



TO: Development Services Customers

SUBJECT: **INFORMATION BULLETIN 162**  
Shell Building Permits

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CREATED BY: Plan Review Division

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**Purpose:**

As a customer service initiative, the Development Services Department (DSD) has developed this **revised** Information Bulletin (IB) 162 to describe and clarify the procedures for permitting shell buildings. This information bulletin has been revised to refer to the BuildSA application.

**Scope:**

A shell building permit is issued to construct a structure that does not receive a Certificate of Occupancy (CofO) and therefore may not be legally occupied upon completion. Rather, a shell building shall receive a “Certificate of Completion” when the work associated with the shell building scope has been completed and approved by DSD. A CofO would be issued later when an “interior finish-out” phase of building construction has been designed, submitted, approved, permitted, and inspected through DSD, or a later CofO is applied for by a tenant.

DSD has defined the following types of shell structures to help in communicating the scope of work of a shell permit but understands that customers use these terms in differing ways. The following definitions are provided to help in understanding DSD requirements.

**Definitions:**

**Shell Building:** A shell building permit is generally utilized in phased construction or for design build, where the building structural shell may be designed and ready to submit for permitting but the interior finish out design is not yet complete. It may also be utilized to build a building where individual tenants will complete their interior spaces to their specifications. For a shell building the future tenant is known or the occupancy type of tenant is known even if a tenant suite is vacant. A shell building at a minimum consists of all exterior walls, property line fire walls and the roof structure. Multi-story shell buildings also include all elevated floor assemblies, mezzanines, stairways and elevators, and core restrooms.

**“Speculative” Shell Building:** A particular type of shell building, that is constructed by an owner/developer for a speculative/unknown future occupant(s) without all the interior elements necessary for a complete building. A speculative shell building is also not ready for occupancy. The design firm for the shell phase generally does not design the later interior finish-out work for a future tenant, and generally the design firm/contractor designing/constructing the interior finish-out work has no information as to how the shell building was designed. Examples of common speculative shell buildings include strip malls, offices, warehouses, and industrial buildings.

**“White Box” or “Vanilla Box”:** The term associated with the level of construction when the owner/designer/contractor wants to do all the work required for occupancy and just wants to rent the space to a future unknown tenant to move in, and the owner does not want to obtain his/her own CofO for the spaces. The owner must specify the intent and occupancy classification of the building as if he/she were intending to get their own CofO. The level of work associated with the “white box” varies but typically includes all demising walls, toilet facilities, mechanical and electrical systems. Generally little to no “remodel” work would be required for a future tenant to move in. However, as there is no declared actual tenant, and therefore the actual occupancy type not known for certain, a “white box” permit is granted only a “Certificate of Completion” - similar to other types of shell buildings. Once the “white box” is completed, a future tenant must apply for a Certificate of Occupancy permit (See [Information Bulletin 126](#)) from DSD in order to obtain a CofO for their space. A future tenant coming into a white box space may or may not need to obtain limited trade permits prior to applying for and obtaining the CofO.

### **Procedure for Permitting Shell Buildings:**

1. Applicants shall submit a [Commercial Project Application](#). The Commercial Project is applied for electronically online through the [BuildSA Customer Portal](#). The application is filled out and submitted electronically and all applicable construction documents, reports and forms are then uploaded electronically as pdf files through the Plan Room in BuildSA.

3. During the application for a shell building, the applicant will be asked if the scope of work is phased or a complete project. A speculative owner and the general contractor may consider the shell as a complete project and the project complete with a Letter of Completion. However, from a City perspective the first-time interior finish out (often with a different owner, design firm, and general contractor) is the final phase of construction where the Certificate of Occupancy is first issued. Therefore, when applying for a shell, permit, the applicant must select that the project is phased (not a complete project). Once that is selected then the shell as a sub-type may be selected. Be aware for a green vacant piece of land with no previous sitework or foundation, the applicant would select all three: Sitework, Foundation and Shell. All three permits would be issued.

3. Applicants shall include all general information within the electronic application/within the uploaded electronic construction documents and a code analysis for the proposed project that includes:

- a. Design approach (if multiple occupancies): Separated occupancies, non-separated occupancies and/or Accessory occupancies per the International Building Code Chapter 5.
- b. Type of construction.
- c. Speculative occupancy classifications. Note: This should be based upon the design team and developer's intended types of possible future tenants (e.g., retail, restaurants, offices, high-piled storage warehouse, etc.). Lack of information at the shell permit stage and/or changes to the potential tenants during the tenant finish out phase of the project can cause significant design challenges, delays, and additional costs to the overall project.
- d. Fire protection system requirements (fire sprinkler, fire alarm, standpipe, etc.).
- e. Plumbing fixture analysis.
- f. The cover sheet should clearly indicate that this permit is designed as a building shell only.

#### **Minimum Code Requirements Permitting Shell Buildings:**

There has been much discussion between the City and our customers to determine the minimum code requirements for shell design. As the building shell will not receive a CofO and therefore, cannot be legally occupied, the question is generally: "What (if anything) is required to obtain a shell building permit and, eventually, the Certificate of Completion?" The following list is presented to describe the City's minimum code requirements for shell buildings, especially "speculative shell" buildings. This list does not represent a complete list of code requirements but is an attempt to answer the most common code questions that DSD receives from the design and development community. This information is presented to expedite the design, plans review, permitting and construction of shell buildings.

- Minimum construction type will be based on the maximum allowable height and area provisions of Chapter 5 of the IBC as adopted at the time of application by COSA. This calculation should be included in the title sheet's code summary and be based upon the potential future occupancy types and the design approach chosen (separated or non-separated occupancy).
- Exiting shall be provided at the shell permit stage as follows to meet the provisions IBC:
  - Exit access doors and exits shall be provided to meet the maximum permitted travel distance criteria of IBC, Section 1016.
  - Means of egress illumination (i.e., exit lighting) is not required in unfinished shell spaces.
  - Exit signs per Section 1013 are not required in unfinished shell spaces.

- Please note that if there is any area of the building that is "finished out" as part of the shell permit (e.g., entrance lobby space, corridor, 1st floor tenant, etc.), those areas will be required to be shown to have emergency egress lighting and exit signs per the IBC.
- Fire sprinkler systems shall be provided and installed at the shell stage for projects that are required to be fire sprinklered per the IBC and/or IFC. The building permit plans are to include/show appropriate electrical supervision per the International Fire Code (IFC) and mechanical heating where needed for freeze protection per NFPA 13. For mercantile, warehouse and industrial shell buildings, the fire sprinkler system design criteria (i.e., design area and density, type of fire sprinklers, minimum sprinkler operating pressure(s), maximum storage height and arrangement of speculative commodities, etc.) is to be provided for the shell permit review.

Note that for some speculative shell buildings, it may be uncertain that a fire sprinkler system will be required (i.e., it may depend solely on what type of tenant(s) purchase and/or lease the space). In these cases, the design team may decide not to install a fire sprinkler system at the shell building stage. If this choice is made, DSD may require a letter from the registered design professional and owner signed and dated by each, indicating that they understand fire sprinklers may be required at the tenant finish out permit stage. This option is not allowed where fire sprinklers are required for allowable height and area, exiting, fire area size, minimum fire flow and fire hydrants, etc.

- Fire alarm systems are typically occupancy specific and installed with the tenant finish out permit(s). Full fire alarm systems need not be installed to obtain a Certificate of Completion. However, where a fire sprinkler system is installed and required to be monitored per the IBC Section 903.4, the sprinkler monitoring system is required to be installed at the shell permit stage prior to the issuance of the Certificate of Completion.
- Minimum parking, minimum plumbing fixtures, and minimum fire flow requirements will be reviewed at the shell stage based upon the proposed speculative occupancy classifications identified by the design team. Each of these items may be reviewed again at the tenant finish out permit(s) to ensure that the proposed parking, plumbing, and fire flow compliance provided at the shell design are adequate for the actual tenant finish out(s).
- Completed Energy Report (COMCheck) that satisfies the current adopted energy code.

For Speculative buildings and White Box shells, all building systems related to the building thermal envelope will need to be designed, constructed, and inspected per Section C402 of the 2018 International Energy Conservation Code during the shell permit and prior to obtaining the letter of completion. The

construction and inspections of mechanical, electrical, and plumbing (MEP) systems may be postponed to the Interior Finish Out permit(s); however, the MEP systems will need to be designed and submitted as part of the COMcheck report during the shell permit process. Future tenants will be responsible to permit, install and inspect the MEP systems that meet the adopted energy code and as designed under the shell, or show that alternative systems are as energy compliant as those designed under the shell.

For shell buildings built by a known owner for their own use, where permits are being phased for whatever reason, all building thermal envelope systems, and MEP systems may be postponed to the IFO stage. The design team needs to be aware of energy compliant building envelope systems such as required skylights that should be installed as part of the roof system at the shell stage rather than trying to retrofit them at the IFO stage after the roof assemblies are already constructed.

The requirements listed above address "typical" shell and "typical" speculative shell building permits – think typical office, retail, warehouse, and industrial shell projects. Where atypical situations require modifications to these general guidelines, DSD will work with the design team and/or owner on a case-by-case basis as needed to facilitate the permitting and construction process.

If you have any questions regarding this Information Bulletin or the procedure for permitting shell structures, please contact the Plan Review Staff at [DSDPlansManagement@sanantonio.gov](mailto:DSDPlansManagement@sanantonio.gov).

**Summary:**

This Information Bulletin is for informational purposes only.

**Prepared by:** Michael Dice, Development Services Manager

**Reviewed by:** Richard Chamberlin, PE, Development Services Engineer

**Authorized by:** Crystal Gonzales, PE, CBO, Assistant Director