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February 24, 2026

RE: Sprinkler Retrofit Ordinance

Dear Chair Melgar, Supervisor Chen and Supervisor Mahmood:

Many thanks for your patience and willingness to listen to community voices yesterday at the Land Use and Planning Committee Hearing at City Hall.

I wanted to take this opportunity to amplify the brief remarks I made regarding the quantitative sizing of the risk that this very large project was intended to mitigate, and the learnings that we all can glean in that connection from a careful review of the published data from the San Francisco Fire Department and San Francisco's EMT Services.

A Quantitative Assessment of the Risk This Project Is Designed to Mitigate.

As part of our building's assessment of the pending retrofit mandate, we engaged a talented young data analyst (Elizabeth Uzelac) to review the past 25 years of publicly available San Francisco Fire Department data on fire-related deaths and injuries.

Although I was able to summarize her work yesterday at the Hearing in my brief comments, I am pleased to now attach that report for you and your staff to review. I would be happy to answer questions or to take comments on the report and its methodologies at your convenience.

In summary, the report establishes that none of the 126 buildings which were originally identified as being subject to the retrofit mandate have had a fire-related death, either of an occupant, a visitor, a staff member, a police officer or an SFFD Firefighter, in any of the 26 years now covered by the Fire and EMT Department's available data.

Over the same period, 123 of those 126 buildings never had a fire-related injury to an occupant, a visitor, a staff member, a police officer or an SFFD Firefighter.

Three of the 126 buildings had one recorded fire-related incident. In these three recorded incidents, a total of 9 occupants/ civilians (and no SFFD Firefighters or Police Officers) sustained injuries. Those injuries were distributed, three in one incident, five in a second incident, and one in the last such incident. None of those injuries resulted in a death.

Although the City's datasets only reach back to the year 2000, our internet research has not revealed reports or Chronicle or Examiner articles noting any other earlier fire-related deaths or injuries in San Francisco high-rise apartment buildings, including during the Loma Prieta earthquake and subsequent conflagrations. Such research is of course indicative, rather than dispositive, but it is a strong indication!

Certainly, in our own building, at 1070 Green Street here in District Three, we

know that there have been no deaths or injuries from fire since the building opened in 1961, a period of 64 years. We believe (but cannot at this moment document) that most of the other 126 buildings originally subject to the Ordinance have had similarly benign incident histories.

The Likely Costs to Our Residents If Compliance were To Be Required.

We are now well along in our assessment of the very significant projected costs of retrofitting sprinkler systems in our building here on Green Street.

Our building is a medium-sized apartment house, with 48 apartments and 19 stories of occupancy.

While it is not yet possible to obtain accurate or binding quotations from potential contractors for installing the extensive building infrastructure that would be necessary to support a fully charged sprinkler system, or for carrying it out into all 48 apartments and the public spaces in the building, I am convinced that the costs will exceed \$5-6 million for our building, not including the moving and displacement costs of securing alternative shelter for our residents as such extensive and intrusive work proceeds, and the significant costs of reconstructing every ceiling in every room in each apartment once the sprinkler system is installed (we estimate six figures and up in additional expense for each of our apartments based on existing building contracting and renovation data).

That overall cost estimate is further dependent on several assumptions that may or may not prove out, the first being that existing water supplies are sufficient to allow a fully charged 20-story system to be grafted onto our existing water main line, and the second being that no material asbestos, lead paint or other toxic substances are revealed as work progresses.

Given the age of all the subject buildings, these are likely additional and significant cost drivers that are not yet subject to accurate estimation.

The several contractors with which we have had substantive discussions have made it clear (at least in their private, non-public bid discussions with us!) that such a project for our building would exceed 3 years in duration, would require a large semi-permanent staging area for workmen, tools and materials, would need multiple semi-permanent Porta Pottis to be placed on our sidewalk, and would require our providing a private investigation firm to provide constant supervision of their workmen in vacated apartments to control theft and to document damage.

Hence, I believe that the allocated costs to each of our apartments (for these purposes treating them equally) would likely exceed \$300,000, and I could be understating those costs by a substantial margin.

When that very large sum is weighed against the demonstrably modest quantitative risk mitigation that retrofitting sprinkler systems would provide in our building, this is not a project that seems to make good public policy or actuarial sense.

Although I do not discount the benefit of sprinklers and fully support the current Code standards that require their installation when new apartment buildings are built, the huge costs of retrofitting such an extensive element of a building's infrastructure to provide such modest risk mitigation seems unduly burdensome to the residents of these buildings.

I would point out that this issue arises at a time when all of us are focused on containing and, where possible, mitigating the high cost of living in our City, to protect and preserve the diversity in our fellow citizens that we all cherish and desire.

How Best to Fix The Problem.

While I believe that outright repeal of this Ordinance is the preferred policy option, I understand that political realities may make that difficult.

Hence, we would urge you to work with your colleagues on the Board of Supervisors to modify the existing mandate by providing a reasonable and thoughtfully framed trigger for its application, rather than making it applicable across the board to these older buildings, as the language now requires.

Section 2A.281 of the San Francisco Building Code provides that “substantial improvements” to any covered building are “...any reconstruction, rehabilitation, addition, or other proposed new development of a structure, the cost of which exceeds 50% of the market value of the structure before the ‘start of construction’ of the improvement....

This formulation seems like a thoughtful starting point for developing a sensible trigger that mandates the retrofitting of sprinklers when a building undergoes truly substantial overall renovation (not apartment by apartment). A similar concept was included in the recent natural gas replacement ordinance as well, and could readily be adapted to serve this purpose as well.

Such language is a typical, responsible, and well-established way of adapting and applying the constant (and desirable) cycle of improvements in building codes for new construction to older structures.

In the absence of urgent and significant risks, demonstrably not present here, such a measured approach makes both practical and policy sense. We urge that you work with your colleagues to secure such a result.

And if political realities require the constitution of an Advisory Committee before taking any legislative action, we strongly urge that such a Committee receive a holistic charter from the Board: first, to quantify the risk that the project is designed to mitigate from the Fire Department’s own data sets, as we have done ourselves, and second, to examine a broad range of fire mitigation technologies, strategies and management practices applicable to the subject buildings in addition to the proposed sprinkler retrofit, assessing the costs and benefits of each in a disciplined and transparent fashion.

This is a clear and pressing matter of urgency for my friends and neighbors.

It is clear to me, in my capacity as Building Treasurer, that a significant number of our older, fixed-income residents, who bought their apartments decades ago (well before the huge inflation in residential property values) would likely be forced out of the homes they have occupied for decades by the special assessments that would be required to fund the retrofitting of sprinklers into a building that has never had a fire-related death or injury in 64 years.

I apologize for the length of this note, but my excuse is the signal importance of this issue to the residents of 1070 Green Street, and my own assessment, based on our quantitative analysis of the Fire Department's own data, of the modest risk mitigation that carrying out this hugely expensive and deeply disruptive project would provide.

This can't be either wise public policy for our City. We need your help!

Respectfully yours,

Daniel L. Rabinowitz

Cc: President Rafael Mandelman
Supervisor Danny Sauter
Supervisor Stephen Sherrill