



**Disneyland**  
RESORT



**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

July 14, 2014

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

**Subject: Proposed Text of Emergency Regulations Regarding Prohibition of  
Activities and Mandatory Actions During Drought Emergency**

Dear Ms. Townsend,

Thank you for the opportunity to provide comments on the Proposed Emergency Water Conservation Regulations that will be added to Title 23 of the California Code of Regulations. Since 2012, the Disneyland Resort (Resort) has collaborated with the Orange County Sanitation District (OCSD), the Orange County Water District (OCWD) and the Santa Ana Regional Water Quality Control Board (RWQCB) to establish and begin execution of a multi-year non-stormwater diversion plan for the discharge of nightly washdown water from On Stage guest-facing areas. The Resort has made significant capital investments in infrastructure to automatically divert our low flow washdown water to be reclaimed while allowing high flow discharge, i.e. rain water, to flow to the ocean. This washdown water from the Resort, therefore, is not wasted but rather reclaimed and returned to our local water supply.

In doing so, the Resort has reduced the amount of non-stormwater discharged to the ocean currently permitted by the RWQCB under a site specific National Pollutant Elimination Discharge System (NPDES) permit. Washdown water leaving the Resort meets NPDES permit limits for priority pollutants, toxicity, pH, total suspended solids, and oil and grease. Diversion is being accomplished by pumping the diverted non-stormwater to the sanitary sewer system during off peak hours when demand at the OCWD's Groundwater Replenishment System (GWRS) is low. Therefore, the Resort's is providing the GWRS source water to sustain and optimize production levels.

The GWRS takes treated water from the OCSD and, rather than discharging the water to the Pacific Ocean, purifies it through a three-step process that includes microfiltration, reverse osmosis and ultraviolet light with hydrogen peroxide. According to the OCWD, 35 million



gallons of near-distilled quality GWRS water per day is pumped into injection wells where it serves as a seawater intrusion barrier. Another 35 million gallons per day is pumped in a 13-mile long pipe to OCWD recharge basins in Anaheim, California. The GWRS water then filters through sand and gravel to replenish the deep aquifers of Orange County's groundwater basin and ultimately becomes part of the drinking water supply.

In essence, the washdown water from the Resort is recycled by being processed through the GWRS. In light of this unique situation, the Resort respectfully requests that washdown of this type be exempt from the emergency regulations. The following is the suggested language on Section X.1. Prohibited Activities in Promotion of Water Conservation.

#### Sec. X.1 Prohibited Activities in Promotion of Water Conservation

(a) To promote water conservation, each of the following actions is prohibited, except where necessary to address an immediate health and safety need or to comply with a term or condition in a permit issued by a state or federal agency:

- (1) The application of water to outdoor landscapes in a manner that causes runoff such that water flows onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures;
- (2) The use of a hose to wash an automobile, except where the hose is fitted with a shut-off nozzle or device attached to it that causes it to cease dispensing water immediately when not in use;
- (3) The application of water to any hard surface, including but not limited to driveways, sidewalks, and asphalt unless the water is captured, treated, and beneficially returned to the local water supply; and
- (4) The use of potable water in a fountain or other decorative water feature, except where the water is part of a recirculating system.

If you have any questions or require additional information, please do not hesitate to contact me at 714-781-3563.

Sincerely,

A handwritten signature in blue ink that reads "Janina Jarvis". The signature is stylized and cursive.

Janina Jarvis  
Manager, Environmental Compliance  
Disneyland Resort

cc: Don Calkins, City of Anaheim  
Jeffrey Kightlinger, Metropolitan Water District  
Michael R. Markus, P.E, Orange County Water District