




Detailed Cost Breakdown

Package for Substantial Improvement/Substantial Damage Review

(aka 50% rule)
last revised May 2025

This rule is only applicable to structures located in a flood zone.

What is the FEMA 50% Rule?



Structures that do not meet the current flood requirements for the flood zone that they are located in are subject to the 50% rule.


This rule limits the improvements or repairs on buildings to 50% of the **Market Value** before the entire structure is required to be brought into full compliance with current flood regulations. If the value of a repair or improvement is more than 50% of the market value, the structure is considered **Substantially Damaged** or **Substantially Improved**.

If a structure is **Substantially Damaged** or **Substantially Improved** it must be brought into compliance with current flood regulations including potentially elevating the building.

What is the **Market Value** of my Structure?

Market Value is determined by one of two ways — by the Lee County Property Appraiser at www.leepa.org OR by private appraisal done by a Florida Licensed Appraiser.

This value is for the structure **only** and excludes land, land extras, and building extras.

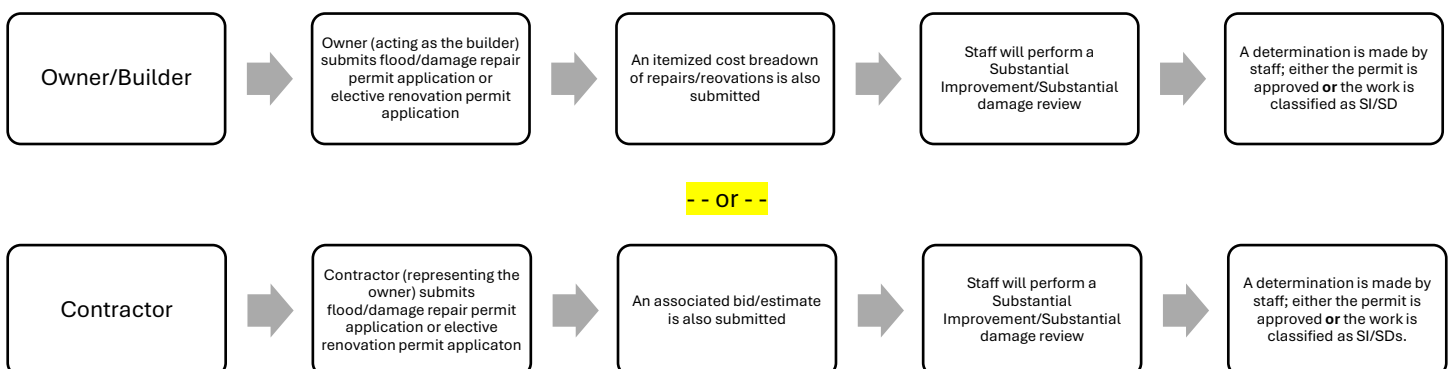


Unincorporated Lee County is a participant in FEMA's National Flood Insurance Program (NFIP). As part of this membership and compliance with 44 CFR 59 and 50, County staff are required to conduct Substantial Improvement (SI) and Substantial Damage (SD) reviews for all elective renovation and damage/flood repair permit applications for structures located in FEMA's Special Flood Hazard Area (SFHA). These assessments determine whether repair costs exceed 50% of the structure's value (pre-event/pre-renovation structure value is used).

This process ensures our continued NFIP membership. It also allows continued access to federally-backed flood insurance, disaster assistance, funding, and reduces future flood risks.

For damaged (from any damage related event, i.e. flood, wind, fire, earthquake, tornado, etc.) or flooded structures in the SFHA, staff must evaluate whether the work required to restore the structure to its pre-damage condition qualifies as "substantial damage." All structures within the SFHA are subject to these reviews, which are carried out by local officials and staff in NFIP communities. Applicants must provide necessary documentation to facilitate these assessments.

For the County to perform an SI/SD reviews, the submittal process occurs in one of two ways:



Please review this document thoroughly to ensure that all required documentation is accurately submitted for staff evaluation.



Owner/Builder
(owner acting as the builder)

Informational page only

Detailed Cost Breakdown Package for Substantial Improvement/Substantial Damage Review

Owner/Builder Guidance Document

Structures that do not meet current flood requirements for their designated flood zone are subject to the 50% rule (*a structure must meet current freeboard and applicable flood zone/BFE requirements to be considered a compliant structure). This rule limits improvements or repairs on buildings to 50% of the structure's value, excluding the land. If the 50% value is breached, the structure is considered "Substantially Damaged" or "Substantially Improved" and must be brought into full compliance. For damage structures, Lee County staff must evaluate whether the work required to restore the structure to its pre-damage condition qualifies as "substantial damage".

- **Property Owner's Affidavit (page 4):** To be signed and dated only if owner is acting as contractor (aka "owner/builder"). Information including, but not limited to: Owner is taking responsibility of permit and work, must be on-site at all times supervising, can hire construction subcontractors to work under their supervision but those contracted employees must be licensed. For more information on liability information and what it means to be an "owner/builder", refer to this document <https://www.leegov.com/dcd/PermittingDocs/OwnerBldrDisclosure.pdf>
- **Subcontractor bids:** If using subcontractors, verify they are licensed within the State of Florida at myfloridalicense.com and registered in Lee County. Subcontractor bids must be dated and signed by the contractor and contain their business name and license number. Bids must state "labor and material included". For situations where certain materials are supplied by owner, indicate this on the bid and ensure labor cost are applied to the work related to the material (owner must provide material cost on page 8).
- **Cost Itemization Form (page 8) either elective or a result of flooding/damage of any kind:** If you are an owner acting as the contractor, you are responsible for submitting the detailed cost itemization or estimate and providing back up documentation to justify the breakdown of costs.
 - ALL costs for ALL improvements/repairs necessary to restore flooded/damaged structures to the before-damage condition must be listed. Per 44 CFR 59 & 50, The County must require the applicant to provide an estimate of the entire cost to fully restore the structure.
 - Owner/Builders must provide supporting cost backup for every applicable line item on page 8. Supporting/cost back up examples: receipts, quotes, cost estimates, bids, online shopping cart* estimate print outs.
 - **How were the costs on page 8 determined? If the cost back up does not clearly support these figures, they may be subject to further review.**
 - If items were obtained through local hardware stores, you may use virtual shopping cart estimates. Place applicable repair items in the virtual shopping cart, then print out the costs sheet. Pro tip: matching corresponding costs back up pages to the line items referenced on page 6 will help with staff reviews.
 - Subcontractor bids may be used for any item. Bids must be dated and signed by the contractor and must contain the contractor's business name and licensed number.
 - Subcontractor Bids for trades (mechanical, electric, etc) must include quantities, material costs and labor costs.
 - Subcontractor bids must state "labor and materials are included". If material is supplied by owner, state that the bid is for labor only, and the owner must provide cost of the material and cost itemization.
 - Permit number will be populated by staff (this field may be left blank)

- When materials are reused—such as being removed, refurbished, or dried out—the associated labor must still be accounted for. In such cases, label the material costs as "reused" and ensure the labor section is completed to reflect the work performed.
 - Line item #1 on page 8 is not for the mold remediation/clean-up of flood damaged materials. Post flood/damage clean up and trash removal costs are not to be included (see page 5 for more details).
 - Labor costs must be estimated at the current market value for local or regional construction industry wage scales for any work performed. The most current data from U.S. Bureau of Labor Statistics – Occupational Employment and Wages in Cape Coral-Ft. Myers should be used as a guideline for compliance – excluding Helper wages. (www.bls.gov/regions/southeast/news-release/occupationalemploymentandwages_capecoral.htm or https://www.bls.gov/oes/current/oes_15980.htm). Labor values less than \$20* per hour will not be accepted (*subject to change).
 - Line item 28 and 29 “**Other**” refers to misc. items not displayed on the list such as skylights, generators, etc.
- **Scope of Work (Page 6):** Provide a complete and detailed scope of work to include all aspects of the project (whether related to flood/damage repair or elective renovation/addition projects). Clearly indicate any trade work (electrical, mechanical, plumbing, roofing). Identify if you are reusing, repairing or reinstalling existing materials, cabinets, doors, baseboards, hardware, etc. in the comments section. You must provide the amount of hours involved and labor costs for all reused materials. In cases where details are unclear or questionable, the permit application review process may be delayed. Providing comprehensive and accurate information helps avoid unnecessary application review delays.
 - **Items to be excluded (Page 5):** This is an informational only page and is not required to be submitted with your paperwork to guide you on what should be excluded from the costs.
 - **Elevation Certificate information:** Elevation Certificates are **not required**. They are ONLY to be submitted if attempting to prove that the structure is already compliant. Please contact staff before purchasing a new elevation certificate. If structure is **currently** compliant (including machinery and equipment) to current flood regulations (elevation and other floodplain regulations), the 50% rule does not apply.
 - **Photos of flooded/damaged structure:** Interior and exterior photos are highly recommended, as they can significantly aid in the review process for the repair permit.

*Information details, refer to this site: <https://www.leegov.com/dcd/flood/building/improvements>



Owner/Builder
(owner acting as the builder)

**Detailed Cost Breakdown Package
for Substantial Improvement/Substantial Damage Review**

AFFIDAVIT

Property Address: _____

PROPERTY OWNER

I hereby attest to the fact that I (acting as contractor) personally produced the attached itemized list of repairs, reconstruction and/or remodeling which are hereby submitted for a Substantial Damage or Substantial Improvement review by Lee County Staff. These damages/improvements are ALL OF THE DAMAGES/IMPROVEMENTS sustained to or proposed for this structure, and that all additions, improvements or repairs proposed on the subject building are included in this estimate. Neither I, nor any other contractor, will make any repairs or reconstruction of additions or remodeling not included in the attached list.

I UNDERSTAND THAT I AM SUBJECT TO ENFORCEMENT ACTION, WHICH MAY INCLUDE FINES, IF ANY INSPECTION OF THE PROPERTY REVEALS THAT I HAVE MADE REPAIRS OR IMPROVEMENTS NOT INCLUDED ON THE ATTACHED LIST OF REPAIRS OR THE APPROVED BUILDING PLANS. See attached itemized list.

I acknowledge the following:

- ☐ Subcontractor bids may be used for any item. (a copy of all signed and dated bids with business name and license number must accompany this form).
- ☐ Subcontractor bids/estimates must state "labor and materials are included".
- ☐ In situations where certain materials are supplied by owner, this should be indicated on the bid and labor costs must be applied to the work related to the material (owner must provide material cost on page 8).
- ☐ All applicable line items listed on the Cost Itemization Form must have corresponding cost backup/supporting documentation i.e. receipts, quotes, etc.
- ☐ Labor costs must be estimated at the current market value for local or regional construction industry wage scales for any work performed. The most current data from U.S. Bureau of Labor Statistics – Occupational Employment and Wages in Cape Coral-Ft. Myers should be used as a guideline for compliance – excluding Helper wages.
(www.bls.gov/regions/southeast/news-release/occupationalemploymentandwages_capecoral.htm or https://www.bls.gov/oes/current/oes_15980.htm. Labor values less than \$20* per hour will not be accepted (*subject to change).
- ☐ When materials are reused—such as being removed, refurbished, or dried out—the associated labor must still be accounted for. In such cases, within the Cost Itemization Form, label the material costs as "reused" and ensure the labor section is completed to reflect the work performed.

Owner's Printed Name: _____

Owner's Signature: _____

Owner's Phone Number: _____

Date: _____



Detailed Cost Breakdown Package for Substantial Improvement/Substantial Damage (SI/SD) Review

Items to be EXCLUDED

Indoor improvements/components that are EXCLUDED:

- Plans and Specifications
- Cost to temporarily stabilize a building
- Survey costs
- Permit fees
- Repair of minor water leaks (attributed to plumbing, i.e., drain cleaning and rodding, and the repair or replacement of existing faucets, fill valves, flushometers and similar fixture trim and fittings) that do not involve structural, mechanical, or electrical systems.
- Clean-up and trash removal costs are not included in the costs used in the SI/SD determination review because they are not related to the actual cost of improving or repairing a building.
- Clean-up costs include such work as removing dirt and mud; and cleaning, disinfecting, and drying out buildings. Trash removal includes disposing of trash piled in the interior of the building or accumulated on the lot and related costs (e.g., dumpster, hauling, and tipping fees), as well as removal of abandoned contents and debris related to general clean-up of the structure before the improvement or repairs can be performed. If clean-up and trash removal are performed alongside demolition disposal, the cost estimate should clearly differentiate between costs that are mandatory and those that can be excluded.
- Plug-in appliances (such as washers, dryers and stoves)
- Items not considered real property such as:
 - Throw rugs
 - Carpeting and recarpeting installed over finished flooring such as wood or tiling
 - Furniture (that is not built-in)
 - Refrigerators
 - Appliances that are not built-in (i.e. a free-standing microwave on the counter is not considered "built-in").
 - Pro-tip: if you flip the building over, whatever doesn't fall out is considered built-in.

Outside improvements/components that are EXCLUDED:

- Landscaping
- Irrigation
- Sidewalks
- Fences
- Yard Lights
- Swimming Pool/Spa
- Screened Pool Enclosures
- Sheds
- Gazebos
- Detached Structures (Including detached garages)
- Landscape Irrigation Systems
- Docks and Davits
- Seawalls
- Driveway
- Decks (not structurally connected)



Detailed Cost Breakdown Package for Substantial Improvement/Substantial Damage Review

Scope of work

Items to be included

- This page contains costs that must be included in Substantial Improvement/Substantial Damage Review. The following list (while not exhaustive) characterizes the typical types of costs that must be included for repairs/renovations.
- Please check all line items that apply and include total count/quantity.
- Additional lines are available at the end to provide any items not listed in the component section.
- If items such as door knobs, hardware, or baseboards are being reused, be sure to note this in the comments section.
- When materials are reused—such as being removed, refurbished, or dried out—the associated labor must still be accounted for. In such cases, label the material costs as "reused" and ensure the labor section is completed to reflect the work performed.

Component	Applicable	N/A	Quantity	Location (i.e. bedroom, kitchen)	Comments
Demolition*					
Structural work					
Foundation work, footings, pilings					
Concrete work, slabs, cutting/repairing					
Sub flooring, joists, planks, plywood					
Masonry, walls, brick, stone, cutting, infills					
Tie beams, Concrete beams, lintels					
Rough framing, interior/exterior walls, plywood sheeting					
Trusses, rafters, dormers, sub fascia, plywood sheeting					
Additions					
Trades					
Electric – Fixtures, outlets or switches, ceiling fans, etc.					
Electric – wiring, panels, additional circuits					
Mechanical – Ductwork only					
Mechanical – any equipment replaced					
Plumbing – Fixtures, water heater, sinks, toilets, bathtub, shower					
Plumbing – re-piping, fixing or replacing broken pipes					
Fire suppression systems					
Roofing all repairs or replacements					
Solar Panels, solar equipment					

Component	Applicable	N/A	Quantity	Location (i.e. bedroom, kitchen)	Comments
Interior					
Security, Sound, Cameras, Cable or other systems					
Insulation					
Drywall (how high up from the floor?)					
Paneling wainscoting or other wall finishes (see tile section)					
Doors- Interior					
Interior trim, base boards, molding, casings, etc.					
Stairways, balustrade, guardrails, etc.					
Hardware, doorknobs, cabinet knobs, drawer pulls, etc.					
Kitchen cabinets					
Bathroom cabinets					
Built-in cabinets, shelving, entertainment centers, other built-ins					
Counter tops					
Appliances (built in only) dishwasher, microwave, wall over, etc.					
Flooring (over sub-flooring) i.e. tile, linoleum, stone**					
Wall tile, shower, bath, shower floor, etc.					
Paint interior					
Exterior					
Stucco, siding, brick, stone, decorative finishes, etc.					
Panel siding					
Widows					
Doors – exterior					
Sliders					
Garage door					
Shutters, storm panels, storm screens, etc.					
Soffit and fascia					
Light fixtures					
Paint exterior					
Misc.***					
Structurally attached decks					
Porches					

* Demolition does not refer to post event clean up or mold remediation.

** Carpeting and recarpeting installed over finished flooring such as wood or tiling is not included.

***additional fields provided below for other types of miscellaneous constructure components not shown in list above.

Miscellaneous/Additional Items

Component	Quantity	Location (i.e. bedroom, kitchen)	Comments



Owner/Builder
(owner acting as the builder)

Detailed Cost Breakdown Package
for Substantial Improvement/Substantial Damage Review
Cost Itemization Form
for Reconstruction, Repair, Improvement or Renovation

Permit Number: _____ **Address:** _____

Date: _____ **Event/Storm name:** _____

For questions about this page, refer to the "Owner/Builder Guidance" document on pages 2 and 3.

All applicable items selected in this column must match the scope of work on pages 7 and 8.	Subcontractor Bids for trades (see page 2)	Material Costs	Hours of labor	Hourly rate	Total labor costs
1. Demo and Removal of demo material (this does not refer to post flood clean-up or mold remediation - see pg. 2)					
Structural work (see scope of work page 6)					
2. Concrete and masonry					
3. Rough framing					
4. Trusses					
5. Other (see page 2)					
Trades					
6. Electric: Fixtures, outlets or switches only					
7. Electric – all other electric (see page 6)					
8. Mechanical - duct work only					
9. Mechanical – any equipment replaced					
10. Plumbing (see page 6)					
11. Roofing – all repairs or replacements					
12. Solar Panels/equipment					
Interior					
13. Insulation					
14. Drywall					
15. Light fixtures and ceiling fans					
16. Cabinets and counter tops, vanities					
17. Interior doors, trim and hardware					
18. Floor covering					
19. Lumber Finish (i.e. base boards, crown moulding)					
20. Tile walls bathrooms					
21. Paint (interior and exterior)					
22. Appliances (built-in, i.e. dishwasher, stove)					
23. Built-in furniture (i.e. bookcases)					
Exterior					
24. Exterior finishes (see scope of work page)					
25. Windows, exterior doors, sliders, garage door					
26. Shutters, storm panels, storm screens					
27. Fire Suppression system					
28. Other:					
29. Other:					
Subtotals	\$	\$			\$

Printed name of owner: _____

Total Cost \$

Signature: _____



Detailed Cost Breakdown Package for Substantial Improvement/Substantial Damage Review

Guidance Document

- **Licensed Contractor's Affidavit (Page 10):** signed and dated (only to be completed by a licensed contractor pulling the building permit).
- **Cost Form for Reconstruction, Repair, Improvement or Renovation (Page 11):** If you are applying as a contractor (on behalf of the owner), pages 9, 10 & 11 apply to you. The contractor must sign an affidavit indicating that the cost estimate submitted includes ALL damages or ALL improvements to the structure.
- **Scope of work:** prepare a complete scope of work to include all aspects of the project. Clearly indicate any trade work (electrical, mechanical, plumbing, roofing). Ensure all areas identified in the scope of work are included in the bid documents.
- **Comprehensive costs:** ALL costs for ALL improvements/repairs necessary to restore flooded/damaged structures to their before-damage condition must be listed. Per 44 CFR 59 & 50, The County must require the applicant to provide an estimate of the entire cost to fully restore the flooded/damaged structure to the pre-event condition.
- **Contractor or Subcontractor Bids (if applicable):** All bids must be dated and signed by the contractor and contain the contractor's business name and license number. Bids must state "labor and material included" and include quantities and material costs.
- **Material by others:** If material is supplied by others, indicate that the bid is for labor only and provide documentation for the cost of material (supplied by others) within the bid documentation.
- **Existing material (reinstalled/reused/refurbished):** The bid must contain the labor cost and description of the reused material and the work necessary to refurbish and reinstall the material (Example: kitchen cabinets and counter tops refurbished and reinstalled).
- **Subcontractor bids required for any trade being utilized.**
- **NOTE: Bids may be in the form of contracts, proposals, estimates, etc.**
- **Excluded items:** Refer to page 5
- **Labor and Material:** Bids, contractor submissions, or estimates that do not include references to labor or materials will be rejected.



Licensed
Contractor

**Detailed Cost Breakdown Package
for Substantial Improvement/Substantial Damage Review**

AFFIDAVIT

Property Address: _____

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, reconstruction and/or remodeling which are hereby submitted for a Substantial Damage or Substantial Improvement review by Lee County Staff. The list of work contains **ALL OF THE WORK TO BE CONDUCTED** or **HAS BEEN CONDUCTED** on the subject property.

Neither I, nor any other contractor, will make any repairs or reconstruction of additions or remodeling not included in the attached list. I UNDERSTAND THAT I AM SUBJECT TO ENFORCEMENT ACTION, WHICH MAY INCLUDE FINES, IF ANY INSPECTION OF THE PROPERTY REVEALS THAT REPAIRS OR IMPROVEMENTS HAVE BEEN MADE AND ARE NOT INCLUDED ON THE ATTACHED LIST OF REPAIRS OR THE APPROVED BUILDING PLANS.

See attached itemized list.

Contractor's Printed Name: _____

Contractor's Business Name: _____

Contractor's Address: _____

Contractor's Phone Number: _____

Contractor's State Registration or Certification Number: _____

Contractor's Signature: _____

Date: _____



Licensed
Contractor

Detailed Cost Breakdown Package
for Substantial Improvement/Substantial Damage Review

COST FORM

For Reconstruction, Repair, Improvement or Renovation

Project Address:	
Owner's name:	
Event/Storm name:	
Project description:	
Contractor business name:	
Contractor printed name:	

Acknowledgement	Initial
When materials are reused—such as being removed, refurbished, or dried out—the associated labor must still be accounted for (include a note in the bid/estimate).	
Flood/Damage repairs: <u>ALL</u> costs for all repairs necessary to fully restore <u>flooded/damaged</u> structure to the pre-event condition must be listed.	
Contractor bids/estimates indicate that labor and materials are included.	
The scope of work and all bid documentation is attached to this page. Select all that apply: <input type="checkbox"/> Construction Cost Estimate <input type="checkbox"/> Construction Bid <input type="checkbox"/> Subcontractor Bid/Estimate (subcontractor bids required for any trade being utilized)	

Total combined construction cost of all bids (including labor/materials)	\$
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Contractor's Signature: _____ Date: _____