerns, I request EU's application be **DENIED**.

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- The system proposed by EU requires electrical pump stations distributed to each homesite. In addition to the **significant cost** of supporting these, an extended Florida Power outage could lead to a devastating raw, untreated sewage dump in our waters - hundreds of times greater than individual septic tanks. Even with EU requiring each homeowner install/upgrade electrical service and generators, during power outages, fuel is precious and difficult to obtain.
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 - The extensive costs to run lines from main roads, fill and remove existing septic, upgrade electrical service, provide, and maintain generators for common power outages, and grant uncompensated easements across privately held land adds further to each homeowner's costs.

Thank you for your service, taking the time to read my concerns and your serious contemplation and review of the EU LLC proposal which drives so many of us to reach out and communicate our concerns with you.

Best regards,

Candyce Cohen

Don Pedro Island Resident,

8 Pointe Way, Don Pedro Island

Charlotte County FL

Financial Technology Consultant

Cell: 201-600-1083

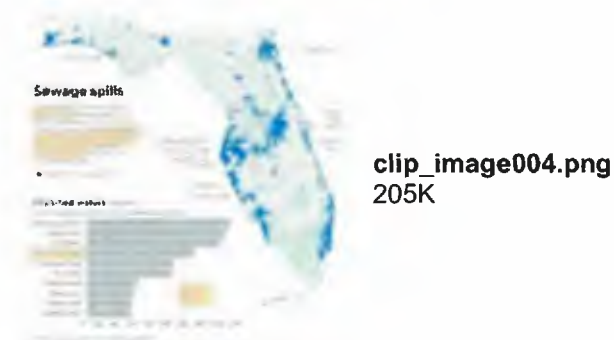
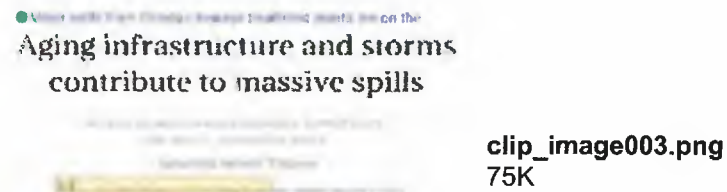
Email: candycecohen@gmail.com

[1] <https://prodenv.dep.state.fl.us/DepPNP/reports/viewIncidentDetails?page=1>

[2] <https://stories.usatodaynetwork.com/sewers/>

[3] <https://dashboards.efc.sog.unc.edu/fl>

8 attachments





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517K



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530K

Cardyce Cohen **PastedGraphic-1.png**
3K

 **PSC Letter Docket #20200226-SU .pdf**
1397K

Antonia Hover

From: Jennifer Jarvis <jarvis@mrinc.net>
Sent: Friday, March 28, 2025 5:02 PM
To: Records Clerk; Office of Commissioner Clark; Office of Commissioner Passidomo Smith; Office of Commissioner Graham; Office of Chairman La Rosa; Office of Commissioner Fay
Subject: DENY EU APPLICATION - RE: Docket #20240032-SU

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

Good Afternoon,

I am writing to ask you to please deny the approval of this application presented by EU for a sewer system. There are a few reasons, I would like to share.

1. Need – Is there really a need? I have been on the island for over 50 years. In that time, I have never seen raw sewage leaking from any property on the island. I do not agree that we are having spillage issues as claimed. Water samples have not been tested from closer to the island than Lemon Bay. Show me that there is a need, and I may change my opinion. Most of the residents do not live full time on the island. Most are weekend residents, which cuts the usage down to about 80 days a year the houses are being used. That is less than 1/3 of the year.
2. Cost – The cost involved is a concern as we would not be allowed to finance over time like impact fees are spread over time. Also, the cost for this system is outrageous. I have a newer septic as it has been replaced, is pumped, and certified every 5 years by Charlotte County's requirements. This is a large amount of money that not all residents have.
3. Charlotte County – for MANY years, the county has overlooked Little Gasparilla Island, and I feel as though now that they are realizing the money they can benefit from us they are trying to get as much as possible. We pay extremely high taxes and do not get much in return.
4. Established business – EU is not even a working water treatment or sewer company. Why would you trust a brand-new company that has no track record to something as important as sewer? We have already experienced Mr. Boyer with the water company. We pay the highest for water in the entire state of Florida. Once again, we use the house about 1/3 of the year but are required to pay their minimum just to have the water line. Here we are looking at the same high rates for monthly service.
5. Electricity – What is going to happen when the electricity goes out? Currently, we all have septic systems. When the power goes out, we keep going. With the new system, how will it keep functioning? Are we responsible for a generator to be able to keep flushing? We know how long it takes for FPL to respond to a power outage. That would mean that much longer that we would be not able to reside at the island until electricity is restored.
6. Easements – The island was not set up for commercializing. We do not have roads as you do on the mainland. How can you just take people's property so you can run all these new sewer lines? Also, the equipment and vehicles to install the lines, we are not equipped to handle the oversized vehicles.
7. Breakage – What if there is a line that breaks? How many gallons of raw sewage will be spilled into the pathways or waterways? Is there a mandatory response time? Will someone be located on the island 24hrs a day to respond to emergencies?
8. Mandatory – How are you able to make this a mandatory hook up when almost the entire island is in opposition? Are you not willing to listen to the people? We are the ones paying the taxes not being heard. Our current system works perfectly, why would I want to connect when I do not have a problem. The residents have long embraced a degree of independence due to our location; we have been self-reliant on what we must work with. Why not make this an option to opt out, especially if we can demonstrate that our system meets the requirements.
9. Financial Gain – I do believe in free enterprise, but Mr. Boyer is only out for his personal gain and NOT the best interest of the residents. If he was, he would be willing to listen.

10. Island/Mainland – There are many residents on the mainland who have septic systems, and the county is not making it mandatory for them to hook up to a sewer system. Why pick on island residents when you do not even make the mainland hook up to a county sewer system.

I believe that if Charlotte County feels as though there is an issue, then maybe look at visiting the island periodically to inspect the conditions of the island and the current sewer systems. This way they could address the issues on a regular basis and know when something isn't right. There are other solutions, this just needs to be discussed. I understand the county's interest in wanting reliable sewer systems for all, but a one-size-fits-all approach may not be the best suited for Little Gasparilla Island. Perhaps a compromise could be considered.

In conclusion, would you trust a new company to handle something as important as this? Would you like to be imposed on a mandatory \$50K hook up fee, then a \$200 charge per month for pumping gray water, and the electricity to run the pump?

I believe you all have a heart and know right from wrong. This is just wrong to approve something that is not warranted.

Thank you for your time and consideration.

Rick & Jennifer Jarvis
9766 Little Gasparilla Island
jarvis@mrinc.net



Jennifer Jarvis
1929 5th ST NW Winter Haven, FL 33881
O: 863.401.2577 | F: 863.294.3269 | jarvis@mrinc.net

Antonia Hover

From: Bruce Kelsey <brucekelsey@yahoo.com>
Sent: Friday, March 28, 2025 4:39 PM
To: Records Clerk; Office of Commissioner Clark; Office of Commissioner Passidomo Smith; Office of Commissioner Graham; Office of Chairman La Rosa; Office of Commissioner Fay
Subject: DENY EU APPLICATION - RE. Docket #20240032-SU

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

Please deny the proposed Environmental Utilities application As a retired Florida professional engineer with pipeline design experience and having owned a home and property on Little Gasparilla Island for over 55 years, I urge you to consider my following concerns.

- 1) The staff and the service application did not consider that most of the homes in the service area are occupied part-time and vacant most of the time.
- 2) The ECR gal/day estimated assumptions were based on other areas with mostly full-time residents and should have been based on the historical records of potable water supplied by water companies in the service area
- 3) Probably, the actual ECR gal/day would produce much less revenue than estimated, and the conceptual design would be inadequate to keep the lines flushed out.
- 4) No environmental tests were made in or near the service area.
- 5) Greater risk of a break in the main line and a massive spill on an island or under the inland waterway
- 6) There are safer and more efficient individual home systems that are even more efficient than the proposed system for removing nitrogen
- 7) Although the county has endorsed the application, there is hearsay the county is now opposed to low- pressure systems in new developments on the mainland.
- 8) The county does not own wastewater systems on barrier islands for good reason. It is too difficult and time consuming to transport equipment and personal to the worksite by boats and barges. EU would have the same problem providing service and dependability Conclusion Due to the average home on the islands having much less impact on the environment than septic tanks on the mainland, it would be safer, cheaper and more effective to wait for upgraded individual home systems that may qualify for government grants.

From: Bruce C Kelsey
9798 Little Gasparilla Island
PO Box 3462 Placida, FL 33946
brucekelsey@yahoo.com
phone 863-288-0286

Antonia Hover

From: Rebecca Hagelin <hagelin.rebecca@gmail.com>
Sent: Friday, March 28, 2025 3:57 PM
To: Records Clerk; Office of Commissioner Clark; Office of Commissioner Passidomo Smith; Office of Commissioner Graham; Office of Chairman La Rosa; Office of Commissioner Fay
Subject: Please Deny EU Application Docket # Docket #20240032-SU

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

Dear Commissioners -

It breaks my heart to have to write this letter. Members of the Boyer family and employees of Environmental Utilities have been my friends for several years. However, their continued efforts to force island home owners to buy their unwanted and unneeded utilities, with the Boyers gaining much wealth while making their neighbors carry a huge financial burden and/or lose their homes, is just plain wrong. I wish no ill will on anyone, and am very saddened by the situation. The projected cost per home of the EU system of \$40,000 (for installation only) is an unreasonable cost for a family to bear - especially after the huge personal financial losses from the recent hurricanes.

Even if you set the consideration of the financial winner and losers aside, the facts show that EU's current application to force neighbors to buy and pay for the maintenance of an expensive and questionable sewage system should be denied by the PSC for two simple reasons:

- 1) EU has failed to prove a need for a sewage system.
 - In fact, EU failed to perform water quality testing of the waters surrounding the island. Given that the State of Florida's own testing of Lower Lemon Bay meets Florida clean water standards, it's no surprise that EU did not perform a test: A monitored EU test would have revealed the same result, only hurting their application.
- 2) The vast majority of property owners are against the EU proposed system.
 - This is evidenced in the number of letters sent to the commission both for and against the proposal; and also by the number of home owners who testified at the recent hearings (approximately 104 testified against the EU application, and only 9 for the EU application, three of the proponents being family members who have a conflict of interest because they would profit from the forced utility.)

Yes, some septic tanks failed in the recent hurricanes - and so did EU's entire water system.

I personally observed water gushing from broken EU water pipes after the hurricanes. I can't imagine the horror of those being central or connected sewage pipes, flooding the entire island's raw sewage onto our pristine lands and shores.

Please also keep in mind that houses failed in the floods, electricity failed, walls failed, roofs failed. Virtually everything failed in some way in the floods - except for most of the current island septic systems.

An EU island-wide sewage system with its labyrinth miles of pipes, and pumps and tanks would be highly vulnerable to future catastrophic flooding and storms, endangering the entire island and our delicate ecosystem. With individual septic, the damage from the storms is episodic, depending on the location of the individual

tanks. During Helene and Milton the vast majority of individual septic tanks remained buried and in working order - while EU's extensive water system was shut down for days.

I respectfully request that the PSC deny all sewage system applications (from any entity) for our island until such time that, 1) there is a demonstrated need, and 2) the majority of the community supports such a utility.

When those two conditions are met, the next step would be to determine the correct sewage system for our vulnerable ecosystem, installed and maintained by an experienced company in the field. EU's proposed system type is responsible for 51% of Florida sewage failures. Additionally, EU has no experience in the sewage industry - our delicate barrier island ecosystem must not be gambled during an EU learning curve.

Thank you for denying EU's application at this time, thus upholding your stated mission ensuring that Floridians will receive some "essential services" - and "in a safe, reasonable, and reliable manner."

Respectfully,
Rebecca Hagelin
(Residing at 8026 Grand Avenue
Little Gasparilla Island)

Rebecca Hagelin
703.915.7288

Antonia Hover

From: Margie <777mmk@gmail.com>
Sent: Friday, March 28, 2025 3:11 PM
To: Records Clerk; Office of Commissioner Clark; Office of Commissioner Passidomo Smith; Office of Commissioner Graham; Office of Chairman La Rosa; Office of Commissioner Fay
Subject: DENY EU APPLICATION - RE. Docket #20240032-SU

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Re: EU Application for Central Sewer Docket # 20240032-SU

Summary – (Quotes from Context)

“There are many other low-nitrogen options to consider.”

“Why are we not looking at all options available, deciding the best option, then pursuing through bids the company best suited to provide the best option?”

“Any process that excludes many viable options in favor of one option, while not allowing discussion of all options, seems to be an absurd result of the process.”

"Only you can give us access to them, by denying this application."

Context

Thank you, Commissioner, for taking your time to serve our communities and the great State of Florida.

I am a real estate investor with a marine biology background. I have contracted to the Army Corp of Engineers managing my team in monitoring various marine constructions for their impacts on marine endangered species. My family has owned on LGI since 1968 to this day.

At the service hearings, with only 3 minutes to speak, I myself gave witness to – not the lack of testing to prove the waters around my island need “cleaning,” but I brought evidence produced by the State of Florida that the waters **have been tested and designated “outstanding Florida Waters”** suggesting the State of Florida itself has already determined **there is no need**.

For all the testimony given for two full days, the following did not come up.

There are many other low-nitrogen options to consider, offering benefits such as:

- Much lower nitrogen output than the current wastewater treatment being proposed.

- Much less risk to sensitive marine environments than untreated slurry under pressure in pipes all over the islands and through our pristine Outstanding Florida Waters.
- Will continue servicing our homes during very frequent electrical outages on the island (It doesn't take a storm for the power to go out. Storms bring extended outages).
- Risks are isolated to a few individual homes rather than a conglomerated slurry of solids and liquids under pressure collected from an entire island chain.
- If there is an event at an individual house, the output is such low nitrogen that we can reclaim it, so if it escapes the system, little to no harm is done.
- Pumping slurry through the ICW and Florida Outstanding Waters imposes long term risks and the potential for catastrophic environmental events that could unfold for months or years before being discovered, whereas individual homes cannot impose a catastrophic threat.
- There is nothing "low-nitrogen" about the slurry of solids and liquids that will pump under pressure through Florida's treasured islands and through Florida's outstanding waters. But what leaves our localized tanks out into drain fields would be low enough nitrogen to reclaim it. Where is the environmental risk in such a case? The current wastewater treatment of Charlotte County has much higher nitrogen output, yet is sold to local golf courses as reclaimed and distributed causing runoff into our waterways and estuaries. A local drainfield at an individual home will likely never enter any water body, but if it did, it would be at extremely low density compared to golf courses AND be much lower nitrogen levels .

Many of us islanders have been looking into these types of systems, but for all of our good intentions for the environment, **we cannot move forward on purchasing and installing these lower nitrogen, lower cost, lower risk, lower maintenance, sensible systems because we are hijacked by this EU application.** If we invest in them, **we will be forced to destroy them** within a designated period of time with a forced connection to EU's system that we deem as *highly dangerous* to our properties and our pristine marine environment.

So the objection is – why are we not looking at all options available, deciding the best option, then pursuing through bids the company best suited to provide the best option?

Why, if there are many solid, viable reasonable solutions available, has the process completely excluded even discussions of these options? Do we risk the rewriting of the book, "The Everglades River of Grass?"

Any process that excludes many viable options in favor of one option, while not allowing discussion of all options seems to be an absurd result of the process.

Only you can swing open that doorway to allow us the opportunity to explore all solutions - existing out there right now.

Only you can give us access to them, **by denying this application**

Only you can give us the necessary time to compare the many solutions that promise much hope for our islands. The fate of these Florida barrier islands rests in your hands.

You hold a lot of power in your hands. Please search your heart, use good judgement, and apply logic. Give our islands the best future.

I cannot thank you enough for your consideration of this issue.

Marjorie Kelsey
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Antonia Hover

From: Debbie Daugherty <ufdaugherty@yahoo.com>
Sent: Friday, March 28, 2025 2:58 PM
To: Records Clerk; Office of Commissioner Clark; Office of Commissioner Passidomo Smith; Office of Commissioner Graham; Office of Chairman La Rosa; Office of Commissioner Fay
Subject: DENY EU APPLICATION - RE. Docket #20240032-SU

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I am writing to urge you to DENY EU's application for wastewater service to Little Gasparilla Island. I attended the hearings held in Charlotte County and spoke in opposition to EU request to serve. I also listened to over 100 residents vocalizing the opposition to this request. Reading the staff recommendation and seeing there are only 29 requests to serve and many more in opposition to wastewater service on our island was shocking. Our island is a unique place and we bought our residence there for the lack of commercialization and hopes of preserving the natural coastal environment. This application by EU goes against the many reasons we purchased our home on Little Gasparilla Island.

In reading the staff recommendation, I was also surprised to see the PSC does not weigh in on property rights and easements to serve customers. The staff report says that is governed by others. Each and everyone home will have to provide land for EUs grinder pump station and provide easements for collection piping. It is apparent in their application that EU has not accounted appropriately for what effort that will take to accomplish. I know from my experience in providing water and wastewater service to my utility customers what is required. The question is what will Mr Boyer do? From what I've seen of how he operates the water system, he will install his pipes without proper easements. My own property has an easement for ingress/egress and a specific easement granted to FPL for electric utility service. There is no proper easement for the water pipe that runs along my property. While the PSC does not weigh in on property rights, it feels like you should weigh in on the entity and people you are approving to hold the wastewater certificate. Much of the opposition to the sewer system is derived from WHO will be the holder of the wastewater certificate. I personally do not believe the island needs a centralized wastewater system, but if it "has" to have one, I urge you to please pick a responsible party who will construct and operate the system properly. EU is not that party. Wastewater systems are very different from a water system and it is imperative that any system installed is properly install and operated or it can cause more environmental harm than good.

I hope the PSC commissioners will reflect back on the public hearings that were held and remember that it was clear to everyone that the majority of the island residents are opposed to the wastewater certificate being granted to EU.

I urge you again to PLEASE DENY EU's APPLICATION FOR WASTEWATER SERVICE.

Debbie Daugherty
9850 Little Gasparilla Island
Current Water/Wastewater Officer for Gainesville Regional Utilities
26 years of design, construction, and operation of water and wastewater systems
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