

DWR's Process for Alternative Data or Methodology, and Special Landscape Areas Requests

Version 5.0, August 22, 2025

Effective for 2025 report submittals (due January 1, 2026) and onward

General Process

Submit request package in accordance with the type of determination requested (Alternative Data, Alternative Methodology, Special Landscape Areas, or a combination – see below). A separate package is not needed for each request, but packages may be submitted separately if desired.

Suppliers are encouraged, but not required, to follow the guidance in this document when submitting requests for Alternative Data or Alternative Methodology different than the data and methodologies provided by the Department of Water Resources (DWR). Similarly, suppliers are encouraged, but not required, to follow this guidance for demonstrating to DWR their Special Landscape Areas determination process and data. Suppliers should submit all initial inquiries related to Alternative Data, Alternative Methodology, or Special Landscape Areas to DWR at: WUEStandards@water.ca.gov and DWR will review them on a case-by-case basis.

An Urban Retail Water Supplier (Supplier) may also have to demonstrate and substantiate any new data or variance needed for calculating their urban water use objective. While DWR is responsible for reviewing and approving a Suppliers' Alternative Data, Alternative Methodology, and Special Landscape Areas requests, in coordination with the State Water Board, the approval to use a Variance and use new data for annual reporting is the responsibility of the State Water Board.

This document also includes guidance on how Suppliers can include new or newly measured landscape areas for annual reporting purposes. These requests are reviewed and approved separately by the State Water Board, and it is recommended that Suppliers consult with the State Water Board in these cases. Please refer to [State Water Board - Water Conservation Portal](#)¹ for details on the State Water Board's process.

¹ https://www.waterboards.ca.gov/conservation/regs/water_efficiency_legislation.html

Submittal

To expedite processing, DWR recommends that Suppliers submit completed package to: WUEStandards@water.ca.gov and include in subject:

- ALTERNATIVE DATA REQUEST
Or
- ALTERNATIVE METHODOLOGY REQUEST
Or
- SPECIAL LANDSCAPE AREA REQUEST
Or
- <LIST COMBINATION> REQUEST

What to Submit: Alternative Data or Methodology Request

Suppliers may use alternative data (Alternative Data) other than that provided by DWR if they demonstrate to DWR, in coordination with the State Water Board, that their alternative data meets or exceeds the quality and accuracy of the DWR estimates (Title 23 of the California Code of Regulations (23 CCR) Sections 967(c)(1); 968 (b)(3), (b)(4), (c)(3), (g)(2), (g)(6); 969(b)(3)).

Suppliers may also use alternative methods (Alternative Methodology) for certain calculations provided that they are demonstrated to DWR, in coordination with the State Water Board, to be equivalent, or superior, in quality and accuracy (23 CCR Section 967(c)(1)(C) – Evaporative Coolers variance; Section 967(c)(2)(A) – Seasonal Population variance; Section 971(b)(1) Bonus Incentive).

If a Supplier chooses to use an Alternative Data or Alternative Methodology it must go through DWR review to determine if the data meets or exceeds the quality and accuracy of data provided by DWR.

It should be noted that pursuant to 23 CCR Section 968(b)(5), for corrections to misclassified residential areas in the DWR provided Residential Landscape Area Measurement (Residential LAM) that are actually commercial, industrial, and institutional (CII) properties, the misclassified landscape area may simply be subtracted from the Residential LAM and no Alternative Data request is required. The misclassified landscape area subtracted from the Residential LAM will need to be included in either the outdoor irrigation of landscape areas with dedicated irrigation meters or equivalent technology in connection with the CII water use standard (DIM Standard) or in assessment and implementation of CII performance measures, as applicable.

General/All

DWR will evaluate all Alternative Data or Alternative Methodology request data packages on a case-by-case basis. It is highly recommended that the request be clear in presenting the request rationale, describing the difference(s) between DWR data or methods and proposed data or methods, and how it meets and/or exceeds the accuracy requirements of DWR data or methods.

A meeting may be requested with DWR staff to walk through the Alternative Data or Alternative Methodology determination process and data. However, submission of written documentation/data summaries is required as that Alternative Methodology, supported by reported documentation, or Alternative Data determined by the documented methods, will be what DWR relies on to make its determination. Of note:

- Alternative Methodology must be accepted **prior** to being used in Variance applications, but it may be requested concurrently with an Alternative Data request.
- Upon acceptance, Alternative Data will be reported in the official State Water Board's Urban Water Use Objectives – Relevant Data open data portal (https://www.waterboards.ca.gov/resources/data_databases/) and used to repopulate the required urban water use objective reporting template.

It is recommended, but not required, that the request include the following in an information package to facilitate DWR's review:

1. The alternative data or methodology. For those Supplier's whose alternative data cannot be submitted for review (e.g., as a result of data privacy restrictions), DWR suggests that Suppliers submit aggregated data and request a 'walk-through' meeting with DWR staff. Depending on the circumstances and review, aggregated data may include either detailed data and mapping, overall summary data, or overall summary data with detailed case examples. The recommended minimum would be an overall summary with detailed case examples.
2. Data, figures, tables, geographic information system (GIS) layers of Alternative Data or resulting from Alternative Methodology compared to DWR provided data.
3. Description of why the alternative data or methodologies meet or exceed the quality and accuracy of the DWR methodology, data, or referenced data.
4. Description of the methodology and data used, including data sources and any locally applicable research and literature.
5. Credentials (such as licenses, certifications, education, training, or professional background of staff) for the entity/party that conducted the measurements and verification.

6. Affidavit or certification of the alternative data or methodology by a qualified Supplier staff member responsible for data quality.
 - a. Certification of the alternative data or methodology by the entity/party that produced it if not produced by the Supplier's staff.
 - b. Referenced, published research reports do not require certification but must be cited.
7. A public process to provide the public an opportunity to review the alternative data or methodologies and understand the purpose of the request to use alternative data – highly recommended for potentially controversial data.
 - a. A minimum of 2 weeks notification and posting via social media or normal customer communication process is recommended with a mechanism for the public to comment on the data and/or methodology.
 - b. Attach comments received during the notification process.
8. Submission of a request signed by the General Manager of the Supplier to DWR.

Additional Recommended Details for Specific Alternative Data

For certain Alternative Data requests, it is recommended that Suppliers include additional data in their data package as follows:

Alternative Residential Landscape Area Measurement Data

- Description of the methodology used for quantifying the irrigable irrigated (II) landscape area. Note that pursuant to 23 CCR Section 968(b)(3) irrigable not-irrigated (INI) landscape area will no longer be allowed as part of the outdoor residential water use budget when electing to use Alternative Data.
- Verification that the measured landscape area is for residential parcels only and does not include nonresidential parcels.

Alternative Reference Evapotranspiration and Total Precipitation Data

- If *ET_o* and/or *Total Precipitation* is calculated using station data:
 - Description of the weather station siting conditions.
 - List of all sensors used.
 - Description of maintenance procedures and schedules.
 - Description of the quality assurance/quality control procedures.
 - Detailed description of the equation used to estimate *ET_o* and *Total Precipitation*.
- If *ET_o* is estimated using remote sensing data:
 - The specific input data source (satellite, airborne, etc.) and image resolution.
 - Detailed description of the methodology for deriving *ET_o* from remotely sensed data.

- Description of how the method and data was validated and documentation of validation.

Alternative Evaporation Rate Calculation or Wet-Bulb Temperature

- Verification that the Evaporative Coolers (ECs) considered in the variance are for residential uses.

What to Submit: Special Landscape Areas

Suppliers may use Special Landscape Areas in calculating their outdoor water budgets provided that they demonstrate to DWR, in coordination with the State Water Board, that these areas meet the definition specified in 23 CCR Section 969 (a)(5) for CII landscapes and 23 CCR Section 965(aaa) for residential landscapes (23 CCR Section 968(c)(2) and 969(c)(2)). Special Landscape Areas demonstrated to DWR, in coordination with the State Water Board, as meeting the requirements may be included in the urban water use objective for up to five years.

Residential Special Landscape Areas (23 CCR Section 965(aaa)):

- Pools, spas, and similar water features. [Note: this area is provided by DWR as part of the Residential LAM].
- Areas dedicated solely to edible plants.
- Areas irrigated with recycled water.

CII Special Landscape Areas (23 CCR Section 969 (a)(5)):

- From the Model Water Efficient Landscape Ordinance (MWELO) (23 CCR Section 491(ttt)):
 - Landscape dedicated solely to edible plants.
 - Recreational areas.
 - Areas irrigated with recycled water.
 - Water features using recycled water.
- Slopes designed and constructed with live vegetation as an integral component of stability.
- Ponds or lakes receiving supplemental water for purposes of sustaining wildlife, recreation, or other public benefit, excluding water reported to the Board supporting a variance for ponds and lakes for sustaining wildlife required to be maintained by regulation or local ordinance.
- Plant collections, botanical gardens, and arboretums.
- Public swimming pools and similar recreational water features.
- Cemeteries built before 2015.

- Landscapes irrigated with recycled water.

Please keep in mind that DWR does not have authority to evaluate temporary provisional data and data requests (23 CCR Section 969 (g)); this guidance applies only to Special Landscape Areas.

General/All

DWR will evaluate all Special Landscape Areas request data packages on a case-by-case basis.

A meeting may be requested with DWR staff to walk through the Special Landscape Areas determination process and data. However, submission of written documentation/data summaries is required as that data, determined by the documented methods, will be what DWR relies on to make its determination.

It is recommended, but not required, that the Suppliers requesting a determination regarding the use of Special Landscape Areas include the following in an information package to facilitate DWR's review:

1. The Special Landscape Areas data (e.g., data, figures, tables, GIS layers). Depending on the circumstances and review, this may include either detailed data and mapping, overall summary data, or overall summary data with detailed case examples. The recommended minimum would be an overall summary with detailed case examples.
2. Summary data tables comparing Residential Special Landscape Areas data with original Residential LAM and other measured features.
3. Description of the methodology and data used, including data sources and any locally applicable research and literature.
4. Credentials (such as licenses, certifications, education, training, or professional background of staff) for the entity/party that conducted the measurements and verification.
5. Affidavit or certification of the Special Landscape Areas data by a qualified Supplier staff member responsible for data quality.
 - a. Certification of the Special Landscape Areas data by the entity/party that produced it if it was not produced by the Supplier's staff.
6. A public process to provide the public an opportunity to review the Special Landscape Areas data or methodologies – highly recommended for potentially controversial data.

- a. A minimum of 2 weeks notification and posting via social media or normal customer communication process is recommended with a mechanism for the public to comment on the data and/or methodology.
 - b. Attach comments received during the notification process.
7. Submission of a request signed by the General Manager of the Supplier to DWR.

General Information: New Landscape Areas

Residential

23 CCR Section 968

(b) (2) Until updated residential landscape area data are available pursuant to paragraph (3), residential landscape area shall be, for each supplier:

(A)

(i) The supplier's unique square footage of Irrigable Irrigated area included in the Landscape Area Measurements Project update released by the Department on December 6, 2023. After the effective date of this section, a supplier may adjust this value by adding the residential parkway area provided by the Department that the supplier has confirmed is associated with a residential service connection; or

(ii) For a supplier that has not received residential landscape area data from the Department by the effective date of this section, the supplier's unique square footage of Irrigable Irrigated area shall be what the Department first provides after this section takes effect.

(b)(3) Residential landscape area shall be, for each supplier, the most current updated Irrigable Irrigated area...

(e)(2) The existence of newly constructed residential landscape area shall be demonstrated by using:

(i) Data from annual reporting required by section 495(b)(6) [Annual MWELo Report], provided the report has disaggregated newly constructed residential landscapes from the total landscape area reported;

(ii) On the ground measurements of newly constructed residential landscapes; or

(iii) Measurements of newly constructed residential landscapes collected using accurate remote sensing methods.

Added Existing Landscape Area:

In accordance with 23 CCR Section 968(b)(2), the existing DWR Residential LAM would apply even when adding new service area(s) (e.g., annexations). DWR does not know

when the Residential LAM may be updated to include any new areas in the measurement data. DWR highly recommends consulting with the State Water Board at ORPP-WaterConservation@waterboards.ca.gov on what to do in the case that the Supplier adds new service area(s)/new existing developed areas. Suppliers can always conduct their own measurements and request use of Alternative Data to the original Residential LAM provided by DWR that would include the new service/developed area. If the use of Alternative Data is requested, only the Irrigable Irrigated fraction of both the existing Residential LAM and new data would be allowed for calculating the compliance budget.

Newly Constructed Landscapes:

DWR does not have the authority to approve any newly constructed landscape area measurements by Suppliers and does not know when a new Residential LAM may be provided. It is recommended that Suppliers consult with the State Water Board at ORPP-WaterConservation@waterboards.ca.gov about their method for approvals and use of newly constructed residential landscape areas in accordance with 23 CCR Section 968(e)(2).

Commercial, Industrial, and Institutional (CII)

23 CCR Section 969

(b) (2) No later than July 1, 2028, and periodically thereafter, a supplier shall quantify the measured total square footage of the irrigated area of CII landscapes with DIMs (DIM LA) and describe and substantiate how that area was quantified.

Annual updates shall include the square footage of large landscapes that have had DIMs installed in accordance with section 973.

(d)(2) The existence of newly constructed CII landscapes with DIMs shall be demonstrated by using:

(A) Data from annual reporting required by section 495(b)(6), provided the report has disaggregated newly constructed CII landscapes with DIMs from the total landscape area reported,

(B) On the ground measurements of newly constructed CII landscapes with DIMs, or

(C) Measurements of newly constructed CII landscapes with DIMs collected using accurate remote sensing methods.

23 CCR Section 973

(c)(2) For purposes of this section, the area of the landscapes (LALL) shall include only CII water users associated with large landscapes and shall be quantified and substantiated by the supplier using data generated by the Department.

DWR does not have the authority to approve any CII landscape area measurement associated with DIMs and therefore subject to the outdoor DIM standard.

23 CCR Section 973(c)(2) does require Suppliers to use data generated by DWR for CII landscape areas subject to CII Performance Measures. However, DWR has not completed analysis of CII landscapes and will not be providing data suitable for this purpose. DWR-provided data will only be a starting point for Suppliers and the data will require necessary ground-truthing and other analysis.

It is recommended that Suppliers consult with the State Water Board at ORPP-WaterConservation@waterboards.ca.gov about their method for approvals and use of CII landscape areas.