



Substantial Improvement Administrative Procedures for development in the Special Flood Hazard Area (SFHA)

Purpose and Use

The purpose of this document is to outline how Renovo Borough will administer and implement steps to make Substantial Improvement (SI) determinations. Communities that participate in the National Flood Insurance Program (NFIP) must adopt and enforce floodplain management regulations that include requirements for SI structures, as defined in 44 CFR 59.1.

Improvements to structures in the regulated floodplain that equal or exceed 50% of the market value, including improvements undertaken after being substantially damaged during a disaster, must comply with local floodplain management regulations. This often means that structures cannot simply be rebuilt to pre-damage conditions. Local officials must ensure that all permits issued for reconstruction comply with local regulations.

This document primarily captures all procedures for actions taken pre-disaster ('blue skies'). However, this document can be utilized to create a substantial damage procedure for actions following a post-disaster event.

This plan was compiled and prepared by Renovo Borough Council.

Regulations

SI structures in Renovo Borough are defined and regulated according to the following regulations and legislation. These should be referenced to determine the definition of SI/SD and any legal requirements pertaining to post-disaster permitting.

Code/Ordinance	Title of Regulation(s)	Document location or link	Responsible Department/POC	Effective Date	SI or SD
Building Codes	2021 International Property Maintenance Code	Renovoborough.org	Roger Hoy	8/9/2023	
Zoning/ Floodplain Ordinance	Borough Code-Zoning Ordinance	Renovoborough.org	Roger Hoy	7/17/17	
Land Use Plan	SALDO Subdivision and Land Development Ordinance	Clintoncountypa.gov/departments/planning	Clinton County Planning Department	1/26/23	

Appeals/Variances

Renovo Borough's provisions that regulate the appeals process for development in the floodplain and/or SI/SD in its regulations. Due to Renovo Borough's adoption of floodplain provisions in the Renovo Borough Zoning Ordinance as well as its Building Codes there are two appeal boards for these regulations:

- Board of Zoning Appeals- appeals based on the Renovo Borough's Floodplain Ordinance
 - More information: [ZHB-Variance-Instructions-Application.pdf \(renovoborough.org\)](#)
- Board of Building Appeals – appeals based on the flood provisions in the Renovo Borough's
 - More Information: [Renovo-Borough-Application-for-Appeal-for-IPMC-UCC.pdf \(renovoborough.org\)](#)

Permit Process - for development in the floodplain (including SI)

Renovo Borough has a process for all development in the floodplain, including existing structures that must be assessed for substantial improvement. The process is:

1. All development in the floodplain requires a permit to be obtained through Renovo Borough's and Zoning Officer.
 - See here for Floodplain Permit; [floodplain-permit-application.pdf \(renovoborough.org\)](#)
 - See here for Substantial Damage/Improvement Worksheet; [substantial-damage-worksheet.pdf \(renovoborough.org\)](#)
2. Renovo Borough's Floodplain Administrator will review the permit and determine if the proposed work constitutes Substantial Improvement.
 - A Substantial Improvement Worksheet will be done for any building in the floodplain making improvements.
 - If it is determined that the improvement on the structure exceeds the value of the structure by 50% it will be deemed substantially improved and must meet all current floodplain regulations set forth in the Land Use Ordinance and Building Codes.
 - Floodplain Administrator will issue Notice of Substantial Improvement Determination
 - Applicant will need to resubmit application to meet the current floodplain regulations for a substantial improvement found in the Land Use/Floodplain Ordinance and Building Codes.
 - If the applicant needs additional information or would like to contest the market value (tax value) or improvement value (cost per square foot) they can schedule a meeting with the Floodplain Administrator and/or submit the information following the policy above.
 - Contact Floodplain Administrator Roger Hoy at 570-660-6435 or by email at hoyinspection@gmail.com.
 - If it is determined that the improvement on the structure does NOT exceed the value of the structure by 50% it will be deemed non-substantially improved. The proposed work can proceed as proposed and a permit will be issued. But if the scope, materials, or budget changes then a new or revised permit application must be submitted.
3. When a building permit is required, flood provisions found in the IRC and IBC are reviewed. See here for Building Permit Application:

Method for Determining Market Value

Renovo Borough has a methodology for determining the market value of substantially improved structures. The primary method used for determining market value of substantially improved structures is:

- The Borough will use the most recent “improvements” value on the List website and provide link: [Mapping Services | Clinton County, PA \(clintoncountypa.gov\)](http://Mapping Services | Clinton County, PA (clintoncountypa.gov))
 - For more than one structure on a parcel the Floodplain Administrator will contact the Assessment Office to get a value for a specific structure.
- If the applicant would like to contest the Tax Assessment Value, they may procure their own appraisal.
 - Must be within the last 1 year
 - Appraisal reports should include:
 - Intended users, including the property owner, who can then submit it as part of a permit application.
 - Must reflect the value of the property before any renovation or alterations
 - Separate the market value of a structure from the value of the land
 - Market Approach must be utilized

Method for Determining Cost of Improvement

Renovo Borough has a methodology for determining the cost of improvement of structures. The primary method used for estimating cost of improvement is:

- Itemized costs estimate from a licensed contractor or design professional.
 - Cost estimate shall include and itemized list of the items found in 4-5 to 4-7 of the [Substantial Improvement/Substantial Damage Desk Reference \(fema.gov\)](http://Substantial Improvement/Substantial Damage Desk Reference (fema.gov))
 - Labor cost must be included, regardless of whether it is volunteered, discounted, or donated.
 - Itemized estimate must be signed by licensed professional attesting that the information provided is accurate.
- If the Floodplain Administrator doesn’t agree with estimate provide they may at their discretion use the most recently published International Code Council – Building Valuation Data: [Building Valuation Data - ICC \(iccsafe.org\)](http://Building Valuation Data - ICC (iccsafe.org)) to determine a value of work based on building types and square footage impacted by proposed work.
- Phased work and/or multiple permits
 - Multiple Permits: The Borough issues separate mechanical, electrical, plumbing, and building permits. Therefore, the applicant must provide the combined value of all the proposed work to make a substantial improvement/damage determination, regardless of the number of permits issued.
 - Phased Improvements: The term “phased improvement” refers to a single improvement that is broken into parts. For a number of reasons, an applicant may wish to schedule anticipated improvements over a period of time, and they may request separate permits for each phase. The floodplain administrator, at its discretion, will ensure that phased improvements do not circumvent the substantial improvement requirements.