Comment by Tatiana Gust –

Date Submitted 01/09/2026

Comment In response to BI#318, and with reference to the Special Inspection Manual, 2021 Edition, the role of a special inspector is described as providing oversight of construction activities that require specific knowledge and expertise exceeding the level of inspection typically provided by the local building department. This enhanced oversight is intended to address circumstances involving specialized technical requirements or limitations in time or resources available to the authority having jurisdiction. Additionally, under the Key Aspects of Special Inspections section, the Manual indicates that special inspections apply principally to the structural framing system of a building. The structural framing system is identified as including foundations, walls and columns, floors and beams, and roof systems. The Manual further notes that certain nonstructural components associated with fire safety may also require special inspections, including fireproofing, smoke control systems, sealing of fireresistant penetrations and joints, and EIFS. The petitioner indicates that the walls in which the windows are being replaced are existing and nonstructural in nature, and that the proposed replacements are size-for-size. The scope of work does not appear to involve modifications to the structural framing system, nor does it include fireresistance or life-safety systems. Further, this work does not appear to require a level of specialized expertise beyond that which the local building department is authorized and qualified to provide. Based on the information presented and the intent of special inspections, it is my opinion that the described work may be inspected by the local building department and does not require a special inspector by the nature of the work itself. Notwithstanding the above, the BO retains the authority to require a special inspector if deemed necessary due to administrative considerations, including limitations of time or available resources.

Comment by Scott McAdam –

Date Submitted 01/12/2026

110.8.1 includes structural system or structural loading, repair or restoration. Windows are part of the exterior envelope components and cladding system which must resist loading pressures and are structural parts of the building. Nowhere does it indicate only the main wind force resisting system is applicable. Code section included. 110.8 Threshold building. 110.8.1 During new construction or during repair or restoration projects in which the structural system or structural loading of a building is being modified, the enforcing agency

shall require a special inspector to perform structural inspections on a threshold building pursuant to a structural inspection plan prepared by the engineer or architect of record. The structural inspection plan must be submitted to the enforcing agency prior to the issuance of a building permit for the construction of a threshold building. The purpose of the structural inspection plans is to provide specific inspection procedures and schedules so that the building can be adequately inspected for compliance with the permitted documents. The special inspector may not serve as a surrogate in carrying out the responsibilities of the building official, the architect, or the engineer of record. The contractor's contractual or statutory obligations are not relieved by any action of the special inspector.

Comment by Shane Kittendorf –

Date Submitted 01/12/2026

The response is focused on the proposed scope of work involving the removal and replacement of windows within a metal stud infill wall system. Section 110.8.1 of the Florida Building Code requires special inspection during repair or restoration projects when either the structural system or the structural loading of a threshold building is modified. The term "modified" is not expressly defined in the Florida Building Code or ASCE 7; therefore, it is interpreted using its plain meaning, code context, and accepted engineering practice. In this context, modified means a change from the original or previously approved condition that alters the behavior or performance of a system or the loads acting on it. While window and door replacement does not alter the building's primary structural system, the exterior building envelope is an integral component of the wind-load–resisting system. Modifications to the envelope affect wind pressures and internal pressurization, which influence how loads are applied to and transferred through the primary structural elements. As such, this scope of work impacts the structural loading of the threshold building. Neither the Florida Building Code nor ASCE 7-22 provides explicit definitions for "structural system" or "structural loading." Instead, these standards define load types, load effects, and load combinations and establish how loads are applied to and resisted by structural systems. Structural loading is therefore understood as the loads acting on a building in accordance with ASCE 7 and the Florida Building Code, including dead, live, wind, flood, rain, and other applicable loads. Accordingly, replacement of windows and doors within the exterior envelope constitutes a modification to the structural loading of a threshold building and falls within the scope of Section 110.8.1, requiring submission of a structural inspection plan and the use of a special inspector.

Comment by Jerry Peck

Date Submitted 01/12/2026

That DEC states: Conclusions of Law 6 Pursuant to section 489.105, Florida Statutes, building contractors are permitted to perform remodeling, repair, or improvement of any size building if the services do not effect the structural members of a building. 7 The Board answers the question in the affirmative as qualified below Therefore, the Board hereby issues a declaratory statement that a building contractor may install non-structural, nonload-bearing windows and doors in buildings greater than 3 stories in height, pursuant to section 489.105(3)(c), Florida Statutes If a building contractor is allowed to install windows and doors in buildings that are greater than 3 stories in height, supposedly because the windows and doors are "nonstructural, non-loadbearing". Would that not remove a need for a Special Inspector/threshold inspector to perform a threshold inspection for replacement of windows and