May 7, 2015

Board of Building Regulations and Standards
One Ashburton Place, Room 1301
Boston, Ma 02108

RE: IRC 2015

Dear Board Members,

We understand that the BBRS may soon vote to move the draft 9th Edition of the Massachusetts Building Code to the internal state review process. We strongly support the BBRS actions to date to reserve the IRC 2015 sections that pertain to residential solar installations, specifically regarding the roof area used for solar panels. We recommend these sections remain reserved. They require excessive roof accesses that reduce the amount of available roof area in which solar panels may be installed, and thus reduces the amount of energy a homeowner is able to generate with a solar PV system. This effectively raises the cost of an installation relative to the benefits, and for many, eliminates solar all together.

Requiring perimeter setbacks on sloped roofs would also impact the architectural aesthetics of buildings in potentially undesirable ways. According to the Massachusetts Department of Energy Resources, there are approximately 21,000 residential installations in Massachusetts, and no known access problems.

Requirements for setbacks for commercial solar installations may differ for varying reasons – to include access for other mechanical equipment for example.

We the undersigned therefore reiterate our support of the BBRS action to reserve these IRC 2015 solar sections.

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Emily Rochon, BCC Solar, Boston MA
Conrad Geyser, Cotuit Solar, Marstons Mills MA
Jason Stoots, E2 Solar Cape Cod, Dennis MA
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