

Date: 10/24/2013  
From: Chris Herman [chris@wintersundesign.com](mailto:chris@wintersundesign.com)  
To: GA SBCC (GA)  
Subject: Solar & fire setbacks

Dear State Building Code Council Members,

I strongly encourage you to adopt **ALL** of the recommendations that came from the technical advisory group, including an exemption from setback requirements when solar panels cover less than 40% of the home's roof area. Requiring most potential solar installations to get fire official review before proceeding would put undue hardship on all of the solar contractors. It would seriously hurt sales in one of the few growing industries in our state. Systems would be smaller in size and many homes with multiple roofs would be unable to install any solar at all. And economy of scale would be greatly reduced as system sizes are reduced, since panels are added in groups, so they can be wired together in series. They are often added in 6-16 panel groups to gain maximum efficiency. These fire setback codes may be appropriate for California, but our typical installation is far different from theirs. They install utility scale projects and huge arrays on flat roof warehouses. Our industry installs, primarily, residential size systems on single family homes. Our state is working hard to encourage solar energy use. Please don't let firefighters' fears, of what "might" happen, kill our hard won strides to solarize the northwest and help save our planet.

It is a fact that there has never been a documented case of a firefighter not being able to do their job because of rooftop solar panels. This speaks clearly that there is no problem and should not require any code to address this non-problem. The odds of a home catching on fire and requiring a firefighter to climb on the roof to facilitate vertical ventilation techniques, are very small, and the odds of that home having solar panels on the only roof where the firefighter can gain easy access to the peak, are even smaller. I would guess miniscule odds would be putting it generously. There are 4,250 solar electric systems in WA state and it has taken almost a decade to get to that point. The idea that there will be solar panels on many many more homes in the next few years is not realistic. Most homeowners do not have good sun exposure, nor do they have a good big roof facing south or the financial means to install solar. I wish that we could look forward to major solar proliferation, but that is unrealistic. The state incentives are winding down and the payback on a solar system will be back to more than 15 years when that happens. Each year closer to the incentive ending means a longer payback. And considering how inexpensive our electricity is and the fact that the average person only stays in their home for 7 years, investing in solar is not something that will become mainstream any time soon. I wish it were otherwise.

Imposing these rigid fire setback codes would make it that much harder for people to invest in clean, renewable, secure, reliable solar power. The "study" done on the economic impact of the proposed code on small business was a fantasy. A finding of neutral impact was not studied in any meaningful way. It was a guess and did not receive substantial input from the industry. We

were asked for input and given less than 3 weeks to supply it, and that was at the same time that the sales tax exemption for solar was ending. All of the solar contractors were swamped with trying to get in as many systems as possible before the 6/30 expiration, meaning a price increase of 9.5% typically. No small potatoes. Our company had our highest sales month ever and none of us had time to devote to making sure that the economic analysis was done accurately. Please don't accept the finding of neutral economic impact. It is not true.

We need to move in the direction of renewable energy generation. Please don't hobble our efforts with unneeded and unreasonable codes designed for California. Accepting ALL of the T.A.G.'s recommendations is the right and reasonable thing to do. Thank you for your careful consideration of this vital issue.

And thank you for your interest in clean, renewable, secure, reliable, solar power.

**Best energy,**

**Chris Herman, owner, Winter Sun Design, [www.wintersundesign.com](http://www.wintersundesign.com)**

**Past-president, Solar WA., [www.solarwashington.org](http://www.solarwashington.org)**

**Co-founder, NW Eco-Building Guild, [www.ecobuilding.org](http://www.ecobuilding.org)**

**Life member, American Solar Energy Society, [www.ases.org](http://www.ases.org)**



**Solar design consultant, Sunergy Systems, [www.sunergysystems.com](http://www.sunergysystems.com)**

**President, Edmonds Community Solar Co-op, [www.tangerinepower.com/edmonds](http://www.tangerinepower.com/edmonds)**