

From: [Board of Supervisors \(BOS\)](#)
To: [BOS-Supervisors](#); [BOS-Legislative Aides](#)
Cc: [Calvillo, Angela \(BOS\)](#); [Mchugh, Eileen \(BOS\)](#); [Ng, Wilson \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [De Asis, Edward \(BOS\)](#); [BOS-Operations](#); [Board of Supervisors \(BOS\)](#); [Carroll, John \(BOS\)](#)
Subject: File No. 251247 - Sprinklers - 16 Letters
Date: Friday, December 19, 2025 3:21:56 PM
Attachments: [16 letters.pdf](#)

Dear Supervisors,

Please see attached 16 letters, from members of the public and various organizations, regarding:

File No. 251247 - Ordinance repealing the existing San Francisco Fire Code in its entirety and enacting a new San Francisco Fire Code consisting of the 2025 California Fire Code and portions of the 2024 International Fire Code, together with amendments specific to San Francisco, including provisions for fees for permits, inspections, and various City services, with an operative date of January 1, 2026; adopting findings of local conditions pursuant to California Health and Safety Code, Section 17958.7; directing the Clerk of the Board of Supervisors to forward San Francisco's amendments to the California Building Standards Commission and State Fire Marshal; and making environmental findings.

Regards,

Richard Lagunte
Office of the Clerk of the Board – Operations Division
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Voice (415) 554-7709 | Fax (415) 554-5163
richard.lagunte@sfgov.org | www.sfbos.org

Pronouns: he, him, his

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

From: cbonina@aol.com
To: [Lurie, Daniel \(MYR\)](#); [Commission, Fire \(FIR\)](#); [Law, Chad \(FIR\)](#); [Board of Supervisors \(BOS\)](#); [SauterStaff](#)
Subject: Sprinkler Ordinance for High Rise Concrete Residential Buildings
Date: Thursday, December 11, 2025 3:15:07 PM
Attachments: [Letter to Supes and Mayor re Sprinklers in HR Concrete Resi Blds 12.121.2025.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

December 11, 2025

To:

Mayor Dan Lurie

Board of Supervisors

Re: Fire Life-Safety Requirements for High-Rise Concrete Buildings and Consideration of Alternatives to Full Sprinkler Retrofits

Dear Mayor Lurie and Members of the Board

I am writing to highlight important considerations regarding proposed or potential sprinkler retrofit mandates for older high-rise concrete residential buildings in San Francisco. While life safety remains a top priority, it is equally essential to evaluate **building-specific risk, historic performance, and feasible alternative compliance pathways**—particularly when retrofit costs pose serious financial burdens for homeowners and undermine the city’s affordable housing goals.

Historical Fire Safety Performance of High-Rise Concrete Buildings

Mid- and late-20th-century concrete residential high-rises have virtually no record of fire-related fatalities in San Francisco—or nationwide—due to their inherent fire-resistive construction and robust compartmentalization.

These buildings, by design, do not behave like the low-rise wood-frame homes where nearly **80% of U.S. residential fire fatalities occur**. They

do not burn the same, they do not spread fire the same, and they do not present even remotely similar occupant risk profiles.

The Problem with One-Size-Fits-All Mandates

Imposing a blanket sprinkler requirement on older concrete towers—structures with decades of safe performance—ignores both risk and reality. It forces homeowners, many of whom are seniors or moderate-income residents, into **six-figure special assessments** for retrofits that are neither technically justified nor financially survivable.

The result would be predictable:

<!--[if !supportLists]-->➤ <!--[endif]-->displacement,
<!--[if !supportLists]-->➤ <!--[endif]-->forced sales,
<!--[if !supportLists]-->➤ <!--[endif]-->upward pressure on HOA dues, and
<!--[if !supportLists]-->➤ <!--[endif]-->the erosion of naturally occurring affordable housing—precisely the housing stock San Francisco can least afford to lose.

Key attributes contributing to High-Rise Concrete Residential Building fire resistant performance include:

1. Non-Combustible Construction

Concrete shear walls, slabs, and columns do not burn, contribute fuel, or release toxic smoke. This inherently limits fire spread and decreases flashover potential.

2. Effective Compartmentalization

Older high-rise buildings were often designed with robust compartmentation:

- 1–2-hour fire-rated walls and floors
- Solid-core unit entry doors
- Enclosed stairwells

These features slow fire spread and protect means of egress even without sprinklers.

*Sprinklers, while extremely effective in combustible construction, provide **marginal incremental benefit** in this very specific building category, as confirmed by decades of real-world outcomes.*

3. Documented Low Fatality Rates*

National fire statistics consistently show:

- **Very few fire deaths occur in high-rise residential buildings with non-combustible construction.**
- The overwhelming majority of residential fire deaths occur in **low-rise, wood-frame homes** due to rapid fire growth and structural vulnerability.
- In many cities—including San Francisco—there is **no historical record of a fire fatality** in certain categories of reinforced concrete residential towers built to mid-century code standards.

This empirical history is critical. Mandating disruptive, costly sprinklers in buildings with decades-long records of life-safety performance raises legitimate questions about **risk-proportionality** and **cost effectiveness**.

Challenges of Retrofitting Sprinklers in Older Concrete High-Rises

Older concrete structures face uniquely complicated retrofit issues:

- Core drilling through structural elements.
- Limited vertical shaft space for new risers
- Extensive ceiling demolition and unit-by-unit access
- Potential need for major water service upgrades, new fire pumps, and seismic bracing

These engineering and construction challenges translate into **very high per-unit costs**, which can lead to substantial **special assessments** for homeowners—including seniors, long-term residents, and low- or moderate-income households.

In a city already facing severe affordability pressures, these retrofit expenses can unintentionally contribute to displacement and loss of economic diversity.

Alternatives to Full Sprinkler Retrofit in High-Rise Concrete Buildings

Given the proven life-safety track record of these structures and the disproportionate financial impact of sprinkler requirements, San Francisco should consider **equivalent or enhanced performance-based alternatives**, including:

1. Enhanced Early Detection & Alarm Systems

Modernizing building-wide fire alarm systems—combined with in-unit smoke and heat detection—can improve response times without intrusive physical retrofits.

2. Smoke Control & Pressurization Improvements

Upgrading stairwell pressurization systems, improving corridor ventilation, and sealing penetrations can significantly reduce smoke migration—the factor most often associated with fire injuries.

3. Fire-Resistant Door Upgrades

Ensuring all dwelling unit doors have proper fire ratings, self-closing mechanisms, and intact seals can maintain effective compartmentalization—one of the strongest life-safety features of mid-century concrete towers.

4. Emergency Communications Systems

Improved public address systems and clearer emergency instructions support safer and more orderly evacuations or “defend in place” strategies.

5. Targeted Sprinklering in High-Risk Areas

Rather than full-building systems, sprinklers may be installed in:

- Compactor rooms
- Mechanical/electrical rooms
- Basements or storage areas
- Trash chutes
- Building lobbies or common areas

This targeted approach addresses the highest ignition-risk zones while controlling cost.

6. Performance-Based Fire Engineering Analysis

In lieu of prescriptive sprinkler requirements, independent fire protection engineers can:

- Model building-specific risk.
- Assess evacuation timelines, smoke movement, and fire growth.
- Demonstrate that existing construction plus enhanced detection meets or exceeds safety objectives.

California codes already allow such **Alternative Means and Methods (AM&M)** submittals when appropriate.

Preserving Affordability While Maintaining Safety

San Francisco's commitment to fire safety must be matched with a commitment to housing stability. Requiring costly, technically challenging retrofits in buildings with no historical pattern of fatalities risks:

- Exacerbating affordability challenges
- Forcing homeowners into financial hardship
- Undermining the preservation of naturally occurring affordable housing
- Creating pressure to convert or redevelop older buildings, reducing socio-economic diversity.

A balanced approach—one that recognizes proven building performance and considers modern, less intrusive safety enhancements—is essential.

Conclusion

High-rise concrete buildings have decades-long records of protecting life through robust construction and compartmentalization. Mandating full sprinkler retrofits without acknowledging this record, or without considering less burdensome alternatives, risks imposing unnecessary financial strain on homeowners and diminishing San Francisco's

affordable housing stock.

I urge policymakers and stakeholders to consider a **performance-based, risk-informed approach** that maintains safety standards while protecting the city’s residents from untenable costs. However, any consideration of citywide sprinkler retrofit mandates must be grounded in **evidence, engineering principles, and financial reality**—not assumptions borrowed from entirely different building types.

Thank you for your attention to this critical matter. I would welcome the opportunity to discuss the technical and policy considerations in greater detail.

Sincerely,
Carole Bonina
66 Cleary Court Unit 1503
cbonina@aol.com

*** DATA APPENDIX: Fire Risk, Building Performance & Historical Outcomes**

Below is a data-driven summary to support the arguments above. All figures are drawn from NFPA, U.S. Fire Administration, and widely reported municipal data.

1. Residential Fire Fatalities by Building Type

U.S. Fatalities by Building Type (NFPA)

Building Category	Share of U.S. Residential Fire Fatalities	Notes
One- and Two-Family Wood-Frame Homes	~70–75%	Highest fuel load, fastest fire spread, older houses often lack alarms.
Low-Rise Apartments (Under 7 Stories)	~20–25%	Often wood or lightweight construction with limited compartmentation.

**High-Rise
Apartments (7+
Stories)** **<2–3%**

Overwhelmingly
noncombustible construction;
fatalities extremely rare.

Key Point:

High-rise buildings, especially concrete ones, represent only a tiny fraction of national fatalities.

2. The Fire Performance of Concrete High-Rises

Core structural features explaining the safety record:

- Noncombustible structure
- One- to two-hour floor and wall assemblies
- Highly compartmentalized unit layouts
- Enclosed, fire-rated stairs.
- Limited pathways for horizontal fire spread.

Historical Outcomes

- NFPA analyses show **zero reported fire deaths in many pre-1990 concrete high-rises with full compartmentation.**
- Many cities report *no fatal fires in these buildings for decades.*

In other words—these buildings already perform at or above modern life-safety objectives without sprinklers.

3. Why Sprinkler Systems Show Greatest Effectiveness in Combustible Construction

Sprinklers are transformative in:

- Wood-frame multifamily buildings
- Single-family homes
- Buildings with lightweight or truss construction prone to collapse

But in heavy concrete structures:

- Fire growth is slower.
- Flashover is delayed or prevented.

- Structural failure risk is minimal.
- Containment within the originating unit is nearly always achieved.

Sprinklers offer **diminishing returns** when the building itself already suppresses, or limits fire spread.

4. Financial Impact: Hazard to AFFORDABILITY, Not Just Safety

Typical Retrofit Cost Ranges (Industry Estimates)

Building Type	Cost Per Unit (Typical)	Notes
Pre-1970 Concrete High-Rise	\$30,000–\$90,000+ per unit	Complex coring, limited riser space, significant finish restoration.
Buildings Requiring Water Service Upgrades	+ \$500,000–\$2.5M	New service laterals, pumps, seismic bracing.

Affordability Impact

- Special assessments of \$40k–\$100k can force homeowners into **distress sales**.
- HOAs may face insolvency if multiple owners cannot pay assessments.
- Naturally Occurring Affordable Housing (NOAH) buildings become financially nonviable.

This contradicts San Francisco’s stated housing stability goals.

5. Alternative Measures & Their Proven Effectiveness

Fire Fatalities by Primary Cause (NFPA)

Cause	Share of Fatalities	Mitigation
Smoke inhalation	~40–50%	Smoke control, door upgrades
Lack of early		Modern alarms, interconnected

detection	~25%	detection
Impaired mobility	15%	Defend-in-place strategies work best in concrete buildings
Fire growth/materials	Remainder	More limited in concrete structures

The data shows that improving detection and limiting smoke spread often saves more lives than sprinklers in noncombustible high-rises.

December 11, 2025

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Board of Supervisors

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From: [Sook Choi](#)
To: [SherrillStaff](#); [Board of Supervisors \(BOS\)](#)
Subject: I oppose SF fire sprinkler mandate
Date: Thursday, December 11, 2025 3:27:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Sherrill and Board of Supervisors,

I have been a San Francisco resident in the building located at 2200 Pacific Avenue for over 40 years, and I write to request your support to oppose the fire sprinkler retrofitting requirement for this building and similar older residential buildings.

Our group of residents are committed to pragmatic and effective safety measures that will continue to protect us and our neighbors.

The current mandate is not feasible or pragmatic, as it would cost each unit around **\$300,000+** to implement. This is cost prohibitive for most residents in the building, including myself.

Importantly, there is truly no need for this mandate to be required retroactively in this particular building located at 2200 Pacific Avenue for the reasons identified below:

1. The building at 2200 Pacific Avenue is a concrete building which has 1-2 hours fire resistance. This is a building with 24-hour security personnel / doorman and there would be ample time for the fire department to respond to any smoke detectors / fire alarms.
2. The building has upgraded to a new fire alarm, smoke detector, and electrical system that encompasses new alarm equipment in the lobby and garage. We also have new speakers in the hallways/corridors and additional smoke detectors in the common areas including corridors. This is sufficient to pick up on any potential fires and to alert residents/visitors, and, given the presence of 24-hour onsite security personnel, the fire department would be called in a timely manner to address any real-time fire concerns.
3. In a building like ours with concrete 8' tall ceilings, code-required earthquake brackets for holding sprinkler pipes, means 11-14" deep soffits to cover the pipes in corridors and inside units. The new "ceiling height" would be 7' or below, which is *lower* than the height required by code to be considered "living space".
4. This places undue burden on the building residents. In addition to the substantial financial burden, residents of our building (whether renters or homeowners) would be forced to essentially move out of our units, with our belongings, for a minimum of 6 months (probably more, given typical construction delays). This mandate affecting 100+ apartment buildings, condos and co-ops all over the city, would displace residents looking for temporary housing while construction is completed. Housing is already scarce in San Francisco. Many renters and homeowners may not come back to their original units.

I respectfully request that 2200 Pacific Avenue be exempted from the fire sprinkler retrofitting mandate. In the case of our building, the benefits are not proportional to the undue burden placed on residents, particularly in light of the concrete nature of the building, updated fire alarm systems, and the presence of a 24-hour doorman in the building to ensure the timely handling of any fire threats.

Thank you for your time and consideration, and I would be most grateful for your support.

Sincerely,

Sook Choi

From: [Marian Li](#)
To: [Board of Supervisors \(BOS\)](#)
Subject: Fwd: Installation of Fire Sprinklers
Date: Thursday, December 11, 2025 5:23:01 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Sent from my iPhone

Begin forwarded message:

From: Marian Li <mli388@gmail.com>
Date: December 8, 2025 at 11:07:27 PM PST
To: bos@sfgov.org
Subject: Fwd: Installation of Fire Sprinklers

Sent from my iPad

Begin forwarded message:

From: Marian Li <mli388@gmail.com>
Date: December 8, 2025 at 10:54:30 PM PST
To: Board.of.Supervors@sfgov.org
Subject: Re: Installation of Fire Sprinklers

SF Board of Supervisors

I am writing to request that you take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our building on other feasible life safety measures that will protect our residents and visitors. The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on me.

My condominium building is not designed to target water to individual units. It was built in 1964. It would not only be a disastrous design inside a small living space but also create a significant special assessment to retrofit the building's substructure systems (if it can even be done) as well as the hallway space and then in addition create some kind of piping into each unit and room. The construction and financial impact would take years to meet the requirements and would be unaffordable for many of us owners.

This would be creating more unaffordable housing for current affordable residences.

I don't have the savings set aside for such a huge unexpected addition to my budget!

The City and State is passing new laws without consideration of existing building operations and living conditions. We residents need help to cope with the rising costs of living in San Francisco. Please consider the practical ramifications of these new sprinkler retrofitting measures and exercise some common sense.

Thank you for your assistance and support.

Sincerely,

Marian Li

2200 Sacramento Street #1003

San Francisco, CA. 94115

Sent from my iPad

From: [meriel.Lindley](#)
To: [Board of Supervisors \(BOS\)](#)
Subject: Maryland Sprinkler Retrofit Mandate Will Not Be Enforced - LerchEarlyBrewer
Date: Thursday, December 11, 2025 7:18:22 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

https://url.avanan.click/v2/r01/___https://www.lerchearly.com/news/maryland-sprinkler-retrofit-mandate-will-not-be-enforced/___YXAzOnNmZHQyOmE6bzpinDkwMTk1ZGE4OGQxYjMzNmZiYzNlZTEwOTk2MTI1Nzo3OjY6MGE2NW12YzczMDZlNjExZGYwN2FjODlkZDRjMTkyZWVhMGUwZWU3MTpwOIQ6Tg
Sent from my iPhone

From: [Meg Reilly](#)
To: [Commission, Fire \(FIR\)](#); [Board of Supervisors \(BOS\)](#); [Lurie, Daniel \(MYR\)](#)
Subject: High Rise Sprinkler Mandate!
Date: Friday, December 12, 2025 2:34:07 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am a 75 year old resident in Fontana East living with my 82 year old husband. We are on a fixed income, like many of the long time owners in this coop high rise. Original owners paid in the neighborhood of \$29,000 for our apartments. We are not among the ultra-rich. Over time, the monthly assessment to cover building operating costs have risen to a point that it is difficult to pay that, as well as real estate taxes. Those two items alone represent a major chunk of our available funds.

Fontana East invested very recently in a new fire safety system. This is a concrete building. The new system is perfectly adequate. A forced upgrade to an unneeded sprinkler system is economically unsustainable and unfair.

We implore you to reverse course on this non-sensical "**one-size-fits-all**" legislation.

With gratitude for your attention and consideration.
Margaret Reilly

From: geofnorman@aol.com
To: [Board of Supervisors \(BOS\)](#); [Lurie, Daniel \(MYR\)](#)
Subject: Code Change for Fire Sprinklers
Date: Saturday, December 13, 2025 1:33:03 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I wanted to make sure that the mayor and board of supervisors saw the email I sent this morning to Stephen Sherrill ... we appreciate all of the work you do for our beautiful city, and Let's Go San Francisco! ☐

Here's the text:

Dear Supervisor Sherrill,

We have lived at 1896 Pacific Avenue for nearly 11 years ... it's a beautiful 100-year old building at the corner of Gough Street and my wife and I live on the top floor. I am nearly 82 and my wife is nearly 79.

We are very concerned regarding the 2022 SF fire code change mandating automatic sprinklers for older buildings like ours.

About 65% of our building is currently sprinklered, including all of the public area, garages, basements, etc.

Fire ladders can reach all of our units, and being a corner building makes it even easier to gain access in the event of a fire.

We spend a lot of time as an HOA, of which I am a member, focusing on fire safety measures, including monthly and quarterly checks of our system, replacements of hoses on a regular basis, quarterly and annual sprinkler tests, repairs and upkeep of fire escapes, annual refreshment of in-unit fire extinguishers, and more.

The San Francisco Chronicle's recent article provided a timely reminder of the impact on homeowners if the fire code change is not substantially altered or eliminated for buildings like ours.

I urge you and the Board of Supervisors to act thoughtfully on behalf of the many homeowners who would be affected by this unnecessarily overreaching code change.

We appreciate all that you do for our district and for the city as a whole ... many

thanks!

Geoffrey and Christina Norman

From: [mitch_cihomsky](#)
To: [Board of Supervisors \(BOS\)](#); [Lurie, Daniel \(MYR\)](#); [SauterStaff](#); [MandelmanStaff \(BOS\)](#); [FireAdministration, FIR \(FIR\)](#); [Commission, Fire \(FIR\)](#)
Subject: SF High Rise Sprinkler Mandate
Date: Saturday, December 13, 2025 5:15:07 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good morning,

I understand and support that you wish to make San Francisco more affordable and livable. However, **this mandate will** have the opposite effect and **continue to drive tax paying citizens out of the City**.

No other city has this onerous requirement.

Please take action to drastically amend or delete the fire sprinkler mandate for high-rise residential buildings. Please collaborate with the 126 affected buildings/residents on other feasible life safety measures that will protect our residents and visitors as well or better.

This mandate was passed in 2023 with no notice to homeowners and without any discussion of its feasibility or cost. It **makes no differentiation based upon the fire escape and protection available at very different types of buildings that you have lumped together as one**. In my building for example, the doors to an outdoor fire escape are located for easy and quick access to exterior concrete fire stairs. A sprinkler system would have negligible benefit.

The mandate places **unreasonable physical and financial hardships on residents**. A nonprofit HOA building's resources are limited with a budget solely based on the actual annual and projected long-term expenses. Annual budget increases are also limited by state law and will impact those on fixed incomes.

The sprinkler mandate and its significant financial impact to each of us individually will impact our HOA's ability to budget and pay for our assessments. A single undertaking of this financial significance could limit the financial health and well-being of the community for years and also result in an inability to maintain the rest of our building as needed.

This is **yet another blow to the affordability concerns that all residents in San Francisco face**, not only because of the direct cost of compliance but because of the effect this will have on thousands of rental units and apartments throughout the City.

While I strongly support fire and life safety measures, **this mandate was enacted without proper study of variations in buildings, their susceptibility to fire and their current fire protection measures**. The financial cost will be too high for a huge number of residents likely causing another mass exodus from the city.

Thank you for hearing my concern. **Please stop this mandate!!!**

Sincerely,
Mitchell G. Cihomsky
Homeowner, 1200 California Street

From: [Anna Abeyta](#)
To: [Commission, Fire \(FIR\)](#)
Cc: [Lurie, Daniel \(MYR\)](#); [Board of Supervisors \(BOS\)](#)
Subject: Failure to Notify Owners Subject to Fire Code Section 1103.5.4
Date: Monday, December 15, 2025 8:38:38 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

San Francisco Fire Commission:

I'm writing to ask the Fire Commission to confirm that all owners subject to 1103.5.4. [For SF] Automatic Sprinkler System for Existing High-Rise Buildings have been notified as required by Section 1103.5.4.3. In addition, I'm asking for clarity that if an owner gets delayed notification, that the 12 year compliance timeline will start for that building at the time of written notification, as opposed to the dates listed in Section 1103.5.4.5.

Background:

I read about the November 12 Fire Commission meeting in the Chronicle, and decided to watch the video.

The Fire Department represented to the Fire Commission that the all the owners of these existing older high-rise buildings had been sent letters notifying them of the change to the 2022 Fire Code now requiring fully retrofitting their buildings with sprinklers.

I am an owner of over 10 years in one of these buildings, and I was certain that I had not received such a letter. I am a part owner of one unit in a condominium building with 112 individual units. To make sure I was not just a one off, I asked several other owners if they had received letters. No one remember having received a letter from the Fire Department.

I read the Fire Code. And sure enough, Section 1103.5.4.3. required the Fire Department to notify all owners within 120 days by certified mail of this change in the Fire Code. That would have been by April 30, 2023, over 2 1/2 years ago.

Through a public records request, I asked the Fire Department for a copy of the letter they should have sent me. I gave them the address of the building and my mailing address, the same mailing address that DBI has used to notify me numerous times of the Façade ordinance.

The response I got from the Fire Department was that the letter had been mailed to the building engineer. Letters were not sent to any of the owners in our building. And I've since learned that the owners in at least three other buildings may not have received letters either.

Conclusion:

The Fire Department, likely without knowledge or intention, may have misinformed the Fire Commission and, by extension, the public on this important requirement.

Therefore, I have two requests of the Fire Commission.

One, ask the Fire Department to review the process used to identify the owners subject to Section 1103.5.4, determined what went wrong that all owners were not notified, and identify by building the number of owners that have and have not been mailed the required Notification Letters.

And two, clarify that if an owner gets delayed notification, that the 12 year compliance timeline will start for that building at the time of written notification, as opposed to the dates listed in Section 1103.5.4.5.

Let me know if you would like additional information.

Sincerely,

Anna Abeyta

From: [Michael Tognarelli](#)
To: [Board of Supervisors \(BOS\)](#); [Lurie, Daniel \(MYR\)](#); [ChanStaff \(BOS\)](#); [ChenStaff](#); [DorseyStaff \(BOS\)](#); [Fielder, Jackie \(BOS\)](#); [MahmoodStaff](#); [MandelmanStaff \(BOS\)](#); [MelgarStaff \(BOS\)](#); [shaman.walton@sfgov.org](#); [WongStaff \(BOS\)](#)
Cc: [patricia.rudd.feac](#)
Subject: Amend/Repeal the SF Older High-Rise Sprinkler Mandate
Date: Monday, December 15, 2025 4:03:28 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors and Mr. Mayor,

I am writing to request you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on our residents.

If the code is not changed, my expected cost would be comparable with my current annual salary. Relocating during the retrofit, and the cost associated with that, would also be an expensive hardship. In short, I'd probably have to move out and take a considerable loss on my property value.

Further, the demographics in our building skew to a more senior population. Many people face health issues and/or live on fixed incomes. For this group, the assessed cost may be prohibitive to their retaining their ownership, and even if they can absorb the cost, relocation to an accommodating temporary home, for some, may be infeasible.

We have recently had a meeting at Fort Mason with Supervisors Sherril and Sauter and the mayor's representative wherein many very germane opinions were voiced by residents. I hope that you may be able to review recordings. At the time of the meeting, the supervisors and the mayor's representative in attendance were very supportive of our position. It is very disappointing to hear that the mayor himself may have reversed course. I sincerely hope that he will reconsider.

Thank you very much for your consideration.

Regards,

Michael Tognarelli
Board Member and Shareholder
Fontana East Apartment Corporation

From: [John Linehan](#)
To: [Board of Supervisors \(BOS\)](#); [Commission, Fire \(FIR\)](#); [Lurie, Daniel \(MYR\)](#); [SauterStaff](#); [MandelmanStaff \(BOS\)](#); [FireAdministration, FIR \(FIR\)](#)
Subject: Fire Mandate
Date: Tuesday, December 16, 2025 9:02:59 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear San Francisco Board of Supervisors, Mayor Laurie and other officials:

I am a homeowner, longtime resident and registered voter who lives in a nonprofit HOA located in the City of San Francisco. I am writing to request that you take action to amend the fire sprinkler mandate for high-rise residential buildings and that you collaborate with the residents of the approximately 126 affected buildings/residents in amending this mandate.

I and a group of about 150 registered voters in my building and several thousand other voters in more than 100 other buildings will be actively watching and reacting to how you vote and act on this request. This is a critical issue for **several thousand** San Francisco residents who are likely to follow this issue and how you and others vote on it more closely than we have ever followed any issue in San Francisco over our many years and, in some cases, lifetimes spent living here. If this mandate is continued, most of us will be displaced from our homes and many will have to sell because we cannot afford the work required.

In this email, I will assume you are familiar with the unaffordable cost to both the city and homeowners of the work required by this mandate. It is virtually impossible from an affordability standpoint for either the city or us residents to complete this work as required in the amendment.

We agree with and support all reasonable fire and safety requirements from the city of San Francisco. But there is a point where the cost and unreasonableness of the requirements are excessive and this is clearly one of those cases.

We hope to have your support in changing the mandate.

Thank you and best to you and your families during the holidays!

John Linehan
1200 California Street
Apartment 12C
john@linehanweb.com

From: [Rudy Gonzalez](#)
To: [Board of Supervisors \(BOS\)](#)
Cc: [Zou, Han \(MYR\)](#); [Larry Mazzola Jr.](#)
Subject: Sprinkler Retrofit Legislation
Date: Tuesday, December 16, 2025 10:46:28 AM
Attachments: [BOFP SF Retrofit Cost 12-16-2025.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good morning,

I write to update the members of the Board of Supervisors on upcoming legislation that will be introduced, today, amending the fire code. This legislation will delay certain deadlines, within the overall 12-year implementation period.

We **support delaying internal deadlines** and **establishing a technical advisory committee (TAC)**, which many of you are familiar with, in the context of inclusionary zoning. This is an important step to ensure stakeholder and expert input, not to mention effective coordination between city agencies.

It should also be noted that some outrageous numbers are floating around causing very real concern for condo owners. These numbers were circulated by a luxury home builder, who ironically, doesn't build with union wages, benefits, or standards. One would think those numbers would be far less than our estimates, but alas they are inflated.

In the attachment to this email, you will see a rebuttal letter referencing Item 2 (Black Mountain Construction) and Item 1 ([National Statement from NFSA](#)).

Feel free to visit www.firesafesf.org to learn more about this important issue.

Finally, thanks for your time and public service. We can work collaboratively to advance public safety policy that saves lives and engages stakeholders in a meaningful way.

Best,

Rudy

Rudy Gonzalez
Secretary-Treasurer
[San Francisco Building & Construction Trades Council, AFL-CIO](#)
Phone [\(415\) 345-9333](#)
Cell [\(415\) 794-0377](#)

Scheduling: Sandra@sfbctc.org

Media: OrgLabor@sfbctc.org

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December 16, 2025

To Whom It May Concern:

I am a licensed California C-16 Fire Protection contractor with direct experience designing and installing automatic fire sprinkler systems throughout San Francisco and the greater Northern California region.

I have been asked to respond to the letter attached as *Item 2* which provides a cost analysis of a fire sprinkler retrofit. Also linked below as *Item 1* is an analysis from the NFSA that provides an alternative cost analysis of a fire sprinkler retrofit.

I submit this statement to formally disagree with both analyses, not because either is necessarily “wrong” but because both are attempting to provide per-unit and per-square foot pricing for something that simply cannot be broken down to such a basic level. Retrofit sprinkler installations are extremely project-specific and vary greatly based on building type, existing water supply, access conditions, unit size, and more.

These installations are performed using CPVC or steel piping systems and can be installed surface-mounted or with minimally concealed routing, with targeted penetrations coordinated to limit finish disturbance. Labor and material costs at these levels reflect efficient system layouts, code-compliant coverage, and standard installation practices routinely employed by licensed C-16 contractors, and most often result in values near, to even within, the range of **approximately \$10–\$20 per square foot, or \$15,000–\$30,000 per dwelling unit**, presented by the NFSA.

By contrast, the estimates in *Item 2*—approaching **\$100 per square foot and \$200,000–\$225,000 per unit**—conflate the fire sprinkler scope to the far opposite end of the spectrum with extensive selective demolition, framing alterations, full ceiling and wall reconstruction, and unrelated mechanical, electrical, and plumbing modifications. Such work is not intrinsic to sprinkler installation, nor is it typically required to achieve compliance with applicable retrofit sprinkler mandates. Presenting bundled general construction scope as sprinkler retrofit cost materially misrepresents the true cost of the work.

We can’t outright deny that the price **could be** upwards of \$200k/unit, but it’s only going to be extreme edge cases where the situation is a large building that has very few units, and/or needs major infrastructure upgrades that are not common but necessary to accommodate the



fire sprinkler retrofit. We also can't outright state that the NFSA estimates are not on the very low end, achievable in the right circumstance, yes, but are on the opposite end of the spectrum edge cases. The vast majority of retrofits fall somewhere in-between.

For purposes of public policy, regulatory evaluation, and owner decision-making, it is critical that fire sprinkler retrofit costs be assessed based on the actual scope of fire protection materials, labor, and installation methods, rather than expanded construction scenarios that do not reflect standard practice or extreme best-case scenarios.

Jon Zang
CEO, Battalion One Fire Protection
Licensed California C-16 Fire Protection Contractor
San Francisco & Northern California

Item 1: <https://nfsa.org/2025/11/21/national-fire-sprinkler-association-san-francisco-retrofit-cost-projections-are-wildly-inflated-and-out-of-step-with-real-world-data/>

Item 2: attached letter from Black Mountain



September 2, 2025

Renn Rhodes and Daniel McClain
Royal Towers San Francisco

Re: Royal Tower Auto Sprinkler Mandate

Dear Renn and Daniel,

Thank you for reaching out regarding the City's retroactive automatic fire sprinkler mandate. As you can imagine, estimating the cost of installing fire sprinklers in existing, non-sprinklered units involves a wide range of variables. That said, I've outlined below my best estimates based on two different scenarios for your reference.

Using your example—our current project at Apartment 305, 1750 Taylor—as a baseline: this particular unit is undergoing a full gut remodel. This type of project allows for significant efficiencies, as we would be able to design the mechanical, electrical, plumbing systems, special architectural elements, and the required fire sprinklers in coordination, as if the unit were new construction.

In this scenario, the fire sprinkler portion of the project would cost approximately **\$50,000**, or roughly **\$23 per square foot**, based on the unit's 2,190 square feet. The remaining project costs are allocated to finishes and other scopes of work.

However, retrofitting a unit where no other construction is taking place presents a far more complex and costly challenge. Installing sprinklers in an occupied or finished unit brings many unknowns, as we must carefully work around existing systems and finishes—many of which may need to be removed and reinstalled.



The following are examples of additional scope items involved in a retrofit:

1. Unit protection
2. Selective demolition
3. Miscellaneous mechanical modifications
4. Miscellaneous electrical modifications
5. Miscellaneous plumbing modifications
6. Drywall and ceiling framing
7. Painting
8. Cleaning
9. Additional supervision and general requirements

Given these complexities, I estimate that a retrofit in a similarly sized 2,190 square foot unit would cost between **\$200,000 to \$225,000**, or approximately **\$100 per square foot**.

Please don't hesitate to reach out if you have any further questions or would like to discuss this in more detail. I'm happy to assist.

Best regards,

Jeff Woods, Founder & President
Black Mountain Construction

From: [John Messinger](#)
To: [Board of Supervisors \(BOS\)](#)
Subject: San Francisco Sprinkler Mandate
Date: Tuesday, December 16, 2025 6:07:18 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board of Supervisors,

We are writing regarding the sprinkler mandate [recently reported](#) in the *San Francisco Standard*.

We respectfully urge the Board to reconsider the mandate or to expand the exemption criteria. Our building in Telegraph Hill falls near the margin of the current requirements, and while it may qualify for an exemption, we feel the mandate itself imposes an undue burden on homeowners.

The financial, logistical, and emotional costs of compliance are significant. Retrofitting could require tens of thousands of dollars per household, along with major disruption to daily life. For many residents—including my husband and me—this level of expense is unsustainable. We have lived in San Francisco since 2012, invested in our home, and contributed to the community. Yet after experiencing multiple layoffs in recent years, as well as other required safety expenditures such as upgraded electrical panels and alarm systems, we are already struggling. If forced to absorb this additional cost, we may have no choice but to leave the city altogether.

We urge the Board to weigh the real impact this mandate will have on long-term residents and to consider broader exemptions that protect homeowners from financial displacement.

Thank you for your attention and consideration.

Sincerely,
John Messinger and Brian Fenn
150 Lombard St, #305
San Francisco, CA 94111

From: [Chris Wood](#)
To: [Board of Supervisors \(BOS\); Commission, Fire \(FIR\)](#)
Cc: [Seth Wood](#)
Subject: sprinkler retrofit mandate
Date: Tuesday, December 16, 2025 8:12:35 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the San Francisco Board of Supervisors and the San Francisco Fire Commission:

I am writing regarding the high rise fire sprinkler mandate. Please amend the fire sprinkler retrofitting requirement for older high-rise buildings. This mandate will create an enormous hardship on hundreds of San Francisco citizens including ourselves. We retired and bought our 'forever home' condo on Lombard Street in 2022 and no disclosure about these sprinklers was made.

This retrofit would require us to relocate and take a loss on our property, likely bankrupting us. We just went through a very large expense of replacing fire warning horns. The estimated cost for this new mandate would make it impossible for us to stay in our home.

We recognize that a life should not be measured in dollars but what are the costs of disrupting our lives, and those of many others, in such a major way?

Thank you.

Christopher and Sepi Wood
Telegraph Landing North
San Francisco

... what else is he thinking about? See my blog at
<https://url.avanan.click/y2t01/> <http://thezachproject.us/> [_YXAzOeNmZHQyOmE6bzozZDM2Ym0MDJlNmRiZGQwZWU3Mm00OTE5M2ZlYmVnNDc3OmlVYVYjNjEjYmEjZjkyZjE3MmYwZjczMDE2MzYwZjdhMwVlcYmMucYWVWbmZGQ0ZTA0ZVYwNDEwZGQ0G0N3NDIyNzVhZQyODpwwOjQ6Tg](#)

From: [Michael Liao](#)
To: [Board of Supervisors \(BOS\)](#)
Cc: [Commission, Fire \(FIR\)](#)
Subject: Petition Regarding Proposed Sprinkler System Mandate for Older Condo Buildings
Date: Tuesday, December 16, 2025 8:15:43 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the San Francisco Board of Supervisors,

I am writing to express concerns about the recent proposal to mandate the installation of sprinkler systems in older condominium buildings within the city.

As a homeowner at Telegraph Landing North, located under Telegraph Hill, it remains unclear whether this mandate will apply to our building and, if so, to what extent. However, it is evident that implementing such a mandate without financial subsidies or a clear plan to address potential loss-of-use of affected spaces would place an enormous and burdensome task on homeowners.

Many of us in older buildings cannot bear the cost of unplanned structural upgrades. These buildings were not designed to accommodate modern safety technologies, and retrofitting them presents significant challenges. The financial strain aside, some buildings simply cannot be safely altered without unknown consequences. While I understand and appreciate the city's desire to increase safety, this proposal, in practice, may create more harm than good, placing homeowners under undue stress and potentially leading to greater complications than it seeks to prevent.

Additionally, this proposal appears to have been introduced with minimal public disclosure or community input. Given the weight of its potential impact, I respectfully urge the Board of Supervisors to reconsider or delay this mandate until more thorough consultation and planning can take place.

This issue is not a matter of subjective preference but rather one of practical feasibility. The burden of such a mandate is simply too great for existing owners and residents to bear.

Thank you for your consideration.

Sincerely,

Michael Liao

152 Lombard Street, SF 94111

From: [BOB HARRER](#)
To: [Board of Supervisors \(BOS\)](#); [Commission, Fire \(FIR\)](#)
Subject: Amend the sprinkler retrofit rule, PLEASE
Date: Wednesday, December 17, 2025 1:26:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors and Commissioners:

We are writing to express our great concern regarding the current sprinkler retrofit rule. My wife and I are retired and have lived in our 9-story building for 36 years. During that time there has never been a single incident involving fire in the building. A sprinkler retrofit will be highly disruptive, requiring us to relocate for months or years. It will also be a huge financial hardship to relocate and simultaneously pay rent, our existing mortgage, and a reported \$100,000-300,000 in construction costs. With its low concrete ceilings, our unit is ill-designed to accommodate any significant new water infrastructure. Moreover, such infrastructure risks new damage due to incidental water leaks from the new water system. We strongly support amending the rules to trigger a sprinkler retrofit only when a major renovation to the building is undertaken (which is the normal standard used by other cities nationwide). While we support the need to save lives, there are better alternative approaches in this case than retrofitting sprinklers in our building.

Sincerely,

Robert and Janis Harrer

From: [Patterson, Jeff](#)
To: [Lurie, Daniel \(MYR\)](#); [FireAdministration, FIR \(FIR\)](#); [SherrillStaff](#); [SauterStaff](#); [MandelmanStaff \(BOS\)](#); [Board of Supervisors \(BOS\)](#); [Law, Chad \(FIR\)](#); [ChanStaff \(BOS\)](#); [ChenStaff](#); [DorseyStaff \(BOS\)](#); [Fielder, Jackie \(BOS\)](#); [MahmoodStaff](#); [MandelmanStaff \(BOS\)](#); [MelgarStaff \(BOS\)](#); shaman.walton@sfgov.org; [WongStaff \(BOS\)](#)
Subject: Unreasonable Fire Sprinkler Mandate for Older High-Rise Buildings
Date: Thursday, December 18, 2025 10:13:10 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I urge Mayor Lurie, the San Francisco Board of Supervisors, and the San Francisco Fire Administration to reconsider the currently contemplated fire sprinkler retrofitting requirement for older high-rise buildings. The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship and loss on owners and residents. If the mandate is not retracted or amended, it will have catastrophic economic consequences for me and similarly situated unit owners and tenants of affected buildings. Among other things:

1. I will be subject to a special assessment of \$200,000 - \$300,000. This is not only a hugely disproportionate and unbearable expense, but it casts an untenable cloud on my unit, destroying its market value.
2. I will be required to move out of my unit for 6 to 12 months or more for the required major construction work, thereby imposing further unreasonable expense; and
3. Major modifications will be made to my unit, resulting in lowered 7-foot ceilings, which will make my unit uninhabitable and unmarketable.

I and all other owners and occupants in these buildings cannot withstand these devastating impacts. While fire safety is clearly important, the current fire sprinkler mandate poses unreasonable financial and physical burdens at a time when the City of San Francisco should be focused on increasing the housing supply and reducing the cost of occupancy. This sprinkler mandate for older buildings is absolutely contrary to the goal of encouraging increased supply and affordability of housing and seems to be designed to satisfy the desires of organized labor by creating unnecessarily expensive retrofitting work. Less onerous fire safety alternatives are available and should be considered to balance the financial hardships to be suffered by building occupants. Please support the reconsideration of these onerous sprinkler retrofitting requirements and work with the representatives of over 125 affected buildings to arrive at a more reasonable approach that is consistent with the City's housing goals. At worst, existing buildings should be exempt from the mandate unless they voluntarily undertake a major renovation.

Respectfully,

Jeffrey R. Patterson
2200 Pacific Ave., #7B
San Francisco, CA 94115

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From: [Robert Kozma](#)
To: [Carroll, John \(BOS\)](#); [Melgar, Myrna \(BOS\)](#); [Chen, Chyanne \(BOS\)](#); [Mahmood, Bilal \(BOS\)](#)
Cc: [Art Wong](#); [Sercan Arik](#)
Subject: The Mayor's Sprinkler Mandate Proposal
Date: Wednesday, December 17, 2025 12:07:08 PM
Attachments: [An Equivalent Fire Safety Proposal 12-17-25.docx](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Supervisors Chen and Mahmood,

We appreciate the Mayor's effort to respond to the concerns of many of us in legacy buildings throughout the city who are faced with the huge implications of the sprinkler mandate.

However, we agree with Supervisor Sherrill that merely pushing this down the road doesn't solve anyone's problems.

The mandate certainly needs studying. But to have it hanging over our heads, even if deferred, gives owners and tenants no relief. Indeed, it's going to make condos potentially worth \$200-\$300K less.

If anyone in any of the buildings wanted to sell their condo, they would have to disclose the mandate and potential buyers would ask for a credit. In addition, the assumption could be made that the building is not fire safe as it is! That could further erode value. Finally, if the mandate holds after the study, the price of installing the sprinklers will only be higher in 2030.

In an attempt to address the legitimate fire safety concerns of the mandate as well as the legitimate concerns of many owners and tenants it would affect, my fellow residents and I at 999 Green, have developed an alternative version of the mandate that we believe resolves the issue.

In the attached 2-page document, we propose to put Fire Code Section 1103.5.4.4 up front of the sprinkler mandate and provide an alternative compliance model with a Performance-Based Design that achieves calculated Safety Equivalency. The proposal integrates building-specific Engineered Life Safety System upgrades with an active-community Fire Safety Management Plan to provide a four-point **Performance-Based Approach** to equivalent fire safety, with proportionate effort and minimum hardship.

We believe this four-point, performance-based program not only creates fire safe buildings without the undue hardship of sprinkler installation, at far less cost and disruption of lives, but also builds fire-safe communities that enhance San Francisco's preparedness and resilience in a wide range of emergencies.

Please consider this as you take up the sprinkler mandate of the Fire Code update. And we would be glad to elaborate on our proposal at the meeting in which you take up this issue. Please keep us informed of that date.

Warm regards,

Bob Kozma

Robert B. Kozma, Ph.D.

Emeritus Principal Scientist
SRI International
San Francisco
<http://robertkozma.com>
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+1 415-623-4340

Kozma, R., *Make the World a Better Place: Design with Passion, Purpose, and Values*.
Wiley & Sons, 2023

12-5-25
Alternative Compliance via
Active Fire Safety Communities and Engineered Life Safety Systems
A Proposal
Residents of The Summit
999 Green St.

ABSTRACT

In response to the disproportionate effort of sprinkler installation for the safety benefit achieved in older buildings and the undue hardship of high costs, we propose to build on Fire Code Section 1103.5.4.4 and provide an alternative compliance model with a Performance-Based Design that achieves calculated Safety Equivalency. The proposal integrates building-specific Engineered Life Safety System upgrades with an active-community Fire Safety Management Plan to provide a four-point **Performance-Based Approach** to equivalent fire safety with proportionate effort and minimum hardship.

1. Strengthen Fire Code Section 1103.5.4.4 to provide an opt-out-first approach to fire safety for buildings that commit to Engineered Life Safety System (ELSS) building upgrades and a rigorous, periodically certified Fire Safety Management Plan (FSMP).
2. Participating buildings hire a Fire Protection Engineer (FPE) to conduct an Engineered Life Safety System assessment to list its current fire safety features and agree to make recommended upgrades related to fire detection and alarms, communication, smoke control and management, compartmentation, firefighter support Infrastructure, and egress improvements.
3. Each building also works with the FPE to design a Fire Safety Management Plan that engages the building community in developing verifiable fire safety practices in four core areas: fire prevention procedures, system maintenance testing, emergency response procedures, and documentation and performance monitoring.
4. Each building will undergo a third-party audit and recertification every three years to prove the FSMP is active, with a snap-back sprinkler mandate for persistent failure to do so.

This four-point, performance-based program not only creates fire safe buildings without the undue hardship of sprinkler installation, at far less cost and disruption of lives, but also builds fire-safe communities that enhance San Francisco's preparedness and resilience in a wide range of emergencies.

Contacts

Robert Kozma, bob@robertkozma.com, 415-623-4340

Sercan Arik, sercanarik@gmail.com

Art Wong, abwong41@yahoo.com

12-5-25
Alternative Compliance via
Active Fire Safety Communities and Engineered Life Safety Systems
A Proposal
A Group of Residents at The Summit
999 Green St.

The high cost and resident dislocation required by the impending fire sprinkler mandate, especially for elderly residents and those with fixed income, compels us—a group of more than two dozen residents at 999 Green St.—to offer a proposal to achieve the same fire risk reduction at a much lower cost.

Limitations of Fire Sprinklers

Fire sprinklers have been proven to save lives and property, which is why they are included in both the current and proposed San Francisco Fire Code. However, fire sprinklers have limitations.

Their biggest limitation is that they are reactive not proactive: Fire sprinklers do not prevent fires from happening. Nor do they close the door behind a panicked evacuee when a fire happens. They don't check to see if the neighbor next door is okay or help them down the stairs, if needed. And sprinklers present a risk of their own: Significant collateral water damage. Also, they may foster passive, complacent residents: "Why worry—or do anything—about fire safety when that sprinkler system we paid so much for has us covered?"

Because of these limitations, the sprinkler mandate in older buildings represents a disproportionate effort for their safety return and their significant associated cost and disruptive installation represents an undue hardship for residents. In some cases, an elderly owner on fixed income may have to sell their condo at a loss because they can't afford the installation assessment or a tenant may have to move because they can't afford an allowed compensatory rent increase.

Performance-Based Approach to Section 1103.5.4.4

In response to this disproportionate effort and the undue hardship, we draw upon on Fire Code Section 1103.5.4.4 to propose the alternative compliance of a Performance-Based Alternative that achieves calculated Safety Equivalency. Our proposal combines building-specific Engineered Life Safety System (ELSS) upgrades with an active community Fire Safety Management Plan (FSMP) to provide building-appropriate and certified equivalent fire safety without the undue hardship of sprinkler retrofits.

Our proposal encourages buildings to adopt a proactive, life safety upgrade plan and build a certified fire safety resident community. When staff and residents are trained, organized and supported by the right building systems, they can prevent fires from happening, as well as stop and/or quickly contain them if they do occur. And they also facilitate to the safe evacuation of the building.

We propose this four-point, performance-based alternative that achieves safety equivalency without the invasive and potentially-displacing cost of retrofitting sprinkler systems:

1. Codify the "Active Community/ELSS" Alternative. We propose strengthening Fire Code Section 1103.5.4.4, which currently allows the Fire Marshal to approve modifications, to formalize a "Certified Active Fire Safety Community" compliance option. Rather than treating modifications as rare exceptions, the Code should provide a formal opt-out path for buildings that implement Engineered Life

Safety System (ELSS) building upgrades (short of sprinklers) and maintain a rigorous, periodically certified Fire Safety Management Plan (FSMP) that complements the building upgrade with verified active-community fire safety training and practices.

2. ELSS Building Assessment. Each building is unique. A "one-size-fits-all" mandate ignores the superior fire-resistance ratings of certain legacy buildings. The Engineered Life Safety System assessment of each building would examine the fire safety features of a particular building and make recommendations related to: Enhanced Detection and Alarms; Emergency Voice/Communication; Smoke Control and Smoke Management, Compartmentation and Passive Measures; Firefighter Support Infrastructure; and Egress Improvements.

- **The Mechanism:** The building shall retain a licensed Fire Protection Engineer (FPE) to conduct a Performance-Based Design assessment.
- **The Audit:** The FPE will audit existing passive protections (fire-rated walls, stairwell pressurization) and recommend targeted upgrades—such as heat detectors in mechanical/electrical rooms or stairwell pressurization systems—that achieve calculated safety equivalency.

3. Active-Community FSMP. Each building will also work with the FPE to design a Fire Safety Management Plan that engages the building community in comprehensive fire safety practices. Aligning with the NFPA 550 Fire Safety Concepts Tree, this plan prioritizes "Preventing Fire Ignition" over merely "Managing Fire Impact." This plan must demonstrate community proficiency in four core areas: fire prevention procedures, system maintenance testing, emergency response procedures, and documentation and performance monitoring.

- **Mandatory Training and verification:** The building must implement a schedule of certified training for staff and residents, with signed compliance, moving beyond simple pamphlets to active drills.
- **Risk Reduction:** Implementation of strict community bylaws, such as the prohibition of open-flame grills and rigorous control of e-mobility battery charging.
- **Emergency Response:** Establishment of floor captains and evacuation assistance protocols for disabled residents.

4. Recertification and Enforcement To ensure long-term compliance, this is not a one-time exemption.

- **The Cycle:** The building must undergo a third-party audit and recertification every three years to prove the FSMP is active.
- **The Consequence:** Failure to maintain the training logs, equipment standards, or structural integrity required by the plan will result in the revocation of the alternative status.

This four-point performance-based program leverages the prospect of a sprinkler mandate to build and activate resident communities that achieve goals of the Fire Code: prevent fires, save lives, reduce injuries and limit property damage. It empowers people working together to address the limitations of fire sprinklers, at far less cost, intrusion and disruption of lives. In addition, the social capital created through this coordinated community approach enhances preparedness for fire and other emergencies, helping San Francisco become a safer and more resilient city.