



Town of
Redington Shores
Nature's Beach

February 27, 2025

To: The Redington Shores Community

Subject: Building Department Process Improvements

Greetings!

To continue to provide updates to the Redington Shores community about the improvements made to the Building Department's operations for storm recovery and rebuilding, please see the following compilation of proposed suggestions that we have received and our subsequent approaches to improving these services. Many of these topics were shared by you as citizens with our elected officials as well as town staff. We greatly appreciate you sharing your concerns and ideas, and the following guide is an effort to communicate back to you that your voices have been heard, and we continue to make every effort to improve.

Best regards,

Mike McGlothlin
Town Administrator

Outline of Proposed Solutions – Building Department Improvements

1. Floodplain Review – Cost Itemization Spreadsheet

Issue: The spreadsheet is a bottleneck in the permitting process, adding unnecessary complexity.

Proposed Solution:

- Confirm FEMA’s specific requirements for cost itemization before the February 26 workshop.
- Eliminate mandatory use of the spreadsheet unless explicitly required by FEMA.
- Offer it as an optional tool for residents and contractors, rather than a requirement.

Note: Our town attorney provided an overview of the FEMA manual’s specific provisions regarding the determination of repair costs, ensuring clarity on the level of detail FEMA expects the Town to obtain when reviewing permits. While there has been some social media discussion suggesting that the County is not following these procedures, the County’s floodplain manager has strongly confirmed that this is not the case.

We have updated our Substantial Improvement packet to better align with floodplain review requirements. This will help residents detail costs more accurately and reduce errors at permit application.

On January 30, 2025, we implemented an “accelerated floodplain review” for homes that were Not Substantially Damaged and under 40%. The Town Attorney, I, and members of SAFEbuilt collaborated to establish that a 9-10% margin of error was sufficient to allow for speedier floodplain review. The review still occurs, it is just not quite a thorough and detail oriented.

- **ARTICLE I. - ADMINISTRATION**
- **Sec. 10-1. - In general.**

(e) *Warning.* The degree of flood protection required by this chapter and the Florida Building Code, as amended by this community, is considered the minimum reasonable for regulatory purposes and is based on scientific and engineering considerations. Larger floods can and will occur. Flood heights may be increased by man-made or natural causes. This chapter does not imply that land outside of mapped special flood hazard areas, or that uses permitted within such flood hazard areas, will be free from flooding or flood damage. The flood hazard areas and base flood elevations contained in the flood insurance study

and shown on flood insurance rate maps and the requirements of Title 44, Code of Federal Regulations. Sections 59 and 60 may be revised by the Federal Emergency Management Agency, requiring this community to revise these regulations to remain eligible for participation in the national flood insurance program. No guaranty of vested use, existing use, or future use is implied or expressed by compliance with this chapter.

2. Floodplain Review – Notice of Deficiency (NOD) Improvements

Issue: Notices of Deficiency (NODs) are difficult to interpret, delaying permit approvals.

Proposed Solution:

- Designate a permit technician to assist applicants in correcting and completing NODs.
- Provide clear guidance and examples to applicants to minimize confusion.
- Implement a checklist to ensure applicants submit complete documentation upfront.

All permit techs understand the deficiency notes and have access to tools to help residents respond.

Permit techs take time with each resident to help them gain access to the permit portal, show them how to navigate and research their permits. This gives residents the capability of seeing permitting issues real-time so they can ask questions or provide additional information if requested. Residents can upload new or modified documents directly to their permit application, eliminating the risk of lost paperwork.

Rebuild /Remodel Permit Checklist:

- Permit application
- Notarized Owner Builder Affidavit (omit application and affidavit if completed online)
- Substantial Improvement Package
- Cost Spreadsheet: itemized cost to repair
- Electrical Safety Letter (if using submerged wires or devices are used) wet signed and notarized by licensed qualifier
- Floor Plan Drawings
- Florida Product Approvals for Exterior Doors or Windows (www.floridabuilding.org)

(skylights, shutters, roofing, windows, exterior doors including garage doors and entrance doors to house from garage)

Turtle Glass must be used when replacing windows and sliding doors that face the beach or bay. Must submit drawing and location of home in relation to the water.

- Recorded NOC (Notice of Commencement \$ 15 K Mechanical, \$5 K all other)
Elevation Certificate (if an appeal has been submitted. May be found on the Pinellas Property Appraiser, Town of Redington Shores or Redington Beach Portal or Third Party. **

Residential Demolition:

- Permit application
- Notarized Owner Builder Affidavit (omit application and affidavit if completed online)
- Disconnect Letter from Duke
- Silt fence Drawing
- Recorded NOC (Notice of Commencement if over \$5 K)

**** For Permits with Appeals*****

3. Substantial Damage vs. Substantial Improvement Calculation Issues

Issue: Misinterpretation of lookback rules for Substantial Improvement (SI) vs. Substantial Damage (SD).

Proposed Solution:

- Confirm with the Building Official that the one-year lookback applies only to SI, not SD (as clarified in prior meetings).
- Provide clear written guidelines on the town's website to prevent further misinterpretation.

SI lookback for storm damage – the example I gave, “If you remodeled your kitchen 6 months before the storm and had to tear it out and do it again, I’m not counting it twice”.

1 year look back and Substantial Improvement explanation are part of the Town Ordinance. Full explanation is provided.

Sec. 63-3. - Additional regulations.

SUBSTANTIAL IMPROVEMENT. Any combination of repair, reconstruction, rehabilitation, alteration, addition or other improvement of a building or structure taking place during a one-year period, the cumulative cost of which equals or exceeds 49 percent of the market value of the structure before the improvement or repair is started. The period of accumulation begins when the first improvement or repair of each building is permitted subsequent to May 8, 2013. If the structure has sustained substantial damage, any repairs are considered substantial improvement regardless of the actual repair work performed. The term does not, however, include either:

1. Any project for improvement of a building required to correct existing health, sanitary or safety code violations identified by the building official and that is the minimum necessary to assure safe living conditions.
2. Any alteration of a historic structure provided that the alteration will not preclude the structure's continued designation as a historic structure.
3. Costs for repairs whose express purpose is to repair wind and flood damage to pre-damage condition, provided the costs of such measures, plus the cost of any other improvements and repairs undertaken at the same time, do not exceed 49 percent of the market value of the structure before the damage occurred.



Town of Redington Shores

17425 Gulf Boulevard
Redington Shores, FL 33708
727.397.5538 Phone

www.bldgdept@townofredingtonshores.com

SUBSTANTIAL IMPROVEMENT / DAMAGE PACKET

ITEMS REQUIRED TO DETERMINE SUBSTANTIAL IMPROVEMENT/DAMAGE

Applicant must submit the following (*Make sure you have an extra copy for your files*):

1. The completed building permit and substantial improvement/damage packet including the required 2 sets of (minimum) plans and documents.
2. An estimated Cost of Reconstruction/Improvement form, completed by a Licensed General Contractor, Architect, Engineer, or owner builder and signed by the Owner/Contractor or Contractor with a copy of his license certificate attached.
3. Pre-FIRM properties (built prior to December 31, 1974) undergoing alteration of a value that exceeds 25% of the Pinellas County approximate market value shall provide staff with an independent appraisal report.
4. Current photos of the structure, or photos before and after the storm.
5. Highlighted floor plan drawing showing area of structure to be repaired or altered.
6. Substantial Improvement/Construction Affidavit completed, signed, and dated.
7. An independent appraisal of the depreciated value of the structure will be used as the market value. It shall be noted on the appraisal that it is for FEMA purposes.
8. Any additions or new construction require a geotechnical report.
9. (3) Elevation Certificates (FEMA Form 81-31) are required for new construction and additions. An Elevation Certificate is required for showing the lowest living level at base flood elevation (BFE) plus 3 feet of freeboard and at final construction prior to receiving a Certificate of Occupancy.
10. A recorded Declaration of Land Restriction (Non-conversion Agreement), completed, signed, and dated for new construction and additions to Post-FIRM structures.
11. NOTE: For Improvement value the most recent Property Appraiser assessment of Just Improved Value will be used. In cases where the assessment level is unacceptably low or where the projected ratio of cost of proposed construction to market value is close to 49 percent, adjustments for assessment level may be made. Adjustments cannot exceed 115 percent of tax assessed value. If the use of assessed value is questioned, an appeal is warranted, but the burden of proof can be placed on the permit applicant who can submit an independent appraisal by a qualified appraiser establishing actual cash value (replacement cost depreciated for age and quality of construction of building). The building value must be fairly depreciated to reflect the age of the building and the deterioration of building components. These appraisals are subject to review by outside appraisal firms of the Town's selection. Cost for such independent review will be borne by the applicant.

APPLICATION FOR SUBSTANTIAL IMPROVEMENT/DAMAGE REVIEW

Tax Appraiser's Parcel ID# _____

Property Address: _____

Owner's Name: _____

Co-Owner's Name: _____

Owner's Mailing Address: _____

Owner's Phone Number: _____

FIRM Panel: _____

Flood Zone: _____

Base Flood Elevation: _____

Lowest Floor Elevation (excluding garage): _____

(GO TO WWW.MSC.FEMA.GOV FOR FLOOD MAPS AND INFORMATION)

Initial _____ I am attaching an independent appraisal report of my property.

Initial _____ I accept Pinellas County's Approximate Market Value

Initial _____ I accept the attached estimated cost of construction as a fair cost of repair or improvement for my structure.

Signature of Owner

Signature of Co-Owner

STATE OF FLORIDA
COUNTY OF _____

The foregoing instrument was acknowledged before me by means of ___physical presence or___online notarization this_____day of_____, 20____, by_____who is personally known to me or has produced_____as identification.

Notary Public

Costs for Substantial Improvements and Repair of Substantial Damage

Included Costs

Items that must be included in the costs of improvement or costs to repair are those that are directly associated with the building. The following list of costs that must be included is not intended to be exhaustive, but characterizes the types of costs that must be included:

- Materials and labor, including the estimated value of donated or discounted materials and owner or volunteered labor
- Site preparation related to the improvement or repair (foundation excavation, filling in basements)
- Demolition and construction debris disposal
- Labor and other costs associated with demolishing, moving, or altering building components to accommodate improvements, additions, and making repairs
- Costs associated with complying with any other regulation or code requirement that is triggered by the work, including costs to comply with the requirements of the Americans with Disabilities Act (ADA)
- Costs associated with elevating a structure to an elevation that is lower than the BFE
- Construction management and supervision
- Contractor's overhead and profit
- Sales taxes on materials
- Structural elements and exterior finishes, including:
 - Foundations (e.g., spread or continuous foundation footings, perimeter walls, chainwalls, pilings, columns, posts, etc.)
 - Monolithic or other types of concrete slabs
 - Bearing walls, tie beams, trusses
 - Joists, beams, subflooring, framing, ceilings
 - Interior non-bearing walls
 - Exterior finishes (e.g., brick, stucco, siding, painting, and trim)
- Structural elements and exterior finishes (cont.):
 - Windows and exterior doors
 - Roofing, gutters, and downspouts
 - Hardware
 - Attached decks and porches
- Interior finish elements, including:
 - Floor finishes (e.g., hardwood, ceramic, vinyl, linoleum, stone, and wall-to-wall carpet over subflooring)
 - Bathroom tiling and fixtures
 - Wall finishes (e.g., drywall, paint, stucco, plaster, paneling, and marble)
 - Built-in cabinets (e.g., kitchen, utility, entertainment, storage, and bathroom)
 - Interior doors
 - Interior finish carpentry
 - Built-in bookcases and furniture
 - Hardware
 - Insulation
- Utility and service equipment, including:
 - HVAC equipment
 - Plumbing fixtures and piping
 - Electrical wiring, outlets, and switches
 - Light fixtures and ceiling fans
 - Security systems
 - Built-in appliances
 - Central vacuum systems
 - Water filtration, conditioning, and recirculation systems

Excluded Costs

Items that can be excluded are those that are not directly associated with the building. The following list characterizes the types of costs that may be excluded:

- Clean-up and trash removal
- Costs to temporarily stabilize a building so that it is safe to enter to evaluate required repairs
- Costs to obtain or prepare plans and specifications
- Land survey costs
- Permit fees and inspection fees
- Carpeting and recarpeting installed over finished flooring such as wood or tiling
- Outside improvements, including landscaping, irrigation, sidewalks, driveways, fences, yard lights, swimming pools, pool enclosures, and detached accessory structures (e.g., garages, sheds, and gazebos)
- Costs required for the minimum necessary work to correct existing violations of health, safety, and sanitary codes
- Plug-in appliances such as washing machines, dryers, and stoves

ESTIMATED COST OF IMPROVEMENTS/RECONSTRUCTION

Parcel ID# _____

Property Address: _____

BUILDING

(Materials and Labor Cost are required)

ITEMS	MATERIALS COST	LABOR COST	Sales Tax	TOTAL COST	Notes/Details
DEMOLITION				\$0.00	
FOUNDATION, SLAB				\$0.00	
DRYWALL				\$0.00	
DRYWALL LABOR				\$0.00	
BEARING WALLS, TIE BEAM, TRUSSES				\$0.00	
FRAMING, JOIST, BEAMS, SUB-FLOORING				\$0.00	
INTERIOR NON-BEARING WALLS				\$0.00	
EXTERIOR FINISHES (STUCCO, SIDING, PAINTING, TRIM, BRICK, ETC.)				\$0.00	
WINDOWS AND EXTERIOR DOORS				\$0.00	
CABINETS AND VANITIES				\$0.00	
HARDWARE				\$0.00	
ATTACHED DECKS AND PORCHES				\$0.00	
FLOOR COVERING				\$0.00	
BATHROOM/KITCHEN TILE				\$0.00	
WALL FINISH/PAINTING/COVERING				\$0.00	
BUILT IN APPLIANCES				\$0.00	
BUILT IN CABINETS, BOOKCASES, FURNITURE, MIRRORS, CLOSET SHELVING				\$0.00	
INTERIOR DOORS				\$0.00	
BASE/TRIM				\$0.00	
HARDWARE (STRAPPING, BOLTS, SCREWS)				\$0.00	
INSULATION				\$0.00	
INSULATION LABOR				\$0.00	
FIREPLACE/HEARTH/MANTEL/CHIMNEY				\$0.00	
ELECTRICAL WIRING				\$0.00	
ELECTRICAL FIXTURES, CEILING FANS, OUTLETS, SWITCHES				\$0.00	
SECURITY SYSTEM, INTERCOM				\$0.00	
SMOKE DETECTORS				\$0.00	
ELECTRICAL PANEL, METER BASE				\$0.00	
PLUMBING PIPING				\$0.00	
PLUMBING FIXTURES				\$0.00	
WATER HEATERS				\$0.00	
WATER FILTRATION, CONDITIONING AND RECIRCULATION SYSTEMS				\$0.00	
HVAC EQUIPMENT				\$0.00	
DUCTWORK, GRILLS				\$0.00	
BATHROOM FANS, RANGE HOOD, CENTRAL VACUUM, DRYER EXHAUST				\$0.00	
GAS PIPING				\$0.00	
GAS TANK				\$0.00	
SINGLES, UNDERLAYMENT, MOD BIT				\$0.00	
GUTTERS, DOWNSPOUTS				\$0.00	
CONSTRUCTION MANAGEMENT AND SUPERVISION				\$0.00	
OVERHEAD & PROFIT				\$0.00	
ITEMS PURCHASED BY HOMEOWNER				\$0.00	
TOTAL				\$0.00	
Add 10% contingency				\$0.00	
GRAND TOTAL				\$0.00	

The value placed on all donated or discounted materials should be equal to the actual or estimated cost of such materials and must be included in the total cost. Where materials or servicing equipment are donated or discounted below normal market values, the value should be adjusted to an amount that would be equivalent to that estimated through normal market transactions. Section 4.4.4*

The situation described above that involves donated or discounted materials may also involve volunteer labor. Also, property owners may undertake fairly significant improvement and repair projects on their own. In both cases, the normal "market" value or "going rate" for labor must be included in the estimates of the cost of improvement and the costs to repair. Section 4.4.5*

I understand that I am subject to enforcement, penalties and / or fines for violation if inspection of the property reveals that I have made additions, renovations or remodeling to the property which were not included in the permit documents.

Violating the FEMA improvement threshold may result in removal of improvement work, revocation of the

(PLEASE attach any additional information)

Contractor's Name: _____ License #: _____

Address: _____ Phone: _____

Contractor's Signature: _____ Date: _____

*FEMA P-759/May 2010 "Substantial Improvement/Substantial Damage Desk Reference", Chapter 4, Making Substantial Improvement and Substantial Damage Determinations.

**CONTRACTOR
IMPROVEMENT/RECONSTRUCTION AFFIDAVIT**

Parcel ID#: _____

Owner's Name: _____

Phone: _____ Email: _____

Address: _____

Contractor's Name: _____

License #: _____

I hereby attest to the fact that I, or a member of my staff, personally inspected the above-mentioned property and produced the attached itemized list of repairs/reconstructions and/or remodeling which is hereby submitted for the **SUBSTANTIAL IMPROVEMENT/DAMAGE REVIEW**. These listed damages/improvements are **ALL of the improvements/damages** sustained by this structure and all additions, improvements, or repairs proposed on the subject building are included in this estimate.

I understand that I am subject to enforcement action and/or fines if inspection of the property reveals that I have made repairs **NOT included on the attached list of improvements/repairs**, or improvements or illegal structures/additions to the existing structure without having present plans for such additions. I understand that any permit issued by the Town of Redington Shores pursuant to this affidavit does not authorize the reconstruction, repair or maintenance of any illegal additions, fences, sheds or non-conforming uses or structures on the subject property.

Total Labor and Materials	\$ _____
Overhead and Profit	\$ _____
TOTAL COST	\$ _____

Contractor Signature

STATE OF FLORIDA

COUNTY OF _____

The foregoing instrument was acknowledged before me by means of ___ physical presence or ___ online notarization this _____ day of _____, 20____, by _____ who is personally known to me or has produced _____ as identification.

Notary Public

OWNER
IMPROVEMENT/RECONSTRUCTION AFFIDAVIT

Parcel ID#: _____

Owner's Name: _____

Phone: _____ Email: _____

Address: _____

Contractor's Name: _____ License #: _____

I hereby attest to the fact that I, or a member of my staff, personally inspected the above-mentioned property and produced the attached itemized list of repairs/reconstructions and/or remodeling which is hereby submitted for the **SUBSTANTIAL IMPROVEMENT/DAMAGE REVIEW**. These listed damages/improvements are **ALL of the improvements/damages** sustained by this structure and all additions, improvements, or repairs proposed on the subject building are included in this estimate.

I understand that I am subject to enforcement action and/or fines if inspection of the property reveals that I have made repairs **NOT included on the attached list of improvements/repairs**, or improvements or illegal structures/additions to the existing structure without having present plans for such additions. I understand that any permit issued by the Town of Redington Shores pursuant to this affidavit does not authorize the reconstruction, repair or maintenance of any illegal additions, fences, sheds or non-conforming uses or structures on the subject property.

TOTAL COST \$ _____

Co-Owner Signature

Co-Owner Signature

STATE OF FLORIDA
COUNTY OF _____

The foregoing instrument was acknowledged before me by means of ___physical presence or ___online notarization this _____ day of _____, 20____, by _____ who is personally known to me or has produced _____ as identification.

Notary Public

FEMA – IMPROVEMENT VALUATION WORKSHEET

(Substantial Improvement / Substantial Damage)

PROPERTY ADDRESS: _____

PINELLAS COUNTY PROPERTY APPRAISER: _____

Just Market Value \$ _____ - Land Adjusted Value \$ _____

=Value of Structure \$ _____

VALUE OF STRUCTURE: \$ _____ X 49% = \$ _____ (a)

PERMITS WITHIN 1 YEAR:

	Permit #	Permit Type	Job Value
Current permit			
Other			

Total Permit Values: & _____ (b)

Therefore: (b) \$ _____ < (a) \$ _____

OK: (Y) _____ or (N) _____

VERIFIED BY: _____

If value exceeds 49% the customer needs to provide one of the following:

_____ Elevation Certificate

_____ Survey showing the finished floor elevation

_____ Current Appraisal using the depreciated value

4. Home Appraisal Requirement Transparency

Issue: Some applicants are required to provide a pre-storm appraisal without prior notice, causing delays.

Proposed Solution:

- Ensure that permit applicants are informed at the start if an appraisal is required.
- If the Property Appraiser's value is used as default, confirm that no additional appraisal is required unless disputed.
- Improve communication and transparency in permit application requirements.

Need for Appraisal is not always known until Substantial Improvement review is complete. For structures built Pre-FIRM (before 1974), structures making improvement of 25% or more of the PCPAO approximate market value require an independent appraisal report.

Due to the age of some of the structures, as well as the length of ownership by some of the residents, updated paperwork is required for permit application. Updated appraisals and elevation certificates may be required.

- **Sec. 63-37. - Powers and duties of floodplain administrator.**

D. *Substantial improvement and substantial damage determinations.* For applications for building permits to improve buildings and structures, including alterations, movement, enlargement, replacement, repair, change of occupancy, additions, rehabilitations, renovations, substantial improvements, repairs of substantial damage, and any other improvement of or work on such buildings and structures, the Floodplain Administrator, in coordination with the Building Official, shall:

(1) Estimate the market value, or require the applicant to obtain an appraisal of the market value prepared by a qualified independent appraiser, of the building or structure before the start of construction of the proposed work; in the case of repair, the market value of the building or structure shall be the market value before the damage occurred and before any repairs are made;

(2) Compare the cost to perform the improvement, the cost to repair a damaged building to its pre-damaged condition, or the combined costs of improvements and repairs, together with a one year cumulative improvement valuation of previous additions or remodeling if applicable, to the market value of the building or structure;

(3) Determine and document whether the proposed work constitutes substantial improvement or repair of substantial damage; the determination requires evaluation of

previous permits issued for improvements and repairs as specified in the definition of "substantial improvement"; and

(4) Notify the applicant if it is determined that the work constitutes substantial improvement or repair of substantial damage and that compliance with the flood resistant construction requirements of the Florida Building Code and this ordinance is required.

Sec. 10-10. - Definitions.

Market value. The value of buildings and structures, excluding the land and other improvements on the parcel. Market value is the actual cash value (in-kind replacement cost depreciated for age, wear and tear, neglect, and quality of construction) determined by a qualified independent appraiser, or tax assessment value adjusted to approximate market value by a factor provided by the county property appraiser.

5. Permit Application Process Simplification

Issue: The process is cumbersome and inconsistent with prior guidance.

Proposed Solution:

- Identify best practices from other municipalities while ensuring FEMA compliance.
- Implement a streamlined checklist of required documents to minimize back-and-forth interactions.

Note: As explained by our town attorney, simply bypassing FEMA’s regulations— which are embedded in all floodplain codes— to expedite permits is not a viable solution. Doing so could result in the municipality facing future suspension by FEMA.

Permit application is codified in Florida Statutes and Florida Building Code. Different types of application have different requirements. A “one size fits all” approach is not effective for permitting. Each time a permit tech interacts with a resident they give their best estimation of the required documents based on the particular needs of the applicant.

We have created a checklist specific to our 2 permits for storm related damage.

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0500-0599/0553/Sections/0553.79.html

2023 FBC 102.2

6. Floodplain Review of Substantial Damage Calculation Worksheets

Issue: Repetitive correction requests for minor formatting issues (labor/material breakdowns, NA vs. 0 entries).

Proposed Solution:

- Host information/training sessions for residents and owner-builders on how to complete forms correctly.
- Standardize the required format to reduce unnecessary revisions (e.g., specify acceptable labor rate range, or post fee schedule previously shared by Bill Hudson).
- Ensure review consistency by training all permit reviewers on uniform standards.

Note: Hosting informational training sessions led by the floodplain administrator on properly presenting labor and material costs would be highly beneficial. This does not need to wait for a Commission meeting and could be scheduled by the Administrator, with sessions advertised at Town Hall. Offering at least two sessions would help ensure accessibility for all interested residents.

We have updated the forms and will ONLY use the detail cost worksheets going forward. This will help eliminate confusion. Permit techs take the time to go through the worksheet item-by-item to help insure clarity.

7. SD Letter Appeal Process – Lack of Clear Instructions

Issue: Residents struggle to find appeal forms and understand the appeal process.

Proposed Solution:

- Make the appeal process and required forms clearly available online (ensure correct labeling and visibility).
- Provide a step-by-step guide for the appeal process, including required documents.
- Consider a public training session on how to appeal an SD letter.

Note: A quick Google search for “Redington Shores Substantial Damage Appeal Form” easily directs users to the correct page: <https://townofredingtonshores.com/wp-content/uploads/2022/02/Substantial-Improvement-Packet.pdf>. The form and process appear to be clearly outlined on the website; however, if any wording is found to be confusing, the floodplain administrator would likely be open to refining it for clarity.

Substantial Damage Assessment letter contains an explanation of the appeal process

SUBSTANTIAL DAMAGE ESTIMATE
SUBSTANTIALLY DAMAGED

Date: 11/15/2024

Owner(s):

Owner's Address:

PIN #

Disaster Event: **Hurricanes Helene/Milton**

Dear Property Owner:

On **9/27/2024 & 10/9/2024**, your Single-Family home located at _____ was damaged by Hurricanes Helene/Milton. Your property is in a special flood hazard area. When a property in a special flood hazard area is damaged by any cause, we must determine whether the amount of damage meets the National Flood Insurance Program (NFIP) definition of "substantial damage." The preliminary determination for your property is ____percent. This number is derived from FEMA's Substantial Damage Estimator tool by comparing the estimated cost to repair the building to its pre-damaged condition, to the estimated market value of the building before the damage occurred.

Since the estimated cost to repair your damaged building to its pre-damaged condition is estimated to equal or exceed fifty percent (50%) of its estimated market value, the building was initially classified as substantially damaged. Substantially damaged buildings are required to be brought into full compliance with the flood resistant construction requirements of the Florida Building Code and Local ordinances that reduce exposure to future flooding, by elevation above the base flood elevation, or demolition. You must contact the Building Department to start the permitting process by **April 9th, 2025**, to bring your building into compliance.

A permit is required, and failure to obtain a required permit is a violation of state law. Restoration work – beyond emergency work- that is done before a permit is issued will not be approved and must be removed. We regret your loss and the damage you have experienced, and our entire staff will do our best to help you through the permitting process.

SUBSTANTIAL DAMAGE ESTIMATE

SUBSTANTIALLY DAMAGED

The Town of Redington Beach participates in the National Flood Insurance Program. Failing to enforce floodplain damage requirements can jeopardize the communities discount and participation in the program losing eligibility for flood insurance, disaster assistance and federally backed loans and grants for all our citizens.

Thank you in advance for your cooperation and assistance.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Peebles', with a long horizontal flourish extending to the right.

Robert Peebles, Building Official
Town Redington Beach

SUBSTANTIAL DAMAGE ESTIMATE

SUBSTANTIALLY DAMAGED

- **I received my letter. What's the next step?**

You have some options at this point:

1. **Accept** the values on the letter and base your decisions on those, or
2. **Disagree** with the pre-storm value and/or substantial improvement-substantial damage estimate
 - a. If you disagree with the **pre-storm value**, you may:
 - i. Contact the Pinellas County Property Appraiser, an application for a Pre-Storm Building Value Reconsideration (BVR) is available on their website, for a second review, or
 - ii. Obtain a retroreflective appraisal from a Florida licensed appraiser.
 - b. If you disagree with the **substantial improvement-substantial damage estimate**, you may:
 - i. Request a Substantial Damage Reinspection from the county, and/or
 - ii. Provide actual costs to repair completely to pre-disaster condition by submitting:
 1. A complete estimate from a licensed contractor, or
 2. A detailed breakdown of labor and materials – substantiated by an approved construction estimation publication.

- **What happens after that?**

Once both pre-storm value and substantial improvement-substantial damage costs are settled, base your decisions on those:

- a. If substantial improvement-substantial damage **is not present**, please submit the required paperwork and apply for the appropriate permit(s),
- b. If substantial improvement-substantial damage **is present**, decide if you want to:
 - i. Elevate the existing structure to the required height.
 - ii. Demolish the building, and:
 1. Rebuild a resilient structure, or
 2. Leave an empty lot.

- **How do I complete the process?**

Submit the required paperwork and apply for the appropriate permit(s)- build as normal.

8. Reducing Excessive Visits and Phone Calls to the Building Department

Issue: Residents make multiple visits and phone calls due to unclear requirements and inconsistent answers.

Proposed Solution:

- Identify the top 3–5 reasons for repeat visits and calls and address them through:
 - A comprehensive FAQ section on the website. These FAQs can also be printed out for paper review in town hall for those residents who come in for consultation.
 - Longer, more detailed permit tech consultations to ensure applications are correct before submission.
 - Cross-training of permit techs to provide consistent answers.
- Improve staffing levels to handle increased demand.

Note: This issue comes down to having trained, experienced permit technicians. While adding staff to work more closely with applicants is a great way to address issues at the desk, it is essential that they are properly trained. Untrained or inexperienced staff will likely provide inconsistent or incorrect guidance, ultimately increasing frustration for applicants.

We added 3 permit techs in December and an additional 2 techs in January. We are working to add 1 additional permit tech. The original 3 techs are very adept in handling the residents and their questions. It appears that it takes a solid 4-6 weeks for a tech to fully understand all of the storm-related permitting issues. Our 2 January techs are doing well and are gaining mastery daily.

Residents have access to permit information on the Town website and through the online permit portal.

Top 3 reasons residents visit:

1. Impatient with the process
2. Submitting incomplete applications
3. Not reading the required documents before submitting them

9. Improving Building Department Staff Training & Customer Service

Issue: Residents report inconsistent service, and unclear communication.

Proposed Solution:

- Ensure all permit techs are fully trained on processes, policies, and FEMA requirements.
- Assign a dedicated point of contact for residents needing extra assistance.

We are doing all of this.

Maria is the designated “special assistance” permit tech, as well as Lead Tech.

10. Code Enforcement vs. Permit Issuance Disparity

Issue: There have been more citations (177) than issued renovation permits (57), creating a perception of excessive enforcement.

Proposed Solution:

- Review citation policies to ensure enforcement is applied fairly and not discouraging compliance.
- Consider policy revisions for penalties.
- Provide a grace period or warning system for residents before issuing citations.
- Offer workshops or guidance to help residents understand how to bring properties into compliance without penalty.

Note: It is understood that FEMA mandates enforcement, and its manual requires officials to take action when violations are identified. However, given the extent of the devastation our residents have endured, implementing a grace period or warning system may be warranted. While the Town must demonstrate its enforcement efforts during a FEMA audit, it is worth considering whether penalty fees are necessary or if alternative compliance measures could be explored.

We have not issued 177 citations and I never said we had. I said we are TRACKING 177 POTENTIAL CODE COMPLIANCE CASES.

We are 5 months post storm. The grace period is over. We are looking for the residents who fully restored their homes without a permit. Permit requirements and guidance have been clear from the beginning. One of the most asked questions is “What are you going to do about people who are already back in their homes and didn’t get a permit?”

We are going after them. We are charging 5x permit fees per Town ordinance. We are filing code compliance cases against them. We are making them remove work they’ve done.

11. Addressing Data Entry Errors in Damage Assessments

Issue: Residents are experiencing delays due to simple data entry errors (e.g., incorrect home square footage affecting substantial damage calculations).

Proposed Solution:

- Provide clear procedures for correcting errors quickly without requiring full re-inspections.
- Ensure appeals related to clerical errors are fast-tracked separately from full damage assessment appeals.

We have an established appeal process to evenly apply the law. Everyone thinks they have a special case, or a reason to be put first. The only way to treat everyone fairly is to treat them exactly the same.

12. Appeal Processing Delays

Issue: The appeal process is taking too long (one appeal per business day, 150 still in the queue).

Proposed Solution:

- Allocate additional personnel or third-party reviewers to process appeals more quickly.
- Implement a triage system where clear clerical errors (like incorrect square footage) are resolved immediately rather than waiting in the full queue.
- Provide status updates online so residents can track where their appeal stands.

We have done this. We now have 2 people working on appeals. We are able to process two appeals per hour, not per day. Again, appeals are processed in the order they are received. This is the most fair and equitable way to manage the tasks.

Residents are able to track their appeals through the online permitting portal

13. Permit Continuity & Expiration Issues

Issue: Confusion regarding whether old permits can be extended or need to be closed and reissued, leading to unnecessary delays.

Proposed Solution:

- Establish a clear policy on permit extensions and communicate this proactively to applicants.
- Allow applicants with open permits to easily transition to a new permit if required without unnecessary bureaucratic hurdles.
- Ensure permit techs and staff provide consistent guidance on permit continuation versus expiration.

This is very rare. Permit expirations and extensions are property specific and again, a one size fits all approach does not work. We look at each case to determine the most practical approach for the resident based on their needs and type of permit.

14. Addressing FEMA Appraisal Discrepancies

Issue: The FEMA pre-storm value may undervalue homes, restricting available repair funding.

Proposed Solution:

- Clearly direct homeowners so they can immediately submit independent appraisals if they dispute the initial FEMA value.
- Establish a review process for appraisals that allows for adjustments without requiring a full appeal.
- Provide a clear timeline for appraisal updates so homeowners are not left waiting indefinitely.

Pre-storm appraisal values are not the responsibility of the Building Department. It is up to the resident to verify their information with the Property Appraiser.

15. Communication & Transparency in the Permit and Appeal Process

Issue: Residents are frustrated with inconsistent messaging and lack of timely updates.

Proposed Solution:

- Establish a centralized online dashboard for permit and appeal status updates.
- Provide estimated timelines for each step in the permit and appeal process.
- Implement weekly town hall updates (virtual or in-person) where residents can ask questions and get real-time answers.

We have created a “permit” task in SmartGov to allow residents to see appeals within the permit portal.

Each appeal is different and has a different timeline, not sure we can provide time estimates.

We will not spend our valuable time on “town hall” meetings. Residents can call, email, or request information in person at the Building Department office.

16. Review of FEMA-Driven Policy Changes & Their Justification

Issue: Residents are struggling with the lack of clarity on what are FEMA-mandated vs. town-imposed requirements.

Proposed Solution:

- Publish a document outlining FEMA requirements vs. town-specific policies.
- Identify and eliminate overly restrictive policies that are not required by FEMA but are causing unnecessary delays.
- Provide training for staff and permit techs to ensure uniform enforcement of FEMA rules.

Town Ordinance is in-line with FEMA policy. The Town ordinances are an almost mirror image of the FEMA SI/SD Desk reference. We are following both to near perfection.

https://www.fema.gov/sites/default/files/documents/fema_nfip_substantial-improvement-substantial-damage-desk-reference.pdf

https://library.municode.com/fl/redington_shores/codes/code_of_ordinances?nodeId=PTII_GELE_CH63BUCOCORE_PT2FLDAPR

17. Reducing Bureaucratic Hurdles for Primary Residences vs. Rental Properties

Issue: Some homeowners are under-insured or uninsured and face greater risk of displacement yet face the same regulatory barriers as rental property owners.

Proposed Solution:

- Expedite the permit and appeal process for primary residences to help those at risk of displacement.
- Provide a separate case management process for low-income or uninsured residents who are struggling with FEMA compliance.
- Work with local organizations and emergency housing programs to refer interim solutions for displaced residents.

Building Department will continue to review applications in the order received. AGAIN, the only fair way is to treat everyone with the exact same standard. Each application has its own issues, each structure was impacted differently.