



Washington State Building Code Council 1500 Jefferson Avenue SE Post Office Box 41449 Olympia, Washington 98504-1449

Re: Solar Photovoltaic Power Systems (WAC 51-54A)

Washington State Building Code Council:

The Washington State Association of Fire Marshals and Washington Fire Chiefs would like to register a disagreement with a proposed amendment to the 2012 Fire Code Section 605.11.3.2 Residential systems for one- and two- family dwellings, Exception 5. Buildings under 10,000 s.f. in size where solar arrays will cover less than 40% of the roof area over any floor.

We are concerned that this exemption negates the fire services ability to review and approve the installation of solar voltaic systems installed in their communities and address any potential hazards associated with the installation.

Specifically, we see no reasonable justification or data to support this exemption, particularly when the proposed code amendments recommended by the Solar TAG Committee includes provisions that allow for alternate means and methods.

The fire service recognizes the needs of the industry and has worked collectively to address a number of industry concerns, however, we feel that the allowance of this specific exemption maybe a hindrance to the fire service and have a potential impact on citizen and firefighter safety.

Therefore, we recommend approval of the amendments as proposed by the Solar TAG with the elimination of Exception 5. Buildings under 10,000 s.f. in size where solar arrays will cover less than 40% of the roof area over any floor.

We look forward to your acceptance of our recommendations.

Jim Kambeitz President

Washington State Association of Fire Marshals

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Mike Brown Executive Director Washington Fire Chiefs