

## Appendix FFF Revised APF Calculations

Renewal of NPDES CA0109223 Carlsbad Desalination Project



May 31, 2018

Mr. Peter MacLaggan
Poseidon Water
Delivered via Email

Appendix FFF – Review of the Calculation Methods Used in Carlsbad Desalination Plant Entrainment Analysis

Dear Peter,

The purpose of this Appendix FFF, is to review the calculation methods used to establish the Area of Production Foregone (APF) estimates for the Carlsbad Desalination Plant (CDP) provided in Appendix K of the Report of Waste Discharge.

Table 2 of Appendix K presents two sets of APF estimates. The first set is labeled "With  $P_s$  in accordance with Appendix E", while the second set is labeled "Without  $P_s$  in accordance with Dr. Raimondi's CCC".

The Science Advisory Panel's (SAP) letter dated May 20, 2018 (the "SAP May 20 Memo") recommends Empirical Transport Model (ETM) calculations for estimating the entrainment impacts for the CDP that are consistent with the entrainment impact assessment conducted for the Encina Power Station (EPS) in January 2008 and the Carlsbad Desalination Plant in 2008.

The calculation methods used to derive the APF estimates in accordance with the SAP recommendations are summarized in Attachment 1. The ETM and APF estimates for the Flow Augmentation (FA 171 MGD) and Reverse Osmosis (RO, 127 MGD) presented in Appendix K (MBC 2015) were recalculated using Equations 2 and 4 in the SAP May 20 Memo. I also calculated the APF for the complete intake (298 MGD) to be consistent with the charge to Dr. Raimondi for his review of Appendix K. It should be noted that mathematical rounding occurring during the calculations resulted in slightly different values for FA+RO vs the complete intake. The revised calculation methodology indirectly followed the methodology used in the "Without Ps in accordance with Dr. Raimondi's CCC" estimates reported in Appendix K, and yielded the same results. The SAP May 20 Memo is included as Attachment 2, and a copy of Appendix K is included as Attachment 3.

Please let me know if you have any questions.

Sincerely.

Eric Miller, MS

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Review of the Calculation Methods Used in Carlsbad Desalination Project Entrainment Analysis

- The RO and FA ETM and APF estimates presented in Appendix K were prepared in two ways
  - a. One to try and maintain consistency with the equations detailed in Appendix E of the Ocean Plan Amendment's (OPA) Substitute Environmental Document Appendix E
    - i. This approach is titled "With P<sub>s</sub> in accordance with Appendix E" APF estimates
  - b. A second version (detailed in Steps 3-5 below) was presented to maintain consistency with the prior record for the site
    - This approach is titled "Without P<sub>s</sub> in accordance with Dr. Raimondi's CCC" APF estimates
- 2. P<sub>e</sub> by survey and taxa was derived in the EPS using Equation 2 in the SAP May 20 Memo
  - a. The P<sub>e</sub> was derived for EPS flow of 857 MGD
    - i. The derived P<sub>e</sub> captures the adjustments to the source water population described in Equation 2 of the SAP Memo to account for tidal flux through the mouth of Aqua Hedionda Lagoon
- 3. The entrainment impact analysis was flow-extrapolated meaning the estimated number of plankton entrained is the product of sampled density at the designated intake sampling station multiplied by the intake water flow volume. Therefore it can be proportionally adjusted to other intake flow volumes.
  - a. Source water population estimates are not adjusted based on the intake water flow volume. Instead, the  $P_e$  reported in EPS for maximum flow volume are scaled to reflect the proposed intake intake flow volume at the CDP, of 298 MGD intake flow (127 RO and 171 Flow Augmentation)
    - i. This approach is consistent with Equation 4 in the SAP May 20 Memo
- APF Calculations reported in Appendix K Table 2 included the following steps
  - a. The source water population adjusted for the proposed CDP intake volume of interest (FA or RO) was used in the standard ETM model equation (Equation 1 in the SAP May 20 Memo) using the following steps for each taxon
    - i. P<sub>e</sub> = [(EPS entrainment survey 857 MGD intake flow entrainment estimate) X (CDP intake flow of interest (FA or RO)/857 EPS maximum intake volume)]/Source Water Population derived in Step 3a above
    - ii. d = larval duration reported in EPS
    - iii. f<sub>i</sub> = as reported in EPS
- 5. The "Without  $P_s$  in accordance with Dr. Raimondi's CCC" estimates in Appendix K Table 2 did not include  $P_s$  in the ETM model
- 6. As a check, I conducted a new ETM and APF analysis for FA and RO in accordance with Equation 4 in the SAP May 20 Memo, reproduced here:

7. 
$$P_m = 1 - \sum_{i=1}^{n} f_i \left( 1 - \frac{Flow}{857} Pe \right)^d$$

i. Where:



- ii.  $P_m$  = proportional mortality
- iii.  $f_i$  = estimated fraction of total source water larval population present during the i<sup>th</sup> survey (values presented in the EPS entrainment calculation were used in these new calculations)
- iv. Flow = proposed Carlsbad Desalination Plant intake flow volume: 127MGD for RO and 171 MGD for FA
- v. 857 = maximum intake flow volume in MGD reported in EPS entrainment calculation
- vi.  $P_e$  = estimated proportional entrainment (maximum intake flow volume derived in EPS entrainment calculation used)
- vii. *d* = larval duration in days (values presented in EPS entrainment calculation were used in these new calculations)
- 8. All APF estimates represent the total APF at the 95% confidence level without any mitigation scaling applied to account for the productivity of the impacted habitat versus the productivity of the proposed mitigation habitat.
  - a. Mean and standard error were calculated for each habitat group
  - b. The mean and standard error were used with the MS-Excel function Norm.INV to calculate the 95% confidence level APF estimate
  - c. CIQ Goby, Combtooth Blennies, Garibaldi were included in the estuarine habitat group
  - d. Engraulidae (including Northern Anchovy), White Croaker, California Halibut, Spotfin Croaker, and Queenfish were included in the open coast habitat group
- 9. The results of the analysis detailed in Step 5 above ("Without P<sub>s</sub> in accordance with Dr. Raimondi's CCC") and Step 7 above (in accordance with the SAP May 20 Memo) resulted in identical APF estimates for FA and RO, which are presented in Tables 1 and 2 below.

Table 1. Area of production forgone estimates (acres) derived for Reverse Osmosis (127 MGD), Flow Augmentation (171 MGD), and Total Intake (298 MGD) derived in the methods detailed above and shown in Appendix K Table 2 under the heading "Without Ps in accordance with Dr. Raimondi's CCC".

Habitat Group	Reverse Osmosis	Flow Augmentation	Total Intake	
Estuarine	27	36	59	- 1
Open Coast	31	41	72	
Total	58	77	131	

Table 2. Area of production forgone estimates (acres) derived for Reverse Osmosis (127 MGD), Flow Augmentation (171 MGD), and Total Intake (298 MGD) using Equation 4 of the SAP May 20 Memo.

Habitat Group	<b>Reverse Osmosis</b>	Flow Augmentation	Total Intake
Estuarine	27	36	59
Open Coast	31	41	72
Total	58	77	131

From: Peter Raimondi, member of the independent review panel for Poseidon Carlsbad

Date: 5-29-2018

Estimation of APF for Stand Alone operations of Poseidon Carlsbad facility based only on intake entrainment operations

I have done a series of calculations to determine the area of production foregone (APF) for stand-alone operation at the Poseidon Carlsbad desalination facility. The following is for intake operations affecting intake entrainment only and is meant to be shared with the review panel and agencies as part of the review process. The intent is to provide Poseidon with an opportunity assess the approach prior to the final review. The following are the assumptions used in the calculations

- 1) I used ETM approach used in the Encina 316B (EPS316B) to determine proportional entrainment (Pe). This includes the use of a mixed water mass in the development of Pe. Proportional mortality values (Pm) are based on these estimates of Pe.
- 2) Total Sources Water Bodies (TSWB) are the same as was done for the original Poseidon evaluation and are based on EPS316B Ps values.
- 3) The APF value used is the 95% confidence limit based on the mean and standard error for each group of species (estuarine, open coast). This estimate is provided using a normal inverse function with standard error replacing standard deviation. This is consistent with the Ocean Plan Amendment.

Calculations of Pm in Appendix K are based on equation 1.

(1) 
$$Pm = 1 - \sum_{i=1}^{n} f_i (1 - Ps_i Pe_i)^d$$

This approach led to estimates of APF (which is based on the product of Pm and TSWB) shown in Table 1 (Table 2 in Appendix K)

	Taxa Category	RO	FA	Diffuser
Witi	Ps in accordance v	with Apper	ndix E	preson to
	Estuarine	27	36	2
	Ocean	9	12	65
	Total	36	48	67
With	out Ps in accordance	e with Dr.	Raimon	di's CCC
	Estuarine	27	36	2
	Ocean	31	41	372
	Total	58	77	374

Table 1: "THE CALCULATED AREA OF PRODUCTION FOREGONE (IN ACRES) AS A FUNCTION OF THE POTENTIALLY AFFECTED HABITAT FOR REVERSE OSMOSIS (RO) ASSUMING 127 MILLION GALLONS PER DAY (MGD), FLOW AUGMENTATION (FA) ASSUMING 171 MGD, AND MULTIPORT DIFFUSER (DIFFUSER) ASSUMING 217 MGD."

This table is basis for table 13 in Appendix ZZ (shown below as table 2)

		Mitigation (	Table 13 Calculation Al	ternative 1	i gurante e e e e e e e e e e e e e e e e e e	segget treff
Type of Impact Measured	Impacted Area (Acres)	Impacted Habitat	Impacted Area By Habitat Type (Acres)	Mitigation Ratio	Required Mitigation (Acres)	Mitigation Area Habitat Type
Intake	83.44	Estuarine	62.58	1:1	62.58	Estuarine
make	05.11	Open Water	20.86	10:1	2.09	Estuarine

Table 2: Only the Intake entrainment section is shown

Note that the value 83.44 is equal to the (rounded) sum of 36 (RO) and 48 (FA) acres based on "With Ps in accordance with Appendix E". This calculation was found to be not consistent with the original EPS316B approach. Note also that the open water acreage (20.86) was "converted" to Estuarine mitigation acreage using a 10 to 1 ratio, yielding 2.09 acres. This is consistent with what was done in the original Poseidon Carlsbad assessment. This leads to a combined acreage of 64.67 acres.

I redid the analyses using the Pe values in the EPS316B, which explicitly utilizes a mixed water body for estimation. An excel worksheet is attached so that the approach can be assessed. Table 3 below shows the results of this analysis. I based the analysis on two similar estimates of stand-alone intake volumes (298 and 304 MGD) as both have been used in support documents.

		Pm Calculat	ted			
		MGD	MGD		APF	APF
Туре	species	304	298	SWB (acres)	304	298
Estuarine	Blennies	0.085507	0.08388	302.00	25.82	25.33
Estuarine	Gobies	0.215512	0.2119	302.00	65.08	63.99
Estuarine	Hypsopops	0.065375	0.06411	302.00	19.74	19.36
Open Coast	White Croaker	0.00137	0.00134	33365.25	45.72	44.81
Open Coast	Northern Anchovy	0.00165	0.00162	15570.45	25.69	25.19
Open Coast	California Halibut	0.001513	0.00148	27477.26	41.57	40.75
<b>Open Coast</b>	Queenfish	0.003656	0.00358	20309.28	74.25	72.79
Open Coast	Spotfin Croaker	0.006371	0.00625	13738.63	87.53	85.81
Average Estuarin	e	0.122132	0.11996		36.88	36.23
Average Open Co	past	0.002912	0.00285		54.95	53.87
SE Estuarine		0.047051	0.04632		14.21	13.99
SE Open Coast		0.00096	0.00094		11.3	11.08
95% Estuarine					60.26	59.24
95% Open Coast					73.54	72.09
95% Open Coast	with 10-1 conversitio	n ratio			7.354	7.209
Total APF					133.8	131.3
Total APF usinng	10-1 ratio				67.61	66.45

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Table 3: Estimated of Pm and APF for Estuarine and open coast species using both 304 and 298 MGD as intake volumes.

The total APF based on intake related entrainment is 133.8 (304 MGD) or 131.3 (298 MGD). This represents a 50.36 (304 MGD) or 47.86 (298 MGD) increase from estimates given in Appendix K and ZZ. Using the 10-1 mitigation ratio produces a 2.94 (304 MGS) or 1.78 (298 MGD) acre increase from the estimates given in Appendix K or ZZ.

I want to note that although one source of difference between my estimates and those made by Poseidon in appendices K and ZZ has been accommodated -the use of the mixed water body approach to Pe rather than equation 1, I have one additional area of concern that I would like to figure out before proceeding with the review. I cannot get the Poseidon estimates of entrainment to even roughly align with my calculations. For example the estimated entrainment of CIQ gobies on page 3-31, section 3.3.2.3 of EPS 316B, for maximum flow, was 2.77 billion larvae over the sampling period (June 2004 – May 2005). Converting this to 304 MGD (from 857) yields a total of ~ 976,000,000 (see table 4 below, Tabl3 3-10 in EPS 316B). However, in appendix 3A in Appendix K (see below table 5) the sum of the entrainment value for CIQ gobies is 18.7 million. Similar discrepancies exist for all species.

**Table 3-10.** Results of *AEL* modeling for CIQ goby complex larvae based on a) actual flows and b) maximum flows. The upper and lower estimates are based on a 90% confidence interval of the mean. *AEL* estimates were also calculated using the upper and lower confidence estimates from the entrainment estimates.

Parameter	Mean	Std. Error	AEL Lower Estimate	AEL Upper Estimate	AEL Range
a) Actual Flows					
AEL Estimate	1,632,666	1,834,554	257,124	10,366,994	10,109,870
Total Entrainment	2,215,477,217	86,364,408	1,527,970	1,737,363	209,392
b) Maximum Flows					
AEL Estimate	2,039,250	2,291,244	321,199	12,946,922	12,625,723
Total Entrainment	2,767,198,570	101,030,008	1,916,775	2,161,725	244,949

Table 4: Table 3-10 from EPS 316B. Note total entrainment from maximum flow (857 MGD) is ~2.7 billion larvae.

APPENDIX 3A. FLOW AUGMENTATION EMPIRICAL TRANSPORT MODEL AND AREA PRODUCTION FOREGONE MODEL PARAMETERS FOR EACH TAXON USED IN THE ANALYSIS. SURVEY = SURVEY IDENTIFIER FROM ENCINA POWER STATION 316(B) STUDY, ENTRAINMENT (ESTIMATE), SWP = SOURCE WATER POPULATION,  $P_{\rm E}$  = PROPORTION ENTRAINED, DURATION = NUMBER OF DAYS THE LARVAE ARE EXPOSED TO ENTRAINMENT,  $P_{\rm M}$  = PROPORTIONAL MORTALITY, AREA = SOURCE WATER AREA IN ACRES,  $F_{\rm I}$  = WEIGHTING FACTOR, AND  $P_{\rm S}$  = LONGSHORE-CROSS SHELF CURRENT SCALING FACTOR.

Survey	Entrainmen t	SWP	Pe	Duratio n	Pm	Area	fi	Pa
CIQ Goby								
			0.00454					
EPSEA001	1,333,379	293,477,734	3	11.5	0.05102	302	0.116	
			0.00716		0.07934			
EPSEA002	1,050,423	146,640,669	3	11.5	9	302	0.0316	
			0.01648		0.17400		0.0795	
EPSEA003	2,365,748	143,505,301	5	11.5	2	302	5	
			0.02542		0.25636		0.1859	
EPSEA004	4,525,063	177,952,299	9	11.5	9	302	5	
			0.01546		0.16408		0.0633	
EPSEA005	1,462,671	94,586,619	4	11.5	1	302	5	
			0.01057		0.11510		0.0457	
EPSEA006	724,020	68,450,670	7	11.5	5	302	7	
			0.00618				0.0234	
EPSEA007	266,152	43,014,350	8	11.5	0.06889	302	7	
			0.00302		0.03428		0.0272	
EPSEA008	151,148	49,901,581	9	11.5	4	302	9	
			0.00313		0.03546		0.0387	
EPSEA009	170,435	54,370,974	5	11.5	. 1	302	В	
	·		0.00310		0.03512		0.1448	
EPSEA010	763,455	245,900,000	5	11.5	8	302	9	
			0.01081		0.11752		0.1167	
EPSEA011	1,748,311	161,690,423	3	11.5	4	302	4	
					0.21370			
EPSEA012	1,715,525	82,917,234	0.02069	11.5	7	302	0.0369	
	. ,	, ,	0.01406		0.15036		0.0897	
EPSEA013	2,431,519	172,827,046	9	11.5	1	302	1	

Table 5: Appendix 3A from Appendix K. Note values in the column "Entrainment". Sum of entrainment is ~ 18.7 million

incorporating reduced flow (realtive to 857) 298=127+171

Pm Calculated	MGD MGD APF APF	304 298 SWB (acres) 304 298	0.083878	0.215512 0.211895 302.00 65.08 63.99	0.065375 0.064114 302.00 19.74 19.36	0.00137 0.001343 33365.25 45.72 44.81	0.00165 0.001618 15570.45 25.69 25.19	0.001513 0.001483 27477.26 41.57 40.75	74.25		0.122132 0.119962 36.23		**	#NAME? #NAME? ##### #####	##### #####	##### #####																										
		Type species	Estuarine Blennies	Estuarine Gobies	Estuarine Hypsopops	Open Coa White Croaker	Open Coa Northern Anchovy	Open Coa California Halibut	Open Coa Queenfish	Open Coa Spotfin Croaker	Average Estuarine	Average Open Coast	SE Estuarine	SE Open Coast	95% Estuarine	95% Open Coast																										
857	298	Survival	0.279549094	0,118146057	0.128015277	0,228829508	0.048830115	0,002494765	0,004516807	0,000256114 1,77881E-05	0,00001	0.002891261	0.008276918	0.094288558	0.083877636		0.105866025	0.056892497	0.110413232	0.046270886	0.036953955	0.020/18889	0.036412451	0.136126425	0.093801873	0.024189359	0.211895026	0.588034395	0.048920289	0.16652267	0	0	0 0	0	0	0	0.080385358	0.064113834	00000	0.00187	68600.0	0.020966144
ı	304	Survival	0,279161465	0.118060395	0.127901435	0.228154589	0.048660842	0.002481858	0.004503119	0.000254411	0.00001	0.002883935	0.008265626	0.094137876	0.085506997		0.105670558	0.056504069	0,109233585	0.045975036	0.036793592	0.0205656	0.036366168	0.135955059	0.0933856	0.023980689	0.215512474	0.587308767	0.048865571	0,166420702	0	0	0 0	0	0	0	0.080128492	0.065375143	00000	0.00187	0.00989	0.020964861
			2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	ъ	19	11.5	11.5	11.5	11.5	11.5	11.5	11.5	11.5	11.5	11.5	d II.s	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2		38.5	26.5	26.5	26.5
		то	0.29923	0,12245	0,13375	0.26395	0.05771	0.00319	0.00523	0.00035	0.00001	0.00327	0.00885	0,10197	PM Calculated		0.116	0.07955	0.18595	0.06335	0.04577	0.02347	0.03878	0.14489	0,11674	0.0369	0.089/1 PM Calculated	0.62469	0.05168	0.1/163	0	0 (	o c	0	0	0 100	0.09371	PM Calculated	0.00001	0.00187	0.00989	0.02103
	*	Max flow PE f	0.07156	0,03786	0.0463	0.14813	0.17257	0.25027	0,15199	0,31413	0	0,12817	0,07043	0.08222	a.		0.02277	0.08262	0.12744	0.0775	0.05301	0.03101	0.01571	0.01556	0.05419	0,10369	U.U.U.S.I.	0.07797	0.07085	0,03922	0	0 (	0 0	0	0				c	0		0.00033
		Date	10-Jun-04	24-Jun-04	6-Jul-04	13-Aug-04	23-Sep-04	21-Oct-04	18-Nov-04	16-Dec-04 13-Jan-05	24-Feb-05	23-Mar-05	21-Apr-05	19-May-05		-	24-lun-04	6-Jul-04	13-Aug-04	23-Sep-04	21-Oct-04	16-Doc-04	13-Jan-05	24-Feb-05	23-Mar-05	21-Apr-05	CO-VBIA-CT	10-Jun-04	24-Jun-04	6-Jul-04 13-Aug-04	23-5ep-04	21-Oct-04	16-Dec-04	13-Jan-05	24-Feb-05	23-Mar-05	19-May-05		10-lun-04	24-Jun-04	6-Jul-04	13-Aug-04
		Species	Blennies	Blennies	Blennies	Blennies	Blennies	Blennies	Blennies	Blennies Blennies	Blennies	Blennies	Blennies	Blennies			Goby	Goby	Goby	Goby	Goby	doby.	Goby	Goby	Goby	Goby	Aggs	Hypsopops	Hypsopops	Hypsopops	Hypsopops	Hypsopops	Hypsopops	Hypsopops	Hypsopops	Hypsopops	Hypsopops		White Croaker	White Croaker	White Croaker	White Croaker

0.35991164 0.03043 0.071750615 0.005718881 0.047672563 0.137694257 0.269412641 0.044146911 0.00523	0.022557359 0.001867048 0.023108785 0.014608279 0.036175157 0.013966077 0.00131 0.00111 0.0033799 0.422074257 0.422086636 0.00261821 0.422086639 0.001618096	0.2564 0.089373296 0.04527955 0.04527466 0.014223036 0.0049386592 0.04431075 0.063804775 0.0138088173 0.009773594	0.149616148 0.23205 0.23205 0.039304883 0.438488253 0.004986743 0.004986743 0.00242 0.00242	0.1725/9493 0.155643597 0.168483346 0.06842895 0.328588892
0,353907044 0,03043 0,071749018 0,005718456 0,04762001 0,137687103 0,26941342 0,04414003 0,00523	0,022556702 0,001866989 0,023407152 0,014607641 0,036175059 0,01156576 0,001395194 0,00011 0,00011 0,0003919 0,000562374 0,00066293 0,000659122 0,0006591643	0.2564 0.08937135 0.36152087 0.04825398 0.01422239 0.00493787 0.00896212 0.04447811 0.06380364 0.018883335 0.009772061	0,149608228 0,23205 0,12955 0,039291798 0,438441826 0,004982151 0 0 0,00242 0,00242	0.27257bbb4 0.155641857 0.168442967 0.068424907 0.328512769
26.5 26.5 26.5 26.5 26.5 26.5 26.5 26.5	7.7	31.1 31.1 31.1 31.1 31.1 31.1 31.1 31.1	21.6 21.6 21.6 21.6 21.6 21.6 21.6 21.6	11.4 11.4 11.4
0.35414 28 0.03043 28 0.07183 26 0.00574 28 0.04775 28 0.13805 28 0.04449 . 28 0.00523 28	0,02259 0,00187 0,02319 0,01464 0,03157 0,01157 0,01404 0,00011 0,00834 0,0123 0,0123 0,0123 0,0123 0,0123 0,02247 0,03926 0,003976 3330,03912 3330,03912	ated	0.15001 22 0.23205 22 0.12955 22 0.4408 22 0.00522 22 0 0 22 0 0 22 0 0 0 0	
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23-Sep-0d 21-Oct-04 18-Nov-04 13-Jan-05 24-Feb-05 23-Mar-05 21-Apr-05 19-May-05	10-Jun-04 24-Jun-04 6-Jul-04 13-Aug-04 21-Oct-04 18-Nov-04 16-Dec-04 19-Jun-05 21-May-05 19-May-05 10-Jun-04 24-Jun-04 24-Jun-04 24-Jun-04 24-Jun-04	6-Jul-04 13-Aug-04 21-0ct-04 18-Nov-04 16-Dec-04 13-lan-05 23-Mar-05 21-May-05 19-May-05	10-Jun-04 24-Jun-04 6-Jul-04 13-Aug-04 21-Oct-04 18-Nov-04 18-Jun-05 24-Reb-05 23-Mar-05 19-Mar-05 19-Mar-05 19-Mar-05	10-lun-04 24-lun-04 6-lul-04 13-Aug-04 23-Sep-04
White Croaker	Anchovy	Hailbut Hailbut Hailbut Hailbut Hailbut Hailbut Hailbut Hailbut	Queenfish	sportin spotfin spotfin spotfin

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11,4	11,4	11,4	11.4	11,4	11.4	11.4		73
0	0	0	0	0	0	0.00003	0	M Calculated
0	0	0	0	0	0	0	0	Δ.
21-Oct-04	18-Nov-04	16-Dec-04	13-Jan-05	24-Feb-05	23-Mar-05	21-Apr-05	19-May-05	
spotfin								

	(4	