



October 25, 2013

Dear Governor Inslee and Chairman Allshouse,

On behalf of our company and the Washington solar industry, Fire Mountain Solar would like to thank you for taking up the International Code Council (ICC) Fire Code issue. As you know, the Code has the ability to significantly impact both residential and small commercial solar installations, affecting local jobs and clean energy production in Washington State.

We wish to formally go on record in support of the changes recommended by the Solar Technical Advisory Group (TAG) to International Fire Code (IFC) Chapter 605.11. The TAG recommendation provides fire code officials with needed flexibility in their review of solar proposals. Homeowners with small roofs are allowed to effectively use their roofs to generate clean, renewable electricity. And the solar industry in Washington State will continue to be able to plan, design and install roof-top solar PV systems while ensuring safe access to fire professionals in the case of a fire.

We would like to point out one provision of particular importance, #5 to section 605.11.3.2 which states:

**605.11.3.2 Residential systems for one- and two-family dwellings.** Access to residential systems for one- and two-family dwellings shall be provided in accordance with Sections 605.11.3.2.1 through 605.11.3.2.4.

**Exceptions:**

1. Residential dwellings with an approved automatic fire sprinkler system installed.
2. Residential dwellings with approved mechanical or passive ventilation systems.
3. Where the fire code official determines that the slope of the roof is too steep for emergency access.
4. Where the fire code official determines that vertical ventilation tactics will not be utilized.
5. ***Buildings under 10,000 s.f. in size where the solar array will cover less than 40% of the roof area over any floor. (emphasis added)***

Exception #5 is important to ensure that buildings with small, chopped-up roofs are not unduly restricted by the current code. The community of Boulder, CO and the State of Oregon have adopted similar exceptions from their fire codes for solar PV, recognizing that the ICC published codes are too restrictive when applied to small roofs. In a study of 25 recent solar projects, we found that over 66% of our solar projects would be negatively impacted by the current fire code's

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solar provisions. The modifications suggested by the TAG including exemption #5 would go a long way to minimizing those negative impacts.

Given your leadership positions, we urge you to encourage the ICC to be more diligent with code proposals by seeking additional input from the stakeholders who use the codes. We also hope you will forward the results from our Solar PV TAG to the ICC so that they may serve as a reference.

Finally, we would like to thank you for your leadership and support in working with the Evergreen State Solar Partnership to standardize and streamline permitting, interconnection, financing and other vital processes that affect the soft costs of installing solar energy systems.

We look forward to continuing to work with you on these fronts, as well as improving the Washington State incentive programs and including “solar ready” requirements in the next version of the building code.

Sincerely,

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Cc: Richard Locke, Executive Director, Office of Economic Development and Competitiveness, WA State Department of Commerce