

SOUTH FLORIDA WATER MANAGEMENT DISTRICT
Statement Of Estimated Regulatory Costs (SERC) – Rule to Incorporate Impaired
Waters Design Aid Guidance Memorandum

Division: Regulation
Board: South Florida Water Management District Governing Board
Rule Number: Rule 40E-4.091 incorporating Rule 62-330.301(e)
Rule Description: Rules, Publications and Interagency Agreements Incorporated by Reference
Contact Person: Ian Miller, Lead Economist, SFWMD, (561)-682-2057, imiller@sfwmd.gov

Please remember to analyze the impact of the rule, NOT the statute, when
completing this form.

Background

Subsection 62-330.301(1)(e), Florida Administrative Code (F.A.C.) provides that in order to obtain a permit, reasonable assurance must be provided that the project will not adversely affect the quality of receiving waters such that state water quality standards will be violated. In order to assist applicants in meeting the requirements of this rule and Sections 10 and 11 of Environmental Resource Permit (ERP) Applicant's Handbook Volume I (Volume I) and Section 4 of ERP Applicant's Handbook Volume II (Volume II)¹, a Memorandum was developed in 2004, and later amended in 2009 and 2013 which pertains to ERP Water Quality Evaluations for Discharges to Water Bodies that Do Not Meet State Water Quality Standards (Memorandum). It also applies to Outstanding Florida Waters (OFWs). The Memorandum is currently included as a Design Aid within the Permit Information Manual and has been provided as guidance to applicants to describe the types of additional measures that may be considered, on a project by project basis, as necessary to provide reasonable assurance that a project's proposed discharge will satisfy the requirements of subsection 62-330.301(1)(e), F.A.C. Applicants currently have the option of using the measures set forth in this Memorandum, or utilizing alternative measures which the applicant demonstrates to the District will meet District water quality rules.

The proposed rule will incorporate by reference an *updated version* of the Memorandum, entitled "Section H. Environmental Resource Permit Water Quality Evaluations for Discharges to Outstanding Florida Waters and Water Bodies that Do Not Meet State Water Quality Standards" thereby formally becoming a District rule. It should be noted that ERP applicants have been subject to Rule 62-330.301(1)(e) in their application procedures governing projects and the proposed rule is a formal codification of current guidance and practices into a District rule.

¹ These rules were formally found within Rule 40E-4-301, Fla. Administrative Code and the Basis of Review for ERP Applications within the South Florida Water Management District.

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Pursuant to Section 373.4131(3)(b), Fla. Stat., if a system is designed in accordance with the adopted rule criteria set forth in the updated Memorandum, the discharges from the system will be presumed not to cause or contribute to violations of applicable state water quality standards. While the incorporation of the updated Memorandum into Volume II will mean that it will be a rule, criteria flexibility will be maintained. Rule 1.1 of Volume II provides that: “an applicant may propose alternative designs to those provided in this Volume for consideration by the Agency.” If this is done, additional reasonable assurances will be required to demonstrate that the alternative design meets the conditions for issuance of an ERP.

The SERC economic evaluation procedure is based on identifying, isolating and measuring the regulatory costs that relate to the “with proposed rule situation” compared to the “without proposed rule situation”. Standard economic evaluation procedures then compare the difference or incremental change between the “with” and “without” situations in attributing *incremental* costs related to the proposed rule or rule modification. These standard economic evaluation procedures are consistent with the guidance in this template that advises the agency to analyze the impact of the rule, NOT the statute, when completing this form.

SERC Conclusion

Since the proposed rule formally codifies current guidance and procedures for ERP applications, there is no incremental regulatory burden associated with the proposed rule’s incorporation by reference. Consequently, there are no “de novo” transactional or regulatory costs or administrative burdens arising out of the proposed rule becoming a District rule by reference. Therefore, the proposed rule is not expected to have an adverse impact on economic growth, private-sector job creation or employment, or private-sector investment in excess of \$1 million (in the aggregate) within 5 years after the rule’s implementation.

A. Is the rule likely to, directly or indirectly, have an adverse impact on economic growth, private-sector job creation or employment, or private-sector investment in excess of \$1 million in the aggregate within 5 years after the implementation of the rule?

- | | | |
|--|------------------------------|--|
| 1. Is the rule likely to reduce personal income? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. Is the rule likely to reduce total non-farm employment? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Is the rule likely to reduce private housing starts? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Is the rule likely to reduce visitors to Florida? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

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5. Is the rule likely to reduce wages or salaries? ☐ Yes ☒ No
6. Is the rule likely to reduce property income? ☐ Yes ☒ No

Explanation:

If any of these questions are answered “Yes,” presume that there is a likely and adverse impact in excess of \$1 million, and the rule must be submitted to the legislature for ratification.

B. Is the rule likely to, directly or indirectly, have an adverse impact on business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation in excess of \$1 million in the aggregate within 5 years after the implementation of the rule?

1. Is the rule likely to raise the price of goods or services provided by Florida business?
☐ Yes ☒ No
2. Is the rule likely to add regulation that is not present in other states or markets?
☐ Yes ☒ No
3. Is the rule likely to reduce the quantity of goods or services Florida businesses are able to produce, i.e. will goods or services become too expensive to produce?
☐ Yes ☒ No
4. Is the rule likely to cause Florida businesses to reduce workforces?
☐ Yes ☒ No
5. Is the rule likely to increase regulatory costs to the extent that Florida businesses will be unable to invest in product development or other innovation?
☐ Yes ☒ No
6. Is the rule likely to make illegal any product or service that is currently legal?
☐ Yes ☒ No

Explanation:

If any of these questions are answered “Yes,” presume that there is a likely and adverse impact in excess of \$1 million, and the rule must be submitted to the legislature for ratification.

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C. Is the rule likely, directly or indirectly, to increase regulatory costs, including any transactional costs (see F below for examples of transactional costs), in excess of \$1 million in the aggregate within 5 years after the implementation of this rule?

No. There are no incremental regulatory costs (including any transactional costs) imposed on ERP applicants' as a consequence of the Guidance Memorandum being incorporated by reference within a rule. The proposed rule will not increase regulatory costs or transactional costs in excess of \$1 million (in the aggregate) within 5 years after the proposed rule's formal implementation compared to the "without rule situation".

1. Current one-time costs
2. New one-time costs
3. Subtract 1 from 2
4. Current recurring costs
5. New recurring costs
6. Subtract 4 from 5
7. Number of times costs will recur in 5 years
8. Multiply 6 times 7
9. Add 3 to 8

If 9. is greater than \$1 million, there is likely an increase of regulatory costs in excess of \$1 million, and the rule must be submitted to the legislature for ratification.

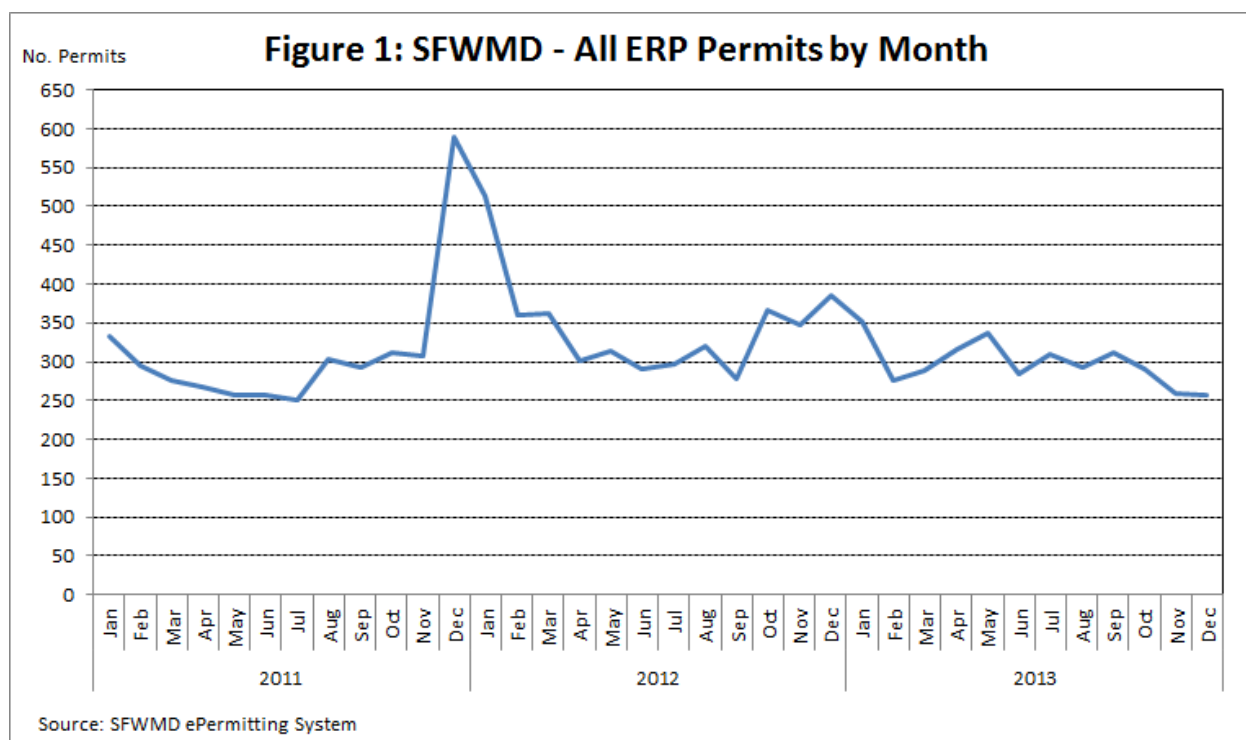
D. Good faith estimates (numbers/types):

1. The number of individuals and entities likely to be required to comply with the rule. *(Please provide a reasonable explanation for the estimate used for the number of individuals and methodology used for deriving the estimate).*

The ERP program pertains to the construction, alteration, operation, maintenance, repair, abandonment, and removal of stormwater management systems, dams, impoundments, reservoirs, appurtenant works, and works (including docks, piers, structures, dredging, and filling located in, on or over wetlands or other surface waters. Over the next five years, ERP applicants' will be required to comply with the proposed

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rule if the activity discharges to an impaired water body or OFW. For this SERC, providing an estimate of the precise number of applications that impact, or, that are hydraulically linked to the designated water bodies is not possible at this time. For background reference, Figure 1 shows a time series of all ERPs issued and closed by month sourced from the District's ePermitting database. The "All" category also includes pending applications.



The following summaries compiled from Florida's Statewide Comprehensive Verified List of Impaired Waters contains geographic information that is relevant to assessing the host location of future projects and sites on a case by case basis, as they arise.² The tables, viewed in their entirety, show the regions and related number of impaired water bodies where ERP applicants would be subject to the proposed rule's conditions and would be following the guidance memorandum.

As background, Table 1 provides a comparative summary of designated impaired water bodies for both Florida and the District. Table 1 shows that the District accounts for

² See <http://www.dep.state.fl.us/water/watersheds/assessment/a-lists.htm>. For maps by Florida county refer to: <http://www.dep.state.fl.us/water/watersheds/assessment/303dmap.htm>

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29% of the statewide total number of impaired water bodies listed on the Comprehensive Verified List.

Table 1: Distribution of Florida Impaired Water Bodies by Water Body Type					
Water-body Type	Florida	%	SFWMD	%	SFWMD Percent of State Total
Beach	83	3.0%	9	1.1%	10.8%
Blackwater	3	0.1%			
Coastal	197	7.2%	31	3.9%	15.7%
Estuary	931	34.0%	252	31.3%	27.1%
Lake	402	14.7%	194	24.1%	48.3%
Spring	39	1.4%			
Stream	1,083	39.6%	318	39.6%	29.4%
Total:	2,738	100.0%	804	100.0%	29.4%
Source: Comprehensive Verified List of Impaired Waters, http://www.dep.state.fl.us/water/watersheds/assessment/a-lists.htm The SFWMD is comprised of the following 16 counties or parts thereof: Broward, Charlotte, Collier, Miami-Dade, Glades, Hendry, Highlands, Lee, Martin, Monroe, Okeechobee, Orange, Osceola, Palm Beach, Polk, and St. Lucie.					

The SFWMD had 804 impaired water bodies within its boundaries or bisecting its borders compared to a grand total of 2,738 statewide. Table 2 shows the distribution of the impaired water bodies within the District's boundaries by basin and water body type.

Table 2: Distribution of Florida Impaired Water Bodies Falling within SFWMD by Basin and Water Body Type							
Basin	Water Body Type					Total:	%
	Beach	Coastal	Estuary	Lake	Stream		
Caloosahatchee			19	2	33	54	6.7%
Charlotte Harbor	5	6	47	1	8	67	8.3%
Everglades			5	1	47	53	6.6%
Everglades West Coast		1	25		18	44	5.5%
Fisheating Creek					13	13	1.6%
Florida Keys			2			2	0.2%
Kissimmee River				85	36	121	15.0%
Lake Okeechobee				7	35	42	5.2%
Lake Worth Lagoon - Palm Beach Coast	1	5	8	7	31	52	6.5%
Middle St. Johns				29	13	42	5.2%
Ocklawaha				7		7	0.9%
Sarasota Bay - Peace - Myakka		2	48	46	29	125	15.5%
Southeast Coast - Biscayne Bay		8	56		23	87	10.8%
St. Lucie – Loxahatchee	3	9	42	2	21	77	9.6%
Tampa Bay Tributaries				2	7	9	1.1%
Upper St. Johns				1	3	4	0.5%
Withlacoochee				4	1	5	0.6%

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Table 2: Distribution of Florida Impaired Water Bodies Falling within SFWMD by Basin and Water Body Type							
Basin	Water Body Type					Total:	%
	Beach	Coastal	Estuary	Lake	Stream		
Total:	9	31	252	194	318	804	100.0%
%	1.1%	3.9%	31.3%	24.1%	39.6%	100.0%	
Source: Comprehensive Verified List of Impaired Waters, http://www.dep.state.fl.us/water/watersheds/assessment/a-lists.htm							

ERP applications that relate to project sites in the relevant sub-basins will need to comply with the proposed rule if the project's stormwater discharge has the potential to impact a designated impaired water body or OFW.³

It should be noted that the proposed rule codifies existing practices that directly and indirectly support key sectors of the economy that are essential for achieving ongoing sustainable economic growth statewide. The proposed rule directly and indirectly supports key industries and natural communities supporting designated beneficial uses. These sectors and communities include public water supply, recreational and commercial fisheries, marine and freshwater recreation, habitats, and ecosystem services that contribute to economic growth in South Florida and across the state.

Furthermore, key industry sectors such as analytical science & testing, architecture & engineering (A&E), consulting, and the design and construction industries provide goods and services linked to rule conditions of issuance, best management practices guidance and compliance.

Table 3 shows the distribution of impaired water bodies within the District by surface water body class and designated use.

Table 3: Distribution of Total SFWMD Impaired Water Bodies by Basin, Water Body Class & Designated Use						
Class=>	[1]	[2]	[3F]	[3M]	Total:	%
Basin	Potable water supplies	Shellfish propagation or harvesting	Recreation, propagation, and maintenance of a healthy, well-balanced population of fish and wildlife in fresh water	Recreation, propagation, and maintenance of a healthy, well-balanced population of fish and wildlife in marine water		
Caloosahatchee			35	19	54	6.7%
Charlotte Harbor	2	21	7	37	67	8.3%
Everglades		2	47	4	53	6.6%
Everglades West Coast		8	18	18	44	5.5%
Fisheating Creek			13		13	1.6%
Florida Keys				2	2	0.2%
Kissimmee River			121		121	15.0%

³ A complete list of OFWs can be viewed in 62-302.700 Special Protection, Outstanding Florida Waters, Outstanding National Resource Waters.
[https://www.flrules.org/gateway/RuleNo.asp?title=SURFACE WATER QUALITY STANDARDS&ID=62-302.700](https://www.flrules.org/gateway/RuleNo.asp?title=SURFACE%20WATER%20QUALITY%20STANDARDS&ID=62-302.700)

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Basin	Potable water supplies	Shellfish propagation or harvesting	Recreation, propagation, and maintenance of a healthy, well-balanced population of fish and wildlife in fresh water	Recreation, propagation, and maintenance of a healthy, well-balanced population of fish and wildlife in marine water	Total:	%
Lake Okeechobee	7		35		42	5.2%
Lake Worth Lagoon - Palm Beach Coast	3		35	14	52	6.5%
Middle St. Johns			42		42	5.2%
Ocklawaha			7		7	0.9%
Sarasota Bay - Peace – Myakka	1	9	74	41	125	15.5%
Southeast Coast - Biscayne Bay			24	63	87	10.8%
St. Lucie – Loxahatchee	2	3	21	51	77	9.6%
Tampa Bay Tributaries			9		9	1.1%
Upper St. Johns			4		4	0.5%
Withlacoochee			5		5	0.6%
Total:	15	43	497	249	804	100.0%
%	1.9%	5.3%	61.8%	31.0%	100.0%	
Source: Comprehensive Verified List of Impaired Waters, http://www.dep.state.fl.us/water/watersheds/assessment/a-lists.htm						

2. A general description of the types of individuals likely to be affected by the rule.

ERP applicants proposing to construct a stormwater management system that has the potential to impact an impaired water body or an OFW.

E. Good faith estimates (costs):

1. Cost to the department (District) of implementing the proposed rule:

☒ None. The District intends to implement the proposed rule within its current workload, with existing staff.

☐ Minimal. *(Provide a brief explanation).*

☐ Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

2. Cost to any other state and local government entities of implementing the proposed rule:

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☒ None. This proposed rule will only affect the District, and later the Department of Environmental Protection, when the Department incorporates the district's rule.

☐ Minimal. *(Provide a brief explanation).*

☐ Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

3. Cost to the department (District) of enforcing the proposed rule:

☒ None. The District intends to enforce the proposed rule within its current workload with existing staff.

☐ Minimal. *(Provide a brief explanation).*

☐ Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

4. Cost to any other state and local government of enforcing the proposed rule:

☒ None. This proposed rule will only affect the District.

☐ Minimal. *(Provide a brief explanation).*

☐ Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

F. Good faith estimates (transactional costs) likely to be incurred by individuals and entities, including local government entities, required to comply with the requirements of the proposed rule. *(Includes filing fees, cost of obtaining a license, cost of equipment required to be installed or used, cost of implementing processes and procedures, cost of modifying existing processes and procedures, additional operating costs incurred, cost of monitoring, and cost of reporting, or any other costs necessary to comply with the rule).*

☒ None. This proposed rule will only affect the District.

Explanation: The proposed rule formalizes guidance that has effectively been in place. Therefore, the proposed rule will not add any incremental permitting costs or transactional costs to ERP applicants', to the District, nor to any other local government entity.

☐ Minimal. *(Provide a brief explanation).*

☐ Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

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G. An analysis of the impact on small business as defined by s. 288.703, F.S., and an analysis of the impact on small counties and small cities as defined by s. 120.52, F.S. (Includes:

- *Why the regulation is needed [e.g., How will the regulation make the regulatory process more efficient? Required to meet changes in federal law? Required to meet changes in state law?];*
- *The type of small businesses that would be subject to the rule;*
- *The probable impact on affected small businesses [e.g., increased reporting requirements; increased staffing; increased legal or accounting fees?];*
- *The likely per-firm regulatory cost increase, if any).*

A small business is defined in 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 applicable to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments."

A small county is defined in Section 120.52(19), F.S., as "any county that has an unincarcerated population of 75,000 or less according to the most recent decennial census." And, a small city is defined in Section 120.52(18), F.S., as "any municipality that has an unincarcerated population of 10,000 or less according to the most recent decennial census."

The estimated number of small businesses that would be subject to the rule:

- | | | |
|---|--|----------------------------------|
| <input type="checkbox"/> 1-99 | <input type="checkbox"/> 100-499 | <input type="checkbox"/> 500-999 |
| <input checked="" type="checkbox"/> 1,000-4,999 | <input type="checkbox"/> More than 5,000 | |
| <input type="checkbox"/> Unknown, please explain: | | |

☒ Analysis of the impact on small business:

Small business entities apply best management practices and techniques embodied within the Guidance Memorandum. Table 4 shows that the majority of business establishments within District counties are small businesses and therefore have been, and will be impacted by the Guidance Memorandum (and proposed rule) in the future. Within the SFWMD, the overwhelming majority of business establishments, across all industry sectors are classified as small businesses. Table 4 shows the distribution of total business establishments stratified by the number of employees per establishment. The table shows that 98% of total establishments have 99 or fewer employees, while 99.5% have 249 or fewer employees. The share of establishments with 250 employees or greater is 0.5% or 1,205 establishments for the sixteen counties shown.

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Table 4: SFWMD Counties – Total Business Establishments Parsed by Employment Size Class

	County	Total establish ments \a	Employees per Establishment								
			1-4	5-9	10-19	20-49	50-99	100-249	250-499	500-999	1000 or more
1	Orange	31,565	17,989	5,245	3,762	2,701	986	588	161	73	60
2	Osceola	4,814	2,957	811	509	329	134	54	11	4	5
3	Polk	10,718	6,038	2,011	1,274	834	296	187	52	18	8
4	Highlands	1,903	1,092	400	220	132	39	13	5	2	0
5	Okeechobee	729	455	117	94	50	6	5	2	0	0
6	St. Lucie	4,827	3,076	774	477	320	96	68	9	4	3
7	Glades	92	58	14	10	8	1	1	0	0	0
8	Charlotte	3,542	2,252	623	341	205	81	30	7	3	0
9	Martin	4,921	3,141	834	454	306	118	56	8	3	1
10	Lee	15,629	9,569	2,627	1,755	1,059	381	194	34	4	6
11	Hendry	540	307	100	81	37	8	5	1	1	0
12	Palm Beach	41,970	27,719	6,195	3,984	2,516	895	518	96	31	16
13	Collier	9,888	6,308	1,605	1,010	590	222	129	14	7	3
14	Broward	55,700	37,305	7,805	5,120	3,343	1,179	719	157	51	21
15	Monroe	3,487	2,281	591	323	199	66	23	2	2	0
16	Miami-Dade	74,585	49,196	11,507	6,948	4,266	1,462	886	202	75	43
	Total:	264,910	169,743	41,259	26,362	16,895	5,970	3,476	761	278	166
	Percent of Total:	100.0%	64.1%	15.6%	10.0%	6.4%	2.3%	1.3%	0.3%	0.1%	0.1%
	Cumulative %:		64.1%	79.7%	89.6%	96.0%	98.2%	99.5%	99.8%	99.9%	100.0%

Source: U.S. Census Bureau, 2011 County Business Patterns (NAICS)

Notes: \a Represents a sum of all NAIC sectors:

☐ There is no small county or small city that will be impacted by this proposed rule.

☒ A small county or small city will be impacted. Analysis:

The following tables show the small cities and counties that fall within the District's boundaries. The tables are reproduced so that evaluators have knowledge of which small counties and cities may possibly be impacted by the proposed rule should they implement projects over the next five years that have the potential to impact an impaired water body.

The SFWMD has several small counties within its boundaries. Table 5 shows the estimated 2013 population levels for the counties with 75,000 or less in unincarcerated population totals.

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Table 5: Populations of Small Counties within the SFWMD		
	County	2013 Population
1	Charlotte	1,399
2	Glades	12,781
3	Hendry	38,255
4	Highlands	8,648
5	Monroe	72,698
6	Okeechobee	39,001
7	Polk	34,536

In addition, the SFWMD has several small cities with unincarcerated populations of 10,000 or less. Table 6 shows the city names and their respective populations within each county within the SFWMD.

Table 6: Small Cities within the South Florida Water Management District					
Planning Region	County	Number of Cities within County	No of Cities w/ population 10,000 or less	Small City Name	Small City Respective Population(s) [2010 Census]
LWC	Charlotte	0	0		
LWC	Collier	3	1	Everglades city	400
LWC	Glades	1	1	Moore Haven	1680
LWC	Hendry	3	3	Clewiston, City of LaBelle, City of Port LaBelle	7155, 4640, 3530
LWC	Lee	5	2	Town of Fort Myers Beach, City of Sanibel	6277, 6469
UEC	Martin	4	3	Town of Jupiter Island, Town of Sewall's Point, Town of Ocean Breeze Park	817, 1996, 355
UEC	St. Lucie	3	1	Town of St. Lucie Village	590
LEC	Broward	31	6	Town of Hillsboro Beach, Town of Lauderdale-by-the-Sea, Village of Lazy Lake, Town of Pembroke Park, Village of Sea Ranch Lakes, Town of Southwest Ranches	1875, 6056, 24, 6102, 670, 7345
LEC	Palm Beach	38			
LEC	Miami-Dade	34	11	City of Bal Harbour Village, Town of Bay Harbor Islands, Village of Biscayne Park, Village of El Portal, Town of Golden Beach, Village of Indian Creek, Town of Medley, City of North Bay Village, Town of Surfside, Virginia Gardens, Village of, City of West Miami	2513, 5628, 3055, 2325, 919, 86, 838, 7137, 5744, 2375, 5965
LEC	Monroe	5	2	City of Key Colony Beach, City of Layton	797, 184
KB	Highlands	3	2	City of Avon Park, City of Lake Placid	8836, 2223
KB	Okeechobee	1	1	City of Okeechobee	5621
KB	Orange	3	2	City of Lake Buena Vista, City of Bay Lake	10,47
KB	Osceola	1			
KB	Polk	0			
SFWMD		135	35		

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☐ Lower impact alternatives were not implemented? Describe the alternatives and the basis for not implementing them.

H. Any additional information that the agency determines may be useful.

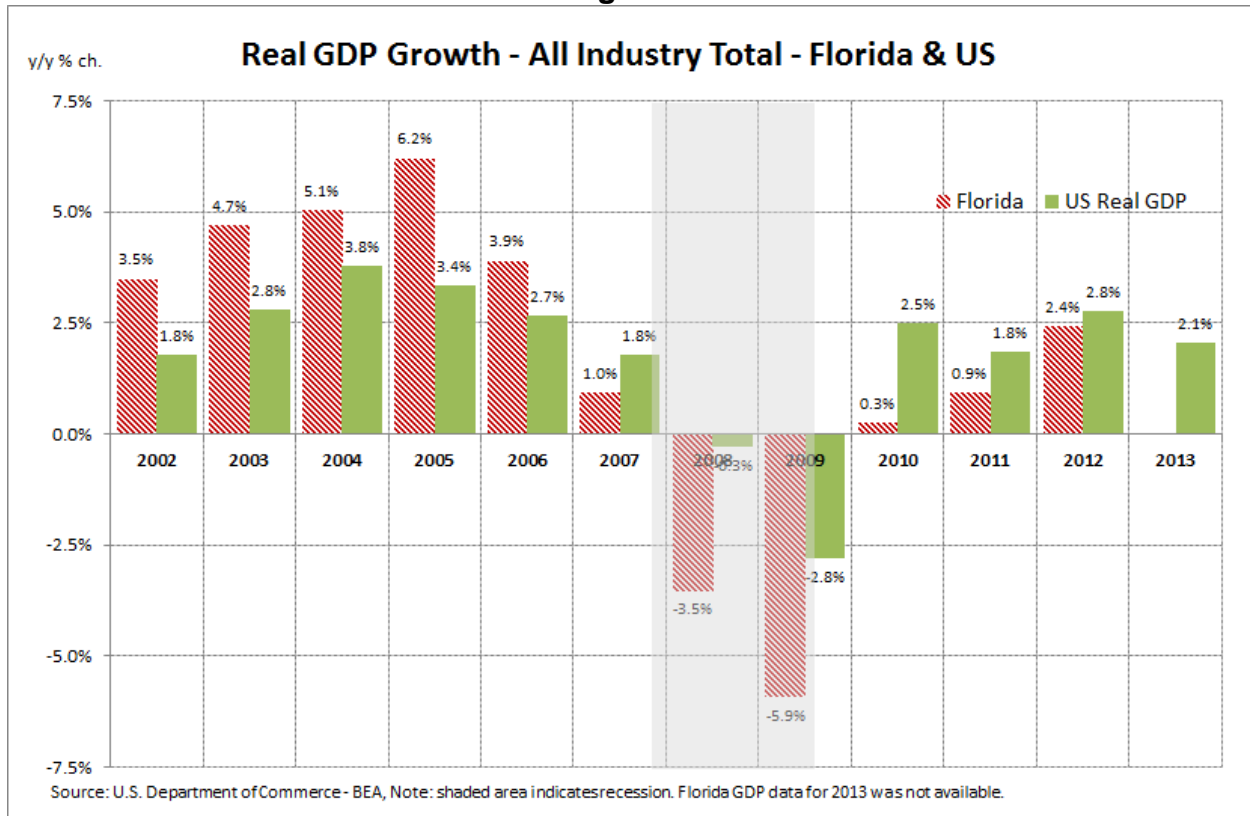
☐ None.

☒ Additional.

It should be noted that the proposed rule codifies existing practices that directly and indirectly support key sectors of the economy that are essential for achieving ongoing sustainable economic growth statewide. The proposed rule directly and indirectly supports key industries and natural communities supporting designated beneficial uses. These sectors and communities include public water supply, recreational and commercial fisheries, marine and freshwater recreation, habitats, and ecosystem services that contribute to economic growth in South Florida and across the state. Furthermore, key industry sectors such as analytical science & testing, architecture & engineering (A&E), consulting, and the design and construction industries provide goods and services linked to rule conditions of issuance, best management practices guidance and compliance. Figure 1 shows that Florida's real GDP growth rate has not recovered to pre-recession levels and in some recovery years lagged U.S. economic performance. Industries that support sustainable development (linked to the ERP process) through the protection of impaired water bodies are essential for Florida's continued economic growth and recovery.

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Figure 1



I. A description of any good faith written proposal for a lower cost regulatory alternative to the proposed rule which substantially accomplishes the objectives of the law being implemented and either a statement adopting the alternative or a statement of the reasons rejecting the alternative in favor of the proposed rule.

☒ No good faith written proposals for a lower cost regulatory alternative to the proposed rule were received.

☐ See attachment "A".

☐ Adopted in entirety.

☐ Adopted / rejected in part. *(Provide a description of the parts adopted or rejected, and provide a brief statement of the reasons adopting or rejecting this alternative in part).*

☐ Rejected in entirety. *(Provide a brief statement of the reasons rejecting this alternative).*

☐ See attachment "B".

SOUTH FLORIDA WATER MANAGEMENT DISTRICT
Statement Of Estimated Regulatory Costs (SERC) – Rule to Incorporate Impaired
Waters Design Aid Guidance Memorandum

☐ Adopted in entirety.

☐ Adopted / rejected in part. *(Provide a description of the parts adopted or rejected, and provide a brief statement of the reasons adopting or rejecting this alternative in part).*

☐ Rejected in entirety. *(Provide a brief statement of the reasons rejecting this alternative).*

☐ See attachment “C”.

☐ Adopted in entirety.

☐ Adopted / rejected in part. *(Provide a description of the parts adopted or rejected, and provide a brief statement of the reasons adopting or rejecting this alternative in part).*

☐ Rejected in entirety. *(Provide a brief statement of the reasons rejecting this alternative).*

☐ See attachment “D”.

☐ Adopted in entirety.

☐ Adopted / rejected in part. *(Provide a description of the parts adopted or rejected, and provide a brief statement of the reasons adopting or rejecting this alternative in part).*

☐ Rejected in entirety. *(Provide a brief statement of the reasons rejecting this alternative).*

☐ See attachment “E”.

☐ Adopted in entirety.

☐ Adopted / rejected in part. *(Provide a description of the parts adopted or rejected, and provide a brief statement of the reasons adopting or rejecting this alternative in part).*

☐ Rejected in entirety. *(Provide a brief statement of the reasons rejecting this alternative).*

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