

OPPOSE FEMA CODE CHANGE PROPOSAL S76-22

FEMA-ATC Seismic Code Support Committee Proposal for the 2024 IBC
Would Stifle Clean Energy Growth Without Improving Grid Resilience

Quick Facts and Background

S76-22 is a code change proposal under consideration for the 2024 International Building Code.



Grid reliability is under the purview of NERC/FERC, who were not engaged in this proposal



Proposal S76-22 by FEMA-ATC SCSC would increase the structural Risk Category (RC) of most large-scale PV, energy storage, and wind turbine projects to RC IV (four) – the same as hospitals, fire stations, and police stations



Rapid deployment of solar and wind energy improves grid reliability; S76-22 would stifle this critical growth



Today, approximately 95% of large-scale PV facilities are designed and permitted as structural Risk Category (RC) I (one); and nearly 100% of wind turbine facilities are Risk Category II (two)

Proponents of S76-22 believe that applying higher seismic, wind, and snow loads to structural calculations will lead to greater grid reliability, fewer widespread power outages, and improved functional recovery of buildings. That claim is false. The net effect would slow renewable generation deployment.



Negative Impacts of FEMA-ATC SCSC Proposal S76-22

- S76-22 sends grid resilience investments through buildout of clean energy projects in the wrong direction and doesn't address actual grid performance
- S76-22 could lead to slower or reduced deployment of solar, storage & wind energy, thus reducing grid reliability
- Proposal S76-22 creates requirements that are poorly defined and technically unworkable
- Unneeded load increases constrain the size & height of wind turbines, reducing power output



Negative Impacts of FEMA-ATC SCSC Proposal S76-22

- Increased demand for steel and concrete to reinforce impacted equipment can lead to higher embedded carbon and supply chain issues
- S76-22 jeopardizes Renewable Portfolio Standards and other decarbonization goals
- S76-22 attempts to respond to *symptoms* of climate change, but harms efforts to establish a clean energy economy to counteract the *causes* of climate change

— TAKE ACTION! —

Clean Energy Stakeholders, and Others Striving for Decarbonization of our Power Grid



Sign our Letter of Opposition to the FEMA-ATC SCSC Proposal S76-22:
www.seia.org/S76-22



Encourage ICC Governmental Member Voting Representatives such as Sustainability Directors, Energy office staff, AHJs, City Engineering, and other municipal or county staff to OPPOSE S76-22

ICC Governmental Member Voting Representatives

As an ICC Governmental Member Voting Representative, you will receive an official electronic ballot on October 10, 2022. The voting period will be open until 11:59pm Pacific Standard Time on October 24, 2022. Please vote for the following:

1 

DISAPPROVAL on FEMA-ATC SCSC Proposal S76-22

2 

APPROVAL on SEIA Proposal S79-22 As Modified by Public Comment 1

3 

APPROVAL on SEIA Proposal S81-22 As Modified by Public Comments 3 and 4