

# Memorandum

**Date:** Tuesday, March 25, 2025  
**To:** Jean Fraser – Chief Executive Officer  
**Via:** Travis Beck – Chief Park Officer  
**From:** Prakash Pinto – Director of Planning & Compliance  
**Re:** Adoption of Building Codes, Federal Compliance, and Fire Life Safety Requirements

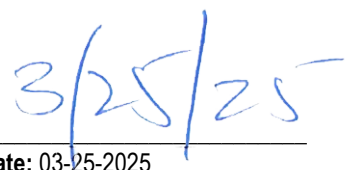
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## Purpose

The purpose of this memorandum is to update the building code requirements that were previously adopted by the Presidio Trust for the 2018 triennial cycle, to the 2021 triennial cycle. These adopted codes will govern all design, construction, rehabilitation and renovation activities within The Presidio. This document provides an overview of the relevant codes, federal regulations, and standards that apply to all projects undertaken within The Presidio, ensuring compliance with modern construction safety, environmental, and sustainability criteria. The building codes outlined herein are essential for maintaining the integrity, safety, and long-term preservation of The Presidio's historic and environmental assets.

In addition to the adoption of the 2021 International Building Code (IBC) and other national standards, this memorandum also incorporates federal compliance regulations, including those pertaining to environmental preservation, historical site protection, and accessibility. It also outlines the fire and life safety (FLS) and public food safety requirements that are to be met in all buildings and structures. This memorandum also includes the application of the 2022 California Building Code Standards (CBCS), including Title 24 energy efficiency requirements and seismic design standards, which are specific to California's unique environmental conditions and are required by all projects in the State of California, as well as the criteria for LEED certification for new construction and adaptive reuse.

The attached matrices present a comprehensive list of the building codes, federal regulations, fire and life safety requirements, and design criteria for the planning and development of projects within The Presidio.

  
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Jean Fraser, Chief Executive Officer  
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Date: 03-25-2025

## 2021 ICC Building Codes & 2020 National Electrical Code (NEC) Adoption

The Presidio Trust has adopted the following **2021 ICC Building Codes & 2020 National Electrical Code (NEC)** for all new construction, adaptive reuse, and other applicable work in The Presidio. These codes are essential to ensuring that all projects comply with modern safety standards, building practices, and preservation requirements.

## 2021 ICC Building Codes & 2020 National Electrical Code (NEC) Matrix

Year	Title	Description
2021	International Building Code (IBC)	Establishes safety, accessibility, and structural requirements for construction and adaptive reuse renovations.
2021	International Residential Code (IRC)	Governs the design and construction of one- and two-family dwellings and townhouses.
2021	International Mechanical Code (IMC)	Sets standards for mechanical systems, including HVAC systems and ventilation.
2020	National Electrical Code (NEC)	Defines requirements for safe electrical installations and repair.
2021	International Plumbing Code (IPC)	Establishes plumbing standards and requirements for plumbing installations.
2021	International Existing Building Code (IEBC)	Governs repairs, alteration, addition and change of occupancy for existing buildings and historic buildings.

### Footnotes:

The applicant is required to coordinate with the Planning and Compliance Department and the Permitting Office to obtain the necessary guidance and ensure full compliance with the applicable building codes. It is the responsibility of the applicant to verify that all relevant codes are met throughout the design, permitting, construction, and occupancy phases to ensure the safety, functionality, and regulatory compliance of the project. The Permitting Office reserves the right to enforce the standards that best protect the unique environment that is the Presidio Trust.

## 2022 California Building Code Standards (CBCS)

The Presidio Trust also adopts the **2022 California Building Code Standards (CBCS)**, which include specific provisions to address California's unique environmental, seismic, and sustainability requirements. The following matrix outlines key sections of the **2022 California Building Code Standards (CBCS)** for projects within The Presidio.

### 2022 California Building Code Standards (CBCS) Matrix

Year	Title	Section
2022	California Building Standards Administrative Code	(Title 24, Part 1)
2022	California Building Code (CBC)	(Title 24, Part 2)
2022	California Residential Code (CRC)	(Title 24, Part 2.5)
2022	California Electrical Code (CEC)	(Title 24, Part 3)
2022	California Mechanical Code (CMC)	(Title 24, Part 4)
2022	California Plumbing Code (CPC)	(Title 24, Part 5)
2022	California Energy Code	(Title 24, Part 6)
2022	California Historical Building Code (CHBC)	(Title 24, Part 8)
2022	California Existing Building Code	(Title 24, Part 10)
2022	California Green Building Standards Code	(CALGreen) (Title 24, Part 11)
2022	California Referenced Standards Code	(Title 24, Part 12)

#### Footnotes:

The applicant is required to coordinate with the Planning and Compliance Department and the Permitting Office to obtain the necessary guidance and ensure full compliance with the applicable building codes. It is the responsibility of the applicant to verify that all relevant codes are met throughout the design, permitting, construction, and occupancy phases to ensure the safety, functionality, and regulatory compliance of the project. The Permitting Office reserves the right to enforce the standards that best protect the unique environment that is the Presidio Trust.

## Federal Compliance Requirements

In addition to the local and state building codes, the Presidio Trust complies with the following **federal regulations** and **compliance guidelines** that may apply to design, construction, and operations within The Presidio:

### Federal Compliance Matrix:

Year	Regulation	Description
1969	National Environmental Policy Act (NEPA)	Requires environmental assessments or impact statements for projects that may significantly affect the environment.
1966	National Historic Preservation Act (NHPA)	Ensures preservation of cultural, historical, and archaeological sites. Requires Section 106 review.
1968	Architectural Barriers Act (ABA)	Requires accessibility in federally owned or leased buildings, programs, and activities.
2022	Occupational Safety and Health Administration (OSHA) Standards	Sets regulations for workplace health and safety, including construction site safety.
2023	NIST IR 8458e2023	Standards of Seismic Safety for Existing Federally Owned and Leased Buildings
2022	FDA Food Code	Sets health standards for food safety, storage, and preparation in restaurants and food service operations.
2024	CDC Model Aquatic Health Code (MAHC)	Sets standards for the design, operation, and safety of aquatic facilities to protect public health.

### Footnotes:

The applicant is required to coordinate with the Planning and Compliance Department and the Permitting Office to obtain the necessary guidance and ensure full compliance with relevant federal compliance documents. This includes adherence to environmental regulations under the National Environmental Policy Act (NEPA), historic preservation standards under the National Historic Preservation Act (NHPA), and accessibility requirements under the Architectural Barriers Act (ABA). It is the responsibility of the applicant to verify that these standards are met throughout the design, permitting, construction, and occupancy phases to ensure full regulatory compliance and the protection of the environment, historical assets, and public accessibility.

## Fire and Life Safety (FLS) Requirements

The Presidio Trust requires that all projects adhere to established **fire and life safety (FLS)** standards. The following matrix outlines these critical FLS standards and the codes that govern them:

### Fire, Life, and Safety (FLS) Matrix:

Year	Title	Description / Section
2021	International Fire Code (IFC)	Provides regulations for fire prevention, fire suppression systems, and emergency access.
2021	National Fire Protection Association (NFPA)	Sets standards for fire prevention, alarm systems, and fire suppression systems.
2022	California Fire Code (CFC)	(Title 24, Part 9)

### Footnotes:

The applicant is required to coordinate with the Department of Public Safety and the Fire Marshal's Office to obtain the necessary approvals prior to the beginning of the project to ensure full compliance with all applicable fire and life safety regulations and Presidio Trust Fire Prevention standards as set by the Fire Marshals Office. The above referenced codes are the baseline regulatory references that the standards are based on. The Fire Marshals Office reserves the right to enforce the standards that best protect the unique environment that is the Presidio Trust. It is the responsibility of the applicant to verify that these standards are met throughout the design, construction, and occupancy phases to guarantee the safety and well-being of all occupants.

## Elevator Compliance Requirements

The following matrix outlines the **building codes governing elevator** requirements for Presidio projects.

### Elevator Compliance Requirements Matrix

Year	Code Standard	Code Reference	Description/Requirement
2021	Elevator Design and Installation	2021 International Building Code (IBC), Chapter 30, ASME A17.1	Defines the requirements for elevator design, installation, and operation, including load, capacity, safety, and accessibility.
2021	Elevator Inspections	2021 National Fire Protection Association (NFPA) 101, ASME A17.1	Regular inspections and maintenance of elevator systems must be conducted to ensure safe operation.

**Footnotes:** The initial Certificate of Operation must be approved by both the Building Official and the Fire Marshal before the elevator is deemed safe for use. For annual inspections, third-party approved inspection agencies are authorized to approve the Certificate of Operation.

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## LEED Certification

The following matrix outlines the **LEED certification** requirements for Presidio projects.

### LEED Certification Matrix

Year	Code Standard	Code Reference	Description/Requirement
2020	LEED Certification	USGBC LEED v4.1	Projects must meet sustainability criteria to achieve certification, including energy efficiency, water use, indoor environmental quality, and materials sourcing.

**Footnotes:**

### LEED Certification Levels for the Presidio Projects

The Presidio Trust requires the following **minimum LEED certification levels** for all projects, to promote sustainability, energy efficiency, and environmental stewardship:

- **New Construction:** The minimum required LEED certification level is **LEED Gold**.
- **Adaptive Reuse:** The minimum required LEED certification level is **LEED Silver**.