



CITY OF SAN ANTONIO  
**DEVELOPMENT SERVICES DEPARTMENT**  
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TO: Development Services Customers

SUBJECT: **INFORMATION BULLETIN 189**  
Existing Buildings – Commercial Repair, Remodel, and Interior Finish  
Out – Applications and Requirements for Issuing a Certificate of  
Occupancy

DATE: March 28, 2011/*Revised October 3, 2011/August 1, 2014/December 22,*  
*2017/ March 25, 2022*

CREATED BY: Plan Review Division

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### **Purpose:**

As a customer service initiative, the Development Services Department (DSD) created this **revised** bulletin to update Information Bulletin (IB) 189 for existing buildings – commercial repairs, remodels and interior finish outs, requirements for a change of use and/or for issuing a certificate of occupancy. This bulletin has been updated to incorporate the new on-line submittal process through BuildSA.

This IB is intended to clarify when a customer should obtain a commercial interior finish out permit, a commercial remodel permit or a commercial repair permit, or perhaps not need a permit. The IB will clarify when a separate Certificate of Occupancy (COO) application is required or whether the COO will be provided automatically with a building permit. The IB will clarify when to use the Demolition permit application or to use the Existing Building Repair permit application.

### **Scope:**

## **Definitions and Application**

**Interior Finish Out** - A interior finish-out (IFO) construction project (from the City perspective) is a first-time completion of a vacant existing shell building/space where the building or space has **never been occupied**. The finish-out is the last phase of construction of an occupied building; the phases being sitework, foundation, shell building, and final finish-out construction to make the building move-in-ready for a known owner/tenant. To be considered first time, there would never have been a Certificate of Occupancy issued for that building or tenant space and the building relatively new. For more information on the types of shell buildings and being “move-in-ready”, please refer to [Information Bulletin 162](#).

A first time Interior Finish-Out application is applied for on-line using the Commercial Project Application by logging into the [BuildSA ACA Customer Portal](#) and selecting “Create an Application” under the Building tab. For information refer to the document: [Commercial Project Application](#). During the application, check “First Time Interior Finish Out” as the commercial application type.

**Remodel** - Any type of alteration to an existing building/space that is or has been previously occupied by an owner or tenant. Normally the owner or tenant, or previous owner or tenant, had received a previous Certificate of Occupancy (COO) from the jurisdiction it was built within.

A commercial remodel permit covers the following:

- Any proposed **structural work** to the building (cutting away of any wall, partition or portion thereof, and the removal or cutting of any structural beam or load bearing support)
- Changes to the **means of egress** (removal or change in any required exiting pathway or rearrangement of parts of a structure affecting the egress requirements). A change requiring a Remodel permit may include work that will require a new path of egress due to a change in use or increase in Occupant Load.
- **New building systems** such as new interior walls, ceilings, raised or lowered floors, new interior doors, or new exterior doors or windows in an existing exterior wall.

The following is included in a Remodel permit:

- All interior (or exterior) demolition required for the renovation/alteration. All partial demolition is included as part of the application and permit.
- Exterior sitework is included in a remodel (tree removal/planning/landscaping, parking lots/sidewalk/driveways, drainage detention, electrical and plumbing utilities).

A commercial remodel application would not be used for:

- A building addition to a structure, which is considered new work - increasing the building square footage and possibly occupant load.
- Finish work only: i.e., work that does not require a permit under the *International Building Code* (such as painting, wallpaper, tiling, carpeting, cabinets, countertops, and other similar work).
- Where the work is only mechanical electrical or plumbing (MEP) work. In this case only MEP trade permits are required.
- Work that is strictly repair (see next section)

A Remodel application is applied for on-line using the Commercial Project Application by logging into the [BuildSA ACA Customer Portal](#) and selecting “Create an Application” under the Building tab. For information refer to the document: [Commercial Project Application](#). During the application, check “Remodel” as the commercial application type, after checking “No” to Is the project going to be phased.

When an owner or tenant applies for a remodel permit, DSD will assume that the original COO is valid if there is no change of use (change in occupancy classification as defined in the *International Building Code*), or there is no significant increase in occupant load. If there is no change of use or occupant load, a new COO is not issued unless specifically requested by the owner on the remodel application. If there is a change of occupancy classification or if an owner asks for a new COO as part of a remodel application, then the submittal documents must include plans for the

entire building with dimensions and use of each room rather than just for the areas or space being remodeled. If there is no change of use, or increase in occupant load, the owner may request the old COO be reprinted or may have the old COO printed with a new business name.

**Repair** – The reconstruction or renewal of any part of an existing building for the purpose of its maintenance or to correct damage.

Work that is Repair only uses a separate/different application than the Interior Finish-Out or the Remodel. To be considered repair, the work must not include any of the following:

- Work that alters the building structurally
- Work that alters/affect the means of egress (remove, alter, or add a required path of travel to exit the building).
- The Work does not include new building systems, walls, ceilings, floors, windows, or doors that were not there previously.

The Repair Work does include:

- Repair work consisting of repairs to sheet rock, and ceilings, exterior siding and roof systems, replacement of windows and door systems (like for like).
- Foundation repairs
- Roof repairs and Re-roofs

Repair permits do not include, or the Minor Building Repair application used for:

- Finish work only: i.e. work that does not require a permit under the *International Building Code* (such as painting, wall paper, tiling, carpeting, cabinets, countertops and other similar work). This work does not require a permit by themselves but are generally included with permits with more extensive work.
- Where the work is only mechanical electrical or plumbing (MEP) work. In this case only MEP trade permits are required.
- Work where the use of the building is changing – different occupancy classification and planned increase in occupant load.

During a repair, and when opening walls and ceilings, the extent of damage may be found to require removal and replacement of a structural element. The repair permit does cover this type of repair if replaced like for like. A City inspection may result in the requirement for an engineer's inspection letter with unplanned structural replacement.

A Building Repair application is applied for on-line using the Minor Building Repair Application by logging into the [BuildSA ACA Customer Portal](#) and selecting "Create an Application" under the Building tab. Choose "Minor Building Repair Application" from the list. During the application, check "Remodel" as the commercial application type, after checking "No" to Is the project going to be phased.

A Minor Commercial Repair permit is **not a combination permit**, meaning that any Mechanical, Electrical, or Plumbing work included in the scope of work requires separate MEP trade permits applied for (with separate fees and inspections).

**Existing Building** - Those buildings that have been constructed previously under a valid building permit and have been legally issued a Certificate of Occupancy (COO) or a building legally constructed in the County and then later annexed into the city limits of San Antonio.

**Demolition** – A separate demolition permit application is required to remove or demolish an entire existing occupied or unoccupied standalone building. See [Information Bulletin 106](#). A demolition permit is required for any detached accessory structure if over 300 square feet (tool and storage sheds, playhouses, and similar uses).

Partial demolitions are included with an application for Repair, Remodel or Interior Finish Out permits. Any partial interior or exterior demolition is considered part of those issued permit types.

Removal of part of a building (attached structure or addition) may be included in either a Remodel permit, or a Building Repair permit, which permit depends on the requirements of the rest of the scope of work. Typically, removal of an addition requires work to the remaining existing building: Structural work is under a Remodel permit; Non-structural work is a Repair permit (to repair the wall between the remaining building and the removed addition).

## **QUESTIONS AN OWNER OR TENANT NEEDS TO ASK**

New owners have differing needs and DSD has several processes in place to help an owner move into a building and start operating their business legally. To determine which process or category an owner falls into, there are several questions that a prospective new owner or tenant needs to ask. Based on the answer, they can place themselves into one of the categories regarding the need for a new certificate of occupancy. Then an owner needs to ask further questions regarding the type of construction to utilize. Based on the answers, an owner can pick the correct permit and DSD process to use to be able to legally occupy the structure.

### **Certificate of Occupancy Questions**

- Is there a valid certificate of occupancy on file with the City of San Antonio for this building or lease space?
- If no, has the building been previously occupied?
- If no, is there a shell building permit on file, but no Interior Finish-Out Permit on file?
- Is the existing Certificate of Occupancy valid, i.e. is my use of the building the same occupancy classification as the previous COO such that I can operate under the old COO?
- Will I need to obtain a new COO because I am proposing to change the use (change the occupancy classification)?
- Am I able to operate simply by reprinting the old COO or by reprinting the old COO with a name change only?

The next page contains a flow chart to help a customer determine whether they need to obtain a new Certificate of Occupancy or can operate under the legal existing COO.

A Building is already constructed on your lot

Yes - Defined as an Existing Building with previous tenants

No - Not Defined as an Existing Building

Has there been a previous valid COO for the

Is a New COO required because of a change of use (Occupancy classification)?

Is the building a shell building with no previous tenant?

Yes, a new COO is required

No, the old COO can be used

No, the space is complete and has had a previous tenant occupying the bldg.

Yes, the building is a shell space with no previous tenant - Submit an IFO permit application

**A. Obtain new COO**  
A new COO with entire building plans with inspections is required

**B. May occupy Bldg under the old COO - May Reprint COO if desired**

**C. No Records - A new COO with entire building plans with inspections are required**

**D. Automatic COO is issued with permit**

Based on the answers to the questions above, an owner or tenant would fall into one of the following four categories regarding the need for a COO:

- A. Existing Building – New Occupancy Classification - A New COO is Required** - The new owner is proposing a change of use (change in occupancy type) for an existing building or space when compared to the previous use (occupancy type) of that building. The owner or tenant may or may not be proposing a remodel, repair, or MEP work to the space.
- B. Existing Building – Same Occupancy Classification - A New COO is Not Required** - The new owner proposes to occupy an existing building and operate under the current Certificate of Occupancy. The occupancy type or “use” of the building or space will remain the same as it was under the old owner or tenant. The new owner does not need a new COO but may wish to reprint the Certificate of Occupancy with a new business name. The fee for a COO reprint is listed in the [DSD Fee Schedule](#), currently \$53.00 with surcharges. A new COO may be requested as part of a remodel permit, however the owner should be aware that the plans submitted for review requires the plans for the entire building and inspections may be more intensive than required by the scope of work.
- C. No City Records Exist for a Building – A New COO is Required** - The new owner proposes to occupy a building that had a previous owner or tenant, but there are no valid Certificate of Occupancy records for that building, or the building was built in the county and later annexed. A new COO is required. Application for a Certificate of Occupancy in this situation is online by logging into the [BuildSA Customer Portal](#). Please refer to the previous [COO Application](#) (paper copy) for what would be required. If remodel work is being proposed a COO may be obtained with the remodel project.
- D. Shell Building - IFO Required with an Automatic COO Issued** - The building or space has never been occupied and there has never been a COO issued for that building or space. An interior finish out (IFO) permit is required to be obtained to ‘complete’ the building and receive the first COO for that building or space. It is possible that little or no construction work will be required if the space was constructed as a “white box”. For more information, please refer to [IB 162](#).

Once the owner understands whether or not a Certificate of Occupancy is required, the next set of questions to ask concerns the type of construction permit is needed in order to move in.

#### **Construction Questions:**

- Do I plan on performing any construction work on the building prior to using it?
- Will any proposed construction work be strictly related to finishes not requiring a permit?
- Is the construction work simply repairs as defined above?
- Will the construction work involve structural or means of egress changes to the building requiring a remodel permit?
- Will the proposed construction work involve only mechanical, electrical and/or plumbing?

The following flow chart should allow a new owner or tenant to determine which type of permit is required to move into the building. This applies only for existing buildings with a valid COO or buildings that have had previous tenants where the City has no records of a COO.

Shell Building or White Box  
(See IB 162)

Is the building a  
shell space or  
existing bldg  
with previous  
tenants?

Existing Building

Does the work  
involve any  
changes to the  
structure or the  
means of  
egress?

No

Does the  
construction  
work only  
involve  
MEP?

Yes

No

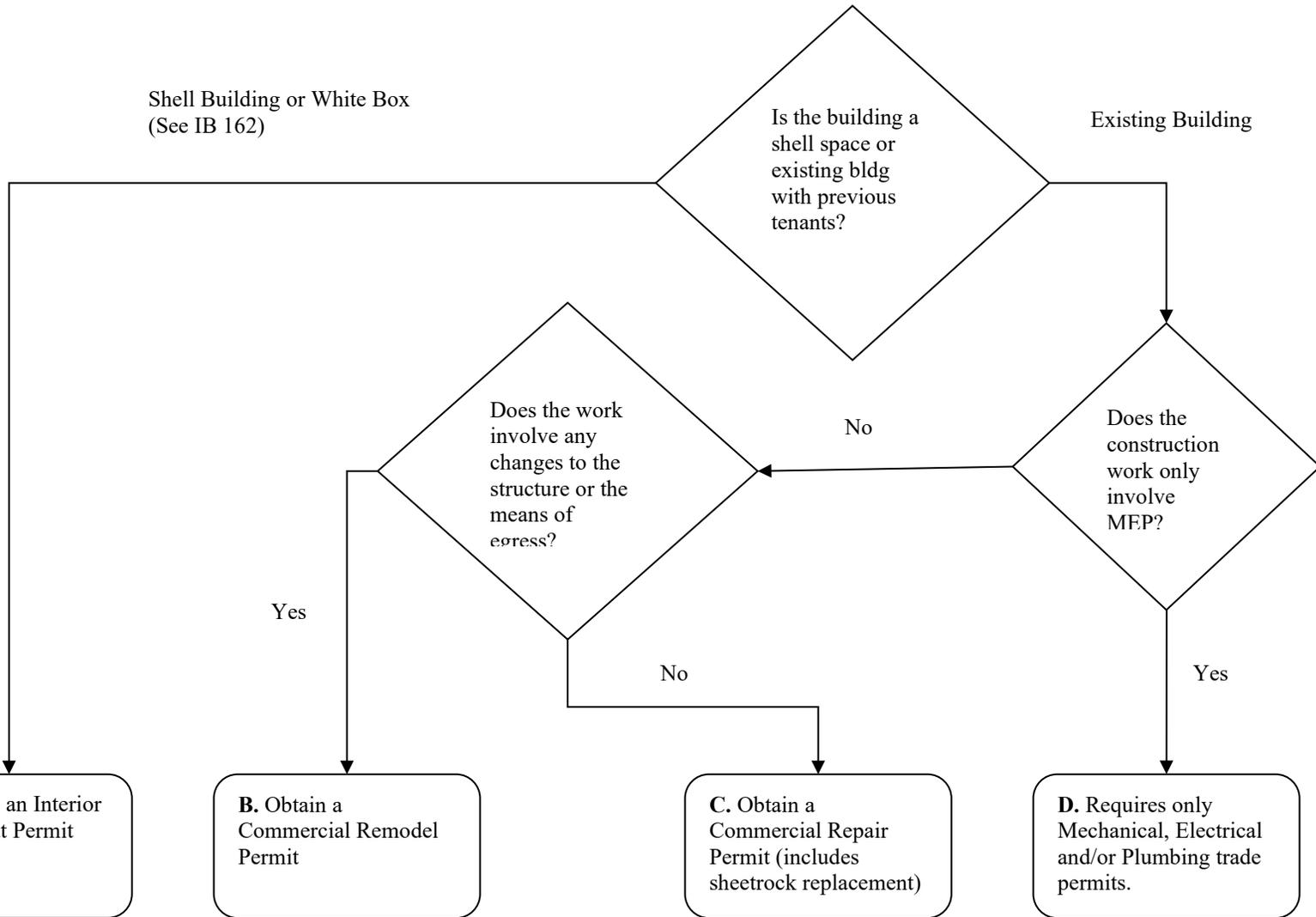
Yes

**A.** Obtain an Interior  
Finish Out Permit

**B.** Obtain a  
Commercial Remodel  
Permit

**C.** Obtain a  
Commercial Repair  
Permit (includes  
sheetrock replacement)

**D.** Requires only  
Mechanical, Electrical  
and/or Plumbing trade  
permits.



For questions related to this IB, please e-mail [DSDPlansManagement@sanantonio.gov](mailto:DSDPlansManagement@sanantonio.gov).

**Summary:**

This Information Bulletin is for informational purposes only.

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