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From: Catherine Hagan (George) [CHagan@waterboards.ca.gov]
Sent: Wednesday, February 25, 2009 3:46 PM
To: Halter, Amanda (OC); Garrett, Christopher (SD); pmaclaggan@poseidon1.com
Cc: Chiara Clemente; Deborah Woodward; Philip Wyels
Subject: Follow-up to February 25, 2009 Conference Call

Attachments: 022509 follow-up.pdf



022509

Follow-up.pdf (193 KB)

Greetings all,

Attached is a summary of the points discussed during our conference call this morning. I hope that this will provide clear direction about what staff is requesting in order to be responsive to the Regional Board's directive. Debbie Woodward of the Regional Board staff will be following up directly with David Mayer to discuss. Please let me know if you have any questions prior to our scheduled phone call tomorrow at noon.

Best regards,

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for ensuring the integrity of the financial system and for providing a clear audit trail. The document also highlights the need for transparency and accountability in all financial dealings.

The second part of the document outlines the specific procedures for recording transactions. It details the steps involved in the accounting process, from the initial entry of data into the system to the final review and approval of the records.

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10/10/2023

The fourth part of the document outlines the specific procedures for recording transactions. It details the steps involved in the accounting process, from the initial entry of data into the system to the final review and approval of the records.

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ATTACHMENT

Regional Board Follow-up to February 25, 2009 Conference Call with Poseidon Representatives

Included in Poseidon's February 18, 2009 submittal were responses to Regional Board staff questions emailed to Dr. David Mayer on February 13, 2009. As discussed this morning, the responses were not fully responsive to staff's questions, intended to address the third outstanding issue identified by the Executive Officer in his recommendation to the Board on February 11. While Regional Board staff will be contacting Dr. Mayer directly to discuss these issues and to ask confirming questions about discrepancies in data from the February 18 submittal as compared to the March 2008 Plan, the following information is intended to summarize the points discussed this morning.

Request 1

Regional Board staff requested estimates of impingement losses using EPS 2004-2005 results prorated to 304 MGD for fish, inverts, and total fish and inverts, presented in terms of individuals and biomass, and in terms of per day and per year.

As we discussed, the March 2008 Flow, Entrainment and Impingement Minimization Plan (Plan) (as with earlier versions) included a table (5-1) that presents data from 52 samples at Encina during 2004-2005. The data are presented as annual and prorated to 304 MGD. Poseidon acknowledged this error in an April 30, 2008 email to staff and in the Supplemental Expert Opinion of Chris Nordby, included in the February 18, 2009 submittal. Mr. Nordby notes that the Regional Board staff correctly pointed out that the table represents 52-day totals for Encina's operations and does not adjust for CDP's operation. Mr. Nordby notes that Tenera erred by dividing the totals in the table by 365 days to project CDP's daily impingement impacts.

The intent of Request 1 was to have Poseidon correct the error and accurately calculate prorated impingement values to allow staff to evaluate the proration. Thus, to more fully describe Request 1, we expect Poseidon to calculate the impingement values associated with 304 MGD during the 2004-2005 sample year by using simple proration of the Encina data, taking into account the actual weekly flows associated with each of the 52 daily samples. (We understand that some sample weeks are +/- 7 days, so use whatever period is associated with a particular sample). We expect Poseidon to provide calculations for fish¹ individuals per day and per year, fish biomass per day and per year, invertebrate individuals per day and per year, and invertebrate biomass per day and per year. We are not asking for individual fishes broken down by species. It may be useful to present this information in a summary table with a row for the four categories of fish information and a row for the four categories of invertebrate information.

¹ Fish Individuals should Include Sharks and Rays.

The method of proration should be transparent and be accompanied by a narrative and relevant table(s) that clearly explain how the fish and invertebrate values described above were arrived at, including reference to appropriate associated flow volumes and numbers and weights of organisms. One way to achieve this is to add the following columns (and subcolumns) and single row, as appropriate, to Table 1 (Impingement Survey Data) included under Response 1 in the 2/18/09 response to email requests. (Table 1 could also be split into separate tables if it becomes unwieldy). Regional Board staff can also speak with David Mayer about other comparable approaches.

Add new columns:

Total Fish (in Table 1, "fishes" are separated from "sharks and rays"; please combine; Total Fish would have two subcolumns, one for individuals and one for weight)

Encina Weekly Volume (actual weekly flow volume associated with each of 52 samples) (the weekly volume amounts respond to Request 2(b) as well)

Encina Weekly Adjusted Amounts of Fish (i.e., Fish Individuals, Fish Biomass, both adjusted to weekly volume) (two subcolumns)

Encina Weekly Adjusted Amounts of Invertebrates (i.e., Invert Individuals, and Invert Biomass, both adjusted to weekly volume) (two subcolumns)

CDP Weekly Amounts of Fish (i.e., the Encina Weekly Adjusted Amounts of Fish (Fish Individuals and Fish Biomass), prorated to Weekly Flow Volume at 304 MGD) (two subcolumns)

CDP Weekly Amounts of Invertebrates (i.e., the Encina Weekly Adjusted Amounts of Invertebrates (Inverts Individuals and Inverts Biomass), prorated to Weekly Flow Volume at 304 MGD) (two subcolumns)

Add new row at bottom of table to total each column/subcolumn.

After the above information has been presented, we expect Poseidon to show the equations they use to derive the daily and yearly amounts of fish and invertebrates impinged (shown both as individuals and biomass).

Once the error is corrected and the proration completed, we would expect Poseidon to explain why the corrected figures do not significantly change Poseidon's conclusions regarding the adequacy of mitigation for the impacts.

Poseidon should also correct tables as necessary in the March 2008 Plan and properly reference tables from the January 2008 EPS Tenera Report relied upon

in their Flow Plan. Poseidon should and consider including significant tables as attachments or insertions into Chapter 5 of the March 2008 Flow, Entrainment and Impingement Minimization Plan for ease of reference.

Request 2

Regional Board staff had requested two sets of data for purposes of corroboration, as follows:

(2)(a): Flow volume on day of each sample, presented so that the flow volume can be paired with the associated sample.

The requested information was provided. Poseidon to confirm MGD for n=52 (i.e., whether 657 MGD or 632.6 MGD number from March 2008 Plan p. 5-3 is correct).

2(b) Volume associated with "Actual flow rate basis" in Tables 4-3 and 4-6 of Tenera January 2008 Report.

The February 18, 2009 submittal did not include the requested information, but the weekly flow volumes associated with each of the 52 samples, requested above, will satisfy this request.

Request 3

Regional Board staff asked for a brief example of estimated CDP impingement impacts for a recent year at the 2004-2005 levels.

The February 18, 2009 response is adequate.

Request 4

Regional Board staff requested that if Poseidon were to present a linear regression analysis, that it do so both for individuals and biomass.

A linear regression approach was proposed only after the March 2008 Plan was conditionally approved and after Poseidon acknowledged the error in projecting impingement impacts in late April 2008. If linear regression will be used as method of calculating projected impingement impacts, we expect Poseidon to provide an explicit rationale for using it, particularly since a linear relationship is not expected or particularly strong (see Tenera May 2007 Introduction, p. 3, "The amount of impinged organisms generally varies with the amount of flow, but it is not in a direct or linear manner"). Linear regression also comes with a host of other problems that should be addressed (e.g., extrapolation to a point outside the range of data).

In addition, the linear regression method Poseidon proposed in an email on April 30, 2008 excludes two days of high impingement data from the analysis (January

12 and February 23, 2005). We expect Poseidon to substantiate its reasons for excluding the data from these two days.

Poseidon has provided an impacts projection based on linear regression for fish and invert biomass combined, and for fish biomass. We would expect Poseidon to provide an associated projection at least for fish individuals, as staff requested, or explain why such an associated projection won't be provided.

Miscellaneous Clarifications of February 18, 2009 Submittal

Confirmation regarding discrepancies in data. Staff will consult with David Mayer to confirm which numbers are correct where different numbers for the same values appear in the February 18, 2009 submittal as compared to the March 2008 Plan.