

Date: 10/25/2013
From: Jon Lange <jonl@sunergysystems.com>
To: GA SBCC (GA)
Subject: International fire Code chapter 605.11

Dear Governor Inslee and Chairman Allshouse,

I am a professional in the solar industry in this state for 8 years, and I am writing today to urge you both to embrace the TAG recommended changes to the IFC chapter 605.11, concerning setbacks. Having designed and installed almost 1,000 PV systems I have had the opportunity to meet with many fire officials, and it seems to me most of them have taken a more liberal opinion to the setbacks outlined from the California rules. The TAG recommendations seem to be more in line with the realities that exist here in the state of WA concerning PV systems.

Because the solar resource is so much more robust in California, it is not uncommon to see solar arrays on West, East, and South roofs, making fire fighters understandably worried about access. Here in Washington, it is very rare to see solar arrays on more than two roof orientations (usually South and West), and more common to see only the south roof having a solar array. This leaves ample room on the other adjacent roofs for venting and moving around.

The simple fact is, if these new setbacks are adopted as is, it will greatly impact the industry's ability to design systems that function efficiently and provide the amount of power that makes it a smart investment. With the average system coming in around 360 sq ft, these setbacks would take away up to 115 sq ft, over 30%!! Of the space required.

I would also ask special attention to be given to Exception #5 giving exemption to buildings under 10,000 s.f. where less than 40% of the roof area over any floor would be used. A lot of effort has been made to streamline the permitting process for the simple PV systems, and to now add a complicating layer to the process where it is likely not needed would be counterproductive and result in slower renewable integration.

In closing, I'd like to point out that here in Washington, we'll likely never have the volume of PV integration that California has seen, so I don't believe adopting their standards is a fitting solution.

Thanks for your consideration,
Jon Lange



Project Integrator



4546 Leary Way NW, Seattle, WA 98107

WA: GCL# SUNERSI905DU WA: ECL# SUNERSI905D4

Email: JonL@sunergysystems.com W: 206.297.0086 C: 206.571.4726
Web: www.sunergysystems.com