

Manhattan Beach Fire Department

Community Risk Reduction Division

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Alternative Materials & Methods Requests



Guideline A-01

Alternative Materials & Methods Requests

PURPOSE

This guideline is intended to provide direction for submitting requests for use of an alternative material or method of construction (AM&M) in accordance with the 2022 California Fire Code (CFC), Chapter 1, Section 104.8.

SCOPE

AM&M requests shall be evaluated by Manhattan Beach Fire Department (MBFD) and/or the Community Risk Reduction Division, to ensure the proposed material, method of construction, design, use, or operation satisfactorily complies with the intent of the CFC. Additionally, the alternatives that are being proposed will be evaluated to determine that they are equivalent to or exceed what is prescribed in the CFC in terms of quality, strength, effectiveness, fire resistance, durability, and/or safety.

It is important to keep in mind that ***an AM&M is NOT a waiver, nor sets a precedent.*** It does not excuse a project from meeting the level of safety or performance required by the code, only to achieve it in a way that may not meet the method described in the code.

REQUIREMENTS

1. **AM&M Request:** The applicant shall complete and submit the appropriate request form with those plans and other documentation necessary to evaluate the proposed AM&M. Use the “Alternate Materials, Design & Methods Request” (AM&M) form for your request; see Section 1.1 below for directions. The AM&M form can be found on the Manhattan Beach Fire Department webpage at www.manhattanbeach.gov; click on “Departments” in the top blue banner, go to **Fire Department** and select “Community Risk Reduction”, then click on “Guidelines and Forms” on the left hand side-bar menu when the Community Risk Reduction page shows.
 - 1.1. **AM&M process:** The owner, or the owner’s authorized representative, shall complete Sections A, B, and C at the top of the AM&M form.
 - 1.1.1. **Section A—Applicant Information:** Provide the owner’s name, as well as the name and contact information of the person applying for the AM&M on behalf of the owner. If the contact for technical questions is different than the applicant, provide the contact information for that person as well.
 - 1.1.2. **Section B—Project Information:** Provide the project name and address and indicate the occupancy classification, construction type, number of stories, and total floor area of the building(s) impacted by the AM&M.
 - 1.1.3. **Section C—Project Requirements & Proposals:** This section provides information related to the applicable code requirements and proposed alternatives.
 - **Code Requirement:** List the code section(s) or requirement(s) that the project does not comply with or to which you are proposing an alternative. A single code section can include multiple requirements or methods of compliance, so be specific in terms of which part of the

- code section is being addressed by the alternative. Briefly describe the intent of the code section or requirement as it pertains to fire and life safety, emergency response, and/or firefighting, as appropriate.
- *Example: “MBFD permits a maximum grade of 10%. A steep, narrow road can delay arrival of fire apparatus, and vehicles parked on the driveway in preparation for evacuation or staged for firefighting presents an obstruction to accessing the home.”*
 - **Code Deficiency:** Indicate how the project does not comply with code and why compliance with the standard requirements is not possible, feasible, or desirable.
 - *Example: “The existing topography precludes compliance with roadway grade requirements. Widening the road would require retaining walls 30 feet in height in some places, and limiting the driveway to 10% would require the proposed building pad to be lowered or driveway extended, which would have significant impacts on grading at this and adjacent sites, and further lengthen the currently proposed driveway.”*
 - **Alternative Proposal:** Describe the alternatives that are being proposed to mitigate the deficiency or code requirement. This section should include only those features or measures that are provided to offset or mitigate the deficiency. Do not include any features that are otherwise already required by the code here.
 - *Example: “As an alternative, I propose the following: Enhance the fire sprinkler system by providing coverage in small closets, all bathrooms, and the attic.”*
 - **Justification:** In this section, you must justify how the project or design approach utilizing the proposed alternative material or method is as safe or effective as if the project were built in the manner detailed in the code. Describe how the proposed alternative offsets the standard requirement. Whenever possible, the alternative should directly offset the deficiency. For example, if project deficiencies would delay emergency response to a building fire, the alternative should provide early notification to the fire department, slow the rate of the fire’s growth, contain the spread of fire to one part of building, or otherwise mitigate the negative effects of a delayed response. You can also provide any other relevant information related to the project or proposal in this section. For instance, if the proposed alternative further enhances the effectiveness of other features *already* required by code in some particular way, this information could be included as additional support.
 - *Example: “The sprinkler enhancements would provide additional protection for the structure and assist in extinguishing or holding*

a fire in check until firefighters arrive, helping to offset delays in response due to the slope of the driveway.”

- **Signature:** The owner, or the owner’s authorized representative, shall provide their signature, job title, company name, and the date that the form was signed at the bottom of Section C.

2. Submittal and Review Process

- 2.1. **Fee and Plan Reference:** The AM&M request will require a fee at the time of submittal. If the AM&M request is submitted after the initial review of the project, add the plan check number as a reference to the current project. If the AM&M request precedes the project, then the address will be the reference point. Be aware that certain requests will require independent review and approval by both the Fire Marshal and the City Building Official prior to acceptance.
- 2.2. **Submittal Format, Timing, and Location:** Where the AM&M is included as part of the initial plan submittal, provide one hard copy of the form and any supporting documentation with the plan check package. If the AM&M request is submitted separately, provide the appropriate form and supporting information for review to the MBFD, Community Risk Division.

Should evaluation of the AM&M proposal require time and resources beyond the standard allotted for this activity, additional time and materials fees may also be applied to the fees collected.

- 2.3. **Evaluation:** All AM&M requests are evaluated on a case-by-case basis in the context of the specific project being reviewed. Approval of the request is based upon several factors, including, but not limited to, the level of equivalency achieved, the effect of the AM&M on fire and emergency response, and site conditions.

Where the AM&M proposal affects project elements under the jurisdiction of another agency (for example, the City Building Division), review or concurrence from that agency may also be required.

- 2.3.1. **Approved AM&M:** If the Fire Marshal determines that the AM&M proposal provides an equivalent level of protection considering all related factors pertaining to the project, the approval section at the bottom of the request form will be completed. Such approval may be conditional upon implementation of additional requirements that were not part of the original AM&M proposal. The original approved hard copy shall be picked up at the Fire Department. Approval is granted only for the specific project under review and the conditions for approval shall not be construed as applicable to any other project.
- 2.3.2. **Denied AM&M:** In the event that the Fire Marshal determines that the AM&M proposal does not provide an equivalent level of protection, the request will be denied and a response issued to this effect. Should the applicant submit a different AM&M request for this project or choose to revise and resubmit the previously denied request, additional AM&M fees

may apply. To facilitate the evaluation process, include any previously denied AM&M proposals when submitting a revised AM&M request.

- 2.4. Other Plans: Once the AM&M request is approved, the completed AM&M form shall be incorporated into the plan(s) that the deficiency is related to as well as all subsequent plans submitted to MBFD, Community Risk Division, and the Building Department that may be impacted by the approved alternative(s). In some cases, this may require revision and resubmittal of previously approved plans. Failure to incorporate the AM&M into other plans may result in return of those plans as incomplete and/or delay plan approval or interrupt progress during construction. It is the responsibility of the owner or owner's authorized agent to provide copies of approved AM&M documentation for this purpose and to ensure that all affected parties are aware of the approved alternatives.
- 3. Engineering Evaluation**: If the Fire Marshal deems an engineering evaluation necessary, it shall be performed and reported by a firm or individual that has been approved by the Fire Marshal. The applicant is responsible for all costs associated with the preparation of the AM&M or associated analysis.