



January 16, 2026

Via Email Delivery

The Honorable Nick DiCeglie
Florida Senate
414 Senate Office Building
404 South Monroe Street
Tallahassee, FL 32399-1100

Re: SB 1234 Building Permits and Inspections
01.20.26 Agenda, Community Affairs Committee

Dear Senator DiCeglie:

On behalf of the Florida League of Cities, I respectfully submit these comments to you regarding SB 1234, which exempts from building permit requirements the installation of hurricane and flood protection walls, certain work valued at less than \$7,500 on single-family lots, and requires the Florida Building Commission to develop a statewide, uniform building permit application. I hope we can meet soon to discuss these concerns.

No building permit for hurricane and flood protection walls (Lines 135-154):

A primary consideration with seawall construction is that it requires moving quantities of dirt, which may cause subsistence issues for adjoining properties. Also, construction of walls and fences may improperly encroach on adjoining properties. If this construction is exempt from building permits, there is no mechanism to ensure the work complies with applicable setback, easement, and drainage requirements to avoid these issues. An after-the-fact inspection by the local government will occur too late to remedy the problems without a high cost to the property owner.

State Uniform Building Permit (Lines 918-922):

The League does not oppose creation of a uniform statewide building permit, but we respectfully request that you address the following practical considerations:

- Include assurances that the uniform permit is capable of full integration with local government building permit software systems. Local governments use a variety of software systems, purchased at considerable cost, to streamline permit review time. A uniform permit, presumably electronic in nature, may not interface with different software and would require manual entry of building permit information. This would increase permit processing times and costs, rather than reducing them.
- Ensure the application accounts for local amendments to the Florida Building Code.
- Ensure the application accounts for variations in projects (all types of commercial, residential, and subtypes thereof).

No building permit for work valued at less than \$7,500 (Lines 215-228):

This proposed exemption from building permits applies to work anywhere on the lot and to both new construction and existing homes. The exemption applies to installation of exterior doors and windows, as well as gas and mechanical work.



- Exemptions for gas and mechanical work raise life safety concerns, and such work should not be exempted from building permits.
- The bill exempts exterior doors and windows, which means there is no way to verify that exterior windows and doors meet wind resistance standards. We respectfully suggest that exterior doors and windows not be exempt.
- The exemption applies to work anywhere on a residential lot. In some cases, work may encroach on easements and adjacent property owners. The permit exemption means there is no way to prevent such encroachments before the work commences. We respectfully suggest that the exemption be confined to work within the structure's interior rather than the entire lot.
- The bill does not address the question of how the value of the work will be verified to ensure the \$7,500 threshold is not exceeded. It requires a contractor to maintain records of the work, but there is no assurance that the records will be preserved if the contractor leaves the area or goes out of business.
- It is unclear whether the exempted work will still be subject to inspection requirements after it is completed. If a local government may still inspect, this may address the concerns raised above, even if it means a homeowner may have to re-do work after the fact. If building officials are still responsible for inspection, however, they remain liable for unpermitted work containing defects that are not apparent through an inspection. We respectfully suggest that you include a limited liability protection to ensure local governments are not held responsible for unpermitted work.

I look forward to meeting with you soon to discuss these issues. In the meantime, thank you very much for your consideration of these comments.

Sincerely,



Rebecca O'Hara
Deputy General Counsel
Florida League of Cities, Inc.

cc: Chair McClain and members of the Senate Community Affairs Committee