

# Making Conservation a California Way of Life: Alternative Compliance

July 1, 2026

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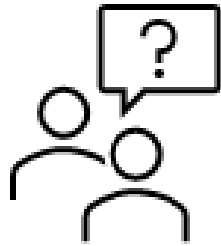
# Agenda

1. **Introduction**
2. What is alternative compliance?
3. How is eligibility determined?
4. What effort is required for alternative compliance?
5. Submission
6. Q&A

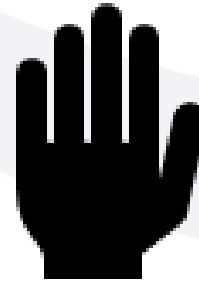
# Logistics



Rename  
box: name  
and  
affiliation



Place questions  
in the  
Q&A box



Use virtual "raise  
hand" to ask  
questions  
verbally



Email us if you're  
having technical  
issues

# Agenda

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- 2. What is alternative compliance?**
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# Making Conservation a California Way of Life

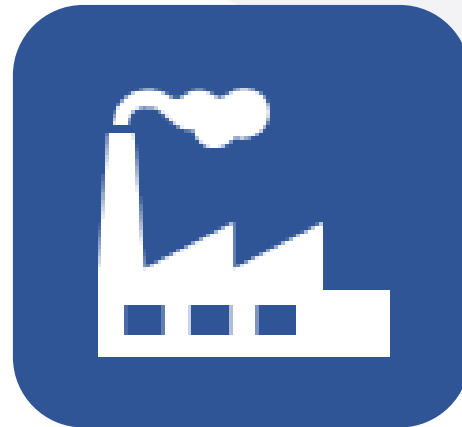


# Making Conservation a Way of Life

Three major components:



**Water Use  
Objectives**



**Performance  
Measures**



**Annual  
Reports**

# What is an “objective?”



## Water Use Objective

The estimated aggregate amount of water that would have been delivered the previous year by an agency if all that water had been used efficiently

=



Variances  
(If applicable)

+



Standard-based budgets  
for efficient water use

+



Bonus Incentive  
(If applicable)



Residential  
Indoor Use



Real  
Water Loss



Residential  
Outdoor Use



CII Landscapes  
with DIMs

# What is a “budget?”

## Example: Calculating Residential Indoor Water Use Budget



*Example budget for Residential Indoor Water Use*

47 Gallons Per Person per Day \* 508,172 people \* 365 days =  
**around 8,700 MG**

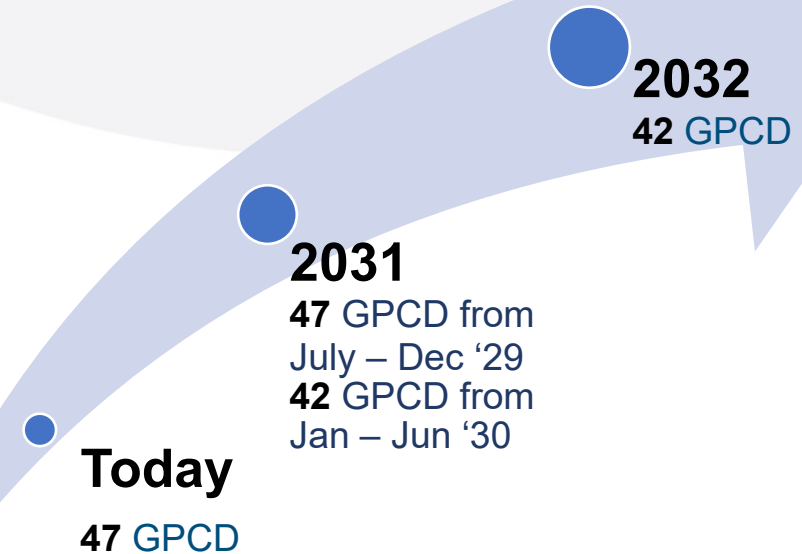
# What is a “standard?”

All budgets are based on efficiency standards.

1. Different efficiency standards are used to calculate each of the standard-based budgets that comprise the urban water use objective.
2. Efficiency standards will become more efficient over time.

**For the report submitted by January 1**

The Res-indoor budget will be based on a standard of....



# Projected compliance

As efficiency standards change, becoming more efficient over time...

| Year            | Res Indoor | Res Outdoor | CII DIMs           | Water Loss         |
|-----------------|------------|-------------|--------------------|--------------------|
| <b>FY 23-24</b> | 55 GPCD    | 0.8 LEF     | Volume as reported | Reported or Budget |
| <b>FY 25-26</b> | 47 GCPD    | 0.8 LEF     | Volume as reported | Reported or Budget |
| <b>FY 30-31</b> | 42 GCPD    | 0.8 LEF     | 0.8 LEF            | Budget             |
| <b>FY 35-36</b> | 42 GCPD    | 0.63 LEF    | 0.63 LEF           | Budget             |
| <b>FY 40-41</b> | 42 GCPD    | 0.55 LEF    | 0.55 LEF           | Budget             |

LEF = landscape efficiency factor  
GPCD = gallons per capita per day

FY = fiscal year  
Budget = budget from water loss regulation

# Projected compliance

...suppliers' objectives will become more efficient, too.

## 1.2 Objectives Calculated with Future Standards

| Year    | FY 24-25 Use (MG) | Calculated/Projected Objective (MG) | Current use lower than objective? |
|---------|-------------------|-------------------------------------|-----------------------------------|
| Current | 1,095.7           | 1,167.5                             | Yes                               |
| FY25-26 | 1,095.7           | 1,108.8                             | Yes                               |
| FY30-31 | 1,095.7           | 1,035.9                             | No (objective is 5.5% lower)      |
| FY35-36 | 1,095.7           | 968.2                               | No (objective is 11.6% lower)     |
| FY40-41 | 1,095.7           | 933.9                               | No (objective is 14.8% lower)     |

# What is “actual water use?”

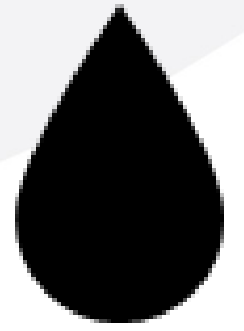
Residential  
Water Use



CII DIM (or Landscape  
Irrigation) Water Use



Real Water Loss



Actual  
Water Use

CII DIM = Commercial, Industrial and Institutional Dedicated Irrigation Meter

# Where does one find actual water use?

## Actual Use Compared to Urban Water Use Objective

In Gallons/Year

| Water Use Component   | Actual Water Use (Gallons) | Urban Water Use Objective (Gallons) |
|---|----------------------------|-------------------------------------|
| Total Residential Water Use, Indoor + Outdoor                             | 2,162,092,692.00           | 1,846,676,005.49                    |
| Outdoor Irrigation of CII landscapes associated with DIMs                 | 47,134,857.00              | 47,134,857.00                       |
| System Water Loss   | 130,040,132.70             | 68,044,481.14                       |
| Variances, Provisions, and 20% INI buffer, if applicable                  | N/A                        | 24,322,469.93                       |
| Bonus Incentive   | N/A                        | 0.00                                |
| Sum of Water Use Components (Specific to Objective)                       | 2,339,267,681.70           | 1,986,177,813.56                    |
| Excluded Demands  | 827,458,147.00             | 827,458,147.00                      |
| Sum of Water Use Components (Objective + Excluded)                        | 3,166,725,828.70           | 2,813,635,960.56                    |
| SB X7-7 Target Volume Plus Previously Excluded Process and Recycled Water | N/A                        | 3,412,090,445.00                    |
| "Capped" Objective  | N/A                        | 1,986,177,813.56                    |
| Regional Alliance Met Regional Target? (if Applicable)                    | N/A                        | Not Applicable                      |
| Final Comparison of Actual Water Use to Objective                         | 2,339,267,681.70           | 1,986,177,813.56                    |

[The source datasets are located on the Open Data Portal.](#)

In Acre-Feet/Year

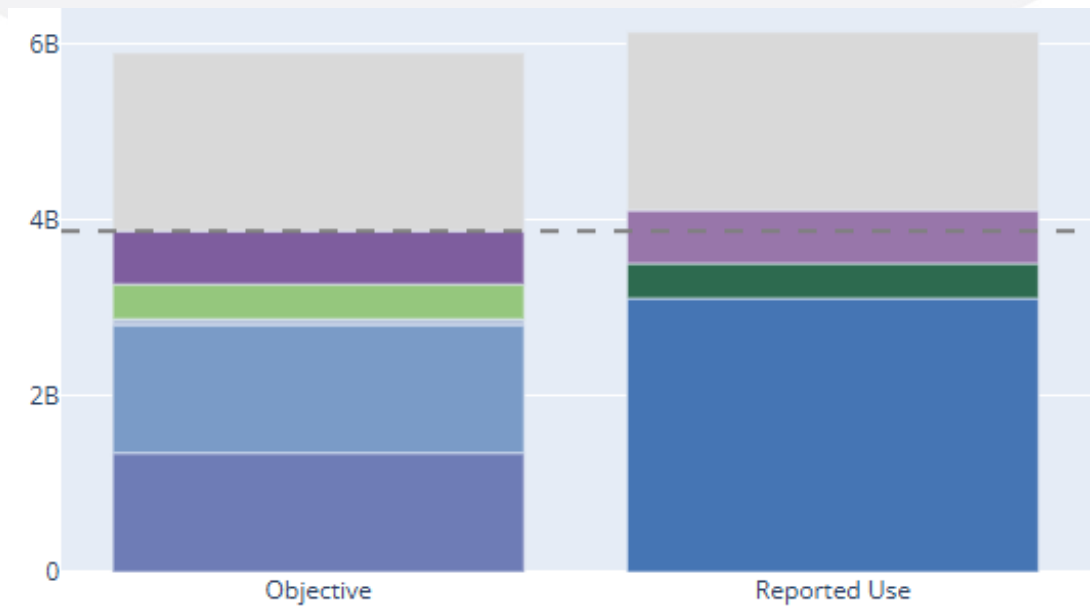
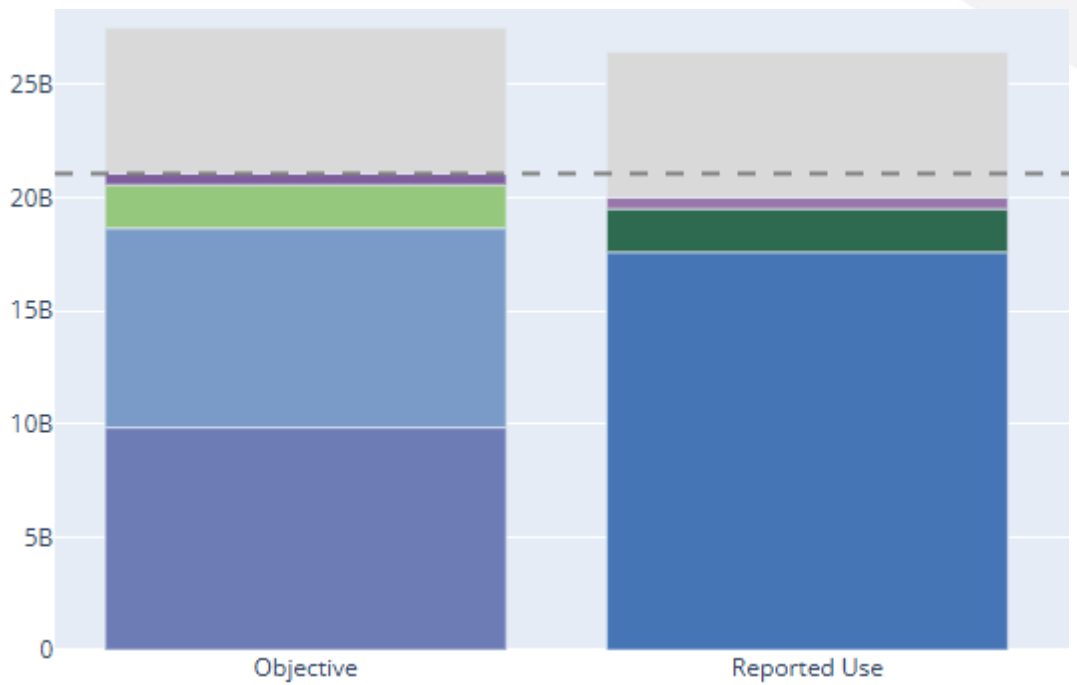
| Water Use Component   | Actual Water Use (Acre-Feet) | Urban Water Use Objective (Acre-Feet) |
|---|------------------------------|---------------------------------------|
| Total Residential Water Use, Indoor + Outdoor                             | 6,635.21                     | 5,667.23                              |
| Outdoor Irrigation of CII landscapes associated with DIMs                 | 144.65                       | 144.65                                |
| System Water Loss   | 399.08                       | 208.82                                |
| Variances, Provisions, and 20% INI buffer, if applicable                  | N/A                          | 74.64                                 |
| Bonus Incentive   | N/A                          | 0.00                                  |
| Sum of Water Use Components (Specific to Objective)                       | 7,178.94                     | 6,095.35                              |
| Excluded Demands  | 2,539.38                     | 2,539.38                              |
| Sum of Water Use Components (Objective + Excluded)                        | 9,718.32                     | 8,634.73                              |
| SB X7-7 Target Volume Plus Previously Excluded Process and Recycled Water | N/A                          | 10,471.32                             |
| "Capped" Objective  | N/A                          | 6,095.36                              |
| Regional Alliance Met Regional Target?                                    | N/A                          | Not Applicable                        |
| Final Comparison of Actual Water Use to Objective                         | 7,178.95                     | 6,095.36                              |

<
>
...
Landing Page and Navigation
Required Items Checklist
Summary
Objective
Residential
...
+
:
◀

# How is compliance with the objective assessed?

If reported water use was less than the objective, supplier **met** the objective

If reported water use was greater than the objective, supplier **did not** meet the objective



# Projected objective compliance

## 1.2 Objectives Calculated with Future Standards

| Year    | FY 24-25 Use (MG) | Calculated/Projected Objective (MG) | Current use lower than objective? |
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# What if a supplier can't meet their long-term objective?

- As standards become more efficient, some suppliers may struggle to comply with their objective.
- Suppliers struggling to meet their 2040 UWUO may be eligible for alternative pathways to compliance with their UWUO.
- These pathways are called Alternative Compliance.

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# The regulation makes available two alternative compliance pathways:

≥30%

## The 30% pathway

Isn't based on Median Household Income (MHI), but has additional effort requirements

≥20%

## The 20% pathway

An income-based pathway that depends on MHI.

# Who is eligible for the 30% Pathway?

- Suppliers who would need to reduce their baseline water use by 30% or more in order to meet their projected 2040 objective are eligible for the 30% pathway.

**Reduction in baseline water use  
necessary to meet 2040 objective:**

**$\geq 30\%$**

# Who is eligible for the 20% Pathway?

- Suppliers who would only need to reduce their baseline water use by 20% or more in order to meet their projected 2040 objective may be eligible for the 20% pathway.
- However, they would also need to meet a median household income threshold.

**Reduction in baseline water use necessary to meet 2040 objective:**



**≥20%**

# Who is eligible for the 20% Pathway?

**The 20% Pathway eligibility is based on median household income (MHI).**

1. The median household income of a supplier's service area must be less than the median household income of California.
2. Median household income is averaged across the three years preceding the year the supplier enters into alternative compliance.
3. Median household income is based on data from the United States Census Bureau's American Community Survey

# The baseline and the 2040 objective

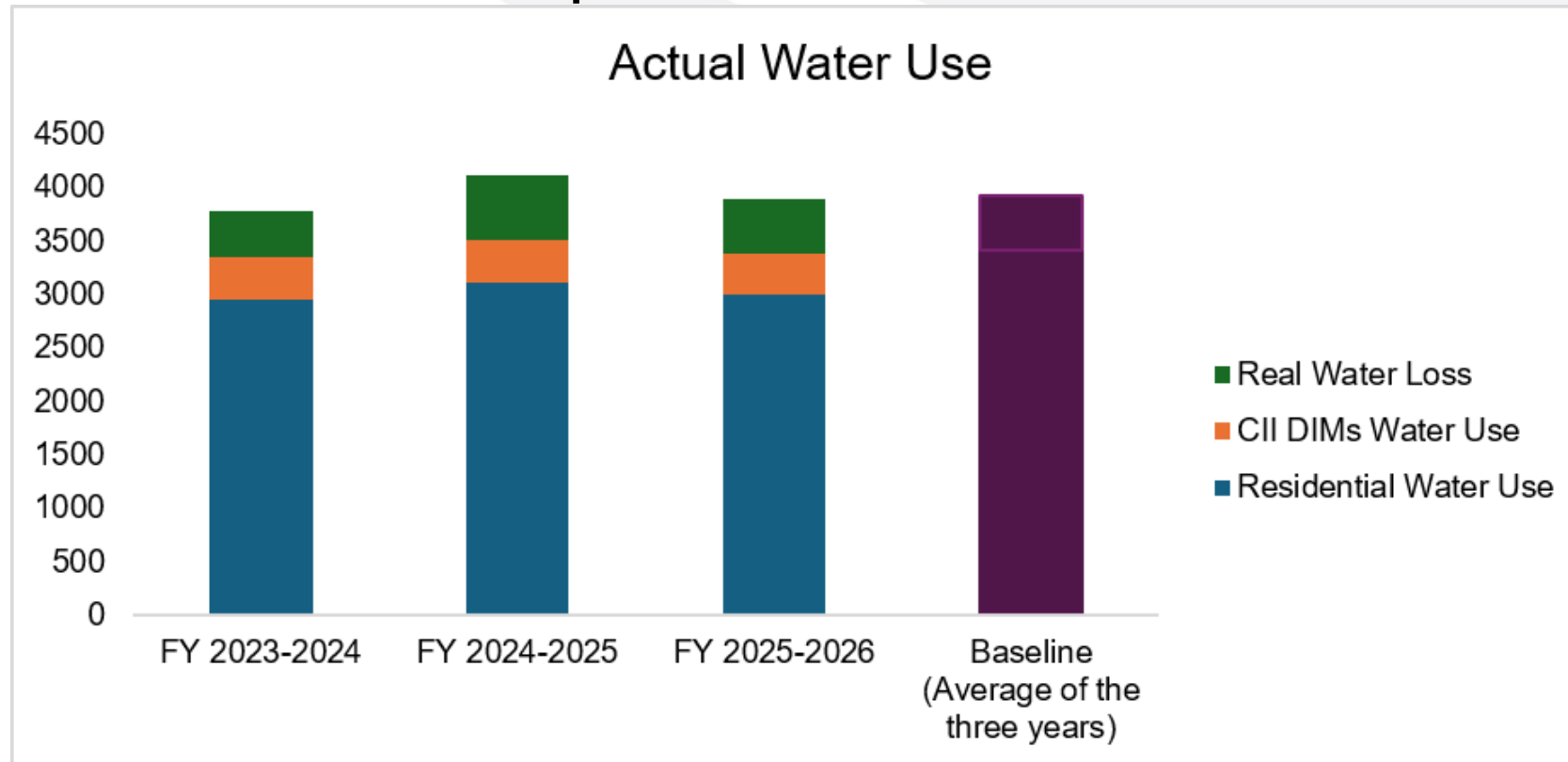
- A supplier's eligibility for both pathways is primarily determined by comparing its baseline water use to a projected 2040 objective.
- So what is the baseline?

# What is the baseline?

- The baseline is based on water use from the fiscal years ending in 2024, 2025 and 2026 as an average.
- Eligibility does not change over time. It is always based on water use from these three fiscal years.
- It is based on residential water use, water use associated with dedicated irrigation meters, and real water loss.

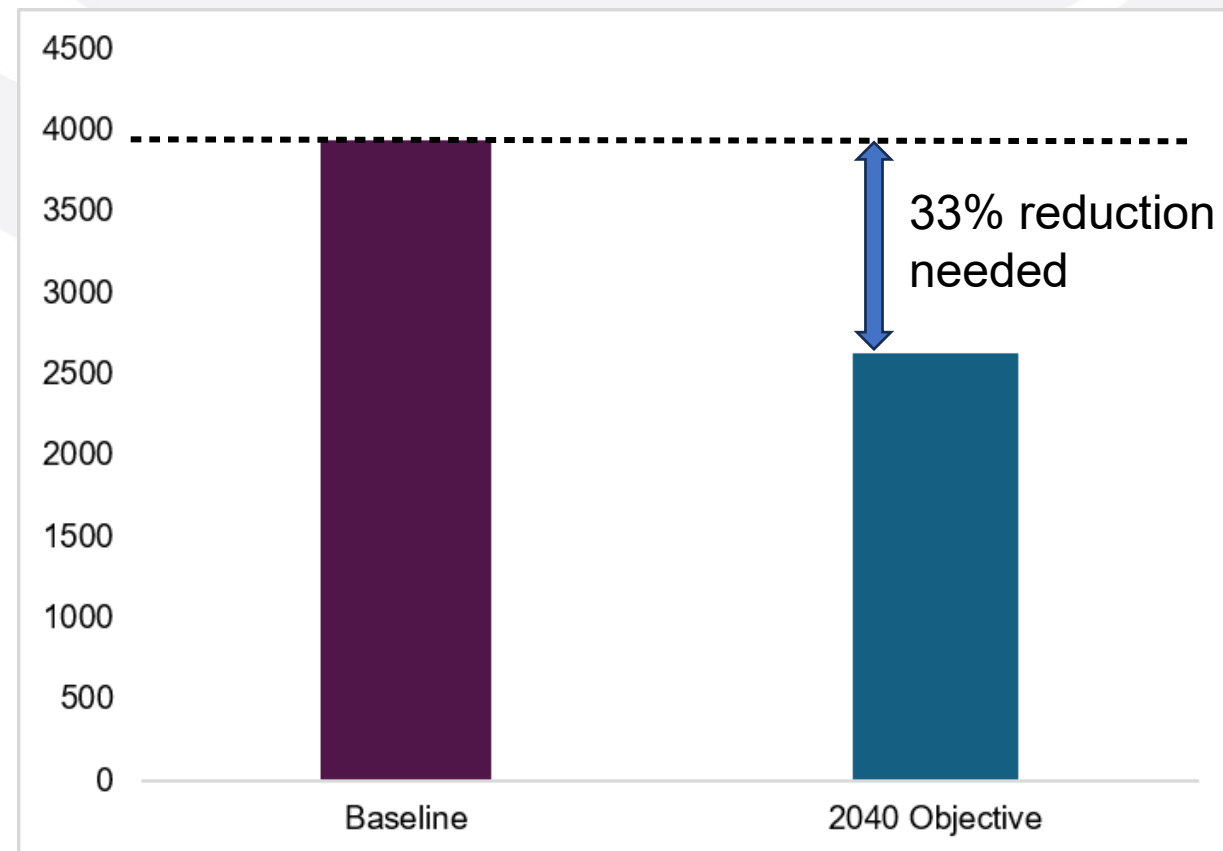
# What is the baseline?

- The baseline in this example is 3,929 MG.



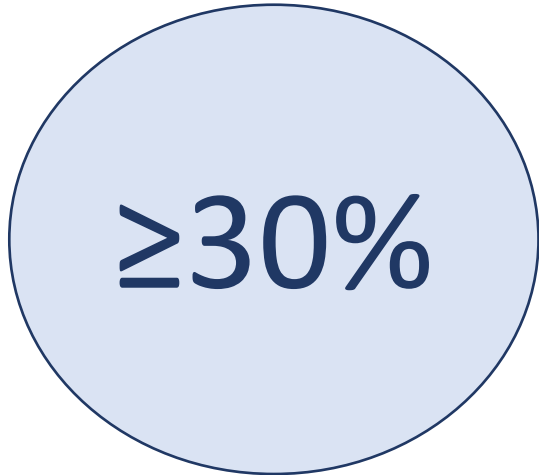
# What is the 2040 objective?

- A supplier will calculate an estimated 2040 objective using the 2040 standards and current information (e.g. current population)
- Next, the supplier will calculate the percent reduction needed to go from the baseline to the 2040 objective



# Who is eligible for Alternative Compliance?

**For the 30% Pathway:**



Reduction in baseline water use necessary to meet 2040 objective

**For the 20% Pathway:**

If median household income threshold is met...

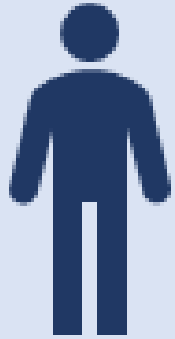


Reduction in baseline water use necessary to meet 2040 objective

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# What is required for suppliers for the 20% pathway?



Annual per-capita water use percent reduction of  $\geq 1\%$



Must develop, post to its public-facing website, and implement a conservation plan.

# What is required for suppliers for the 30% pathway?



Annual per-capita water use percent reduction of  $\geq 2\%$



Must develop, post to its public-facing website, and implement a conservation plan.



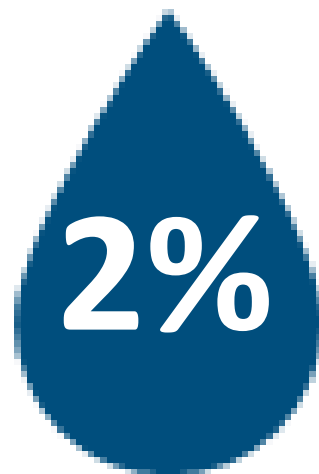
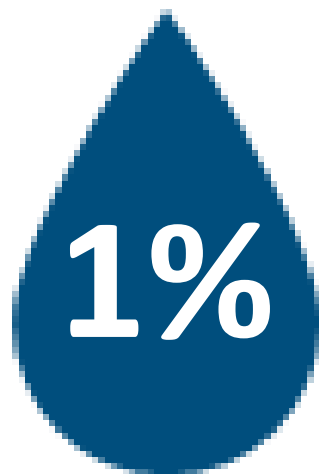
Verify adherence to AWWA G480-20 guidance.

# Annual Per-Capita Water Use Percent Reduction

Annual Per-Capita Water Use  
Percent Reduction for...

20% Pathway

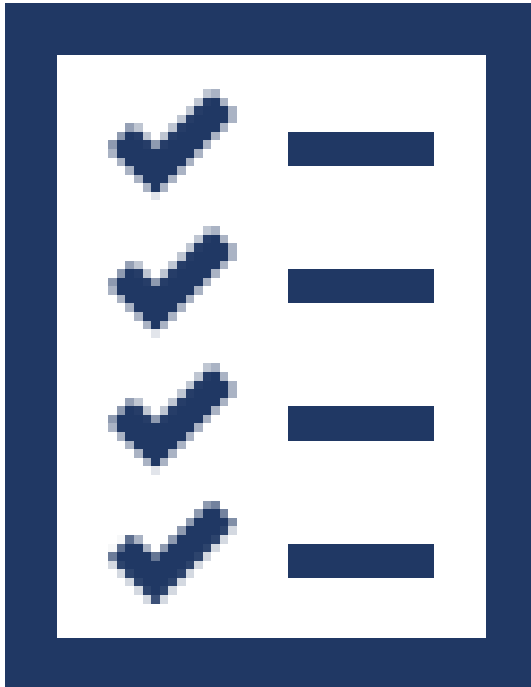
30% Pathway



**Annual per-capita water use percent reduction is calculated by comparing:**

- A rolling average of the per-capita water use for the three most recent years
- The average per-capita water use for fiscal years 2024, 2025, and 2026.

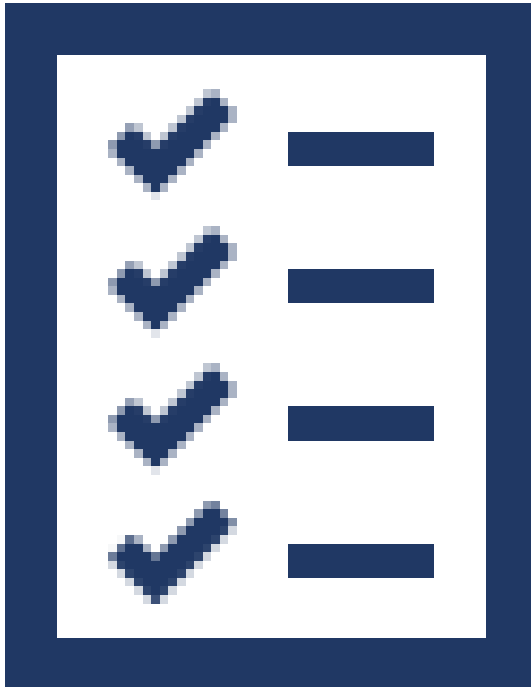
# Creating a conservation plan to achieve a long-term UWUO.



For the **20% Pathway**, conservation plans...

- Must be designed with the goal of achieving, by June 30, 2041, the supplier's urban water use objective.
  - A different date may be approved by State Water Board staff.
- Plan must include efforts to keep trees healthy.

# Creating a conservation plan to achieve a long-term UWUO.



In addition to the same requirements as for the 20% Pathway, conservation plans developed for the **30% Pathway** must include...

- An analysis of baseline and objective data
- Strategies for disadvantaged communities and low-income households
- Regional partnerships for climate-ready landscapes

# What constitutes increased support to low-income households?

Water conservation assistance such as rebates, outreach, or other programs are examples of increased support to low-income households.



# What are climate-ready landscapes?



Landscapes that are designed and maintained to:

- Reduce greenhouse gas emissions
- Weather more extreme conditions
- Save water
- Reduce waste
- Nurture soil
- Sequester carbon
- Conserve energy
- Reduce urban heat
- Protect air and water quality
- Create habitat for native plants and pollinators

# What are local and regional partnerships to support climate ready landscapes?

- Non-profits
- Conservancies
- Botanical Gardens
- Governmental Organizations
- NGOs
- Native Plant Nurseries



# What is the AWWA G480?

The AWWA G480-20 is a management standard by the American Water Works Association (AWWA) for water conservation and efficiency program operation and management. It outlines criteria, requirements and best practices for utilities to establish and maintain effective water conservation and efficiency programs.

# How do I make a conservation plan?

Introducing guest speaker:

**Mo Erbeznik**

*MEA Consulting*

STATE WATER RESOURCES CONTROL BOARD WEBINAR

# UWUO Compliance: Alternative Pathways

*Building Your Budget, Reassessing Projections, and Finding the Path Forward*

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**MEA Consulting**

Water Use Efficiency Strategy and Compliance Planning



# The Steps to a Compliance Plan

*A sequence, not a scramble. Each step builds the case for the next.*

**1** Know your number, and verify the data behind it is complete and accurate

**2** Build your budget: variances, residential extensions, Special Landscape Areas, potable reuse

**3** Reassess your projections

**4** Identify biggest risks and opportunities

**5** Examine water use and trends

**6** Build a strategy

**7** Project cost and find funding

*You May Be Able to Take the Alternative Pathway.*

# Know Your Numbers First

*Like any good health plan, you start with an honest baseline, not a fad diet. Get your numbers right, then build a plan that fits your community. **Slow down. It is more manageable than it looks.***

## YOUR BASELINE PANEL the vitals behind your objective

---

- **Population** from your eAR
- **Landscape Area** DWR aerial measurements
- **Water Use** SAFER reporting
- **Water Loss** audits and the Open Data Portal

# Your Objective Is Mostly Already Built

Five public data sources auto-populate your Urban Water Use Objective. You do not calculate it.

Your job is to verify the inputs.



## Population

From your eAR



## Land Area

DWR aerial measurements



## Weather

DWR climate data



## Actual Use

SAFER



## Water Loss

Open Data Portal and water loss audits

CALCULATES



The portal does the math.

| In Acre-Feet/Year   |                              |                                       |
|---|------------------------------|---------------------------------------|
| Water Use Component   | Actual Water Use (Acre-Feet) | Urban Water Use Objective (Acre-Feet) |
| Total Residential Water Use, Indoor + Outdoor                             | 13,829.33                    | 16,746.40                             |
| Outdoor Irrigation of CII landscapes associated with DIMs                 | 4,835.55                     | 4,835.55                              |
| System Water Loss   | 1,089.08                     | 944.88                                |
| Variances, Provisions, and 20% INI buffer, if applicable                  | N/A                          | 0.00                                  |
| Bonus Incentive   | N/A                          | 0.00                                  |
| Sum of Water Use Components (Specific to Objective)                       | 19,753.96                    | 22,526.83                             |
| Excluded Demands  | 3,401.47                     | 3,401.47                              |
| Sum of Water Use Components (Objective + Excluded)                        | 23,155.45                    | 25,928.33                             |
| SB X7-7 Target Volume Plus Previously Excluded Process and Recycled Water | N/A                          | 40,890.70                             |
| "Capped" Objective  | N/A                          | 22,526.86                             |
| Regional Alliance Met Regional Target?                                    | N/A                          | Not Applicable                        |
| Final Comparison of Actual Water Use to Objective                         | 19,753.98                    | 22,526.86                             |

# 2

## Build Your Budget: Every Available Path

*Find every credit you are entitled to.*



### Variances

Seasonal population, livestock, approved variances



### Residential Extensions

Residential extension areas for parkways



### Confirm DIM Measurements

Special Landscape Areas at dedicated irrigation meters



### New Builds Since 2018

Identify and measure irrigated areas developed since 2018

# 3

## Reassess Your Projections

*With a bigger budget, the picture changes. The pathway changes too.*

- Once you know the true numbers, recalculate where you actually stand against the objective.
- The gap you started with may shrink, close, or reframe entirely.
- This is the moment you learn whether the standard pathway is achievable, or whether the alternative pathway is an option.



### The Alternative Pathway

If your reassessed projections show the standard objective is not reasonably achievable, the alternative pathway becomes your defensible route to compliance.

It still requires a plan.

# Know Your Community

*Steps 4 and 5: where the risk lives and where the savings hide.*

4

## Risks and Opportunities



- Identify where you are most exposed to falling short
- Find the highest-leverage opportunities to close the gap
- Prioritize effort where it you'll have the biggest impact

5

## Water Use and Trends



- Examine use across your community over time
- Evaluate how your existing programs are performing
- Let the data point to where the next savings come from

# From Strategy to Funding

*Steps 6 and 7: turn the analysis into a funded, executable plan.*

6



## Build a Strategy

Assemble the programs and actions that close your gap, sequenced and tied to your risks and opportunities.

7



## Project Cost and Find Funding

Estimate what the strategy costs, then secure grants, rates, and other funding to make it real.

# Where to Start

*The compliance year closed June 30. The clock is already running.*

- 1** **File your UWUO Annual Report by January 1.** Report this year's number while you start the work that follows.
- 2** **Spend the next six months planning.** Verify your data, build your full budget, reassess projections, and rank your risks.
- 3** **Be ready for the June 30, 2027 deliverables.** A defensible pathway is built over months, not assembled in the final weeks.

# What is the AWWA G480?

Introducing guest speaker:

**Peter Mayer**

*WaterDM (Water Demand Management)*



## **The AWWA G-480 Water Conservation and Efficiency Program Standard -Alternative Pathways to Compliance**

Peter Mayer, P.E., Principal WaterDM  
[peter.mayer@waterdm.com](mailto:peter.mayer@waterdm.com)





# AWWA G-Series Standards

- Voluntary standards available through AWWA
- Intended to improve a utility's overall performance
- Establishes formal management and operational guidelines
- Identifies practices / procedures for effective & efficient operations

# G-Series Standards



- AWWA G-Series Standard
  - Voluntary, utility management standard.
  - Utilities or communities can choose to adopt it or not.
  - Once adopted, there is no governance structure or enforcement beyond what the entity itself chooses to establish.
  - No formal AWWA process to verify and confirm utility compliance to the standard
- Intended to improve a utility’s overall operations and service
- Establishes formal management and operations guidelines
- These guidelines are appropriate practices, procedures and behaviors whose implementation will promote effective and efficient utility operations
- **Available for purchase from the online AWWA Bookstore.**
  - \$99 for members and \$142 for non-members
  - Specify the G480-20 for California alternative compliance



# Why Use the Standard?

- Establishes consistent expectations of the conservation program
- Assures rate payers, regulators, and decision makers conservation program meets established qualifications
- Offers a benchmark for new programs
- Provides basis for evaluating adequacy of program design and deliverables
- Offers a level playing field for program development
- **May assist utilities in establishing compliance with conservation program mandates**

# Water Conservation & Efficiency Program Operation & Management

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- 1st Edition - G480-13 released in 2013
- **2nd Edition – G480-20 released February 1, 2021**
- 3rd edition – G480-25 December 1, 2025
  
- Basic structure retained + several updates
- Available at [www.awwa.org/store](http://www.awwa.org/store)



# Water Conservation and Efficiency Program Operation and Management

**Effective date: Dec. 1, 2025.**

First edition approved by Board of Directors Jan. 20, 2013.

This edition approved June 7, 2025.

Approved by American National Standards Institute Aug. 11, 2025.

# Key Components of the G-480

- 💧 Regulatory Requirements
- 💧 Top-Level Organizational Functions
  - 💧 Staff for conservation initiatives
  - 💧 Water conservation planning
  - 💧 Water conservation in integrated resource planning
  - 💧 **Planning for climate change**
  - 💧 Water shortage or drought plan
  - 💧 Public information & education program
  - 💧 Water waste ordinance
- 💧 Internal Utility Actions and Requirements
  - 💧 Metering practices
  - 💧 Conservation-oriented rate structure
  - 💧 Billing practices
  - 💧 **Customer leak detection**
  - 💧 Landscape efficiency program
  - 💧 Water loss control program
- 💧 External Policy Requirements
- 💧 Wholesale Agency Requirements



## Water Conservation and Efficiency Program Operation and Management

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Approved by American National Standards Institute Aug. 11, 2025.



# Compliance Verification Requirements

## G480-20 – part 1

- 5.1.1 – Job description that incorporates water conservation and efficiency.
- 5.1.2 – Water conservation and efficiency plan.
- 5.1.3 – Water resource plan.
- 5.1.4 – Drought or water shortage plan.
- 5.1.5 – Public information and education programs.
- 5.1.6 – Water waste ordinance.
- 5.1.7 – Rate schedule.

# Compliance Verification Requirements

## G480-20 – part 2

5.1.8 – Billing practices.

5.1.9 – Landscape efficiency program.

5.1.10 – Water loss control program.

5.1.12 – Building code and standard development.


5.1.13 – Land-use planning.

# *G480 Requirements* Documentation and Reporting

## Recommended documentation and reporting:

- ✓ Job description that incorporates water conservation
- ✓ Water conservation and efficiency plan
- ✓ Water resource plan
- ✓ Drought or water shortage plan
- ✓ Public information and education program
- ✓ Water waste ordinance
- ✓ Rate schedule and sample water bill
- ✓ Landscape efficiency program promo materials
- ✓ AWWA Water audit worksheet
- ✓ Water loss plan and tracking to document progress
- ✓ Documentation of how engaged in codes and standards
- ✓ Documentation of how engaged in land use planning





# G480 in Action

- First program operation and management standard for water conservation and efficiency programs.
- Alternative compliance pathway in California.
- Useful benchmark for water utilities.
- **AWE G480 leaderboard** – available to CalWEP members



# Thank you

Peter Mayer

[peter.mayer@waterdm.com](mailto:peter.mayer@waterdm.com)

# Agenda

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# Summary of Submissions

## One-time submissions:

|  | 20% | 30% |
|--|-----|-----|
| Percent reduction necessary to be considered in compliance with the 2040 objective | ✓   | ✓   |
| Median household income  | ✓   |     |
| AWWA G480 Checklist  |     | ✓   |
| Conservation plan  | ✓   | ✓   |

## Annual submissions:

|  |   |   |
|--|---|---|
| Annual per capita water use reductions | ✓ | ✓ |
|--|---|---|

# The New Form

- The Board will release an Excel file this year, where suppliers will provide the following:
  - Three-year baseline water use
  - 2040 objective
  - Link to the conservation plan
  - Service area median household income (if applicable)
  - Verify adherence to the G480-20 Standard (if applicable)
- Information will be pre-filled to the extent possible from the annual UWUO reports.

# Annual submission of per capita reductions

- Suppliers are still required to annually submit the UWUO report
- The report will be updated to collect and reflect annual per capita water use reductions

# In summary

| Eligibility Thresholds |  | Required Effort  | Result   |
|------------------------|--|--|--|
| <b>20% Pathway</b>     | <p>If the income of the population served is less than CA median household income...</p> <p>... and compliance with the 2040 objective would result in a 20% or greater reduction in water use</p> | <p>Then the supplier can:</p> <ol style="list-style-type: none"> <li>1. Reduce per capita water use by <math>\geq 1\%</math> per year <b>AND</b></li> <li>2. Create a plan to achieve its urban water use objective</li> </ol>   | <p><b>And still be deemed in compliance with the objective</b></p> |
| <b>30% Pathway</b>     | <p>If compliance with the 2040 objective would result in a 30% or greater reduction in water use</p>   | <p>Then the supplier can:</p> <ol style="list-style-type: none"> <li>1. Reduce per capita water use by <math>\geq 2\%</math> per year <b>AND</b></li> <li>2. Verify adherence to G480 standard* <b>AND</b></li> <li>3. Create a plan to achieve its urban water use objective</li> </ol> |  |

\*American Water Works Association G480-20 Water Conservation and Efficiency Program Operation and Management Standard (published February 1, 2021)

# Additional Resources

**For your reference...**

[Alternative Compliance Fact Sheet](#)

**If you have any questions...**

[Alternative Compliance Frequently Asked Questions](#)

**If you have any additional questions...**

[waterconservation@waterboards.ca.gov](mailto:waterconservation@waterboards.ca.gov)

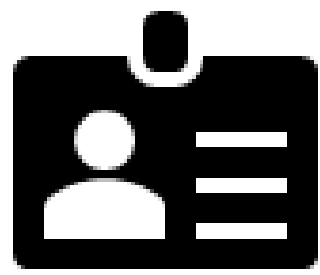
# Agenda

1. Introduction
2. What is alternative compliance?
3. How is eligibility determined?
4. What effort is required for alternative compliance?
5. Submission
6. **Q&A**

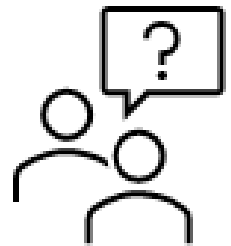
# Questions

Contact Us at [waterconservation@waterboards.ca.gov](mailto:waterconservation@waterboards.ca.gov)

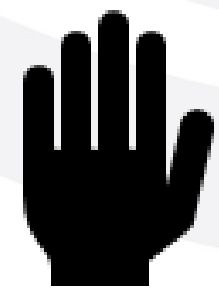
# Logistics



Rename  
box: name  
and  
affiliation



Place questions  
in the  
Q&A box



Use virtual "raise  
hand" to ask  
questions  
verbally



Email us if you're  
having technical  
issues