

Making Conservation a California Way of Life

Variances and Temporary Provisions Request Process Webinar

August 11 & 12, 2025

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State Water Board



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Logistics



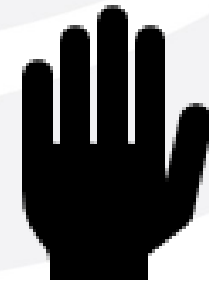
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Place questions
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Q&A box



Use virtual "raise
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Meeting Scope



- ✓ Variances and provisions, request package
- × UWUO reporting form, SLAs, BMPs, and non-Variance related topics will be addressed at a later time
- ✓ Only questions in the Q&A will be addressed

Further questions, contact

WaterConservation@Waterboards.ca.gov

Agenda

1. Overview of variances and temporary provisions
2. Details about request package
3. Variance and Temporary Provision Template
Walk Through
4. Q&A

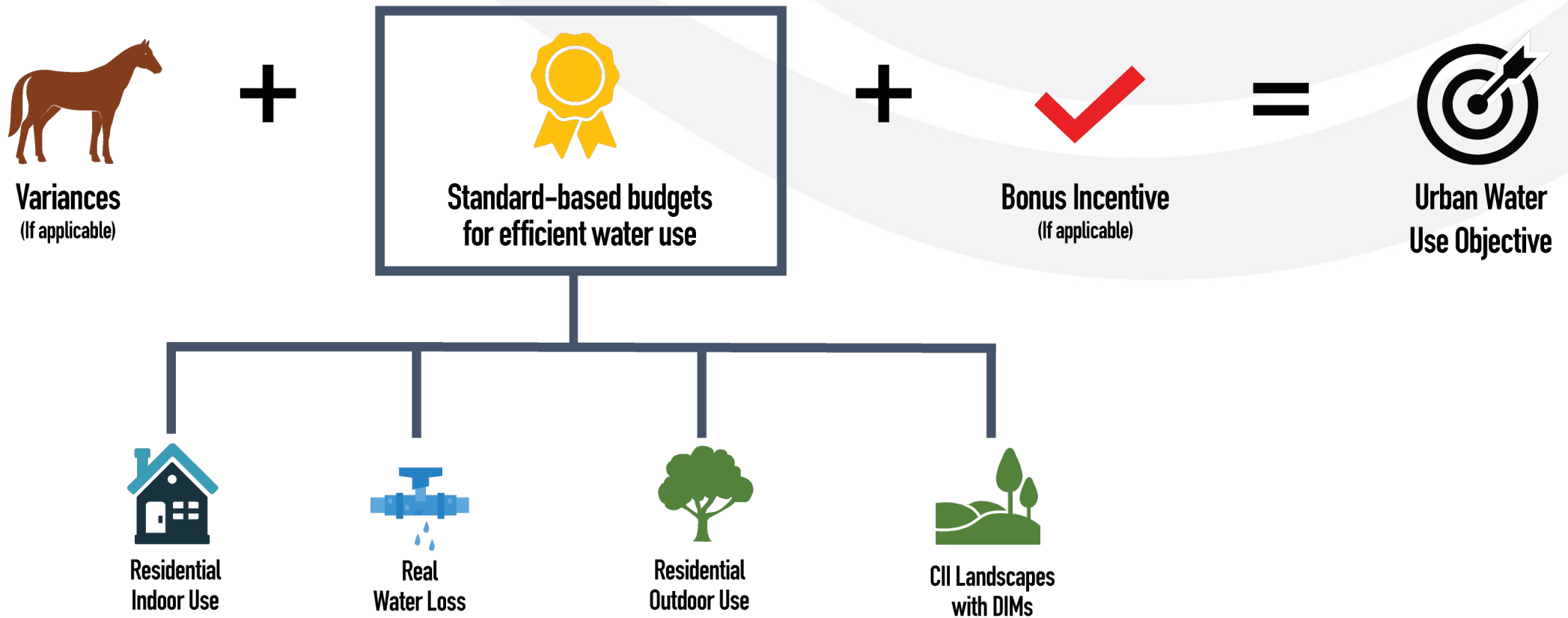
Common Abbreviations

- CII = Commercial, Industrial, and Institutional
- DIMs = Dedicated Irrigation Meters
- supplier = Urban Water Retail Supplier
- TDS = Total Dissolved Solids
- UWUO / objective = Urban Water Use Objective



Overview

Urban Water Use Objective



Variances

- Variances are volumes of water added to the supplier's objective (separately from budgets) for specific uses of water that have a material effect on the urban water use objective
- Eligibility Thresholds: Majority are 1% or 5% of the applicable budget(s)
- Approved variance volumes can count in the objective for 5 reporting cycles
- Careful not to confuse variances with special landscape areas (SLAs)

Variances

<div>Referenced budgets in parenthesis:</div> <div>RI = Residential Indoor; RO = Residential Outdoor; CII = CII with DIMs</div>	Threshold of Significance
Significant use of evaporative coolers <i>(RI)</i>	5%
Significant fluctuations in seasonal population <i>(RI)</i>	1% or 5%
Populations of horses & livestock <i>(RO)</i>	5%
Dust control in animal exercise arenas <i>(RO)</i>	5%
Irrigating agricultural landscapes not classified as irrigable irrigated in the LAM <i>(RO)</i>	1% or 5%
Responding to emergency events, not including drought <i>(RO, CII)</i>	5%*
Landscapes irrigated with recycled water containing high levels of TDS <i>(RO, CII)</i>	1%* or 5%*
Supplementing ponds and lakes to sustain wildlife as required by existing regulations or local ordinances <i>(RO, CII)</i>	--
Irrigating existing residential trees <i>(RO, CII)</i>	--

* = sum of RO and CII

Temporary Provisions

- Approved provision volumes can count in the objective for 3 reporting cycles
- No volumetric thresholds for provision eligibility
- Must still submit information quantifying and substantiating request, and other information in 967(e) for indoor or 968(j) for outdoor/CII

Temporary Provisions

	Associated Budget (no threshold)
Meeting the budget for efficient residential indoor use is causing challenges within wastewater collection, treatment, and reuse systems	Residential Indoor
The planting of new, climate-ready trees	Residential Outdoor, CII with DIMs
The establishment of qualifying landscapes	Residential Outdoor, CII with DIMs



Request Details

Request Template

- Suppliers may use the template to navigate required variance and temporary provision request components

- Visit https://www.waterboards.ca.gov/conservation/regs/water_efficiency_legislation.html#materials

Variance and Temporary Provision Request Form for FY24-25

Table of Contents

Abbreviations and Color Key	Abbreviations dictionary and cell color-key
READ ME	Instructions for completing and submitting
Preliminary Budget Calculation	Select which year of data to use for budget (FY24 or FY25)
Indoor required certification	Must-do for any indoor variance or provisions
Residential Indoor Variances	Calculation & components checklist: <ul style="list-style-type: none">- Evaporative Coolers- Fluctuations in Seasonal Population- Wastewater Provision
Outdoor required certification	Must-do for any residential or CII variances or provisions
Residential Outdoor Variances	Calculation & components checklist: <ul style="list-style-type: none">- Livestock on Residential Property- Required Ponds and Lakes- Animal Dust Control- Climate-ready Trees Provision- Non-II-classed Residential Agriculture- Qualifying Landscapes Provision
Emergency and High TDS Variances	Calculation tool and components checklist: <ul style="list-style-type: none">- Responding to non-drought emergencies - Irrigation with Recycled Water with High TDS levels
Residential Agriculture 1%	Auxiliary tab if using the 1% threshold method for this variance
Residential Outdoor Components	Preliminary updates to landscape area values if necessary (must be approved for final LUNOJ report)
Alternative Data or Methodology	To indicate if alternative data is pending from DWR
--	Remaining tabs are for auto-population purposes

2022 Meetings and Workshops

2021 Meetings and Workshops

Reporting Materials

- Download 2025 Variance and Temporary Provision Request Template with VBA
- Download 2025 Variance and Temporary Provision Request Template no VBA
- Variance and Temporary Provision FAQ
- WUE Data Portal

Regulatory Documents

- Final Text of Regulation and Adopted Resolution
 - Regulation to Make Conservation a California Way of Life (Approved by the Office of Administrative Law, Effective on 1/1/2025)
 - Board Resolution 2024-0019 (Adopted on 7/3/2024)
- Notice(s)

Submission Timeline

- Variance and temporary provision requests are due annually by October 1 to include volumes in the UWUO report due on the following January 1



January 1, 2025	Regulation effective
June 30, 2025	State fiscal year ends, end of 2024-25 reporting cycle
October 1, 2025	Final day for variance+prov requests for 2024-25 reporting cycle
January 1, 2026	UWUO report due for 2024-25 reporting cycle
June 30, 2026	End of 25-26 reporting period
October 1, 2026	Final day to submit variance+prov for 2025-26 reporting due Jan 1 2027
October 2, 2026	Variance+prov request window starts for 2026-27 reporting cycle

Submitting the Package


- Send to waterconservation@waterboards.ca.gov
- Subject line “Variance Submission for [ORG ID] [Supplier name] FY 2024-25”
 - Package contents:
 - Completed Variance Request Template (Excel file)
 - Methodology descriptions
 - Other required documentation
 - Template file title convention: “Variance_Submission_[ORG ID]_[Supplier name]_FY 2024-25”
 - Use identifiable file names (e.g., “Methodology_evap_coolers” rather than “ec2425” or “file2”)

Certification

- Requesting any variance or provision needs to comply with 967(e) and/or 968(j)
- 967(e) and 968(j) require suppliers to certify the information submitted, and include some general requirements:
 - Certification that water in the report was delivered by the supplier
 - No existing permit requirement compliance is jeopardized due to variance or provision
 - Quantification and substantiation of need
 - Methodology is included in request
 - (Outdoor) Existing trees are prioritized

Certification can be satisfied by initialing in the designated fields on the Excel template

Supporting Methodology

- For each variance or temporary provision requested, suppliers should “show their work”
 - Justify and explain the elements of and basis for your request
 - Describe and support the methodology used
- Examples of supporting information could include:
 - Sample size
 - How and when the data was collected
 - Steps taken, why this strategy was chosen
 - Original datasets and other information by discretion
- Word doc, spreadsheet, “searchable” PDF 

Indoor Variance Tools

- DWR has two Excel-based tools for indoor variances:
 - Seasonal population tool
 - [Instructional video](#) on YouTube
 - Evaporative cooler tool
 - Building zone specific ΔT_{bulb} component of the variance
 - Supplementary guidance for using this tool can be found in DWR's 2022 report to the State Water Board: [Recommendations for Variance for Significant Water Use of Evaporative Coolers, Methods of Calculation, and Supporting Data Requirements](#) (starting on page 69 of the PDF)

[WUEdata - Resources for Urban Water Suppliers](#)

Alternative Data

- All alternative data and methods are reviewed by Department of Water Resources (DWR)
 - WUEstandards@water.ca.gov
- If a supplier is submitting alternative sources for any of the six data points specific to the variances
 - Indicate on the “Alternative Data or Methodology” tab
 - Review of related variances will be saved until DWR confirms approval with State Water Board
 - Other package elements will still be reviewed and approved – separate from variance that has any alternative sources

Post-Submission

Request packages sent off to SWB:

Now what?

- State Water Board staff will review that packages have included all components and information quantifying and substantiating each request
- Variance data will be uploaded to Open Data Portal
- Suppliers will be emailed a status update
- The Jan 1 2026 UWUO reporting form will have variance/provision package information auto-populated
- Volume thresholds will be double checked on final budget data in UWUO report
- Next reporting year, some data components will need to be updated

Summary

- Variances and temporary provisions add volume to the urban water use objective, some have eligibility thresholds
- State Water Board produced a template to assist with submitting required components of the requests – available on our [webpage](#)
- Tools for calculating the indoor variances – on WUE Data Portal
- Deadline for the 2024-2025 reporting year is October 1, 2025
 - Info received 10/2/2025 – 10/1/2026 will go into the Jan 1 2027 report
- Submit Variance and Temp Provision requests to SWB
WaterConservation@waterboards.ca.gov
- Submit Alternative Data requests to DWR
WUEstandards@water.ca.gov

Poll Question 1

What is your status on variance and temporary provision requests?

- A. I have just begun my journey
- B. Currently checking numbers, potentially going to submit request
- C. I checked the eligibility and I am submitting at least one variance or provision request
- D. Not submitting this year

Poll Question 2

I am likely requesting a variance by October 1 for:

- | | |
|----------------------------------|----------------------------------|
| 1) Evaporate cooler variance | 5) Misclassified Res Ag variance |
| 2) Seasonal population variance | 6) Emergency variance |
| 3) Livestock population variance | 7) High TDS variance |
| 4) Animal dust control variance | 8) Ponds and lakes variance |

Poll Question 3

**I am likely requesting a temporary provision by
October 1 for:**

- 1) Wastewater provision
- 2) Climate-ready trees provision
- 3) Qualifying landscapes provision



Request Template Walkthrough

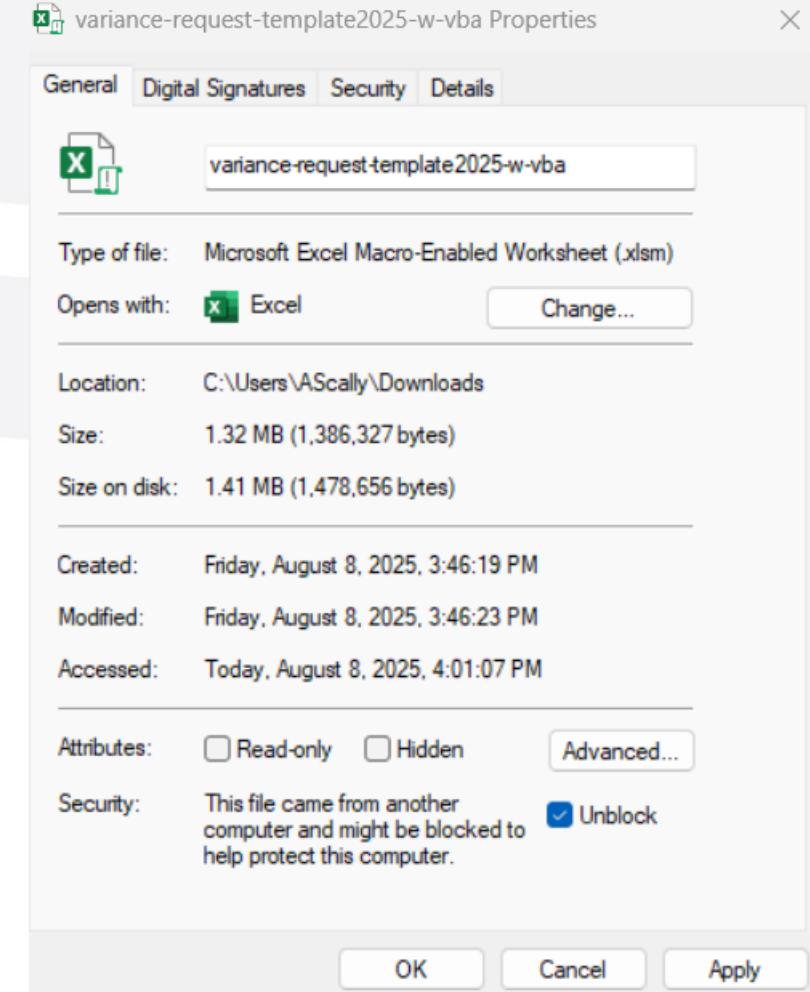
Notice! Version update

Both versions of the Request Template had a permissions error on the Indoor Variances sheet. The issue has been resolved and version 1.1 is available on the website now for redownloading.
Sorry for the inconvenience.

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

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1. Close file
2. Find downloaded file location on your computer
3. Right click, open properties
4. Under properties page, or under security tab, check “unblock” and then Apply
5. Reopen file





Q&A