

ST. JOHNS RIVER WATER MANAGEMENT DISTRICT
STATEMENT OF ESTIMATED REGULATORY COSTS
Rule 40C-3.035

Overview: Delegation of Water Well Permitting to Certain Local Governments

In chapter 40C-3, F.A.C., SJRWMD regulates the construction, repair, modification, and abandonment of water wells by issuing a water well permit. From its inception in 1984, rule 40C-3.051(5), F.A.C., has generally exempted wells less than 6-inches in diameter from permitting requirements, unless the well is located in either: (1) an area with a permitting delegation agreement (see rule 40C-3.051(5)(d), F.A.C.), or (2) in a contaminated area delineated pursuant to chapter 62-524, F.A.C. (“62-524 wells”). See rule 40C-3.051(5)(b)-(c), F.A.C. Additionally, under section 373.326(2), Fla. Stat., and rule 40C-3.051(3), F.A.C., no water well permit is required for constructing a 2-inch or smaller well on a person’s own or leased land for their own private use (for a single-family house where they reside or for their own farm) (“statutorily exempt wells”). Thus, even in a delegated county, statutorily exempt wells do not need a water well permit. All other water well construction standards and driller licensure requirements remain in effect for permit exempt wells.

SJRWMD has delegation agreements in place in most counties within SJRWMD, and typically we partner with the local Florida Department of Health (DOH) office in each county (also referred to as the “County Health Department” in Sections C.2. and C.3. of this SERC). Under the typical delegation agreement, we delegate the permitting of most wells less than 6-inches in diameter to the county DOH. This delegation results in an increased regulatory cost, because water wells less than 6-inches that used to be exempt will now require a water well permit from the county DOH (or delegated entity) under rule 40C-3.051(5)(d). There would not be an increased regulatory cost for 62-524 wells, because even if they are less than 6-inches, those wells already require a water well permit from SJRWMD. See rule 40C-3.051(5)(b)-(c), F.A.C. Similarly, there would not be an increased regulatory cost for statutorily exempt wells, because those wells are still exempt by law in a delegated county.

In this rulemaking, SJRWMD is proposing to delegate its water well permitting of wells less than 6-inches in diameter in the following four* new counties, which will result in an increased regulatory cost in each county:

- Alachua
- Bradford
- Seminole
- St. Johns*

*Notably, SJRWMD previously delegated its water well permitting to St. Johns County DOH, but a prior administration rescinded that delegation agreement. To be conservative in estimating regulatory cost increases, we are treating the delegation to St. Johns County DOH as a new regulatory cost, even though it is a resumption of a prior delegation.

SJRWMD is proposing to delegate the permitting of all non-exempt wells in Bradford County to Suwannee River Water Management District (Suwannee), including wells of 6-inches and greater in diameter, because Suwannee regulates most of Bradford County (SJRWMD only has jurisdiction over approximately six square miles of Bradford County). There are no 62-524 wells in Bradford County. The delegation of permitting of most wells less than 6-inches in diameter

will represent a cost increase. The delegation of permitting of wells 6-inches and greater in diameter will result in a revised regulatory cost. Depending on the well category, the cost to obtain a water well permit from Suwannee for a well six inches or greater may increase or decrease (versus the current cost from SJRWMD).

SJRWMD is proposing to amend its existing delegation agreement with Marion County, which is currently delegated permitting of all water wells (not just wells under six inches) to reduce that delegation. Under the amended delegation agreement, SJRWMD will once again handle the permitting of all wells six inches or greater, which will result in a revised regulatory cost. Depending on the well category, the cost to obtain a water well permit from SJRWMD for a well six inches or greater may increase or decrease (versus the current cost from Marion County DOH).

SJRWMD is also proposing to amend some of its existing water well delegation agreements with other county DOHs, but those amended agreements are largely to update or clarify provisions that will not measurably alter the general scope of the delegation and hence will not measurably change regulatory costs. Thus, this SERC will not discuss the other water well delegation agreements.

<p>1. Will the proposed rule have an adverse impact on small business? [120.541(1)(b), F.S.] (See Section E. below for definition of small business.)</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If the answer to Question 1 is “yes,” see comments in Section E.</p> <p>2. Is the proposed rule likely to directly or indirectly increase regulatory costs in excess of \$200,000 in the aggregate in this state within 1 year after implementation of the rule? [120.541(1)(b), F.S.]</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

If the answer to either question above is “yes,” a Statement of Estimated Regulatory Costs (SERC) must be prepared. The SERC shall include an economic analysis showing:

A. Whether the rule directly or indirectly:	
(1) Is likely to have an adverse impact on any of the following in excess of \$1 million in the aggregate within 5 years after implementation of the rule? [120.541(2)(a)1, F.S.]	
Economic growth	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Private-sector job creation or employment	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Private-sector investment	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
(2) Is likely to have an adverse impact on any of the following in excess of \$1 million in the aggregate within 5 years after implementation of the rule? [120.541(2)(a)2, F.S.]	

Business competitiveness (including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets)

Yes No

Productivity

Yes No

Innovation

Yes No

(3) Is likely to increase regulatory costs, including any transactional costs, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? [120.541(2)(a)3, F.S.]

Yes No

Economic Analysis: These new delegated counties will process small-sized wells (less than 6 inches) and charge a fee for those wells. Currently, these small-sized wells are generally exempt from the District's rule. As explained in Section E below, the proposed rule will increase regulatory costs in the delegated counties due to the proposed rule by way of a pass-through charge from the water well contractor to the property owner.

However, the proposed rule will not directly or indirectly increase regulatory costs in excess of \$200,000 in the aggregate in this state within 1 year after implementation of the rule. Additionally, the proposed rule will not directly or indirectly have an adverse impact in excess of \$1 million in the aggregate within 5 years after implementation of the rule for the factors listed in section 120.541(2)(a)1.-3., Fla. Stat.

Based on the District's Water Well Construction (WWC) data and the Florida Department of Environmental Protection's (FDEP's) Onsite Sewage Treatment and Disposal System (OSTDS) New Construction Permits, the number of persons, businesses, and government agencies affected by the proposed rule is estimated to range between 296 and 733 in 2026. Thus, over the next five years, the total number affected is estimated to range from 1,480 to 3,665. Based on the use of these two different data sets, the related fee increase is estimated to range between \$18,965 and \$67,575 each year over the next five years. Thus, over the next five years, the total increased regulatory cost is estimated to range from \$94,825 to \$337,875.

The District's WWC data relies on well completion reports, which are believed to be underreported. The low-end figure of 296 persons and \$18,965 in fees in 2026 reflects a minimum estimate (see Table 1-2 in Tables section attached as Exhibit A). Discussions with County Health Department staff suggest FDEP's OSTDS data may be a better indicator for small potable well construction activities. As a result, the District replaced the number of potable wells in the WWC data set with adjusted OSTDS data. Using this supplemented data, the number of affected persons could be as high as 733 annually, and the fee increase could reach \$67,575 in 2026 (see Table 1-3). The fees charged by the delegated counties for these small wells are relatively low. For example, the lowest fee category is \$45 for abandoning a well in Seminole County, while the highest is \$275 for a Public Supply well in Bradford County/SRWMD. These new fees should have minimal effect on a person or business

seeking a WWC permit. Table 1-1 shows the typical construction cost of a new potable well in the new delegated counties. Permit fees account for a very small share of the total construction cost.

B. A good faith estimate of: [120.541(2)(b), F.S.]

(1) The number of individuals and entities likely to be required to comply with the rule. The total number of individuals and entities who will be required to comply with the proposed rule relating to the revised delegations in the five counties over the next five years is: 1,480-3,665

The number of individuals and entities affected broken out by county is:

Alachua [300-765]
Bradford [35]
Marion [65]
Seminole [380-1,030]
St. Johns [700 -1,770]

(2) A general description of the types of individuals likely to be affected by the rule. The individuals primarily affected by the proposed rule are water well drillers, as they are responsible for applying for construction permits. While drillers are administratively impacted, the financial burden is expected to be passed on to their customers, including homeowners, business owners, and government agencies.

C. A good faith estimate of: [120.541(2)(c), F.S.]

(1) The cost to the agency to implement and enforce the rule.

- None. To be done with the current workload and existing staff.
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

(2) The cost to any other state and local government entity to implement and enforce the rule.

- None. The rule will only affect the agency.
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

Among the five counties directly affected by the proposed rule, only Alachua, Seminole, and St. Johns Counties anticipate requiring additional staff to process these Water Well

Construction (WWC) permits. The estimated annual staff cost of \$150,500 is based on the number of full-time employees required by position type, multiplied by projected salaries and benefits. These estimates were provided by the heads of the respective County Health Departments via telephone interviews.

The financial structure of the County Health Department is somewhat unique in Florida, which is funded through a hybrid model, combining state, federal, and local funds. Primary revenue sources include state general revenue, federal grants, local government contributions, and fees for services. Table 4-1 shows that the state will incur the lion's share of the cost increases for about \$145,620 a year. (See Tables section attached as Exhibit A). The shares of the proposed Full Time Equivalent positions (FTEs) by funding source were also provided by the heads of the respective County Health Departments via telephone interviews.

(3) Any anticipated effect on state or local revenues.

None.

Minimal. Provide a brief explanation.

Other. Provide an explanation for estimate and methodology used.

The proposed rule is expected to have a positive impact on county revenues, as delegated County Health Departments will charge fees for their services. Projected annual service fee revenues are estimated to range from \$18,965 to \$67,575, which will partially offset the estimated annual staff cost of \$150,500. Consequently, the net annual costs to local and state agencies are projected to range from \$82,925 to \$131,535.

Total revenues were estimated by multiplying the number of permits in each fee category by the proposed fees for Alachua, Bradford, Seminole, and St. Johns Counties. As part of the proposed rule, Marion County will no longer issue permits for all wells six inches in diameter or larger, but will issue permits for wells less than six inches in diameter except for 62-524 wells. Revenue changes for Marion County were calculated based on the fee differences between SJRWMD and Marion County multiplied by the estimated number of wells in each fee category. (See Table 1-3 for proposed fee schedules for Alachua, Bradford, Marion, Seminole, and St. Johns Counties, plus the fee schedules for SJRWMD and Suwannee).

D. A good faith estimate of the transactional costs likely to be incurred by individuals and entities (including local government entities) required to comply with the requirements of the rule. "Transactional costs" may include the following: filing fees; expenses to obtain a license; necessary equipment; installation, utilities for, and maintenance of necessary equipment; necessary operations or procedures; accounting, financial, information management, and other administrative processes; labor, based on relevant wages, salaries, and benefits; materials and supplies; capital expenditures, including financing costs; professional and technical services, including contracted services necessary to implement and maintain compliance; monitoring and reporting; qualifying and recurring education, training, and testing; travel; insurance and surety requirements; a fair and reasonable allocation of administrative costs and other overhead; reduced sales or other revenue; or other items

suggested by the rules ombudsman in the Executive Office of the Governor or by any interested person, business organization, or business representative. [120.541(2)(d), F.S.]

- None. The rule will only affect the agency.
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

The transactional costs for the proposed rule to be incurred by well drillers, who apply for WWC permits, include the permit application fees and labor costs associated with the application process.

The estimates for total fees incurred by well drillers are relatively straightforward when only District data were used (a low-end estimate). This estimate uses a 6-year annual average number of permits by permit type multiplied by the corresponding fee category to derive the total permit fee of \$18,965 in 2026.

The District's WWC data relies on well completion reports, which are believed to be underreported. Consultations with County Health Department staff suggest that FDEP's Onsite Sewage Treatment and Disposal Systems (OSTDS) data provide a more accurate indicator of small potable well construction activities.

Consequently, the District has replaced the number of potable wells in the WWC dataset with adjusted OSTDS data. As shown in Table 3-2, a five-year annual average of new septic tank permits was used for Alachua, Seminole, and St. Johns Counties. Because Alachua County is split between SJRWMD and SRWMD, only 50% of that county's total permits were included.

Additionally, a 75% ratio was applied to the total septic tank permits for all three counties to account for homes that may receive water from municipal or county systems rather than requiring a new well. Based on the supplemental data, the total permit fee is estimated to be \$67,575 in 2026.

The second component of the transaction costs involves the labor costs incurred by well drillers when completing permit applications for their customers. Well construction permit applications are straightforward and can be submitted online or in paper form, typically requiring no more than 30 minutes to complete. To calculate the total labor costs, the estimated number of permits per county is multiplied by the average processing time and the average hourly wage of well drillers. See Tables 1-4 and 1-5 for more details. Similar to the methodologies used to estimate the permit fees discussed above, Table 1-4 reflects a low-end estimate of permit processing costs based on SJRWMD data only, Table 1-5 shows a high-end estimate of permit processing costs based on SJRWMD data and supplemented with OSTDS data.

Average wages for well drillers were gathered from several online sources specializing in labor costs. For 2026, searches for well driller wages in Florida ranged from a low of \$21.65 per hour (ZipRecruiter) to a high of \$25 per hour (SalaryExpert). While rates fluctuate based on experience and location—with top earners potentially exceeding \$30 per hour—the rate for this SERC has been set at an average of \$25 per hour. With an estimated range of 296 to

733 WWC permit applications per year, the net annual transaction costs are projected to range from \$3,700 to \$9,163. Thus, over the next five years, the total increased transaction costs are estimated to range from \$18,500 to \$45,815.

E. An analysis of the impact on small businesses, small counties, and small cities: [120.541(2)(e), F.S.]

(1) “Small business” is defined by Section 288.703, F.S., as an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state which has a Small Business Administration 8(a) certification. As to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.

- No adverse impact on small business.
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

The District does not track the status of permit applicants in terms of their employment size or net worth to determine whether a permit applicant is a large or small business. Based on the estimated total number of affected applications ranging from ranging between 296 and 733 in 2026 and 1,480 to 3,665 affected applications over the next five years, the estimated number of impacted small businesses ranges from 241 to 596 in 2026, and between 1,205 to 2,980 over the next five years.

These estimates were developed using a two-step approach. First, well completion reports from 2019 to 2024 were reviewed for all affected counties to categorize permittees as small businesses, large businesses, or government agencies. We then calculated the total number and percentage of small businesses for each affected county and all five counties as a whole. Assuming these proportions remain constant, Table 3-1 indicates that 241 small businesses would be affected in 2026, totaling 1,205 over five years. However, to account for underreporting in well completion reports, we applied an adjustment using OSDTS data to more accurately reflect the number of small potable wells. As shown in Table 3-3, this adjusted estimate suggests that 596 small businesses will be affected in 2026, or 2,980 over the next five years.

Notably, a business owner may apply for multiple permits in a single year. Thus, the actual number of small businesses should be smaller than the estimated numbers in both scenarios. Additionally, increases in permit processing costs and permit fees paid by well drillers are likely to be passed on to consumers. Consequently, well drillers are not expected to be financially impacted by the proposed rule.

(2) A “Small City” is defined by Section 120.52, F.S., as any municipality that has an unincarcerated population of 10,000 or less according to the most recent decennial census. A “small county” is defined by Section 120.52, F.S., as any county that has an unincarcerated population of 75,000 or less according to the most recent decennial census.

No impact on small cities or small counties.

The proposed rule will not affect any small cities, as it applies exclusively to counties. While Table 2.1 identifies Bradford as the only small county with a population under 75,000 in the 2020 Census, there will likely be no impact on the county, as SRWMD will continue to process its permit applications for Bradford County.

Minimal. Provide a brief explanation.

Other. Provide an explanation for estimate and methodology used.

F. In evaluating the impacts described in paragraphs A and E, include a discussion, if applicable, of the market impacts likely to result from compliance with the proposed rule, including: [120.541(2)(f), F.S.]

1. Changes to customer charges for goods or services.
2. Changes to the market value of goods and services produced, provided, or sold.
3. Changes to costs resulting from the purchase of substitute or alternative goods or services.
4. The reasonable value of time to be spent by owners, officers, operators, and managers to understand and comply with the proposed rule, including, but not limited to, time to be spent completing requiring education, training, or testing.

Discussion and Analysis of Market Impacts:

The proposed rule is not expected to have a discernible impact on the well construction business or consumer behavior regarding new well installations for two reasons. First, the requirement for WWC permits is not new to the industry. In the newly delegated counties, well drillers are already required to apply for permits for wells 6 inches and larger. Consequently, the proposed rule will not necessitate additional education or training for permit applications. Secondly, the required permits will not affect consumer behavior for purchasing new wells. As shown in Table 1-1, permit fees represent a small portion of the total construction cost. Therefore, adding a permit fee is not expected to influence a consumer's willingness to pay for a new well.

G. Any additional information that the agency determines may be useful. [120.541(2)(g), F.S.]

None.

Additional Information:

H. A description of any regulatory alternatives submitted and a statement adopting the alternative or a statement of the reasons for rejecting the alternative in favor of the proposed rule. [120.541(2)(h), F.S.]

- No regulatory alternatives were submitted.
- A regulatory alternative was received from
- Adopted in its entirety.
- Rejected. Describe what alternative was rejected and provide a statement of the reason for rejecting that alternative.

The District determined that the alternatives to be considered in section 120.54(3)(b)2.a.(I) through (IV), F.S., were not suitable alternatives because the proposed delegation rules do not contain any compliance or reporting requirements or any design or operational standards. Moreover, the proposed delegation rules are designed to continue to protect public health, safety, and welfare, and prevent contamination of water resources from incompetent or dishonest well drillers consistent with the statutory criteria in sections 373.302, 373.308, and 373.309, F.S.

The District also considered the alternative in section 120.54(3)(b)2.a.(V), F.S. The District determined that alternative (V) was not a suitable alternative because exempting small businesses, small counties, and small cities from the delegation rule would undermine the District's statutory obligation to protect public health, safety, and welfare, and prevent groundwater contamination under sections 373.302, 373.308, and 373.309, F.S. Exempting small businesses and small local governments from the rule would also create the negative public perception that small businesses and small local governments are not doing their part to protect water resources of the District and are being treated more favorably than, for example, individual landowners who apply for a WWC permit from the District. Since approximately 81% of all wells drilled in the four new delegated counties are for small businesses, small counties, or small cities, applying an exemption for them would eliminate much of the environmental protection required by several Florida Statutes.

Additionally, before July 1, 2013 (the effective date of Chapter 2013-92, Laws of Florida), counties possessed independent legal authority to regulate the construction and abandonment of water wells, and did so through their building permit programs. Chapter 2013-92 amended section 373.308(1), F.S., making it the sole responsibility of the water management districts and delegated local governments and delegated local county health departments to issue well permits and prohibited local governmental entities from establishing separate well permitting programs. Thus, as of July 1, 2013, any water well permitting in a county must be done by a water management district or a delegated local government or local health department. Since the District does not regulate most water wells under six inches, the proposed delegation rule is needed to ensure protection of public health, safety and welfare, and to protect groundwater resources in counties that are not currently delegated. Moreover, the proposed delegation rule supports continued protection of public health, safety and welfare and groundwater resources by providing a screening process to ensure wells proposed in chapter 62-524, F.A.C., delineated areas are reviewed by the District. The delegated will be able to identify wells that are proposed in delineated areas and refer these applications to the District

for review. Without this screening process, a potable water well might be constructed within a delineated area without proper review to protect people's health and prevent contamination.

Exhibit A

Tables Regarding Effects of Proposed Water Well Delegation Rule

Table 1-1. Typical Well Construction Cost Including Well Drilling and a Pump

County	2" well	4" well	Permit Cost for Potable Wells	Permit Fee as % of Total Cost
Alachua	\$3,000-\$6,000	\$7,000-\$12,000	\$ 150	1.3%-5.0%
Bradford	N/A	\$8,000-\$14,000	\$ 40	0.3%-0.5%
Seminole	\$2,000-\$5,000	\$7,000-\$12,000	\$ 135	1.1%-6.8%
St Johns	\$4,000-\$8,000	\$8,000-\$16,000	\$ 75	0.5%-1.9%

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Table 1-2. Estimated Annual Average Number of WWC Permits and Associated Fees Charged by County with SJRWMD Data Only- A Low End of Estimates

Agency	Well Type	County/SRWMD Fees	SJRWMD Fees	# WWC Permits 6 Year Total	# WWC Permits Annual Average	Total Annual Fees
Alachua County				351	60	\$ 4,150
	Abandonment	\$ 50	\$ -	2	1	50
	All Other Wells	100	120	17	3	300
	Commercial	100	120	0	0	-
	Irrigation	100	120	10	2	200
	Monitoring	50	120	275	46	2,300
	Potable Well	150	120	42	7	1,050
	Public Supply	250	250	5	1	250
	Variances	\$ 100	100	0	0	-
Bradford County/SRWMD				22	7	\$ (215)
	Abandonment	N/A	\$ -	1	1	-
	All Other Wells ³	\$ 140	120	0	0	-
	Commercial	N/A	120	1	1	-
	Irrigation	N/A	120	1	1	-
	Monitoring	N/A	120	0	0	-
	Potable Well	40	120	18	3	(240)
	Public Supply ⁴	275	250	1	1	25
	Variances	N/A	100	0	0	-
Marion County (SJRWMD) -for wells in the delineated area only				7	2	\$ (65)
	Abandonment	\$ 75	\$ -	0	0	-
	All Other Wells	N/A	120	0	0	-
	Commercial	N/A	120	0	0	-
	Irrigation	75	120	0	0	-
	Monitoring	75	120	6	1	(45)
	Potable Well	100	120	1	1	(20)
	Public Supply	200	250	0	0	-
	Variances	N/A	100	0	0	-
Seminole County				439	76	\$ 6,645
	Abandonment	\$ 45	\$ -	16	3	135
	All Other Wells ¹	50	120	68	12	600
	Commercial	200	120	1	1	200
	Irrigation	80	120	102	17	1,360
	Monitoring	45	120	118	20	900
	Potable Wells	135	120	117	20	2,700
	Public Supply	250	250	17	3	750
	Variances	50	100	0	0	-
St. Johns County				820	140	\$ 8,600
	Abandonment	\$ 50	\$ -	26	5	250
	All Other Wells ²	50	120	50	10	500
	Commercial	N/A	120	0	0	-
	Irrigation	50	120	318	53	2,650
	Monitoring	50	120	81	14	700
	Potable Well	75	120	334	56	4,200
	Public Supply	150	250	11	2	300
	Variances	50	100	0	0	-
SJRWMD (Marion) - for wells > 6" only				50	11	\$ (150)
	Abandonment	\$ 75	\$ -	26	5	(375)
	All Other Wells	75	120	3	1	45
	Commercial	N/A	120	0	0	-
	Irrigation	75	120	5	1	45
	Monitoring	75	120	2	1	45
	Potable Well	100	120	12	2	40
	Public Supply	200	250	2	1	50
	Variances	N/A	100	0	0	-
Grand Total				1,689	296	\$ 18,965

Note: ¹ Including Modification/Repair
² Including HVAC/Agriculture
³ Repair only
⁴ Not in Chapter 62-524 area

Table 1-3. Estimated Annual Average Number of WWC Permits and Associated Fees Charged by County with SJRWMD Data and Supplemented by OSTDS Data - A High End of Estimates

Agency	Well Type	County/SRWMD Fees	SJRWMD Fees	# WWC Permits 6 Year Total	# WWC Permits Annual Average	Total Annual Fees
Alachua County				909	153	\$ 18,100
	Abandonment	\$ 50	\$ -	2	1	50
	All Other Wells	100	120	17	3	300
	Commercial	100	120	0	0	-
	Irrigation	100	120	10	2	200
	Monitoring	50	120	275	46	2,300
	Potable Well	150	120	600	100	15,000
	Public Supply	250	250	5	1	250
	Variances	\$ 100	100	0	0	-
Bradford County/SRWMD				22	7	\$ 695
	Abandonment	N/A	\$ -	1	1	-
	All Other Wells ³	\$ 140	120	0	0	-
	Commercial	N/A	120	1	1	-
	Irrigation	N/A	120	1	1	-
	Monitoring	N/A	120	0	0	-
	Potable Well	140	120	18	3	420
	Public Supply ⁴	275	250	1	1	275
	Variances	N/A	100	0	0	-
Marion County (SJRWMD) -for wells in the delineated area only				7	2	\$ (65)
	Abandonment	\$ 75	\$ -	0	0	-
	All Other Wells	N/A	120	0	0	-
	Commercial	N/A	120	0	0	-
	Irrigation	75	120	0	0	-
	Monitoring	75	120	6	1	(45)
	Potable Well	100	120	1	1	(20)
	Public Supply	200	250	0	0	-
	Variances	N/A	100	0	0	-
Seminole County				1,222	206	\$ 24,195
	Abandonment	\$ 45	\$ -	16	3	135
	All Other Wells ¹	50	120	68	12	600
	Commercial	200	120	1	1	200
	Irrigation	80	120	102	17	1,360
	Monitoring	45	120	118	20	900
	Potable Wells	135	120	900	150	20,250
	Public Supply	250	250	17	3	750
	Variances	50	100	0	0	-
St. Johns County				2,106	354	\$ 24,650
	Abandonment	\$ 50	\$ -	26	5	250
	All Other Wells ²	50	120	50	10	500
	Commercial	N/A	120	0	0	-
	Irrigation	50	120	318	53	2,650
	Monitoring	50	120	81	14	700
	Potable Well	75	120	1,620	270	20,250
	Public Supply	150	250	11	2	300
	Variances	50	100	0	0	-
SJRWMD (Marion) - for wells > 6" only				50	11	\$ (150)
	Abandonment	\$ 75	\$ -	26	5	(375)
	All Other Wells	75	120	3	1	45
	Commercial	N/A	120	0	0	-
	Irrigation	75	120	5	1	45
	Monitoring	75	120	2	1	45
	Potable Well	100	120	12	2	40
	Public Supply	200	250	2	1	50
	Variances	N/A	100	0	0	-
Grand Total				4,316	733	\$ 67,575

Note: ¹ Including Modification/Repair
² Including HVAC/Agriculture
³ Repair only
⁴ Not in Chapter 62-524 area

Table 1-4. Estimated Permit Processing Cost by County with SJRWMD Data Only- A Low End of Estimates

County	# WWC Permits 6 Year Total	# WWC Permits Annual Average	Processing Hours/Permit	Processing Cost/Permit	Total Processing Cost/Permit
Alachua	351	60	0.5	\$ 25	\$ 750
Bradford	22	7	0.5	25	88
Marion	57	13	0.5	25	163
Seminole	439	76	0.5	25	950
St. Johns	820	140	0.5	25	1,750
Grand Total	1,689	296			\$ 3,700

Table 1-5. Estimated Permit Processing Cost by County with SJRWMD Data Only- and Supplemented by OSTDS Data - A High End of Estimates

County	# WWC Permits 6 Year Total	# WWC Permits Annual Average	Processing Hours/Permit	Processing Cost/Permit	Total Processing Cost/Permit
Alachua	909	153	0.5	\$ 25	\$ 1,913
Bradford	22	7	0.5	25	88
Marion	57	13	0.5	25	163
Seminole	1,222	206	0.5	25	2,575
St. Johns	2,106	354	0.5	25	4,425
Grand Total	4,316	733			\$ 9,163

Table 2.1 Census Population of 18 Counties within SJRWMD, April 1, 2020 and 2010

County	April 1, 2020	April 2, 2010	Total Change	Percent Change
Alachua	278,468	247,336	31,132	12.6%
Baker	28,259	27,115	1,144	4.2%
Bradford	28,303	28,520	-217	-0.8%
Brevard	606,612	543,376	63,236	11.6%
Clay	218,245	190,865	27,380	14.3%
Duval	995,567	864,263	131,304	15.2%
Flagler	115,378	95,696	19,682	20.6%
Nassau	90,352	73,314	17,038	23.2%
Indian River	159,788	138,028	21,760	15.8%
Lake	383,956	297,047	86,909	29.3%
Marion	375,908	331,303	44,605	13.5%
Okeechobee	39,644	39,996	-352	-0.9%
Orange	1,429,908	1,145,956	283,952	24.8%
Osceola	388,656	268,685	119,971	44.7%
Putnam	73,321	74,364	-1,043	-1.4%
St. Johns	273,425	190,039	83,386	43.9%
Seminole	470,856	422,718	48,138	11.4%
Volusia	553,543	494,593	58,950	11.9%

Table 3-1. Estimated Number of Small Businesses to be Affected by the Proposed Rule in 2026 Based on SJRWMD WWC Data - A Low End of Estimates

County	# Small	# Large/Gov	Total	% Small	% Large/Gov	Total
Alachua	40	20	60	66%	34%	100%
Bradford/SRWMD	7	0	7	95%	5%	100%
Marion	9	4	13	68%	32%	100%
Seminole	58	18	76	76%	24%	100%
St. Johns	128	12	140	91%	9%	100%
Total	241	55	296	81%	19%	100%

Table 3-2. Estimated Number of New Potable Wells Based on the Number of New OSTDS by Select County from 2019 to 2023

County	OSTDS	OSTDS	OSTDS	OSTDS	OSTDS	OSTDS	Estimated #
	2018-19	2019-20	2010-21	2021-22	2022-23	5 Year Avg	Potable Wells 5 Year Avg
Alachua	206	197	282	330	278	259	100
Seminole	144	160	219	226	218	193	150
St. Johns	215	244	431	468	447	361	270

Table 3-3. Estimated Number of Small Businesses to be Affected by the Proposed Rule in 2026 Based on SJRWMD WWC Data and Supplemented by OSTDS Data -A High End of Estimates

County	# Small	# Large/Gov	Total	% Small	% Large/Gov	Total
Alachua	101	52	153	66%	34%	100%
Bradford/SRWMD	7	0	7	95%	5%	100%
Marion	9	4	13	68%	32%	100%
Seminole	157	49	206	76%	24%	100%
St. Johns	322	32	354	91%	9%	100%
Total	596	137	733	81%	19%	100%

Table 4-1. Estimated Additional Staff Costs to Local and State Governments Due to the Proposed Rule

Government	Change to Number of FTE s	Annual Salaries & Benefits	Annual Salaries & Benefits Allocation	Note
Alachua County	0.25 ESII + 0.15 Environmental Manager =0.4 FTE	\$ 35,610	\$ 1,420	4% funded by the County and the remainder by the state
Bradford County/SRWMD	Not Required	-	-	- No FTE increases are expected
Marion County	Not Required	-	-	- No FTE increases are expected
Seminole County	1.0 ESII + 1.0 OPS =2.0 FTE	83,010	-	- 0% of funded by the County and the remainder by the state
St. Johns County	0.5 ES I	31,880	3,460	10.85% funded by the County and the remainder by the state
State of Florida		-	145,620	Indirectly affected
Total		\$ 150,500	\$ 150,500	