



St. Johns County Board of County Commissioners

Growth Management | Building Services Division

To Whom It May Concern:

This is a courtesy notification from the St. Johns County Building Department to certain residential condominium and cooperative associations concerning structural safety inspection requirements recently adopted by the State for condominium and cooperative buildings three (3) stories or more in height as determined by the Florida Building Code. You have received this notification based upon public records identifying you as the registered agent or representative of a condominium and/or cooperative association that may be affected by these new requirements.

During the 2022 Special Session, the Florida Legislature passed Senate Bill 4D, which was signed into law as Chapter 2022-269. The Florida Legislature further clarified Senate Bill 4D in 2023 passing SB 154 which was signed into law as Chapter 2023-203 Laws of Florida, and effective as of June 12, 2023. Among other things, the legislation establishes a requirement that residential condominium and cooperative associations must have a “milestone inspection” performed by a professional engineer or architect for each building that is three (3) stories or more in height based on the age of the building. The legislation also includes other new requirements for condominium and cooperative associations, including completion of a “structural integrity reserve study” and other related budgeting and disclosure obligations.

Please be aware of the following important deadlines in this legislation:

- The initial milestone inspection for any condominium or cooperative building that is three (3) stories or more in height, and a building reaches 30 years of age before July 1, 2022, must be performed, and a copy of the inspection report submitted to the Building Official before **December 31, 2024**.
- If a building reaches 30 years of age on or after July 1, 2022, and before December 31, 2024, the building’s initial milestone inspection must be performed and a copy of the inspection report submitted to the Building Official before **December 31, 2025**.
- The Building Official may accept an inspection report performed before July 1, 2022 as the initial milestone inspection. If the Building Official accepts a previous inspection as the initial milestone inspection, the deadline for a subsequent 10-year re-inspection is based on the date of the previous inspection.
- For any other condominium or cooperative building that is three (3) stories or more in height, the initial milestone inspection must be performed, and a copy of the inspection report submitted to the Building Official, the year in which the building reaches **30 years of age** (based on the date of occupancy), and **every 10 years** thereafter.

- Upon determining that a building must have a milestone inspection, the Building Official will provide written notice of such required inspection to the condominium or cooperative association. Phase one of the milestone inspection must be completed, and a copy of the inspection report submitted to the St. Johns County Building Official, within **180 days** of the written notice.
- A phase two of the milestone inspection must be performed if any substantial structural deterioration is identified during phase one. If a phase two inspection is required, a progress report providing a timeline for completion of the phase two inspections must be submitted to the St. Johns County Building Official within 30 days after submitting the phase one inspection report. All repairs for substantial deterioration must be commenced within **365 days** of receipt of the phase two inspection report to the Building Official. The Building Official may extend the 30 day time frame to no more than 80 days for cause. If the building is in eminent danger of collapse the design professional must notify the Building Official immediately.
- If an association fails to submit proof that repairs have been scheduled or commenced within the required timeframe, the Building Official will review and determine if the building is unsafe for human occupancy.

St. Johns County is reviewing whether to prescribe further timelines and penalties with respect to compliance with the legislation.

This courtesy letter is not intended as a comprehensive review or summary of Senate Bill 4D, or Senate Bill 154 which contains additional requirements and deadlines not discussed above, or intended as legal advice or interpretation. **You are strongly encouraged to review the legislation and any obligations you and/or your association may have with an attorney.**

County staff may reach out further to obtain necessary contact information, as they continue to develop the required database of affected properties and associations. It is also the County's intention to provide notice of changes in the law or applicable procedures. You and your association, however, are responsible for complying with all applicable requirements of the law.

St. Johns County has set up an online database and inspection forms for this work. Following is the web application URL address for you to login and set up your user account information. Please do this as soon as possible so proper notices can be delivered.

<https://secure.sjcfl.us/CondoAssocsExt/Login.aspx>

If you are not the registered agent or representative of a condominium and/or cooperative association, please submit a change request, along with the contact information for the current agent/representative, if known, to: Debbie Willis at dwillis@sjcfl.us

Howard White C.B.O
St. Johns County Building Official
4040 Lewis Speedway
St. Augustine, FL 32084