



FLORIDA DIVISION OF EMERGENCY MANAGEMENT

Office of Floodplain Management Guidance

SUBSTANTIAL IMPROVEMENT/SUBSTANTIAL DAMAGE PACKETS TO OBTAIN ESTIMATED PROJECT COSTS TO MAKE SI/SD DETERMINATIONS

PURPOSE:

Provide guidance on preparing community-specific packets to be provided to applicants who propose improving or repairing buildings and structures located in flood hazard areas. The model "SI/SD Packet" is based on the FEMA [Substantial Improvement/Substantial Damage Desk Reference](#) (FEMA P-758), supplemented with information taken from similar packets prepared by several Florida communities. It briefly explains the Substantial Improvement (SI) and Substantial Damage (SD) requirements of the Florida Building Code (FBC) and local floodplain management regulations. Communities can ask applicants to complete the forms to provide descriptions of cost elements and estimated costs of the work to be covered by requested building permits.

BACKGROUND:

Every local jurisdiction in Florida is required to enforce the FBC, including requirements that apply to existing buildings located in flood hazard areas. To administer the SI/SD provisions of the FBC, communities must have documentation showing expected project costs to determine whether proposed improvements meet the definition of Substantial Improvement and to determine whether damaged buildings have incurred Substantial Damage. Making SI/SD determinations is a fundamental responsibility of communities that participate in the National Flood Insurance Program (NFIP). The steps communities take to make SI/SD determinations are articulated in each community's local floodplain management regulations.

House Bill 683 is codified in [Chapter No. 2025-140](#), Florida Statutes. Section 7 expands section 553.79(1)(f), Florida Statutes, which precludes communities from requiring copies of contracts or "any associated document, including but not limited to, letters of intent, material costs lists, labor costs, or overhead or profit statements." Local officials can request that applicants complete an SI/SD Packet to provide them with the information necessary to fulfill their legal responsibilities. Failure to enforce the SI/SD requirements could result in sanctions being imposed by the Federal Emergency Management Agency.

GUIDANCE:

Communities should review the model SI/SD Packet and tailor it for their use. The Microsoft Word file for the model packet is available at the link below.

Communities that have similar packets should replace or revise their packets to be consistent with this model.

A sample checklist to help local officials review Actual Cash Value appraisals is available at the link below.

SUBMIT FOR FDEM REVIEW

Significant deviations from the model packet should be reviewed by the FDEM Office of Floodplain Management. Please put your community name in the subject line and send to floods@em.myflorida.com.

DISCLAIMER:

This guidance is informational and should not be construed as legal advice or engineering advice. The FDEM Office of Floodplain Management staff are floodplain specialists, not registered design professionals or licensed building officials. OFM staff are not authorized by statute to interpret the Florida Building Code.

Office of Floodplain Management
Florida Division of Emergency Management
Helpline: 850-815-4556 and floods@em.myflorida.com
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<https://www.floridadisaster.org/dem/mitigation/floodplain/community-resources/> (under Guidance, Ordinance Amendments, FBC Amendments, and Sample Forms)