

(e) An Estimate of the Anticipated Workload
(Required by 40 C.F.R. § 233.11(e))

Purpose of Section (e)

The purpose of Section (e) is to provide the information required in 40 C.F.R. § 233.11(e), which states: “An estimate of the anticipated workload, e.g., number of discharges.”

Existing Department ERP Permitting Workload

Tables (e)-1 through (e)-7 show the number of Environmental Resource Permits (ERP), or wetland-related dredge and fill permits issued per DEP District and by the Mining and Mitigation Program per calendar year from 2014-2019. The purpose of these tables is to illustrate the existing workload of DEP permit processing staff.

Data does not include:

- Self-certifications for single-family docks (do not require staff processing)
- 10/2 stormwater general permit self-certifications (do not require staff processing)
- Minor modifications (extensions, transfers - these typically require only minimal staff processing)
- Permits denied or withdrawn

DF = Pre-ERP dredge and fill permit. Some of these are still effective and occasionally modified. ERP was effective in most districts in 1995 but did not become effective in the Northwest District until 2007 (stormwater) and 2013 (environmental aka dredge and fill).

If a category of permit is absent from the table, then the district processed no permits in that category.

Mining and Mitigation Program	2014	2015	2016	2017	2018	2019	Average
DF	20	3	6	8	1	5	7
ERP Conceptual Approval Permit	0	0	0	0	0	1	0
ERP Exemption	2		5	2	2	2	3
ERP General Permit	5	3	5	1	5	6	4
ERP Individual Permit	4	9	5	10	5	3	6
ERP Modification	8	2	11	8	12	7	8

Table (e)-1: Average number of ERP permits processed per year by the Mining and Mitigation Program

Central District	2014	2015	2016	2017	2018	2019	Average
DF	0	0	1	0	0	0	0
ERP Conceptual Approval Permit	1	0	0	1	0	1	1
ERP Exemption	90	86	77	105	91	86	89
ERP General Permit	137	105	138	151	155	117	134
ERP Individual Permit	76	117	88	118	126	150	113
ERP Modification	19	22	14	17	9	15	16

Table (e)-2: Average number of permits processed per year by the Central District

Northeast District	2014	2015	2016	2017	2018	2019	Average
ERP Exemption	120	105	136	164	158	141	137
ERP General Permit	101	97	110	110	116	212	124
ERP Individual Permit	119	130	145	129	180	136	140
ERP Modification	6	2	3	3	2	3	3

Table (e)-3: Average number of permits processed per year by the Northeast District

Northwest District	2014	2015	2016	2017	2018	2019	Average
DF	79	42	19	1	1	2	24
ERP Conceptual Approval Permit	1	3	4	1	0	2	2
ERP Exemption	226	248	322	420	290	407	319
ERP General Permit	132	100	130	130	155	125	129
ERP Individual Permit	144	164	248	211	228	239	206
Ecosystem Management Agreement Authorization	0	1	1	2	3	11	3
ERP Modification	2	8	9	19	16	7	10

Table (e)-4: Average number of permits processed per year by the Northwest District

South District	2014	2015	2016	2017	2018	2019	Average
ERP Exemption	1524	1624	1811	2077	2990	3054	2180
ERP General Permit	128	156	156	184	298	268	198
ERP Individual Permit	123	194	180	212	275	352	223
ERP Modification	6	4	14	6	11	24	11

Table (e)-5: Average number of permits processed per year by the South District

Southeast District	2014	2015	2016	2017	2018	2019	Average
DF	0	2	0	0	0	0	0
ERP Conceptual Approval Permit	2	0	1	0	0	0	1
ERP Exemption	837	1192	1296	1310	1892	1753	1380
ERP General Permit	118	120	148	179	159	165	148
ERP Individual Permit	105	119	117	120	118	102	114
ERP Modification	10	9	29	28	16	14	18

Table (e)-6: Average number of permits processed per year by the Southeast District

Southwest District	2014	2015	2016	2017	2018	2019	Average
ERP Conceptual Approval Permit	1	0	1	2	1	0	1
ERP Exemption	322	328	363	343	371	360	348
ERP General Permit	119	139	113	220	274	137	167
ERP Individual Permit	56	56	52	80	109	74	71
ERP Modification	17	13	6	4	3	5	8

Table (e)-7: Average number of permits processed per year by the Southwest District

Estimated Number of State 404 Program Permits per District Office

The Department obtained permitting data from the US Army Corps of Engineers (USACE) for the years 2014-2018. The data contained latitude/longitude location points, which DEP converted into a GIS shapefile. The data was then overlain with GIS layers including a layer depicting the shoreline of retained freshwater bodies, a layer depicting the extent of tidal waters (NOAA Composite Shoreline), and a 300 foot buffer layer from the previous two layers representing the 300-foot guide line used to determine the administrative boundary of retained waters. Any project for which the location point fell landward of the 300-foot guide line was considered to be within state-assumed waters. These projects were overlain with a layer created to show all land parcels on which an ERP permit had been issued. The USACE projects that did not fall within a parcel that had an ERP permit were removed from the dataset. The remaining projects (those within state-assumed waters and with a corresponding ERP permit) were then sorted by type of USACE 404 permit (Individual, Standard, Letters of Permission, and Regional General Permit (RGP)); and General (Nationwide Permits), and by the DEP district and water management district (WMD) where the point was located. USACE RGPs were counted as individual permits because in many cases those project types will require a State 404 Program individual permit.

The Department will be processing all State 404 Permits. Tables (e)-8 through (e)-13 below show the total number of individual and general permits processed each year by USACE within the Department's district office boundary in the gray-shaded rows. This is the total estimated State 404 Program permit workload for the district. The data is then sorted further to show which state agency processed the ERP permit associated with the USACE-issued section 404 permit. These numbers provide an indication of the number of State 404 Program permits that will require coordination between the Department and WMD when the WMD processes the ERP and the Department processes the State 404 Program permit. Each district boundary contains areas under the jurisdiction of multiple water management districts.

The numbers shown are estimates as some of the USACE location point data did not match up closely with Department or WMD permit location data. Best professional judgement was used to assign the ERP for such mismatched point data to a Department district office or WMD.

The number of USACE-issued 404 permits that would have been attributed to DEP's Mining and Mitigation Program were not estimated based on location. Instead, the Department estimates that all ERP permits issued by the Mining and Mitigation Program will have an associated State 404 Program permit. This conservative estimate accounts for the fact that at the time this package was submitted, State 404 permits can be issued for a period not to exceed five years. This means that each mining project with an ERP that has a duration of more than 5 years may require multiple State 404 Program permits.

Within DEP Central District	USACE 404 Permit Type	2014	2015	2016	2017	2018	Average
Total	Individual	37	38	39	71	53	48
	General	105	85	160	124	84	112
DEP ERP	Individual	3	3	0	1	1	2
	General	27	24	56	40	19	33
SFWMD ERP	Individual	17	12	16	22	24	18
	General	20	19	26	15	22	20
SJRWMD ERP	Individual	16	22	23	48	27	27
	General	56	41	77	69	41	57
SWFWMD ERP	Individual	1	1	1	0	1	1
	General	2	1	1	0	2	1

Table (e)-8: Average estimated State 404 Program permit workload for the Central District

Within DEP Northeast District	USACE 404 Permit Type	2014	2015	2016	2017	2018	Average
Total	Individual	49	34	33	34	35	37
	General	63	75	73	104	87	80
DEP ERP	Individual	3	3	1	5	4	3
	General	18	16	27	28	39	26
SJRWMD ERP	Individual	43	30	32	29	31	33
	General	42	49	41	67	46	49
SRWMD ERP	Individual	3	1	0	0	0	1
	General	3	10	5	9	2	6

Table (e)-9: Average estimated State 404 Program permit workload for the Northeast District

Within DEP Northwest District	USACE 404 Permit Type	2014	2015	2016	2017	2018	Average
Total	Individual	14	25	14	43	30	26
	General	64	97	100	111	90	92
DEP ERP	Individual	13	17	10	32	21	19
	General	37	53	57	61	53	52
NFWMD ERP	Individual	1	8	4	11	9	7
	General	27	41	42	50	37	39
SRWMD ERP	Individual	0	0	0	0	0	0
	General	0	3	1	0	0	1

Table (e)-10: Average estimated State 404 Program permit workload for the Northwest District

Within DEP South District	USACE 404 Permit Type	2014	2015	2016	2017	2018	Average
Total	Individual	26	26	37	23	46	32
	General	75	73	69	100	174	98
DEP ERP	Individual	7	5	4	4	16	7
	General	23	36	17	54	120	50
SFWMD ERP	Individual	12	17	26	12	27	19
	General	38	24	35	28	37	32
SWFWMD ERP	Individual	7	4	7	7	3	6
	General	14	13	17	18	17	16

Table (e)-11: Average estimated State 404 Program permit workload for the South District

Within DEP Southeast District	USACE 404 Permit Type	2014	2015	2016	2017	2018	Average
Total	Individual	58	53	41	56	61	54
	General	59	87	55	67	73	68
DEP ERP	Individual	3	7	4	10	11	7
	General	10	17	14	15	18	15
SFWMD ERP	Individual	53	45	32	44	47	44
	General	41	45	32	45	49	42
SJRWMD ERP	Individual	2	1	5	2	3	3
	General	8	25	9	7	6	11

Table (e)-12: Average estimated State 404 Program permit workload for the Southeast District

Within DEP Southwest District	USACE 404 Permit Type	2014	2015	2016	2017	2018	Average
Total	Individual	27	26	29	31	32	29
	General	108	83	85	110	85	94
DEP ERP	Individual	2	1	3	3	1	2
	General	0	1	0	2	0	1
SFWMD ERP	Individual	1	2	1	1	1	1
	General	14	8	7	22	10	12
SWFWMD ERP	Individual	24	23	25	27	30	26
	General	94	74	78	86	75	81

Table (e)-13: Average estimated State 404 Program permit workload for the Southwest District

Estimated Staff Review Hours

First, the Department estimated the number of hours required to process small, medium, and large individual ERPs. The estimates were created from a poll of experienced processing staff. Position estimates include consideration for essential staff functions including training and leave. It should be noted that the following activities may not apply to all applications: Pre-application meetings, draft request for additional information (RAI), Review RAI response, and Draft RAI in response to comments from public notice (added for 404). Where these steps are not required because an application is received complete or there are no public comments, permitting time may be shortened.

A small ERP includes projects such as a single-family residence, boardwalk over wetlands, or small commercial site. A medium ERP includes projects such as smaller transportation projects, a small subdivision, or single-phase construction development. A large ERP includes major transportation projects, large residential or commercial developments, or multi-phase projects.

Activity	Small ERP Project hours	Medium ERP Project hours	Large ERP Project hours	Small Mining hours	Large Mining hours
Pre-application meetings	0.6	1.7	3.5	46.0	276.0
Application log in	0.6	0.6	0.6	0.6	0.6
Initial Review	3.5	9.2	18.4	64.4	184.0
Site visit (including delineation verification)	6.9	13.8	18.4	27.6	92.0
Draft RAI	3.5	9.2	18.4	18.4	46.0
Review RAI response	3.5	9.2	18.4	64.4	184.0
Draft Public Notice	2.3	3.5	4.6	46.0	92.0
Draft RAI in response to comments from public notice (Conservative estimate for 404 projects: ~50% of ERP projects, 100% mining may require)	1.7	4.6	9.2	18.4	46.0
Review RAI response	3.5	9.2	18.4	64.4	184.0
Draft Permit and Staff Report	6.9	13.8	27.6	46.0	184.0
Data Entry	1.2	1.2	1.2	18.4	27.6
General Communication (email and phone calls)	4.6	11.5	27.6	55.2	82.8
Total hours per permit	38.5	87.4	166.2	469.8	1399.0
Staff days (hours/8)	4.8	10.9	20.8	58.7	174.9

Table (e)-14: Average estimated staff review time per ERP permit by project size

Second, the Department estimated the additional time required to process a State 404 Program Permit and perform compliance related to the State 404 Program. The additional time is converted into an estimate of how many full-time staff will be retrained or reclassified to perform the additional work associated with a State 404 Program permit. (see Tables (e)-15 through (e)-21, below) The Department intends to administer the State 404 Program using existing resources, which includes reallocating existing positions and staff time from elsewhere in the Department to the State 404 Program. The Department intends to compensate for the reallocation of positions and staff time in other Department programs by creating efficiencies throughout the Department such as online applications, self-certifications, and additional automation of processes where practicable.

To calculate the estimated workload, the following assumptions were made:

1. A State 404 Program general permit, considered alone, will take as much time as a small ERP individual permit.
2. State 404 Program and ERP permit review requirements overlap approximately 85%. Additional coordination between DEP and WMDs and commenting agency coordination will add time to the process, so it is estimated that a State 404 Program authorization, on average, will add 50% to the staff time required to process a similarly-sized ERP (15% non-overlapping requirements, 35% WMD and commenting agency coordination).
3. State 404 Program compliance activities are estimated to take approximately 25% of the time required to process State 404 Program permits per district.

Central District

State 404 Program Permit Type	Estimated Number of Permits or Compliance Cases Annually	Estimated total staff hours for review items overlapping with ERP (85%)	Additional 50% time allowance for non-overlapping review items and WMD coordination (hours)	Estimated staff days	Estimated number of staff needed (based on 260 working days per year)
General Permits	112	4314.8	2157.4	269.7	1.0
Small Individual Permits	24	924.6	462.3	57.8	0.2
Medium Individual Permits	12	1048.8	524.4	65.6	0.3
Large Individual Permits	12	1994.1	997.1	124.6	0.5
Compliance Activities	40	2070.6	1035.3	129.4	0.5
Staff Needed:					2.5

Table (e)-15: Estimated reallocated staff needed by the Central District

Northeast District

State 404 Program Permit Type	Estimated Number of Permits or Compliance Cases Annually	Estimated total staff hours for review items overlapping with ERP (85%)	Additional 50% time allowance for non- overlapping review items and WMD coordination (hours)	Estimated staff days	Estimated number of staff needed (based on 260 working days per year)
General Permits	80	3082.0	1541.0	192.6	0.7
Small Individual Permits	19	732.0	366.0	45.7	0.2
Medium Individual Permits	9	786.6	393.3	49.2	0.2
Large Individual Permits	9	1495.6	747.8	93.5	0.4
Compliance Activities	29	1524.1	762.0	95.3	0.4
Staff Needed:					1.8

Table (e)-16: Estimated reallocated staff needed by the Northeast District

Northwest District

State 404 Program Permit Type	Estimated Number of Permits or Compliance Cases Annually	Estimated total staff hours for review items overlapping with ERP (85%)	Additional 50% time allowance for non-overlapping review items and WMD coordination (hours)	Estimated staff days	Estimated number of staff needed (based on 260 working days per year)
General Permits	92	3544.3	1772.2	221.5	0.9
Small Individual Permits	13	500.8	250.4	31.3	0.1
Medium Individual Permits	7	611.8	305.9	38.2	0.1
Large Individual Permits	6	997.1	498.5	62.3	0.2
Compliance Activities	30	1413.5	706.7	88.3	0.3
Staff Needed:					1.7

Table (e)-17: Estimated reallocated staff needed by the Northwest District

South District

State 404 Program Permit Type	Estimated Number of Permits or Compliance Cases Annually	Estimated total staff hours for review items overlapping with ERP (85%)	Additional 50% time allowance for non- overlapping review items and WMD coordination (hours)	Estimated staff days	Estimated number of staff needed (based on 260 working days per year)
General Permits	98	3775.5	1887.7	236.0	0.9
Small Individual Permits	16	616.4	308.2	38.5	0.1
Medium Individual Permits	8	699.2	349.6	43.7	0.2
Large Individual Permits	8	1329.4	664.7	83.1	0.3
Compliance Activities	33	1605.2	802.6	100.3	0.4
Staff Needed:					1.9

Table (e)-18: Estimated reallocated staff needed by the South District

Southeast District

State 404 Program Permit Type	Estimated Number of Permits or Compliance Cases Annually	Estimated total staff hours for review items overlapping with ERP (85%)	Additional 50% time allowance for non- overlapping review items and WMD coordination (hours)	Estimated staff days	Estimated number of staff needed (based on 260 working days per year)
General Permits	68	2619.7	1309.9	163.7	0.6
Small Individual Permits	27	1040.2	520.1	65.0	0.3
Medium Individual Permits	14	1223.6	611.8	76.5	0.3
Large Individual Permits	13	2160.3	1080.1	135.0	0.5
Compliance Activities	31	1761.0	880.5	110.1	0.4
Staff Needed:					2.1

Table (e)-19: Estimated reallocated staff needed by the Southeast District

Southwest District

State 404 Program Permit Type	Estimated Number of Permits or Compliance Cases Annually	Estimated total staff hours for review items overlapping with ERP (85%)	Additional 50% time allowance for non- overlapping review items and WMD coordination (hours)	Estimated staff days	Estimated number of staff needed (based on 260 working days per year)
General Permits	94	3621.4	1810.7	226.3	0.9
Small Individual Permits	15	577.9	288.9	36.1	0.1
Medium Individual Permits	7	611.8	305.9	38.2	0.1
Large Individual Permits	7	1163.2	581.6	72.7	0.3
Compliance Activities	31	1493.6	746.8	93.4	0.4
Staff Needed:					1.8

Table (e)-20: Estimated reallocated staff needed by the Southwest District

Mining

State 404 Program Permit Type	Estimated Number of Permits or Compliance Cases Annually	Total staff hours for dredge and fill -related ERP review (not including stormwater engineering review, estimated to be 50% of total time)	Estimated total staff hours for review items overlapping with ERP (85%)	Additional 50% time allowance for non-overlapping review items and commenting agency coordination (hours)	Estimated staff days	Estimated number of staff needed (based on 260 working days per year)
Small Individual Permits	18.0	4228.0	3593.8	1796.9	224.6	0.9
Large Individual Permits	3.0	2098.5	1783.7	891.8	111.5	0.4
404 Compliance	5.3	1581.6	1344.4	672.2	84.0	0.3
Staff needed:						1.6

Table (e)-21: Estimated reallocated staff needed by the Mining and Mitigation Program

State 404 Program Quality Control Auditing Estimates

Subject matter experts in the Department's Submerged Lands and Environmental Resources Coordination (SLERC) program will audit a percentage of State 404 Program permits and compliance actions and associated wetland delineations. All formal jurisdictional determinations will be audited. Estimated audit numbers are shown for the first year for purposes of this workload analysis and reflect the minimum percentage of actions that will be audited (see Tables (e)-22 through (e)-29, below). SLERC may audit a greater percentage of actions if staff time allows. If the first year of auditing demonstrates a high level of quality work product, SLERC may reduce the percent of files audited by no more than 50% of the first year percentages. If the first year of auditing does not satisfy the Department's standards for a quality work product, SLERC will identify issues, provide training to correct the issues, and may increase the percentage of files audited. These auditing estimates reflect the requirement that any processing staff verifying delineations for State 404 Program permitting and compliance actions or conducting formal determinations are required to have passed the Department's internal Certified Wetland Evaluator (CWE) test, which is created and implemented solely by SLERC's

delineation subject matter experts to ensure accurate and consistent interpretations of Chapter 62-340, F.A.C., and Chapter 62-345, F.A.C.

Terms:

Desktop Delineation Audit: desktop analysis of a determination or delineation line using aerial photographs, topographic maps, soil survey maps and data forms

Follow-up Field Audit: field verification of portions of a determination or delineation line where the desktop audit showed a potential discrepancy

File Audit: desktop analysis of files associated with an issued permit or compliance action

Person-hour: 1 hour of work performed by 1 person

Scope of Work:

- Tallahassee SLERC staff will perform desktop audits for a percentage of State 404 Program (404) individual and general permits for determinations or delineations.
- Tallahassee SLERC staff will perform desktop audits for all formal delineations within the state.
- Tallahassee SLERC staff will perform field audits for any formal delineation or 404 individual and general permits where the desktop delineation audit shows a potential discrepancy.
- Tallahassee SLERC staff will perform desktop audits on a percentage of issued State 404 Program permit files and compliance actions.

Assumptions used to calculate workload:

- Permitting and compliance numbers were calculated as described in the Estimated Staff Review Hours section, above.
- 18,764 acres of Mining Formal Delineations averaged 16.5 acres per hour including travel and fieldwork. This number was used to estimate time needed for formal determination field audits. Mining staff averages are representative of the best trained and highest paid staff in the Department.
- 1 work day = 8 hours of work
- 1-person hour includes travel, desktop work, or fieldwork audit activities
- Baseline desktop audits require 4 hours for mapping and aerial data collection by an auditing assistant, plus an additional 2 hours by a SLERC ecologist for a total of 6 hours on all projects smaller than 1000 acres
- Baseline field audits require 8 hours of travel with 2 hours fieldwork for the first 16.5 acres and 1 hour of fieldwork for every additional 16.5 acres evaluated.
- When WOTUS evaluations are necessary desktop audit hours and/or fieldwork audit hours are predicted to double. It is not yet known what percentage of applicants will request WOTUS evaluations in accordance with the State 404 Applicant's Handbook section 1.1.

Staffing and Time analysis:

Individual Permit Actions

Individual Permit Desktop Delineation Audits

Percentage of projects in a certain size category are variable per year. The following conservative estimates were used to allow for this variation: 50% of projects have less than 3 acres of impact; 25% of projects have between 3 and less than 10 acres of impact; 25% of projects have 10+ acres of impact. Where a decimal was calculated, the estimated number was rounded up.

Size of Wetland or Surface Water Impact	Time Estimate	Estimated Number of Permits*	Number of Person-Hours Required per Year
<3 acres	4 +2= 6 hours	12 (10% of 113)	68
3 to <10 acres	4 +2= 6 hours	12 (20% of 57)	68
10 to 1000 acres	4 +2= 6 hours 1 hour for every additional 1000 acres	12 (25% of 57)	68
Total number of person-hours required per year:			204

Table (e)-22: Estimated person-hours for desktop delineation audits of individual permits

Individual Permit Follow-up Field Audits

A conservative estimate of 20% was used as the anticipated number of desktop delineation audits that will require a follow-up field audit.

Size of Project	Time Estimate	Estimated Number of Permits	Number of Person-Hours Required per year <i>(number of permits x time estimate)</i>
<3 acres	8+2=10 hours	3 <i>(20% of 12)</i>	30
3 to <10 acres	8+2=10 hours	3 <i>(20% of 12)</i>	30
10- 16.5 acres	8+2=10 hours 1 hour for every additional 16.5 acres	3 <i>(25% of 12)</i>	30
Total number of person-hours required per year:			90

Table (e)-23: Estimated person-hours for follow-up field audits of individual permits

General Permit Actions

General Permit Desktop Delineation Audits

Estimated Number of Permits	Time Estimate for projects <1000 acres	Estimated Number of Audits (10% of permits)	Number of Person-Hours Required Per Year (number of audits x time estimate)
544	4 +2= 6 hours <1000 acres 1 hour for every additional 1000 acres	55	330

Table (e)-24: Estimated person-hours for desktop delineation audits of general permits

General Permit Follow-up Field Audits

A conservative estimate of 20% was used as the anticipated number of desktop delineation audits that will require a follow-up field audit.

Estimated Number of Permits	Time Estimate	Estimated Number of Field Audits (20% of Desktop Audits)	Number of Person-Hours Required Per Year (number of Audits x time estimate)
544	8+2=10 hours < 16.5 acres 1 hour for every additional 16.5 acres	11	111

Table (e)-25: Estimated person-hours for follow-up field audits of general permits

Formal Determinations

Formal Determination Desktop Delineation Audits

Size of Project	Time Estimate	Estimated Number of Formal Determinations in a 3-year period*	Number of Person-Hours Required Per Year (<i>number of permits/3 years x time estimate</i>)
1 to 1000 acres	6 hours	331	662
1000+ to 2000 acres	7 hours	20	47
2000+ to 3000 acres	8 hours	7	19
3000+ to 4000 acres	9 hours	1	3
4000+ to 5000 acres	10 hours	3	10
5000+ to 6000 acres	11 hours	1	4
6000+ to 7000 acres	12 hours	1	4
10,000+ to 11,000 acres	16 hours	1	6
23,000 to 24,000 acres	36 hours	1	12
Total number of Person-hours required per year:			767

Table (e)-26: Estimated person-hours for desktop delineation audits of formal determinations

*Estimate calculated using data from DEP and WMDs from 10/2013 – 9/2016

Formal Determination Follow-up Field Audits

A conservative estimate of 20% was used as the anticipated number of desktop formal determination audits that will require a follow-up field audit. Required time was calculated using average total acreage of formals issued by the Department and WMDs between 10/2013 – 9/2016.

Size of Project	Time Estimate	20% Of Formal Determination acreage evaluation	Number of Person-Hours Required Per Year
Average FD acreage per year = 49,747 acres	16.5 acres per hour	9,950 acres per year	603

Table (e)-27: Estimated person-hours for follow-up field audits of formal determinations

Compliance Actions Audit Estimates

The Department estimates that compliance actions will take 25% of the time calculated for permitting actions.

Desktop Delineation Audits <i>(Total Person Hours Calculated for Permitting Actions)</i>	Follow-up Field Audits <i>(Total Person Hours Calculated for Permitting Actions)</i>	Total Person-Hours Required Per Year for Compliance Actions <i>(Hours for Permitting Desktop and Follow-up Audits x 25%)</i>
534	201	183.75

Table (e)-28: Estimated person-hours for audits of compliance actions

Permitting/Compliance Regulatory File Audits

SLERC subject matter experts will audit a percentage of State 404 Program permit files to ensure that permitting and compliance actions are consistent with the requirements of the State 404 Program.

Type of Action	Time Estimate for Auditing Each Action (Hours)	Estimated Number of Actions Per Year	Percent of Files Audited	Number of Person-Hours Required Per Year
General Permit	1	544	20%	109
Individual Permit	2.5	226	50%	283
Compliance	2.5	195 (25% of Permit Actions)	50%	244
Total Person-Hours Required Per Year				636

Table (e)-29: Estimated person-hours for audits of regulatory files

Program Reassessment

The Department has committed to periodically re-assessing program staffing and funding needs, and to work toward program excellence in subsection 62-331.010(14), F.A.C.:

(14) The Department strives to operate a wetlands regulatory program that far exceeds the minimum standards set by federal law and is comprised of professional and knowledgeable staff that make science-based decisions regarding the water resources of the state. To continuously exhibit these qualities, the Department will institute continuous improvement and evaluation measures, including but not limited to:

- (a) Partnering with a third-party entity to identify the qualities of a state wetlands regulatory program that exhibits a paragon of excellence, and
- (b) Conducting an annual staffing analysis of the State 404 Program.