**REVENUE ESTIMATING CONFERENCE**

**Tax**: Ad Valorem
**Issue**: Disabled Veterans' Exemption Transfer
**Bill Number(s)**: Draft Language

☒ **Entire Bill**
☐ **Partial Bill**:
**Sponsor(s)**: N/A
**Month/Year Impact Begins**:
**Date of Analysis**:

**Section 1: Narrative**

**a. Current Law**: Section 196.081, Florida Statutes, provides (In part):

(1) Any real estate that is owned and used as a homestead by a veteran who was honorably discharged with a service-connected total and permanent disability and for whom a letter from the United States Government or United States Department of Veterans Affairs or its predecessor has been issued certifying that the veteran is totally and permanently disabled is exempt from taxation, if the veteran is a permanent resident of this state on January 1 of the tax year for which exemption is being claimed or was a permanent resident of this state on January 1 of the year the veteran died.

(2) The production by a veteran or the spouse or surviving spouse of a letter of total and permanent disability from the United States Government or United States Department of Veterans Affairs or its predecessor before the property appraiser of the county in which property of the veteran lies is prima facie evidence of the fact that the veteran or the surviving spouse is entitled to the exemption.

(3) If the totally and permanently disabled veteran predeceases his or her spouse and if, upon the death of the veteran, the spouse holds the legal or beneficial title to the homestead and permanently resides thereon as specified in s. 196.031, the exemption from taxation carries over to the benefit of the veteran's spouse until such time as he or she remarries or sells or otherwise disposes of the property. If the spouse sells the property, an exemption not to exceed the amount granted from the most recent ad valorem tax roll may be transferred to his or her new residence, as long as it is used as his or her primary residence and he or she does not remarry.

(4) Any real estate that is owned and used as a homestead by the surviving spouse of a veteran who died from service-connected causes while on active duty as a member of the United States Armed Forces and for whom a letter from the United States Government or United States Department of Veterans Affairs or its predecessor has been issued certifying that the veteran who died from service-connected causes while on active duty is exempt from taxation if the veteran was a permanent resident of this state on January 1 of the year in which the veteran died.

(a) The production of the letter by the surviving spouse which attests to the veteran's death while on active duty is prima facie evidence that the surviving spouse is entitled to the exemption.

(b) The tax exemption carries over to the benefit of the veteran's surviving spouse as long as the spouse holds the legal or beneficial title to the homestead, permanently resides thereon as specified in s. 196.031, and does not remarry. If the surviving spouse sells the property, an exemption not to exceed the amount granted under the most recent ad valorem tax roll may be transferred to his or her new residence as long as it is used as his or her primary residence and he or she does not remarry.

(5) An applicant for the exemption under this section may apply for the exemption before receiving the necessary documentation from the United States Government or the United States Department of Veterans Affairs or its predecessor. Upon receipt of the documentation, the exemption shall be granted as of the date of the original application, and the excess taxes paid shall be refunded. Any refund of excess taxes paid shall be limited to those paid during the 4-year period of limitation set forth in s. 197.182(1)(e).

**b. Proposed Change**: Creates a new paragraph 196.081(1)(b) to provide:

(b) Notwithstanding section 196.011, the exemption under paragraph (a) may be applied to a tax year if the real estate owned and used as a homestead is acquired after January 1 of that tax year and the veteran received the exemption on another property in the immediately prior tax year. To receive the exemption pursuant to this paragraph, the veteran must file with the property appraiser within 30 days of acquisition of the new property and no later than the 25th day following the mailing by the property appraiser of the notices required under s. 194.011(1), an application that lists and describes both the previous homestead and the new property and certifies under oath that the veteran:

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Ad Valorem
**Issue**: Disabled Veterans' Exemption Transfer
**Bill Number(s)**: Draft Language

1. is otherwise qualified to receive the exemption under s. 196.081,
2. holds legal title to the new property, and
3. intends to use the new property as his or her homestead.

If the exemption is granted on the new homestead, the previous homestead may not receive the exemption in that tax year, unless the subsequent owner of the previous homestead is qualified to receive the exemption pursuant to paragraph (a) of this section.

**Section 2: Description of Data and Sources**
2015 Property Tax Roll Values

**Section 3: Methodology (Include Assumptions and Attach Details)**
Under current law, the exemption eligibility is determined as of January 1. If the property subject to the exemption is sold after January 1, that sale does not affect the exemption for the year the property was sold. In the subsequent year, any exemption for the property will be based on the new owner's qualifications on the subsequent January 1. The impact of this proposed language will be a function of the following:

1. The just value as of the January 1 preceding the sale for the home sold by the qualified veteran
2. The Just value as of January 1 preceding the purchase of the new home purchased by the veteran
3. The relative millage rates of the jurisdictions within which the home sold by the veteran and the home purchased by the veteran
4. The number of qualified veterans that sell a home and purchase a new one in the same calendar year
5. The split between new homes purchased by qualified veterans prior to the 25th day following the mailing of the notice required under s. 194.011(1)

As 1., 2., and 3. above are unknowable and likely to move in opposite direction, the analyst is able to determine a direction of potential impact.

**Section 4: Proposed Fiscal Impact**

| | High | | Middle | | Low | |
|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | | | +/- | +/- | | |
| 2017-18 | | | +/- | +/- | | |
| 2018-19 | | | +/- | +/- | | |
| 2019-20 | | | +/- | +/- | | |
| 2020-21 | | | +/- | +/- | | |

**List of affected Trust Funds:**

**Section 5: Consensus Estimate (Adopted: 10/02/2015): The Conference adopted the proposed estimate.**

| | GR | | Trust | | Local/Other | | Total | |
|---|---|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | 0.0 | 0.0 | 0.0 | 0.0 | +/- | +/- | +/- | +/- |
| 2017-18 | 0.0 | 0.0 | 0.0 | 0.0 | +/- | +/- | +/- | +/- |
| 2018-19 | 0.0 | 0.0 | 0.0 | 0.0 | +/- | +/- | +/- | +/- |
| 2019-20 | 0.0 | 0.0 | 0.0 | 0.0 | +/- | +/- | +/- | +/- |
| 2020-21 | 0.0 | 0.0 | 0.0 | 0.0 | +/- | +/- | +/- | +/- |

| | A | B | C | D | E | F | G | H | I |
|---|---|---|---|---|---|---|---|---|---|
| 1 | | County | Exempt Amount - 196.081 | Parcels | | | County | Exempt Amount - 196.081 | Parcels |
| 2 | 11 | Alachua | $52,375,241 | 438 | | 45 | Lake | $133,555,994 | 998 |
| 3 | 12 | Baker | | | | 46 | Lee | $220,786,626 | 1538 |
| 4 | 13 | Bay | $96,913,055 | 915 | | 47 | Leon | $56,435,886 | 366 |
| 5 | 14 | Bradford | $5,818,624 | 84 | | 48 | Levy | $14,089,177 | 181 |
| 6 | 15 | Brevard | $335,762,400 | 2,778 | | 49 | Liberty | $862,229 | 10 |
| 7 | 16 | Broward | $277,496,080 | 1,843 | | 50 | Madison | $4,473,348 | 57 |
| 8 | 17 | Calhoun | $2,997,214 | 46 | | 51 | Manatee | $109,963,546 | 727 |
| 9 | 18 | Charlotte | $96,900,357 | 782 | | 52 | Marion | $132,809,975 | 1276 |
| 10 | 19 | Citrus | $57,622,237 | 760 | | 53 | Martin | $54,327,466 | 386 |
| 11 | 20 | Clay | $83,658,104 | 811 | | 54 | Monroe | $56,188,090 | 162 |
| 12 | 21 | Collier | $107,242,026 | 499 | | 55 | Nassau | $33,290,623 | 199 |
| 13 | 22 | Columbia | $23,328,974 | 293 | | 56 | Okaloosa | $139,587,547 | 1150 |
| 14 | 23 | Miami-Dade | $143,090,980 | 1,110 | | 57 | Okeechobee | $11,365,549 | 127 |
| 15 | 24 | Desoto | $5,674,208 | 94 | | 58 | Orange | $285,236,553 | 1999 |
| 16 | 25 | Dixie | $2,153,824 | 87 | | 59 | Osceola | $86,320,499 | 887 |
| 17 | 26 | Duval | $124,544,373 | 1,664 | | 60 | Palm Beach | $293,768,821 | 1927 |
| 18 | 27 | Escambia | $91,960,063 | 1,428 | | 61 | Pasco | $214,804,149 | 1672 |
| 19 | 28 | Flagler | $53,616,562 | 381 | | 62 | Pinellas | $328,964,467 | 2657 |
| 20 | 29 | Franklin | $4,441,711 | 52 | | 63 | Polk | $128,713,546 | 1351 |
| 21 | 30 | Gadsden | $7,662,724 | 101 | | 64 | Putnam | $25,736,897 | 276 |
| 22 | 31 | Gilchrist | $4,783,487 | 80 | | 65 | Saint Johns | $80,583,300 | 434 |
| 23 | 32 | Glades | $2,670,755 | 42 | | 66 | Saint Lucie | $82,471,647 | 955 |
| 24 | 33 | Gulf | $5,147,693 | 61 | | 67 | Santa Rosa | $92,866,809 | 867 |
| 25 | 34 | Hamilton | $1,697,132 | 40 | | 68 | Sarasota | $144,612,587 | 1024 |
| 26 | 35 | Hardee | $1,277,860 | 28 | | 69 | Seminole | $79,975,124 | 845 |
| 27 | 36 | Hendry | $5,093,080 | 58 | | 70 | Sumter | $98,994,190 | 574 |
| 28 | 37 | Hernando | $99,518,317 | 1,015 | | 71 | Suwannee | | |
| 29 | 38 | Highlands | | | | 72 | Taylor | $4,847,020 | 72 |
| 30 | 39 | Hillsborough | $355,084,009 | 2,783 | | 73 | Union | $2,514,293 | 43 |
| 31 | 40 | Holmes | $6,718,850 | 110 | | 74 | Volusia | $219,106,194 | 1874 |
| 32 | 41 | Indian River | $61,959,701 | 461 | | 75 | Wakulla | $9,271,912 | 145 |
| 33 | 42 | Jackson | $11,655,262 | 172 | | 76 | Walton | $27,471,678 | 241 |
| 34 | 43 | Jefferson | $4,364,153 | 42 | | 77 | Washington | $8,125,125 | 136 |
| 35 | 44 | Lafayette | $2,134,152 | 22 | | | Statewide | $5,317,484,075 | 44,236 |
| 36 | | | | | | | | | |
| 37 | | | | | | Impact of current exemption | | | |
| 38 | | School Millage | 7.1334 | | | | School | $37,931,741 | |
| 39 | | NonSchool Millage | 10.6390 | | | | NonSchool | $56,572,713 | |

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Corporate Income Tax
**Issue**: Mandatory Combined Reporting
**Bill Number(s)**: HB 1221 (2015)

☐ **Entire Bill**
☒ **Partial Bill**: Sections 3 - 22
**Sponsor(s)**: Rep. Rodriguez
**Month/Year Impact Begins**: Directed to assume effective for all tax years beginning on or after January 1, 2017. Without a change in estimated payment requirement, the first impact would occur in April of 2018.
**Date of Analysis**: 9/16/2015

**Section 1: Narrative**

**a. Current Law**: Section 220.03, Florida Statutes defines "taxpayer" to mean (in part)" any corporation subject to the tax imposed by this code, and includes all corporations for which a consolidated return is filed under s. 220.131"

Section 220.131 provides for an election for entities that are part of an affiliated group to consolidate their income with all other members of the group, regardless of whether such member is subject to tax under this code, and to return such consolidated taxable income provided that affiliated group has filed a consolidated return for federal income tax purposes and the affiliated group in Florida is composed of the identical component members as have consolidated their taxable income in such federal return. The filing of a consolidated return for any taxable year shall require the filing of consolidated returns for all subsequent taxable years so long as the filing taxpayers remain members of the affiliated group or, in the case of a group having component members not subject to tax under this code, so long as a consolidated return is filed by such group for federal income tax purposes, unless the director consents to the filing of separate returns.

There is no definition for the terms "Tax Haven" or "Water's edge group".

Net operating losses may be carried forward for 20 years.

There are no rules for determining membership in a water's edge group.

There is no provision to exclude intercompany sales transactions between members of a water's edge group for purposes of determining numerator or denominator of the sales apportionment factor.

There is no provision for the exclusion of sales that are not apportioned to any taxing jurisdiction to be excluded from the numerator and denominator of the sales apportionment factor.

There is no requirement that a single return be filed for a water's edge group.

There is no requirement for computational schedules for a water's edge group that combines the federal income of all members of a water's edge group, shows all intercompany eliminations, shows Florida additions and subtractions under S. 220.13, nor is there a requirement that a water's edge group file a domestic disclosure spreadsheet the fully discloses the income reported to each state, the state tax liability, the method used for apportioning or allocating income to the various states.

**b. Proposed Change**: Revises the definition of "taxpayer" to include all corporations that are members of a water's edge group. Provides for a definition of the term "Tax Haven".

Defines a "water's Edge Group to be a group of corporations related through common ownership whose business activities are integrated with, dependent upon, or contribute to a flow of value among members of the group.

Revises the term "Adjusted Federal Income" in section 22.13, F.S., to include the taxable income of more than one taxpayer as provided in newly created section 220.1363.

Further revises section 220.13, F.S., to provide that a deduction is not allowed for net operating losses, net capital losses, or excess contribution deductions for a member of a water's edge group that is not a United States Member. Further provides that carryovers of net operating losses, net capital losses, or excess contribution deductions may be subtracted only by the member of a water's edge group that generates a carryover. Also provides that amounts received by a member of a water's edge group shall be subtracted from the taxable income to the extent that the dividends are included in the taxable income.

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**Tax**: Corporate Income Tax
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Creates section 220.136, F.S., which provides for the determination of the members of a water's edge group. The membership rules are as follows: A corporation having 50 percent or more of its outstanding voting stock directly or indirectly owned or controlled by a water's edge group is presumed to be a member of the group. A corporation having less than 50 percent of its outstanding voting stock directly or indirectly owned or controlled by a water's edge group is a member of the group if the businesses activities of the corporation show that the corporation is a member of the group. All of the income of a corporation that is a member of a water's edge group is presumed to be unitary. A corporation that conducts business outside the United States is not a member of a water's edge group if 80 percent or more of the corporation's property and payroll, as determined by the apportionment factors described in ss. 220.15 and 220.1363, may be assigned to locations outside the United States. However, such corporations that are incorporated in a tax haven may be a member of a water's edge group pursuant to paragraph (a). This paragraph does not exempt a corporation that is not a member of a water's edge group from this chapter.

Creates S. 220.1363, which establishes the following requirements for water's edge groups:

1. All members of a water's edge group must use the water's edge reporting method, under the water's edge reporting method:
   a) Adjusted federal income for purposes of s. 220.12 means the sum of adjusted federal income for all members of the group as determined for a concurrent tax year
   b) The numerators and denominators of the apportionment factors are calculated for all members of the group combined
   c) Intercompany sales transactions between members of the group are not included in the numerator or denominator of the sales factor regardless of indicia of a sale exist. As used in this subsection, the term "sale includes, but is not limited to, loans, payments for the use of intangibles, dividends, and management fees,
   d) For sales of intangibles, including, but not limited to, accounts receivable, notes, bonds, and stock, which are made to entities outside the group, only the net proceeds are included in the numerator and denominator of the sales factor
   e) Sales that are not allocated or apportioned to any taxing jurisdiction otherwise known as "nowhere sales", may not be included in the numerator or denominator of the sales factor
   f) The income attributable to the Florida activities of a corporation that is exempt from taxation under Public Law no. 86-272 is excluded from the apportionment factor numerators in the calculation of corporate income tax even if another member of the water's edge group has nexus with Florida and is subject to tax (Joyce method)

(2) For purposes of this section, the term "water's edge reporting method" is a method to determine the taxable business profits of a group of entities conducting a unitary business. Under this method, the net income of the entities must be added together along with the additions and subtractions under s. 220.13 and apportioned to this state as a single taxpayer under ss. 220.15 and 220.151. However, each special industry member included in a water's edge group return, which would otherwise be permitted to use a special method of apportionment under s. 220.151, shall convert its single-factor apportionment to a three-factor apportionment of property, payroll, and sales. The special industry member shall calculate the denominator of its property, payroll, and sales factors in the same manner as those denominators are calculated by members that are not special industry members. The numerator of its sales, property, and payroll factors is the product of the denominator of each factor multiplied by the premiums or revenue-miles-factor ratio otherwise applicable under s. 220.151.

(3) Further provides for a single water's edge group return by all members. Provides for the determination of a member of the group to file is there is no parent, the parent is not a member of the group, or the parent does not have nexus in Florida. Provides for determination of a tax year if the members of the group have different tax years. Provides for methods of determining the income of a member that has a different tax year from the tax year of the group.

(4) Provides that a water's edge group return shall include a computational schedule that:

1) Combines the federal income of all members of the water's edge group
2) Shows all intercompany eliminations
3) Shows Florida additions and subtractions
4) Shows the calculation of the combined apportionment factors

Provides that a water's edge group shall also file a domestic disclosure spreadsheet that shall fully disclose:

1) The income reported to each state
2) The state tax liability
3) The method used for apportioning or allocating income to the various states

4) Other information required by the department by rule in order to determine the proper amount of tax due to each state and to identify the water's edge group

(5) Provides that the department may adopt rules and forms to administer this section. The Legislature intends to grant the department extensive authority to adopt rules and forms describing and defining principles for determining the existence of a water's edge business, definitions of common control, methods of reporting, and related forms, principles, and other definitions.

The bill makes a series of conforming changes to Chapter 220, particularly to conform to the repeal of section 220.131.

The bill repeals section 202.131.

Provides for the following transitional rules:
(1) For the first tax year beginning on or after January 1, 2016, a taxpayer that filed a Florida corporate income tax return in the preceding tax year and is a member of a water's edge group shall compute its income together with all members of its water's edge group and file a combined Florida corporate income tax return with all members of its water's edge group.
(2) An affiliated group of corporations that filed a Florida consolidated corporate income tax return pursuant to an election provided in s. 220.131, Florida Statutes, shall cease filing a Florida consolidated return for tax years beginning on or after January 1, 2016, and shall file a combined Florida corporate income tax return with all members of its water's edge group.
(3) An affiliated group of corporations that filed a Florida consolidated corporate income tax return pursuant to the election in s. 220.131(1), Florida Statutes (1985), which allowed the affiliated group to make an election within 90 days after December 20, 1984, or upon filing the taxpayer's first return after December 20, 1984, whichever was later, shall cease filing a Florida consolidated corporate income tax return using that method for tax years beginning on or after January 1, 2016, and shall file a combined Florida corporate income tax return with all members of its water's edge group.
(4) A taxpayer that is not a member of a water's edge group remains subject to chapter 220, Florida Statutes, and shall file a separate Florida corporate income tax return as previously required.
(5) For tax years beginning on or after January 1, 2016, a tax return for a member of a water's edge group must be a combined Florida corporate income tax return that includes tax information for all members of the water's edge group. The tax return must be filed by a member that has a nexus with Florida.

**Section 2: Description of Data and Sources**

| | |
|---|---|
| Data – Bureau of Economic Analysis | State Gross Domestic Product - Private Entities 2010-14 and 1975 to 2014 |
| US Census Bureau | State Corporate Income Tax Receipts 2010-14 and 1975 to 2014 |
| Federation of Tax Administrators | State Corporate Income Tax Rates 2010-14 |
| Book of the States | State Corporate Income Tax Rates 1975 to 2009 |

Sources and Reference Material -
"Combined Reporting Understanding the Revenue and Competition Effects of Combined Reporting" by Robert Cline and the Council on State Taxation, May 2008

"Tax Administrator's Study of Combined Reporting" by the Rhode Island Department of Revenue Division of Taxation, March 2014

"An Explanation of Combined Reporting – Maryland Business Tax Reform Commission"

"A Majority of States have Now Adopted a Key Corporate Tax Reform – "Combined Reporting"" by Michael Mazerov, Center for Budget and Policy Priorities, Revised April 3, 2009

"Combined Reporting of State Income Taxes: A Primer" by the Institute on Taxation and Economic Policy, August 2011

"State Corporate Tax Shelters and the Need for "Combined Reporting"" by Michael Mazerov, Center for Budget and Policy Priorities, October 26, 2007
"Combined Reporting with Corporate Income Tax – Issues for State Legislatures" by William F. Fox and LeAnn Luna, Center for Business and Economic Research, University of Tennessee, Knoxville, November 2010

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Corporate Income Tax
**Issue**: Mandatory Combined Reporting
**Bill Number(s)**: HB 1221 (2015)

"Proposed Model Statute for Combined Reporting, as amended July 29, 2011" – Multistate Tax Commission

Presentation – "Combined Reporting Developments" by Prentiss Willson and Madison Barnett, Tax Executives Institute, June 3 2014

Presentation – "Mandatory Combined Reporting for State Income taxes Seminar" by Robert Rosato, Mike Shaikh, Jeffery Reed, and Robert Rorcelli, May 22, 2013

**Section 3: Methodology (Include Assumptions and Attach Details)**

From the literature review, identified issues that are addressed or created under a combined reporting structure. Made a determination of whether those issues were likely to generate additional revenue, reduce current revenue, leave revenue unchanged, or be indeterminate as to direction.

Used data obtained for Gross State Product – Private Entities and Corporate Income Tax Receipts for all fifty states for 2011-14. Calculated Corporate Tax Base by dividing receipts by the tax rate for each state. Computed percentage of State Gross Domestic Product that is the taxable Corporate Income Tax Base. From the literature identified each state as a combined reporting state, an add back state, or a separate entity reporting state (with no addback). Grouped like states in terms of whether they were separate entity reporting state without add back provisions, a non-combined reporting state (both add back and no add back), and combined reporting state and calculated both a simple average and a weighted average percentage of State Gross Domestic Product that was taxable corporate profits for each year for each group. The results for each group were averaged over five years and over four years, eliminating 2010 in the latter average. Calculated a difference from the average of the combined reporting states from non-combined reporting states and from separate entity reporting states without an addback. The percentage difference represents the additional State Gross Domestic Product on average that was taxable corporate profits in a combined reporting state. The resulting percentage was multiplied by Florida's Gross Domestic Product for 2014 to estimate the amount of additional receipts that would have occurred in Florida if it had been a combined reporting state in 2014. Calculated the percent increase those additional CIT receipts represented for 2014. Applied that percentage forward to the REC forecast for Net CIT receipts for the period 2016-17 through 2020-21. For the high used the five year simple average difference from separate entities without add-back provisions. For the low used the four year weighted average difference from all non-combined reporting states. For the middle used the average of the percentages used for the high and the low.

Also calculated the CIT base for each year by state for the period 1975 to 2014. Calculated the percent that the CIT base represents of the State Gross Domestic Product for each state for each year from 1975 to 2014. Identified those states that had shifted to combined reporting in that period. The states were as follows:
Illinois - 1993
Maine – 1986
Massachusetts – 2009
Minnesota – 1981
New Hampshire – 1986
Vermont – 2006
Wisconsin – 2009

The percent of the state Gross Domestic Product that the CIT base represents was measured for the five year period prior to and after the adoption of combined reporting in each state. T

For the nonrecurring, all impacts are zero for 2016-17 as April 2018 will be when the first impact occurs. For the low, it is assumed that entities are able to reconfigure income within the group to result in the entity that generated a NOL to fully offset any gain that otherwise would occur for all years in the forecast period. For the middle estimate it is assumed that the entities are able to offset gains in the following pattern – 50% in 2017-18, 30% in 2018-19, 10% in 2019-20, and 0% in 2020-21. Due to no revision to the estimated payment requirement, the first year consists of a full year plus two estimated payments - the formula with respect to the recurring is [(2017-18 recurring*50%) + ((2017-18 recurring*50%)/2)]. The high estimate assumes there is no ability to utilize accumulated NOL's. Due to no revision of the estimated payment

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requirement, the first year (2017-18) impact is the full recurring amount plus two estimated payments (equal to 50% of the recurring amount).

**Section 4: Proposed Fiscal Impact**

| | High | | Middle | | Low | |
|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | $0 | $642.7 M | $0 | $466.8 M | $0 | $290.9 M |
| 2017-18 | $933.1 M | $622.1 M | $338.9 M | $451.9 M | $0 | $281.6 M |
| 2018-19 | $597.9 M | $597.9 M | $304.0 M | $434.3 M | $0 | $270.7 M |
| 2019-20 | $590.0 M | $590.0 M | $385.7 M | $428.5 M | $0 | $267.1 M |
| 2020-21 | $591.7 M | $591.7 M | $429.8 M | $429.8 M | $0 | $267.9 M |

**List of affected Trust Funds:**
General Revenue

**Section 5: Consensus Estimate (Adopted: 10/02/2015): The Conference adopted a positive indeterminate impact for the recurring in each year in the window, and a zero impact for the first year's cash, +/- indeterminate cash for years 2 through 4, and positive indeterminate in the last year.**

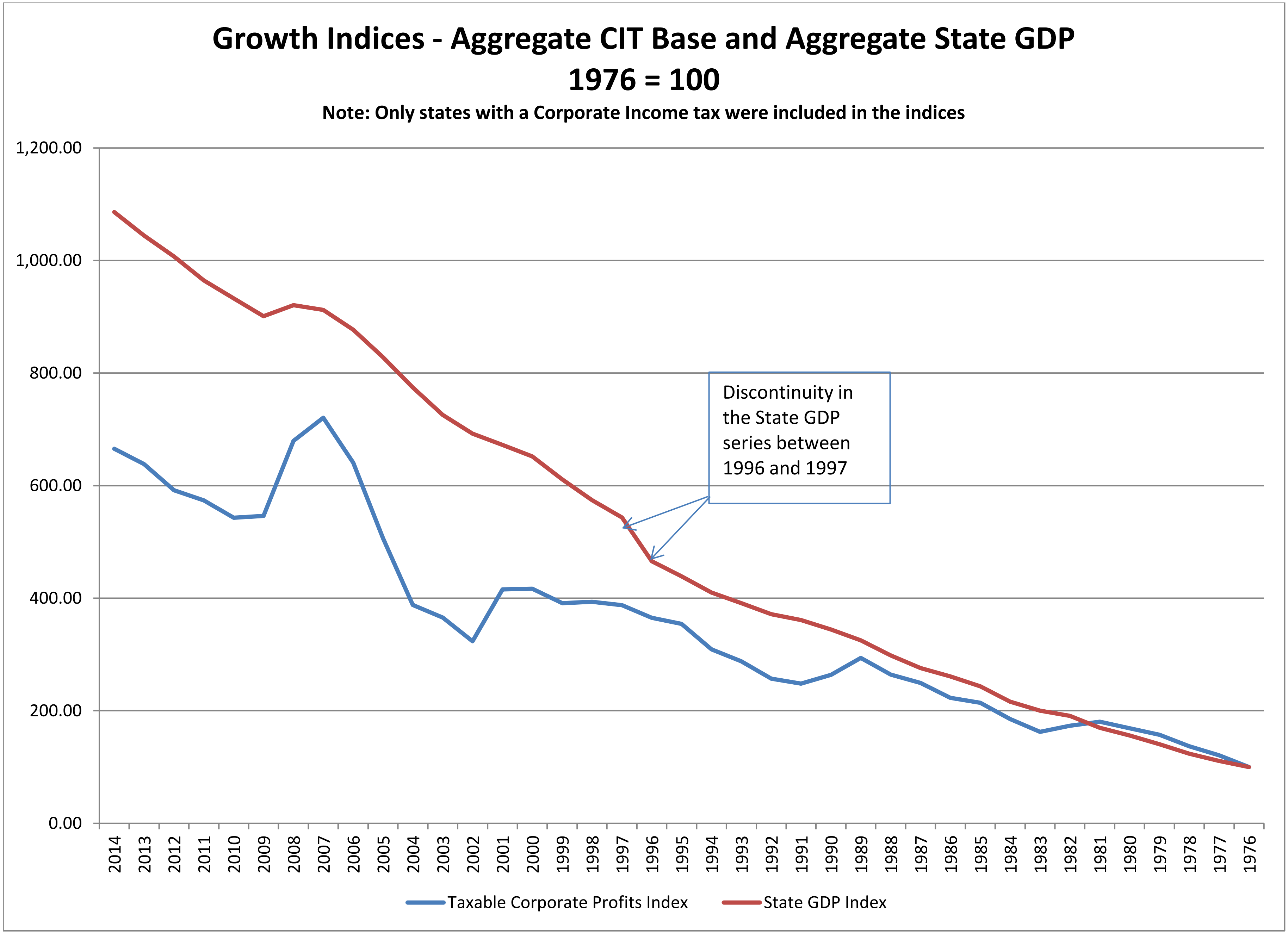
| | GR | | Trust | | Local/Other | | Total | |
|---|---|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | 0.0 | ** | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | ** |
| 2017-18 | +/- | ** | 0.0 | 0.0 | 0.0 | 0.0 | +/- | ** |
| 2018-19 | +/- | ** | 0.0 | 0.0 | 0.0 | 0.0 | +/- | ** |
| 2019-20 | +/- | ** | 0.0 | 0.0 | 0.0 | 0.0 | +/- | ** |
| 2020-21 | ** | ** | 0.0 | 0.0 | 0.0 | 0.0 | ** | ** |

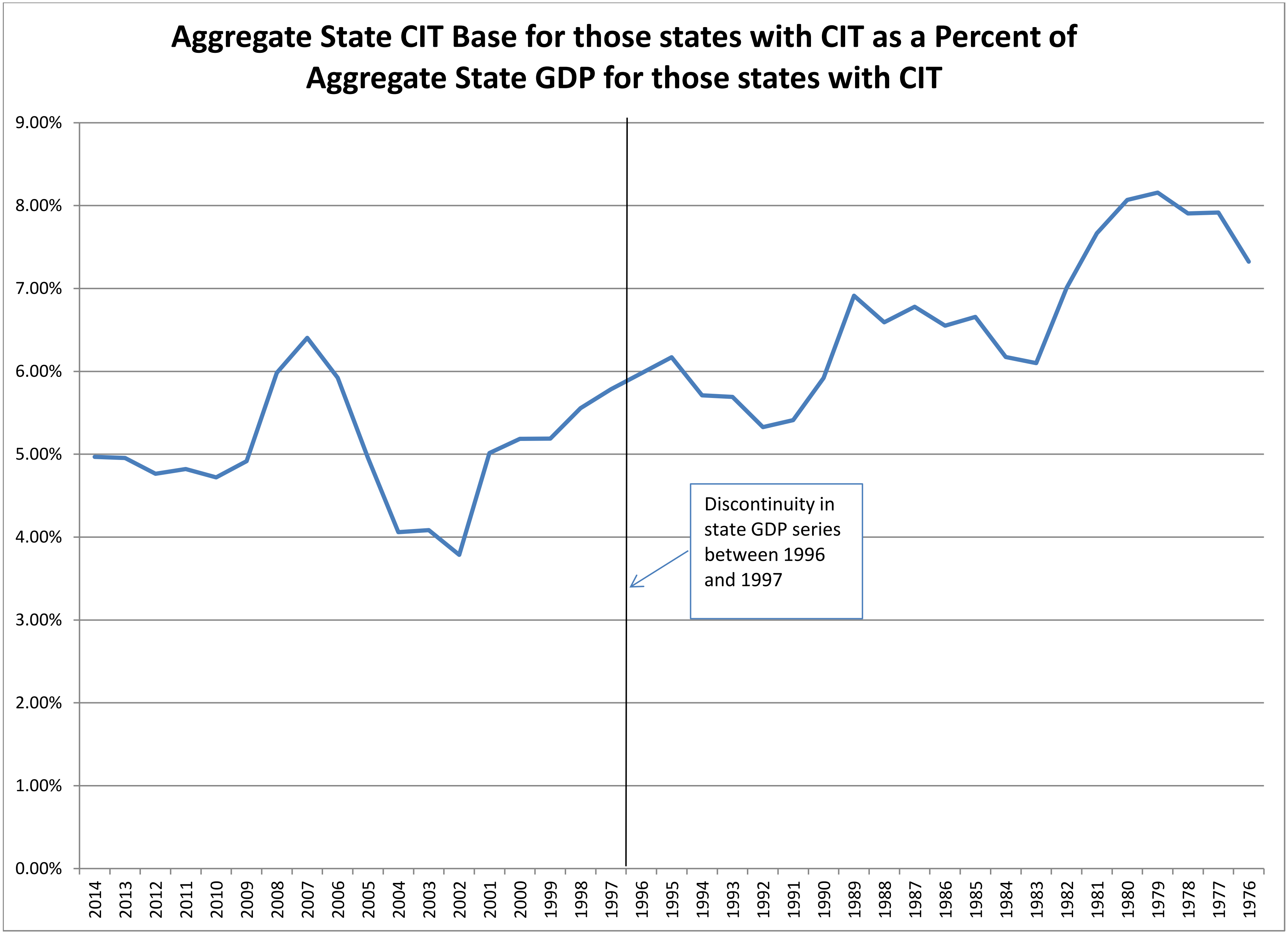
| | A | B | C | D | E | F | G | H | I | J |
|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | | | | | | | | | |
| 2 | | | | | | | 2010-2014 | 211-2014 | | |
| 3 | Results - | 2010 | 2011 | 2012 | 2013 | 2014 | 5 year Avg | 4 year Avg | Difference from Combined - 5 years | Difference from Combined - 4 years |
| 4 | CIT Base as a percent of GSP - Simple Average - Combined States | 5.34% | 5.51% | 5.59% | 6.02% | 5.63% | 5.62% | 5.69% | | |
| 5 | CIT Base as a percent of GSP - Simple Average -Non Combined States | 3.87% | 4.67% | 4.80% | 5.19% | 4.90% | 4.69% | 4.89% | 0.93% | 0.79% |
| 6 | CIT Base as a percent of GSP - Simple Average Separate Entity States Without Add-back | 3.01% | 4.21% | 4.50% | 4.85% | 4.29% | 4.17% | 4.46% | 1.44% | 1.22% |
| 7 | | | | | | | | | | |
| 8 | CIT Base as a percent of GSP - Weighted Average - Combined States | 6.28% | 5.15% | 5.09% | 5.31% | 5.30% | 5.43% | 5.21% | | |
| 9 | CIT Base as a percent of GSP - Weighted Average -Non Combined States | 4.00% | 4.40% | 4.47% | 4.73% | 4.63% | 4.45% | 4.56% | 0.98% | 0.65% |
| 10 | CIT Base as a percent of GSP - Weighted Average Separate Entity States Without Add-back | 3.50% | 4.24% | 4.46% | 4.71% | 4.38% | 4.26% | 4.44% | 1.17% | 0.77% |
| 11 | | | | | | | | | | |
| 12 | | | | | | | | | | |
| 13 | Florida 2014 GSP - Private Entities | | $735,785,000,000 | | | | | | | |
| 14 | | | | | | | | | | |
| 15 | | Percentage Difference | Additional Corporate Base | Tax Impact @ 5.5% | % increase to 2014 CIT | | | | | |
| 16 | Five year simple average difference from separate Entities without Add Back | 1.44% | $10,629,904,518 | $584,644,748 | 29.37% | High Recurring | | | | |
| 17 | Four year simple average difference from separate Entities without Add Back | 1.22% | $8,997,252,547 | $494,848,890 | 24.86% | | | | | |
| 18 | Five year simple average difference from Non-Combined | 0.93% | $6,836,585,436 | $376,012,199 | 18.89% | | | | | |
| 19 | Five year simple average difference from Non-Combined | 0.79% | $5,848,125,397 | $321,646,897 | 16.16% | | | | | |
| 20 | Five year weighted average difference from separate Entities without Add Back | 1.17% | $8,614,166,744 | $473,779,171 | 23.80% | | | | | |
| 21 | Four year weighted average difference from separate Entities without Add Back | 0.77% | $5,639,157,192 | $310,153,646 | 15.58% | | | | | |
| 22 | Five year weighted average difference from Non-Combined | 0.98% | $7,215,710,478 | $396,864,076 | 19.94% | | | | | |
| 23 | Four year weighted average difference from Non-Combined | 0.65% | $4,812,125,382 | $264,666,896 | 13.30% | Low Recurring | | | | |
| 24 | | | | | | | | | | |
| 25 | | | Avg - High and Low | | 21.33% | Middle Recurring | | | | |
| 26 | | | | | | | | | | |
| 27 | | | | | | | | | | |
| 28 | | | | Recurring | | | | | | |
| 29 | | CIT Receipts | High | Middle | Low | | | | | |
| 30 | 2014-15 | $1,990,600,000 | | | | | | | | |
| 31 | 2015-16 | $2,124,800,000 | $624,059,661 | $453,284,784 | $282,509,907 | | | | | |
| 32 | 2016-17 | $2,188,200,000 | $642,680,417 | $466,809,942 | $290,939,466 | | | | | |
| 33 | 2017-18 | $2,118,100,000 | $622,091,853 | $451,855,469 | $281,619,086 | | | | | |
| 34 | 2018-19 | $2,035,800,000 | $597,920,114 | $434,298,364 | $270,676,614 | | | | | |
| 35 | 2019-20 | $2,008,800,000 | $589,990,139 | $428,538,439 | $267,086,738 | | | | | |
| 36 | 2020-21 | $2,014,700,000 | $591,722,985 | $429,797,089 | $267,871,192 | | | | | |
| 37 | | | | | | | | | | |
| 38 | | | | | | | | | | |
| 39 | Cash - Explanation | | | | | | | | | |
| 40 | All impacts are zero for the first year as April 2018 will be first month of impact | | | | | | | | | |
| 41 | Low - Entities are able to reconfigure income to result in the entity that had accumulated Net Operating Losses (NOLs) being able to utilize those losses in a manner that offsets all gains for the forecast period | | | | | | | | | |
| 42 | Middle - Entities are able to utilize NOL's to offset gains in the following pattern - 50% year 2, 30% year 3, 10% year 4, zero years 5. Due to Estimated Payment requirement remaining unchanged, the first year(2017-18) impact is 50% higher than recurring. | | | | | | | | | |
| 43 | High - there is no ability for combined groups to utilize NOL's. Due to Estimated Payment requirement remaining unchanged, the first year impact is 50% higher than recurring. | | | | | | | | | |
| 44 | | | Cash | | | | | | | |
| 45 | | High | Middle | Low | | | | | | |
| 46 | 2016-17 | $0 | $0 | $0 | | | | | | |
| 47 | 2017-18 | $933,137,779 | $338,891,602 | $0 | | | | | | |
| 48 | 2018-19 | $597,920,114 | $304,008,855 | $0 | | | | | | |
| 49 | 2019-20 | $589,990,139 | $385,684,595 | $0 | | | | | | |
| 50 | 2020-21 | $591,722,985 | $429,797,089 | $0 | | | | | | |

| Issue: | | Effect of HB 1221 | Likely Revenue Effect |
|---|---|---|---|
| Determination of Taxable Income - Income Shifting | | | |
| | Transactions between related parties<br>Intangible holding companies<br>Transfer Pricing<br>Management Services fees<br>Loans and Interest Expense | Requires income to be determined as the sum of the income of all entities in the water's edge group. | Positive |
| Apportionment of Income | | | |
| | Sourcing of Services<br>Transactions between related parties<br>Intangible Holding Companies<br>Sourcing of Management Services<br>Dividends between related companies | Provides that intercompany sales transactions between members of the group are not included in the numerator or denominator of the sales factor regardless of whether indicia of a sale exists . The term sale includes but is not limited to loans, payments for the use of intangibles, dividends, and management fees. | Positive |
| | Sales of intangibles to unrelated parties | Only the net proceeds of sales of intangibles to entities not in the group are included in the numerator and denominator of the sales factor. Sales of intangibles include, but are not limited to sales of accounts receivable, notes, bonds, and stock. | Positive |
| Net Operating Losses (NOLs) | | | |
| | Use of carryover NOLs generated by entity in Florida used by broader group | Limits the use of carryover NOLs to allow its deduction only against the member of the water's edge group that generated the carryover | |
| | Use of NOLs by the member that generated the carryover | | Likely negative in the early periods.<br>Explanation - As the bill eliminates the ability to utilize income shifting to reduce income, entities with accumulated NOLs that where generated due to income shifting will likely cease in shifting and would then be able to utilize the accumulated NOL against income generated by that entity. |

| Other effects of Combined Reporting | | Explanation of issue | |
|---|---|---|---|
| | Differing profitability across entities | Businesses may have differing profitability among related entities for competitive, cost, or market reasons. Tax Planning is not the only cause of differing profitability among related entities. Combined reporting may pull in more profitable, less profitable, or equally profitable entities. | Indeterminate without a better understanding of the structure of the combined groups |
| | Effect of water's edge group Apportionment | The result of a combined group may result in diluting the apportionment factor for Florida. Differences in property, payroll, and sales may occur in a combined group compared to a separate entity that are not due to tax planning. It is possible that the resulting combined group may allocate more income, less income, or the same amount of income as allocated under current law. | Indeterminate without a better understanding of the structure of the combined groups |

| | A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | Year Combined reporting effective | Five year average prior to adoption | Five Year Average After Adoption | Difference | | | | | | | | | | | | |
| 2 | | | | | | | 1998 | 1997 | 1996 | 1995 | 1994 | 1993 | 1992 | 1991 | 1990 | 1989 | 1988 |
| 3 | Illinois | 1993 | 5.67% | 6.23% | 0.56% | | 6.72% | 6.48% | 6.41% | 6.17% | 5.36% | 5.23% | 4.84% | 4.97% | 5.12% | 6.85% | 6.56% |
| 4 | | | | | | | | | | | | | | | | | |
| 5 | | | | | | | 1991 | 1990 | 1989 | 1988 | 1987 | 1986 | 1985 | 1984 | 1983 | 1982 | 1981 |
| 6 | Maine | 1986 | 4.88% | 4.61% | -0.27% | | 4.34% | 3.29% | 5.58% | 5.18% | 4.67% | 3.92% | 4.40% | 4.61% | 4.29% | 5.12% | 5.96% |
| 7 | | | | | | | | | | | | | | | | | |
| 8 | | | | | | | 2014 | 2013 | 2012 | 2011 | 2010 | 2009 | 2008 | 2007 | 2006 | 2005 | 2004 |
| 9 | Massachusetts | 2009 | 5.75% | 6.35% | 0.60% | | 6.71% | 6.02% | 6.59% | 6.46% | 5.97% | 5.62% | 6.76% | 6.62% | 6.13% | 4.58% | 4.67% |
| 10 | | | | | | | | | | | | | | | | | |
| 11 | | | | | | | 1986 | 1985 | 1984 | 1983 | 1982 | 1981 | 1980 | 1979 | 1978 | 1977 | 1976 |
| 12 | Minnesota | 1981 | 6.59% | 4.43% | -2.16% | | 4.32% | 4.71% | 3.98% | 3.84% | 5.31% | 5.59% | 7.09% | 7.08% | 6.57% | 6.57% | 5.64% |
| 13 | | | | | | | | | | | | | | | | | |
| 14 | | | | | | | 1991 | 1990 | 1989 | 1988 | 1987 | 1986 | 1985 | 1984 | 1983 | 1982 | 1981 |
| 15 | New Hampshire | 1986 | 7.56% | 8.42% | 0.86% | | 6.89% | 7.44% | 8.87% | 8.75% | 10.16% | 7.22% | 6.67% | 7.51% | 7.24% | 8.68% | 7.71% |
| 16 | | | | | | | | | | | | | | | | | |
| 17 | | | | | | | 2011 | 2010 | 2009 | 2008 | 2007 | 2006 | 2005 | 2004 | 2003 | 2002 | 2001 |
| 18 | Vermont | 2006 | 2.82% | 4.71% | 1.89% | | 5.27% | 4.45% | 4.76% | 4.63% | 4.43% | 4.26% | 3.51% | 3.29% | 2.33% | 2.20% | 2.75% |
| 19 | | | | | | | | | | | | | | | | | |
| 20 | | | | | | | 2014 | 2013 | 2012 | 2011 | 2010 | 2009 | 2008 | 2007 | 2006 | 2005 | 2004 |
| 21 | Wisconsin | 2009 | 4.94% | 4.81% | -0.14% | | 4.82% | 4.82% | 4.92% | 4.64% | 4.84% | 3.86% | 5.04% | 5.40% | 4.87% | 4.92% | 4.49% |
| 22 | | | | | | | | | | | | | | | | | |
| 23 | | | | | | | | | | | | | | | | | |
| 24 | | | | | | | | | | | | | | | | | |
| 25 | Percentages are CIT Base / State Gross Domestic Product | | | | | | | | | | | | | | | | |


Growth Indices - Aggregate CIT Base and Aggregate State GDP
1976 = 100
Note: Only states with a Corporate Income tax were included in the indices
1,200.00
1,000.00
800.00
600.00
400.00
200.00
0.00
2014 2013 2012 2011 2010 2009 2008 2007 2006 2005 2004 2003 2002 2001 2000 1999 1998 1997 1996 1995 1994 1993 1992 1991 1990 1989 1988 1987 1986 1985 1984 1983 1982 1981 1980 1979 1978 1977 1976
Discontinuity in the State GDP series between 1996 and 1997
Taxable Corporate Profits Index
State GDP Index



Aggregate State CIT Base for those states with CIT as a Percent of Aggregate State GDP for those states with CIT
9.00%
8.00%
7.00%
6.00%
5.00%
4.00%
3.00%
2.00%
1.00%
0.00%
Discontinuity in state GDP series between 1996 and 1997
2014
2013
2012
2011
2010
2009
2008
2007
2006
2005
2004
2003
2002
2001
2000
1999
1998
1997
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1977
1976

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Sales and Use Tax
**Issue**: Reduce state tax rate from 6% to 5% for commercial rentals
**Bill Number(s)**: SB 116

- [x] **Entire Bill**
- [ ] **Partial Bill**:

**Sponsor(s)**: Senator Hukill
**Month/Year Impact Begins**: February 2017
**Date of Analysis**: September 25, 2015

**Section 1: Narrative**

a. **Current Law**: Section 212.031 Provides for a tax levied in an amount equal to 6% of and on the total rent or license fee charged for the exercise of the taxable privilege of engaging in the business of renting, leasing, letting, or granting a license for the use of any real property unless the property is one of 13 specifically identified types of property.

b. **Proposed Change**: Reduces the tax levied on the taxable privilege of engaging in the business of renting, leasing, letting, or granting a license for the use of any real property from 6% to 5%.

**Section 2: Description of Data and Sources**

DOR Sales Tape for 2011, 2012, 2013 and 2014 Calendar Years
DR-15 Line 3.C. (Taxable Commercial Rent) or 4.C. (Tax on Commercial Rent).
DR-15EZ line 3 (Total Taxable Sales) and line 4 (Total Tax Collected)

Instructions for DR-15EZ read in part: "If you only report tax collected for the lease or rental of commercial property, you may file a DR-15EZ return."

**Section 3: Methodology (Include Assumptions and Attach Details)**

For 2013 and 2014, those dealers who either were identified as Kind Code 82 – Lease or Rental of Real Property or as having positive amounts inform DR15 line 3.C. (Taxable Commercial Rent) or 4.C. (Tax on Commercial Rent). Those dealers that indicated Kind Code 82 were further broken into 5 groups:
KindCode 82 - Form DR15 With line 4C > 0
KindCode 82 - Form DR15 with line 4C = 0 multiplied by 50% as directed by REC
Kindcode 82 - Form DR15EZ
Kind Code 82 - No form ID with line 4C > 0
Kind Code 82 - No form ID with line 4C = 0

For 2014 the data file contained form information for all sales tax dealers. As a result the data was broken into three groups:
KindCode 82 - Form DR15 With line 4C > 0
KindCode 82 - Form DR15 with line 4C = 0 multiplied by 50% as directed by REC
Kindcode 82 - Form DR15EZ

Additionally, the amount of taxable commercial rent reported on Form DR-15 line 3c for all sales tax dealers not in kind code 82 was identified for 2013 and 2014.

For those dealers that were Kind Code 82 and filed using form DR-15, taxable sales amounts for commercial rent were used to calculate the state 6% sales tax on commercial rent where the dealer had reported some amount on line 3.C. For those dealers in Kindcode 82 that either filed form DR-15EZ or filed DR-15 but did not report any tax on line 4.C., line 3 (Taxable Sales/Purchases) or line 3.A. (Taxable Sales) multiplied by the state 6% rate to calculate the state 6% sales tax collected on commercial rent.
For those dealers that were not in Kindcode 82 the amount reported on line 3.C. was multiplied by the state 6% rate to calculate the sales tax on commercial rent.

For 2012 and 2011, the dataset used for analysis did not provide data on type of form used by the dealer. Those dealers that either were identified as Kind Code 82 – Lease or Rental of Real Property or as having positive amounts inform DR15 line 3.C. were identified. This se was broken into three groups:
KindCode 82 - Amount on Commercial rental line
Kindcode 82 - No amount on Commercial rental line
Dealers with Commercial rental tax not in Kindcode 82

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Sales and Use Tax
**Issue**: Reduce state tax rate from 6% to 5% for commercial rentals
**Bill Number(s)**: SB 116

For those identified as "KindCode 82 - Amount on Commercial rental line" or "Dealers with Commercial rental tax not in Kindcode 82", the reported taxable sales of Commercial Rent was multiplied by 6% to get state sales tax on commercial rent. For those identified as "Kindcode 82 - No amount on Commercial rental line", the amount in the Taxable Sales Line was multiplied by 6% to calculate the state sales tax on commercial rent.

For the middle estimate, Nonresidential Real Property Growth rates from the March 4, 2015 Ad Valorem Assessments Estimating Conference were used to estimate 6% sales tax for future
The calendar year values are converted to state fiscal year. The tax that would be collected at 5% is calculated and compared to the estimate for the tax at 6% to determine recurring impact. The first year cash is 5/12th of the recurring impact due to the January 1, 2017 effective date.

**Section 4: Proposed Fiscal Impact**

| | High | | Middle | | Low | |
|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | | | ($119.6 M) | ($287.0 M) | | |
| 2017-18 | | | ($299.7 M) | ($299.7 M) | | |
| 2018-19 | | | ($311.5 M) | ($311.5 M) | | |
| 2019-20 | | | ($322.8 M) | ($322.8 M) | | |
| 2020-21 | | | ($334.0 M) | ($334.0 M) | | |

**List of affected Trust Funds:** Sales and Use Tax Group

**Section 5: Consensus Estimate (Adopted: 10/02/2015): The Conference adopted the proposed estimate.**

| | GR | | Trust | | Revenue Sharing | | Local Half Cent | |
|---|---|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | (105.9) | (254.1) | (Insignificant) | (Insignificant) | (3.5) | (8.5) | (10.2) | (24.4) |
| 2017-18 | (265.4) | (265.4) | (Insignificant) | (Insignificant) | (8.8) | (8.8) | (25.5) | (25.5) |
| 2018-19 | (275.8) | (275.8) | (Insignificant) | (Insignificant) | (9.2) | (9.2) | (26.5) | (26.5) |
| 2019-20 | (285.8) | (285.8) | (Insignificant) | (Insignificant) | (9.5) | (9.5) | (27.4) | (27.4) |
| 2020-21 | (295.8) | (295.8) | (Insignificant) | (Insignificant) | (9.8) | (9.8) | (28.4) | (28.4) |

| | Local Option | | Total Local | | Total | |
|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | 0.0 | 0.0 | (13.7) | (32.9) | (119.6) | (287.0) |
| 2017-18 | 0.0 | 0.0 | (34.3) | (34.3) | (299.7) | (299.7) |
| 2018-19 | 0.0 | 0.0 | (35.7) | (35.7) | (311.5) | (311.5) |
| 2019-20 | 0.0 | 0.0 | (36.9) | (36.9) | (322.7) | (322.7) |
| 2020-21 | 0.0 | 0.0 | (38.2) | (38.2) | (334.0) | (334.0) |

| | A | B | C | D | E | F |
|---|---|---|---|---|---|---|
| 1 | | | | | | |
| 2 | Note - for Calendar year 2013 and 2014 data files had variable denoting form used by dealer. This data was not a part of the 2012 or 2011 data sets. | | | | | |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | Calendar Year 2014 | Sales/Services Taxable Sales (Line 3A DR-15 or Line 3 DR-15EZ) | Taxable Sales Reported on line 3C- Commercial Rentals | Sales Tax at 6% rate applied to Taxable Sales (Line 3A DR-15 or Line 3 DR-15EZ) | Sales Tax at 6% rate applied to line 3C- Commercial Rentals | Number of Accounts |
| 6 | KindCode 82 - Form DR15 With line 4C > 0 | $537,440,074 | $13,075,756,344 | | $784,545,381 | 42,923 |
| 7 | KindCode 82 - Form DR15 with line 4C = 0 | $369,105,345 | | $22,146,321 | | 6,158 |
| 8 | Kindcode 82 - Form DR15EZ | $9,969,543,929 | | $598,172,636 | | 90,846 |
| 9 | Kind Code 82 - No form ID with line 4C > 0 | $0 | $0 | 0 | $0 | 0 |
| 10 | Kind Code 82 - No form ID with line 4C = 0 | $0 | | $0 | | 0 |
| 11 | Dealers with Commercial rental tax not in kindcode 82 | $23,876,968,994 | $1,147,816,198 | | $68,868,972 | 7,699 |
| 12 | | | | | | |
| 13 | Statewide 2013 | | | $620,318,956 | $853,414,352 | 147,626 |
| 14 | | | | | | |
| 15 | | | | | | |
| 16 | Calendar Year 2013 | Sales/Services Taxable Sales (Line 3A DR-15 or Line 3 DR-15EZ) | Taxable Sales Reported on line 3C- Commercial Rentals | Sales Tax at 6% rate applied to Taxable Sales (Line 3A DR-15 or Line 3 DR-15EZ) | Sales Tax at 6% rate applied to line 3C- Commercial Rentals | Number of Accounts |
| 17 | KindCode 82 - Form DR15 With line 4C > 0 | $668,576,684 | $9,187,064,349 | | $551,223,861 | 31,248 |
| 18 | KindCode 82 - Form DR15 with line 4C = 0 | $411,980,060 | | $24,718,804 | | 2,954 |
| 19 | Kindcode 82 - Form DR15EZ | $10,219,270,436 | | $613,156,226 | | 90,719 |
| 20 | Kind Code 82 - No form ID with line 4C > 0 | $120,898,245 | $2,626,883,968 | | $157,613,038 | 10,001 |
| 21 | Kind Code 82 - No form ID with line 4C = 0 | $84,173,669 | | $5,050,420 | | 2,435 |
| 22 | Dealers with Commercial rental tax not in kindcode 82 | $20,940,595,250 | $1,166,438,863 | | $69,986,332 | 7,699 |
| 23 | | | | | | |
| 24 | Statewide 2013 | | | $642,925,450 | $778,823,231 | 145,056 |
| 25 | | | | | | |
| 26 | | | | | | |
| 27 | Calendar Year 2012 | Sales/Services Taxable Sales (Line 3A) | Taxable Sales Reported on line 3C- Commercial Rentals | Sales Tax at 6% rate applied to Taxable Sales (Line 3A DR-15 or Line 3 DR-15EZ) | Sales Tax at 6% rate applied to line 3C- Commercial Rentals | Number of Accounts |
| 28 | KindCode 82 - Amount on Commercial rental line | $43,504,345 | $10,721,712,227 | | $643,302,734 | 33,311 |
| 29 | Kindcode 82 - No amount on Commercial rental line | $10,844,225,989 | | $650,653,559 | | 100,168 |
| 30 | Dealers with Commercial rental tax not in kindcode 82 | $18,828,894,116 | $856,395,403 | | $51,383,724 | 6,274 |
| 31 | | | | | | |
| 32 | Statewide 2012 | | | $650,653,559 | $694,686,458 | 139,753 |
| 33 | | | | | | |
| 34 | Calendar Year 2011 | Sales/Services Taxable Sales (Line 3A) | Taxable Sales Reported on line 3C- Commercial Rentals | Sales Tax at 6% rate applied to Taxable Sales (Line 3A DR-15 or Line 3 DR-15EZ) | Sales Tax at 6% rate applied to line 3C- Commercial Rentals | Number of Accounts |
| 35 | KindCode 82 - Amount on Commercial rental line | $78,813,932 | $10,578,070,012 | $634,684,201 | | 34,036 |
| 36 | Kindcode 82 - No amount on Commercial rental line | $10,569,099,439 | | | $634,145,966 | 97,876 |
| 37 | Dealers with Commercial rental tax not in kindcode 82 | $18,867,994,443 | $997,194,450 | $59,831,667 | | 6,612 |
| 38 | | | | | | |
| 39 | Statewide 2011 | | | $694,515,868 | $634,145,966 | 138,524 |

| | A | B | C | D | E | F |
|---|---|---|---|---|---|---|
| 40 | | | | | | |
| 41 | Total Estimated State Sales Tax - Commercial Rent | | Sales Tax (Years 2015-2021 grown by Commercial Property Growth Rate) | Business Investment Growth Rate (GR-REC 8/15) | Commercial Property Growth Rate (Ad Valorem - REC 07/15) | |
| 42 | Actuals (E17+E20+E22+D21+D19+(D18/2)) | 2013 | $1,409,389,279 | | | |
| 43 | Actuals (D7/2+D8+E6+E11) | 2014 | $1,462,660,149 | | | |
| 44 | Estimates grown by Commercial Property Growth Rates | *2015* | *$1,588,156,389* | *7.70* | *8.58* | |
| 45 | | *2016* | *$1,682,175,248* | *5.20* | *5.92* | |
| 46 | | *2017* | *$1,761,405,702* | *5.40* | *4.71* | |
| 47 | | *2018* | *$1,834,504,038* | *7.40* | *4.15* | |
| 48 | | *2019* | *$1,903,114,489* | *4.70* | *3.74* | |
| 49 | | *2020* | *$1,969,723,497* | *4.30* | *3.50* | |
| 50 | | *2021* | *$2,038,663,819* | *3.80* | *3.50* | |
| 51 | | | | | | |
| 52 | | | Sales Tax Grown by Commercial Property Growth Rate | | | |
| 53 | Estimated Sales tax at new rates - 5.0% | 2016 | $1,401,812,706 | | | |
| 54 | | 2017 | $1,467,838,085 | | | |
| 55 | | 2018 | $1,528,753,365 | | | |
| 56 | | 2019 | $1,585,928,741 | | | |
| 57 | | 2020 | $1,641,436,247 | | | |
| 58 | | 2021 | $1,698,886,516 | | | |
| 59 | | | | | | |
| 60 | | | | | | |
| 61 | Calendar Year to Fiscal Year conversion | | | | | |
| 62 | | Sales Tax @ 6% | Sales Tax Grown by Commercial Property Growth Rate | | | |
| 63 | | 2016-17 | $1,721,790,475 | | | |
| 64 | | 2017-18 | $1,797,954,870 | | | |
| 65 | | 2018-19 | $1,868,809,264 | | | |
| 66 | | 2019-20 | $1,936,418,993 | | | |
| 67 | | 2020-21 | $2,004,193,658 | | | |
| 68 | | | | | | |
| 69 | Annualized | Sales Tax @ New rates | Sales Tax Grown by Commercial Property Growth Rate | | | |
| 70 | | 2016-17 | $1,434,825,396 | | | |
| 71 | | 2017-18 | $1,498,295,725 | | | |
| 72 | | 2018-19 | $1,557,341,053 | | | |
| 73 | | 2019-20 | $1,613,682,494 | | | |
| 74 | | 2020-21 | $1,670,161,381 | | | |
| 75 | | | | | | |

| | A | B | C | D | E | F |
|---|---|---|---|---|---|---|
| 76 | | | | | | |
| 77 | | | Middle Cash | Middle Recurring | | |
| 78 | | | Sales Tax Grown by Commercial Property Growth Rate | Sales Tax Grown by Commercial Property Growth Rate | | |
| 79 | | 2016-17 | -$119,568,783 | -$286,965,079 | | |
| 80 | | 2017-18 | -$299,659,145 | -$299,659,145 | | |
| 81 | | 2018-19 | -$311,468,211 | -$311,468,211 | | |
| 82 | | 2019-20 | -$322,736,499 | -$322,736,499 | | |
| 83 | | 2020-21 | -$334,032,276 | -$334,032,276 | | |
| 84 | | | | | | |
| 85 | NAICS code for those dealers within Kind Code 82 (2014) | | | | | |
| 86 | North American Industrial Classification Code | Description | | | Frequency | Percent |
| 87 | 531120 | Lessors of Nonresidential Buildings (except Miniwarehouses) | | | 136,670 | 97.7 |
| 88 | 531190 | Lessors of Other Real Estate Property | | | 1,506 | 1.1 |
| 89 | 531210 | Offices of Real estate Agents and Brokers | | | 366 | .3 |
| 90 | 531312 | Nonresidential Property Managers | | | 606 | .4 |
| 91 | 531320 | Offices of Real Estate Appraisers | | | 3 | .0 |
| 92 | 531390 | Other Activities Related to Real Estate | | | 485 | .3 |
| 93 | 561431 | Private Mail Centers | | | 103 | .1 |
| 94 | 561920 | Convention and Trade Show Organizers | | | 62 | .0 |
| 95 | 711310 | Promoters of Performing arts, Sports, and Similar Events with Facilities | | | 77 | .1 |
| 96 | 812220 | Cemeteries and Crematoriums | | | 3 | .0 |
| 97 | 813990 | Other Similar Organizations (except Business, Professional, Labor, and Political Organizations) | | | 46 | .0 |
| 98 | Total | | | | 139,927 | 100.0 |

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Sales and use tax
**Issue**: Exempt sales and use tax from transactions made by or to qualified veterans' organizations
**Bill Number(s)**: Proposed language

- [x] **Entire Bill**
- [ ] **Partial Bill**:

**Sponsor(s)**:
**Month/Year Impact Begins**: assuming July 1, 2016
**Date of Analysis**: 9/25/2015

**Section 1: Narrative**

a. **Current Law**: 212.08(7)(n) F.S. exempt sales and use tax for sales and leases to veterans' organizations such as Florida chapters of the Paralyzed Veterans of America, Catholic War Veterans of the U.S.A., Jewish War Veterans of the U.S.A., and the Disabled American Veterans, Department of the Florida, Inc, which hold current exemptions from federal income tax under s. 501©(4) or (19) of the Internal Revenue Code of 1986. The term "veterans' organizations' means nationally chartered or recognized veterans' organization.

b. **Proposed Change**:
The proposed language added the American Legion, Veterans of Foreign Wars of the United States to the list; and specified the Exemptions on the transactions involving sales or leases made by or to the veterans' organizations.

**Section 2: Description of Data and Sources**

2015 Florida Tax Handbook has $0.7m estimate for the sales or leases to the veterans' organizations for FY 2014-15.
2015 Florida Tax Handbook has $24.5m exemption for the sales or leases by or to religious orgs, 212.08(7)(m)1 F.S.
US Economic Survey
Florida Labor data 2012-2014 for NAICS code 813110 and 813410 (religious and civil & social organizations)
DOR 2014 sales tax return

**Section 3: Methodology (Include Assumptions and Attach Details)**

Assuming the constant growth rate of 1%
Assuming 11/12 for the first year

**Section 4: Proposed Fiscal Impact**

| | High | | Middle | | Low | |
|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | -5.2m | -5.7m | -3.5m | -3.8m | -1.7m | -1.9m |
| 2017-18 | -5.8m | -5.8m | -3.8m | -3.8m | -1.9m | -1.9m |
| 2018-19 | -5.8m | -5.8m | -3.9m | -3.9m | -1.9m | -1.9m |
| 2019-20 | -5.9m | -5.9m | -3.9m | -3.9m | -1.9m | -1.9m |
| 2020-21 | -6.0m | -6.0m | -4.0m | -4.0m | -1.9m | -1.9m |

**List of affected Trust Funds:**
SUT group

**Section 5: Consensus Estimate (Adopted: 10/02/2015): The Conference adopted a recurring impact of ($3.9m) with a ramp up of 20% growth in each cash year until FY 2020-21 cash equals the recurring of ($3.9m).**

| | GR | | Trust | | Revenue Sharing | | Local Half Cent | |
|---|---|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | (1.5) | (3.5) | (Insignificant) | (Insignificant) | (Insignificant) | (0.1) | (0.1) | (0.3) |
| 2017-18 | (1.9) | (3.5) | (Insignificant) | (Insignificant) | (0.1) | (0.1) | (0.2) | (0.3) |
| 2018-19 | (2.2) | (3.5) | (Insignificant) | (Insignificant) | (0.1) | (0.1) | (0.2) | (0.3) |
| 2019-20 | (2.7) | (3.5) | (Insignificant) | (Insignificant) | (0.1) | (0.1) | (0.3) | (0.3) |
| 2020-21 | (3.5) | (3.5) | (Insignificant) | (Insignificant) | (0.1) | (0.1) | (0.3) | (0.3) |

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Sales and use tax

**Issue**: Exempt sales and use tax from transactions made by or to qualified veterans' organizations

**Bill Number(s)**: Proposed language

| | Local Option | | Total Local | | Total | |
|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | (0.1) | (0.3) | (0.2) | (0.7) | (1.7) | (4.2) |
| 2017-18 | (0.2) | (0.3) | (0.5) | (0.7) | (2.4) | (4.2) |
| 2018-19 | (0.2) | (0.3) | (0.5) | (0.7) | (2.7) | (4.2) |
| 2019-20 | (0.3) | (0.3) | (0.7) | (0.7) | (3.4) | (4.2) |
| 2020-21 | (0.3) | (0.3) | (0.7) | (0.7) | (4.2) | (4.2) |

| | A | B | C | D | E | F | G |
|---|---|---|---|---|---|---|---|
| 1 | exempt sales and use tax from transactions involving sales or leases made by or to | | | | | | |
| 2 | qualified veterans' organizations | | | | | | |
| 3 | | | | | | | |
| 4 | 813110 | relig org. | year | # estab. | paid empl | annual payroll | avg payroll |
| 5 | | Florda | 2013 | 8,762 | 100,729 | 2,106,662,000 | 20,914 |
| 6 | | | 2012 | 8,694 | 100,591 | 2,059,205,000 | 20,471 |
| 7 | | | 2011 | 8,566 | 97,778 | 1,972,655,000 | 20,175 |
| 8 | | | 2010 | 8,584 | 97,659 | 1,952,084,000 | 19,989 |
| 9 | | | | | | | |
| 10 | 813410 | civil and social organizations | | | | | |
| 11 | | Florda | 2013 | 1,139 | 9,220 | 176,740,000 | 19,169 |
| 12 | | | 2012 | 1,132 | 9,189 | 183,413,000 | 19,960 |
| 13 | | | 2011 | 1,200 | 10,235 | 176,809,000 | 17,275 |
| 14 | | | 2010 | 1,259 | 10,631 | 172,321,000 | 16,209 |
| 15 | Source: US economic survey | | | | | | |
| 16 | ratio of 813410 to 813110 | | 2013 | 13.0% | 9.2% | 8.4% | |
| 17 | | | 2012 | 13.0% | 9.1% | 8.9% | |
| 18 | | | 2011 | 14.0% | 10.5% | 9.0% | |
| 19 | | | 2010 | 14.7% | 10.9% | 8.8% | |
| 20 | | | | | | civil etc to | civil etc to |
| 21 | | 813110 relig. | 813110 relig. | 813410 civil | 813410 civil | relig. Org. | relig. Org. |
| 22 | | employee | wages | employee | wages | employee | wages |
| 23 | FY 2012 | 10,867 | 299,450,013 | 10,055 | 228,463,739 | 92.53% | 76.29% |
| 24 | FY 2013 | 10,773 | 291,999,225 | 10,311 | 228,513,230 | 95.71% | 78.26% |
| 25 | FY 2014 | 10,969 | 309,801,510 | 10,624 | 234,403,659 | 96.85% | 75.66% |
| 26 | Source: Labor data | | | | 3 yr average | 95.03% | 76.74% |
| 27 | The ratio of civil & social orgs to religious orgs is | | | | 85.88% | | 85.88% |
| 28 | In 2015 Florida Tax Handbook the exemption of religious organizations is | | | | | | $24.5m |
| 29 | | | | civil & social organizations | | | 21.0 |
| 30 | | | | | | | |
| 31 | This nacis code 813410 comprises establishments primarily engaged in promoting | | | | | | |
| 32 | the civic and social interests of their members. Establishments in this category | | | | | | |
| 33 | may operate bars and restaurants for their members. | | | | | | |
| 34 | examples: | | alumni associations | | | | |
| 35 | | | automobile clubs (except travel) | | | | |
| 36 | | | booster clubs | | | | |
| 37 | | | ethnic associations | | | | |
| 38 | | | fraternal lodges | | | | |
| 39 | | | granges | | | | |
| 40 | | | parent-teacher associations | | | | |
| 41 | | | scouting organizations | | | | |
| 42 | | | social clubs | | | | |
| 43 | | | veterans' membership organizations | | | | |
| 44 | | | garden clubs, homeowner associations, etc. | | | | |
| 45 | | | | | | | |
| 46 | DOR 2014 sales tax return | | # returns | gross | exempt | taxable | tax |
| 47 | civil&social | 813410 | 642 | 287,877,555 | 51,402,399 | 236,475,155 | 15,063,705 |
| 48 | veterans' organizations | | 192 | 32,415,586 | 4,911,884 | 27,503,702 | 1,876,051 |
| 49 | based on name search | | 29.9% | 11.3% | 9.6% | 11.6% | 12.5% |
| 50 | | | | | | | 12.0% |
| 51 | | High | middle | low | | | |
| 52 | | 30.0% | 21.0% | 12.0% | | | |
| 53 | 2015 | 6.3 | 4.4 | 2.5 | subtract the current $0.7m exemption | | |
| 54 | less currently exempt $0.7m | | | | to qualified organizations | | |
| 55 | 2016 | 5.7 | 3.8 | 1.8 | | | |
| 56 | 2017 | 5.7 | 3.8 | 2.2 | | | |
| 57 | 2018 | 5.8 | 3.8 | 2.7 | | | |
| 58 | 2019 | 5.8 | 3.9 | 3.2 | | | |
| 59 | 2020 | 5.9 | 3.9 | 3.8 | | | |
| 60 | 2021 | 6.0 | 3.9 | 4.6 | | | |
| 61 | assuming 1% constant growth rate | | | | | | |

**REVENUE ESTIMATING CONFERENCE**

**Tax**: Ad Valorem
**Issue**: Conservation Easements (Remove Annual Application Requirement)
**Bill Number(s)**: SB 190

☒ **Entire Bill**
☐ **Partial Bill**:
**Sponsor(s)**: Senator Hutson
**Month/Year Impact Begins**: July 1, 2016
**Date of Analysis**: October 1, 2015

**Section 1: Narrative**

**a. Current Law**: Section 196.26 Reads as follows:

1196.26 Exemption for real property dedicated in perpetuity for conservation purposes.—

(1) As used in this section:

(a) "Allowed commercial uses" means commercial uses that are allowed by the conservation easement encumbering the land exempt from taxation under this section.

(b) "Conservation easement" means the property right described in s. 704.06.

(c) "Conservation purposes" means:

1. Serving a conservation purpose, as defined in 26 U.S.C. s. 170(h)(4)(A)(i)-(iii), for land which serves as the basis of a qualified conservation contribution under 26 U.S.C. s. 170(h); or

2.a. Retention of the substantial natural value of land, including woodlands, wetlands, watercourses, ponds, streams, and natural open spaces;

b. Retention of such lands as suitable habitat for fish, plants, or wildlife; or

c. Retention of such lands' natural value for water quality enhancement or water recharge.

(d) "Dedicated in perpetuity" means that the land is encumbered by an irrevocable, perpetual conservation easement.

(2) Land that is dedicated in perpetuity for conservation purposes and that is used exclusively for conservation purposes is exempt from ad valorem taxation. Such exclusive use does not preclude the receipt of income from activities that are consistent with a management plan when the income is used to implement, maintain, and manage the management plan.

(3) Land that is dedicated in perpetuity for conservation purposes and that is used for allowed commercial uses is exempt from ad valorem taxation to the extent of 50 percent of the assessed value of the land.

(4) Land that comprises less than 40 contiguous acres does not qualify for the exemption provided in this section unless, in addition to meeting the other requirements of this section, the use of the land for conservation purposes is determined by the Acquisition and Restoration Council created in s. 259.035 to fulfill a clearly delineated state conservation policy and yield a significant public benefit. In making its determination of public benefit, the Acquisition and Restoration Council must give particular consideration to land that:

(a) Contains a natural sinkhole or natural spring that serves a water recharge or production function;

(b) Contains a unique geological feature;

(c) Provides habitat for endangered or threatened species;

(d) Provides nursery habitat for marine and estuarine species;

(e) Provides protection or restoration of vulnerable coastal areas;

(f) Preserves natural shoreline habitat; or

(g) Provides retention of natural open space in otherwise densely built-up areas.

Any land approved by the Acquisition and Restoration Council under this subsection must have a management plan and a designated manager who will be responsible for implementing the management plan.

(5) The conservation easement that serves as the basis for the exemption granted by this section must include baseline documentation as to the natural values to be protected on the land and may include a management plan that details the management of the land so as to effectuate the conservation of natural resources on the land.

(6) Buildings, structures, and other improvements situated on land receiving the exemption provided in this section and the land area immediately surrounding the buildings, structures, and improvements must be assessed separately pursuant to chapter 193. However, structures and other improvements that are auxiliary to the use of the land for conservation purposes are exempt to the same extent as the underlying land.

(7) Land that qualifies for the exemption provided in this section the allowed commercial uses of which include agriculture must comply with the most recent best management practices if adopted by rule of the Department of Agriculture and Consumer Services.

(8) As provided in s. 704.06(8) and (9), water management districts with jurisdiction over lands receiving the exemption provided in this section have a third-party right of enforcement to enforce the terms of the applicable conservation easement

for any easement that is not enforceable by a federal or state agency, county, municipality, or water management district when the holder of the easement is unable or unwilling to enforce the terms of the easement.

(9) The Acquisition and Restoration Council, created in s. 259.035, shall maintain a list of nonprofit entities that are qualified to enforce the provisions of a conservation easement.

Section 196.011 reads (in part): (3) It shall not be necessary to make annual application for exemption on houses of public worship, the lots on which they are located, personal property located therein or thereon, parsonages, burial grounds and tombs owned by houses of public worship, individually owned burial rights not held for speculation, or other such property not rented or hired out for other than religious or educational purposes at any time; household goods and personal effects of permanent residents of this state; and property of the state or any county, any municipality, any school district, or community college district thereof.

Current Administration: The department has promulgated two forms – the DR 418C Real Property Dedicated in Perpetuity for Conservation and DR 418CR Real Property Dedicated in Perpetuity for Conservation – Exemption Renewal

The form DR 418-CR asks only for a certification that the se of the property complies with the restrictions and requirements for the exemption in section 196.26, Florida Statutes.

**b. Proposed Change**: Adds a conservation easement as defined in s. 704.06, F.S. to the list of entities who are not required to make an annual application.

**Section 2: Description of Data and Sources**

2015 Real Property Tax Roll

DR 418CR Real Property Dedicated in Perpetuity for Conservation – Exemption Renewal

**Section 3: Methodology (Include Assumptions and Attach Details)**

Eliminating the annual application requirement should not result in a fiscal impact because other measures exist to encourage compliance. Owners of property who fail to notify the property appraiser that the use of the property no longer complies with the requirements of the perpetual conservation easement are subject to payment of 10 years back taxes, plus interest, and to a penalty of 100% of taxes exempted. S. 196.011(9)(b). Also, other persons have an interest in ensuring that the requirements of the easement are followed. See ss. 196.26(8) and 704.06.

**Section 4: Proposed Fiscal Impact**

| | High | | Middle | | Low | |
|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | | | $0 | $0 | | |
| 2017-18 | | | $0 | $0 | | |
| 2018-19 | | | $0 | $0 | | |
| 2019-20 | | | $0 | $0 | | |
| 2020-21 | | | $0 | $0 | | |

**List of affected Trust Funds:** Ad Valorem

**Section 5: Consensus Estimate (Adopted: 10/02/2015): The Conference adopted the proposed estimate.**

| | GR | | Trust | | Local/Other | | Total | |
|---|---|---|---|---|---|---|---|---|
| | Cash | Recurring | Cash | Recurring | Cash | Recurring | Cash | Recurring |
| 2016-17 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| 2017-18 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| 2018-19 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| 2019-20 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| 2020-21 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

| | A | B | C | D | E | F |
|---|---|---|---|---|---|---|
| 1 | County | Land dedicated in perpetuity for conservation purposes and used exclusively for those purposes - Exemption Amounts 2015 | Parcels | | Land dedicated in perpetuity for conservation purposes but also used for commercial purposes - Exemption Amounts 2015 | Parcels |
| 2 | Alachua | $533,850 | 25 | | | |
| 3 | Baker | | | | | |
| 4 | Bay | $11,731 | 5 | | | |
| 5 | Bradford | | | | | |
| 6 | Brevard | $186,632 | 2 | | | |
| 7 | Broward | $1,382,660 | 14 | | | |
| 8 | Calhoun | $415,071 | 18 | | $138,733 | 13 |
| 9 | Charlotte | $731,061 | 3 | | | |
| 10 | Citrus | | | | | |
| 11 | Clay | $1,896,793 | 20 | | $677,569 | 11 |
| 12 | Collier | | | | | |
| 13 | Columbia | $1,541,511 | 22 | | $313,651 | 27 |
| 14 | Miami-Dade | $15,461,312 | 116 | | | |
| 15 | Desoto | $1,189,800 | 3 | | $201,269 | 19 |
| 16 | Dixie | $148,100 | 2 | | $1,170,388 | 36 |
| 17 | Duval | $784,368 | 21 | | $263,034 | 3 |
| 18 | Escambia | $149,655 | 4 | | | |
| 19 | Flagler | $2,633,192 | 8 | | $2,077,922 | 57 |
| 20 | Franklin | | | | | |
| 21 | Gadsden | $32,120 | 7 | | | |
| 22 | Gilchrist | $121,886 | 5 | | $37,692 | 3 |
| 23 | Glades | $2,959,074 | 3 | | $1,390,793 | 122 |
| 24 | Gulf | | | | | |
| 25 | Hamilton | $132,344 | 9 | | $159,773 | 8 |
| 26 | Hardee | $347,505 | 6 | | | |
| 27 | Hendry | $3,578,710 | 19 | | $4,011,315 | 54 |
| 28 | Hernando | $73,304 | 1 | | | |
| 29 | Highlands | | | | | |
| 30 | Hillsborough | $217,816 | 3 | | | |
| 31 | Holmes | | | | | |
| 32 | Indian River | | | | $153,605 | 12 |
| 33 | Jackson | | | | | |
| 34 | Jefferson | $21,334,160 | 130 | | $331,884 | 2 |
| 35 | Lafayette | | | | | |
| 36 | Lake | $6,001,662 | 29 | | $580,797 | 31 |
| 37 | Lee | $1,181,973 | 4 | | | |
| 38 | Leon | $90,021,937 | 95 | | $179,824 | 3 |
| 39 | Levy | $436,271 | 13 | | $62,407 | 7 |
| 40 | Liberty | $316,200 | 2 | | | |
| 41 | Madison | $181,802 | 25 | | | |

| | A | B | C | D | E | F |
|---|---|---|---|---|---|---|
| 1 | County | Land dedicated in perpetuity for conservation purposes and used exclusively for those purposes - Exemption Amounts 2015 | Parcels | | Land dedicated in perpetuity for conservation purposes but also used for commercial purposes - Exemption Amounts 2015 | Parcels |
| 42 | Manatee | | | | | |
| 43 | Marion | $1,353,586 | 28 | | $315,459 | 30 |
| 44 | Martin | $430,220 | 2 | | | |
| 45 | Monroe | | | | | |
| 46 | Nassau | $3,702,450 | 7 | | $414,157 | 5 |
| 47 | Okaloosa | | | | | |
| 48 | Okechobee | $341,821 | 4 | | $1,066,644 | 45 |
| 49 | Orange | $11,887,637 | 21 | | | |
| 50 | Osceola | $1,278,904 | 23 | | $972,024 | 38 |
| 51 | Palm Beach | $3,566,724 | 19 | | $486,333 | 12 |
| 52 | Pasco | $849,619 | 4 | | $748,600 | 37 |
| 53 | Pinellas | | | | | |
| 54 | Polk | $11,576,034 | 108 | | $3,801,346 | 301 |
| 55 | Putnam | $1,201,366 | 8 | | | |
| 56 | Santa Rosa | $2,709,438 | 64 | | $391,101 | 28 |
| 57 | Saint Johns | $172,450 | 4 | | $802,212 | 20 |
| 58 | Saint Lucie | $150,180 | 3 | | | |
| 59 | Sarasota | $83,248 | 1 | | | |
| 60 | Seminole | $190,526 | 7 | | | |
| 61 | Sumter | | | | | |
| 62 | Suwannee | $7,261,763 | 18 | | | |
| 63 | Taylor | $2,063,370 | 16 | | | |
| 64 | Union | | | | | |
| 65 | Volusia | $149,605 | 19 | | $1,658,094 | 61 |
| 66 | Wakulla | | | | $34,501 | 2 |
| 67 | Walton | $3,137,746 | 134 | | | |
| 68 | Washington | $306,698 | 8 | | $104,761 | 13 |
| 69 | Statewide | $206,415,885 | 1,112 | | $22,545,888 | 1,000 |
| 70 | | | | | | |
| 71 | School Millage | 7.1334 | | | | |
| 72 | NonSchool Millage | 10.6390 | | | | |
| 73 | | | | | | |
| 74 | Current Law Impact | | | | | |
| 75 | School | $1,472,447 | | | $160,829 | |
| 76 | NonSchool | $2,196,059 | | | $239,866 | |