Undue Hardship: A burden on an individual resident or household from the cost of, or displacement caused by, installing a complete automatic sprinkler system in their building that is not justified by the life-safety benefit the system would provide there. The benefit is measured against the baseline used in the definition of Disproportionate Effort. Undue hardship exists where any of the following applies to a resident or household.

1. **Financial hardship, tenants.** The household meets the San Francisco Rent Board's Financial Hardship guidelines, applied to the rent increase or other cost attributable to the retrofit. This means any of the following:

    - Monthly rent exceeds 33% of gross monthly household income.
    - Household assets, excluding retirement accounts and non-liquid assets such as cars, antiques and collectibles, do not exceed $60,000.
    - Gross monthly household income is below the Rent Board's maximum for the household size.

    Exceptional circumstances, such as large out-of-pocket medical bills, may qualify a household that misses the income test, as under the Rent Board's guidance.

    A household's undue hardship is not to be remedied by requiring other residents, owners, or tenants in the building to cover its share of the cost. The consideration of reserves, financing, and assistance under the showing requirement does not extend to the contributions of other residents on the hardship household's behalf.

2. **Financial hardship, owners.** For owners of condominium, cooperative, and similar units, the same three tests apply, with total housing costs in place of rent. Housing costs mean mortgage or rent, property taxes, HOA fees, assessments attributable to the retrofit, and similar items. Each household is assessed on its own circumstances.

3. **Displacement.** Compliance would displace a resident from their home beyond the thresholds in the definition of Disproportionate Effort: more than one week, or more than 24 hours for asbestos remediation.

4. **Other proceedings.** Compliance would trigger proceedings before the Rent Board or the Housing Preservation Commission.

Reasonable Degree of Fire Safety: The San Francisco Fire and Building Codes define a Reasonable Degree of Fire Protection, independent of the sprinkler retrofit mandate for high-rises. The mandate is excluded because it does not apply to other building categories with equal or greater demonstrated fire risk, which the codes already treat as adequately protected.

Not Physically Possible: A condition in which installing a complete automatic sprinkler system cannot be accomplished through any reasonably available, code-compliant design because of verified physical or engineering constraints of an existing building or its site. Such constraints include but may not be limited to:

- A renovation of the property that would otherwise be considered a "Major Renovation";
- Moving or demolishing load-bearing walls;
- An easement or other access to adjacent or nearby lots or parcels;
- Work that would compromise structural integrity;
- Insufficient space for piping, pumps, or equipment;
- Ceiling heights that would fall below code due to the installation of sprinklers or related equipment; or
- Inadequate water supply or pressure, or infrastructure that cannot reasonably be upgraded. This includes gas, electrical, and backup power requirements.

Disproportionate Effort: A condition in which the cost, construction, or disruption required to install a complete automatic sprinkler system in an individual building outweighs the additional life-safety benefit the system would provide in that building.

- **Baseline.** The benefit is measured against the building's current conditions and the San Francisco record: no fire deaths or significant injuries in the 126 buildings covered by the mandate since 2001, and no fire deaths since 1991. The TAC acknowledges that sprinklers improve life safety generally. However, most of the evidence for that benefit comes from wood-frame buildings under six stories, which are not the buildings covered here.
- **Thresholds.** Effort is presumed disproportionate where compliance would require any of the following:
    - A resident to move out for more than one week;
    - Asbestos remediation requiring a resident to move out for more than 24 hours; or
    - Work that would infringe on the public right of way for any period of time.
- **Showing.** Effort may also be shown to be disproportionate through a dollar-quantified comparison of cost and disruption against the measurable safety benefit. Either route requires documentation from a qualified professional: detailed engineering analysis, a defined construction scope, credible cost estimates, evaluation of less-invasive and lower-cost compliant designs, and an explanation of the life-safety consequences of any proposed modification.
- **Exclusions.** Disproportionate effort is not established solely by high overall project cost, owner preference for concealed piping, aesthetic concerns, or the inclusion of unrelated building improvements.