Technical Report

Virginian Province Approach to Dissolved Oxygen in Lower South San Francisco Bay Sloughs

Draft Report, May 2, 2022

Prepared by:

Jerry Diamond, Alexis Walls, Sujoy Roy Tetra Tech, Inc. 3697 Mt. Diablo Blvd., Suite 150 Lafayette, CA

10711 Red Run Blvd, Suite 105 Owings Mills, MD

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1 Introduction

Aquatic life depends on having sufficient dissolved oxygen (DO) for normal metabolism and productivity. While the minimum DO concentration necessary to sustain populations varies widely among animal species even in a single waterbody, virtually all species require DO to survive and reproduce. The DO concentrations observed at a site are dependent on many factors including temperature, hydrologic dynamics, organic matter and decomposition rates, DO production by primary producers, and respiration rates of the aquatic life. Setting appropriate DO criteria or objectives for a given water body or type of water body is therefore complex because many site-specific natural factors can influence DO concentrations that are attainable at various times of day and during different seasons.

Human activities can alter or exacerbate naturally occurring DO conditions in a waterbody making criteria development even more complex. In the case of Lower South San Francisco Bay (LSB) sloughs, both natural and anthropogenic factors could affect observed DO concentrations. High organic biomass and warmer temperature in some sloughs, as well as limited water exchange with more open regions of the Bay and with upstream waterbodies, may naturally depress DO concentrations when photosynthetic DO production is minimal. In addition, with a human population of over 2,000,000 people in the LSB region, anthropogenic causes of depressed DO (e.g., organic carbon inputs and BOD from wastewater and stormwater runoff) are possible as well. Some LSB sloughs have been prone to low dissolved oxygen (DO) due to anthropogenic influences and natural conditions in the system, and water quality management of the sloughs requires DO objectives for evaluation of impairment (MacVean et al 2018; Lewis, et al., 2018). Currently, the DO objective listed in the San Francisco Bay Regional Waterboard's (SFBRWQCB's) Basin Plan DO for applicable to the LSB sloughs is the minimum value of 5.0 mg/L yearround, which is applicable to all tidal waters -south of the Carquinez Bridge (SFBRWQCB, 2022). In addition, the Basin Plan contains an objective that the median DO concentration for any three consecutive months shall not be less than 80 percent of the DO content at saturation.

DO criteria should not be considered as "one size fits all waterbodies" because the influence of naturally occurring factors is inherently site specific. Currently the DO criteria methodology commonly used for estuarine and marine waterbodies is the Virginian Province Approach (VPA) developed by U.S. Environmental Protection Agency (EPA) (2000). As discussed in this report, the VPA is not inherently a site-specific methodology but rather an approach similar to that used by USEPA to derive criteria for toxic chemicals (Stephen et al., 1985). Tetra Tech was contracted by the San Francisco Estuary Institute (SFEI) to evaluate DO objectives for south San Francisco Bay sloughs using EPA's VPA approach because it requires a lower level of effort than more site-specific approaches (e.g., Chesapeake Bay DO approach) and it provides DO sensitivity information for many species, which with some modifications and incorporation of other site-specific lines of evidence, may provide appropriate DO criteria for LSB sloughs.

This report consists of results related to four tasks as described in Tetra Tech's approved Work Plan with SFEI, as well as recommended next steps. This analysis primarily focused on the Alviso Marsh complex sloughs (Figure 1) although other sloughs south of Dumbarton Bridge were also considered. The VPA DO criteria, like U.S. EPA's toxics criteria, are based on sensitivity data for many species, some of which may be unlikely to occur in LSB because of habitat limitations or other natural constraints.

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bp_ch3 | San Francisco Bay Regional Water Quality Control [Board \(ca.gov\)](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/bp_ch3.html#3.3.5)

Tasks 1 and 2 examine existing species data to refine the VPA for LSB sloughs. In Task 1 of this report, we present existing taxonomic information for LSB sloughs and examine which of the species in U.S. EPA's VPA are ecologically appropriate to LSB. In Task 2, we present available information concerning salmonid and Sturgeon species in LSB slough because early life stages of these two families of fish are some of the most sensitive species to hypoxia according to U.S. EPA (2000) and others. In DO objective development for Suisun Marsh, in the northern part of the San Francisco Estuary, Tetra Tech discriminated between sloughs with or without salmonids because of the large difference in resulting DO objectives (Flippin et al., 2017). Results of Tasks 1 and 2 help determine the extent to which species modifications to the VPA reflect site-specific DO concerns.

Task 3 presents results of the VPA approach based on percent DO saturation rather than concentration (mg/L DO). At higher water temperatures percent DO saturation decreases, resulting in naturally lower DO concentrations. Some states such as Florida are using DO saturation rather than DO concentration to set DO criteria (FDEP 2013) and several studies of the sloughs have examined percent saturation as well as concentration of DO (e.g., MacVean et al 2018). Incorporating site specific temperature data into the VPA as percent DO saturation increases the ecological relevance of VPA DO criteria for LSB sloughs.

Task 4 presents a preliminary evaluation of habitat factors, seasonality of certain species life stages, and other site-specific information that are being examined by researchers in the region and that could be used with the VPA to refine appropriate DO objectives for the Lower South San Francisco Bay sloughs. A similar type of approach has been used in Chesapeake Bay (Tango and Batiuk 2013) and in Florida (FDEP 2013) to develop DO criteria.

This report provides results of VPA DO analyses as outlined in Tetra Tech's Work Plan and incorporates results based on different assumptions regarding specific species presence or absence in the sloughs. The different scenarios examined in this report may help SFEI and stakeholders identify critical data gaps that can help focus ongoing efforts to develop appropriate site-specific DO objectives for Lower South San Francisco Bay sloughs.

1.1 Study Area Examined

The greater portion of the Lower South San Francisco Bay is termed the Alviso Marsh Complex in Lewis et al., 2018 (Figure 1). In this report the Alviso Marsh complex refers to Alviso, Artesian, and Dump Sloughs, Coyote Creek, Upper Coyote Creek, Ponds 21 and 19, and several sites in Lower South Bay proper. This analysis focused on these sloughs as well as lower Coyote Creek because that Creek is the connection between the South Bay and Dump and Artesian sloughs. This study also considered aquatic life-populations and habitat conditions in Guadalupe Slough.

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Figure 1. Lower South San Francisco Bay sloughs discussed in this analysis. The focus of the dissolved oxygen criteria in the present document are the sloughs and not open waters or marsh ponds.

2 Task 1.1: Refined Species List for Analysis

2.1 Overview of VPA

The VPA (USEPA 2000) was developed to derive DO criteria protective of coastal and estuarine organisms animals living in the Virginian Province (Cape Cod, MA to Cape Hatteras, NC). The resulting criteria are based on laboratory data for organisms that may occur in the geographical region of interest and follows the general approach used to develop criteria for toxic compounds as mentioned previously. This approach has subsequently been used to develop DO criteria in estuarine waters, such as in Florida (FDEP, 2013), Chesapeake Bay (USEPA, 2003), Georgia (coastal estuaries, Tetra Tech 2014), Louisiana (coastal estuaries, Tetra Tech 2008, 2013), Massachusetts (Taunton River Estuary, Tetra Tech 2018), and Suisun Marsh (Flippin et al., 2017).

EPA's VPA document compiles a list of DO toxicity data for aquatic species that occur between Cape Cod, MA to Cape Hatteras, NC. This method uses endpoints analogous to those used to set criteria for toxics. Acute endpoints describing lethality to 50% of test organisms (LC50) and chronic endpoints

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describing the most sensitive endpoint (growth in the case of DO) are gathered from available sources of appropriate laboratory data. Toxicity data are ranked according to genus mean acute (or chronic) values (Genus Mean Acute Values [GMAVs] or Genus Mean Chronic Values [GMCVs]), which represent the geometric mean acute or chronic endpoint value, respectively, for each genus of invertebrate or fish, based on the number of individual test values available for a given genus at the time of criteria development. Genera are ranked from most to least sensitive to DO based on acute sensitivity (GMAVs) and chronic sensitivity (GMCVs). The four most sensitive GMAVs for acute criteria or GMCVs for chronic criteria and the total number of genera for which acceptable data are available are used in a series of equations to determine the Final Acute Value (FAV) or Final Chronic Value (FCV). The FAV/FCV is designed to be protective of at least 95% of the species for which toxicity data are available (Stephan et al., 1985). The FAV can be modified by correction factors to result in the Criterion Minimum Concentration (CMC, analogous to the Criterion Maximum Concentration for traditional toxics). In the case of DO, the FAV was adjusted to the CMC by multiplying by 1.38, the average LC5 to LC50 ratio for juvenile and adult species (USEPA 2000). The FCV can be modified to result in the Criterion Continuous Concentration (CCC), but no further modifications were used in the VPA.

The VPA document also developed a modeled larval recruitment endpoint. The purpose of the larval recruitment model is to determine the cumulative impact of DO stress on the larval phase of estuarine organisms. The larval recruitment segment is the period up to the point when an organism enters the juvenile life stage. The acute DO target endpoints are considered protective of organisms already in the juvenile stage. Larvae are usually more sensitive to environmental stress such as low DO as compared to juveniles and adults. Therefore, a separate target endpoint for organisms in the larval life stage is required. This endpoint is developed using a spreadsheet tool that integrates population parameters including length of recruitment season, duration of larval development, cohort size, and sensitivity to DO. The larval recruitment model generates a final curve that describes the number of days larvae can be exposed to a certain DO concentration without negatively affecting the total population. A maximum acceptable reduction in seasonal recruitment is set at 5% as described in the VPA document (USEPA 2000).

In summary, the VPA allows for the calculation of three endpoints to protect aquatic organisms from adverse effects of low DO—acute, chronic, and larval recruitment. The CMC is protective against acute DO exposures and the CCC is protective against chronic growth effects in aquatic organisms. The larval recruitment endpoint is also protective against the cumulative effects of stress on larval organisms.

2.2 Literature Review and Data Used

A literature search was conducted to evaluate the availability of dissolved oxygen toxicity sensitivity data relevant to species present in Lower South San Francisco Bay sloughs. The literature search was divided in three parts: (1) compilation of invertebrate and vertebrate aquatic species that have been reported from any of the sloughs, (2) compilation of available laboratory DO toxicity sensitivity data in addition to those presented by EPA in the VPA (USEPA 2000) for species relevant to the sloughs, and (3) Records records of sturgeon and salmonid presence in the sloughs.

Species reported in the sloughs were obtained from several sources (Table 1 and Appendix A) as well as information obtained from local experts familiar with biological data from the sloughs.

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Appendix B lists the species that have DO laboratory toxicity sensitivity data that were compiled in this study and the life stage for which the toxicity endpoint applies. While many of the species data are reported in EPA's VPA document, Tetra Tech added several others that were made available after EPA's VPA document was published in 2000. Most of the toxicity sensitivity data were derived using early life stages of fish or invertebrates.

In the event that an acute or chronic endpoint was identified for a species that is not found in LSB sloughs, the possibility of using a surrogate species from the sloughs was determined. According to the EPA's VPA, a surrogate is deemed appropriate if it is of the same family and preferably, the same genus. Results from the University of California, Davis (UC Davis) Otter Trawl surveys reported in Lewis, et al., 2018 as well as personal communication with local experts on species presence in the study area were utilized in finding local replacements. The results of the surrogate evaluation are summarized in Table 2.

Table 2. Species whose chronic (yellow), acute (blue), or both chronic and acute(orange) endpoints are available. Surrogate Relation indicates whether the local surrogate was of the same genus or family.

Acute LC50 values were available for 5 species that have been reported in the sloughs and 12 species that were of the same genus as a fish or macroinvertebrate found in the sloughs. An additional 18 species had acute DO toxicity data based on family level relatedness. Chronic values were available for 1 species that has been reported in the sloughs and 8 species that were of the same genus as a fish or macroinvertebrate found in the sloughs. An additional 11 species had chronic DO toxicity data based on family level relatedness. Many of the families of species collected in the sloughs are represented in the acute DO toxicity dataset. Fewer families of species reported in the sloughs are represented in the chronic DO toxicity data set due to there being fewer chronic DO toxicity studies available.

Table 3 summarizes the acute and chronic toxicity values for relevant species in the sloughs based on the literature review in this task. The extent to which salmonids and sturgeon can inhabit the sloughs is discussed under Task 1.2 in Section 3 of this report.

2.3 Calculation of Acute and Chronic Dissolved Oxygen Criteria Using the VPA

Following EPA's VPA, the ranked acute and chronic DO toxicity endpoints listed in Table 3 were subjected to the analyses EPA recommends for calculating DO water quality criteria. Based on the four

most sensitive genera in Table 3, the acute DO criterion or CMC using the VPA is 3.7 mg/L. (see Appendix C with the calculations following the VPA). This criterion assumes that the genera and life stages upon which the DO toxicity data are based in Table 3 are appropriate for the sloughs, which may not be an accurate assumption for salmonids and sturgeon (see Section 3). Table 4 summarizes the chronic toxicity endpoints for early life stages of genera based on the literature review. Based on the four most sensitive genera in Table 4, the chronic DO criterion or CCC using the VPA is 5.3 mg/L (see Appendix C with the calculations following the VPA). This criterion also assumes that the genera and life stages upon which the DO toxicity data are based in Table 4 are appropriate for the sloughs (see Section 3).

Table 3. Acute data for species of interest and surrogate species toxicity data used to perform the Virginian Province Approach. Species present in sloughs were determined by results of the UC Davis report (Lewis, 2018) and Bailey, 2014. In both cases, surrogates were selected when South Bay species and surrogate species shared at least common family classifications.

South San Francisco Bay Species

Table 4. Chronic data for species of interest and surrogate species toxicity data used to perform the Virginian Province Approach. Species present in sloughs were determined by lists in the UC Davis report (Lewis, 2018) and Bailey, 2014. In both cases, surrogates were selected when South Bay species and surrogate species shared at least common family classifications.

2.4 Calculation of the Larval Recruitment Dissolved Oxygen Criterion

The purpose of the larval recruitment model is to determine the cumulative impact of dissolved oxygen stress on the larval phase of estuarine organisms. The larval recruitment phase is the time period up to the point when an organism enters the juvenile life stage. The larval recruitment model generates a curve that describes the number of days larvae can be exposed to a certain dissolved oxygen concentration without negatively impacting the total population.

Acute dissolved oxygen toxicity values for larval estuarine organisms were derived primarily from EPA's VPA document (U.S. EPA 2000) for select species that are either known to occur in the Alviso Marsh Complex sloughs or have closely related genera or species that occur. Larval acute DO toxicity values based on controlled laboratory studies are available for relatively few species. The values, along with life history parameters derived from regional sources, were used in the larval recruitment model to calculate a dissolved oxygen target endpoint that should not adversely affect the overall species population.

The model calculations are based on the methods described in the VPA (U.S. EPA, 2000). This approach requires compilation of laboratory toxicity data describing dissolved oxygen LC₅₀ values for larvae. Life history parameters including length of larval recruitment season, duration of larval development, and number of cohorts produced per season also factor into the model. To the extent possible regional information was used to characterize these input factors to the model.

Table 5 summarizes the surrogate species for which larval DO toxicity data are available, the approximate length of the larval life stage of related species in the San Francisco estuary region, the acute toxicity value reported along with the salinity and temperature tested, and sources of information.

Table 5. Summary of information used in the larval recruitment model for species relevant to South San Francisco Bay sloughs.

According to EPA's VPA the four most sensitive genera larval recruitment curves were for *Morone, Octopus, Chasmodes,* and *Cancer* (U.S. EPA 2000)*.* However, of these, only *Morone* is represented in the sloughs. The other three species for which larval DO toxicity data exist are less sensitive than *Morone* (Table 5). Plotting the recruitment curve for species that either occur, or are representative of species that occur in the sloughs (Figure 2), *Morone saxitalis* is the most sensitive. Based on a mean larval recruitment period of 42 days, a DO concentration of approximately 4.3 mg/L or above would be protective of the striped bass population and probably larval stages of most other species that occur in the sloughs in that life stage.

Figure 2. Results of EPA's Virginian Province Approach larval recruitment model for species representative of those that occur in South San Francisco Bay sloughs. The solid line represents the regression or final curve based on individual species recruitment curves.

3 Task 1.2: Data Gaps for Salmonids and Sturgeon

As shown in Tables 3 and 4 in the previous section, salmonids (trout, salmon) and sturgeon are some of the most sensitive species to reduced dissolved oxygen saturation and are therefore critical species in deriving chronic DO criteria where these species occur. Therefore, the purpose of this task was to determine whether these fish species occur in the Alviso Marsh Complex and if so, at what times of year and which life stages, as that information will help inform whether the DO objectives calculated in Section 2.3 are appropriate or whether alternative objectives using the VPA are warranted.

Information regarding the presence of Salmonids and Sturgeon in Lower South San Francisco Bay was obtained using reports and peer-reviewed articles from reputable sources such as NOAA National

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Marine Fisheries Service (NMFS), California Department of Fish and Wildlife (CDFW), Santa Clara Valley Water, The Center for Ecosystem Management and Restoration (CEMAR), University of California, Davis Fish Ecology lab (UC Davis), and the California Open Data Portal. Reference sections of relevant reports were also used to search for additional published materials. Some information was provided initially by SFEI such as the 2017 Sturgeon Fishing Report Card: Preliminary Data Report (DuBois and Danos, 2018) and an article from the Environmental Biology of Fishes Journal which reported on sturgeon distribution (Miller, et al., 2020). Additional key sources used in this task are listed in Table 1. The following subsections summarize the current information obtained by Tetra Tech regarding the occurrence of salmonids and sturgeon and habitat suitability of Alviso Marsh Complex sloughs for these species. The first part of this discussion is for anadromous salmonid species, followed by non-anadromous trout because their life history traits are different. The last part of this section is focused on green and white sturgeon.

3.1 Anadromous Salmonid Species

Anadromous salmonid species in the genus *Oncorhynchus* (salmon and steelhead trout) typically live up to 4 years and spend the first year of their lives in freshwater. After that time, they migrate to the ocean, remaining there until they reach spawning maturity and then return to natal streams to spawn. According to the NMFS Central California Coast Multispecies recovery plan, adult salmonids in South San Francisco Bay are most often migrating in and out of freshwater streams from November-May while the smolt period is considered to occur from January-June (NMFS, 2016, Appendix A, Marine and Large Estuarine Environments).

Several counts of salmonid occurrences were found among scientific surveys and historical literature reviews. The Center for Ecosystem Management and Restoration (CEMAR) published a document in 2005 (Leidy, et al., 2005) authored in unison with U.S. EPA and the University of California, Davis depicting the current and historical occurrence of salmonids in San Francisco Estuary by watershed. Steelhead trout (*Oncorhynchus mykiss*) are reported present in Coyote Creek and Guadalupe River watersheds as recently as 2004. A similar document also describing current and historical occurrence published by a collaboration of agencies reported Chinook salmon (*Oncorhynchus tshawytscha*) in Coyote Creek up to 2000. (Leidy and Becker, 2003). According to the California Fish and Wildlife Bay Study (CDFW, 2019) Chinook Salmon were present in the Southern San Francisco Estuary in 2017, though more specific locations were not provided.

Several species of salmonids have been recorded in San Francisco Bay and in the Guadalupe River and Coyote Creek watersheds (Leidy and Becker , 2003). Sources reviewed by Tetra Tech, as well as discussion with Levi Lewis, U.C. Davis and Joseph Dillon from NOAA indicate that anadromous salmonid species including Coho and Chinook salmon and steelhead trout, currently migrate primarily to the Guadalupe River and some of its tributaries during the winter spawning run (NMFS, 2016). Larvae and juvenile life stages of these species feed for a period of time in these cooler streams before migrating to the ocean from January-June (NMFS, 2016).

According to literature sources reviewed by Tetra Tech (Appendix A and Table1, above) adult anadromous salmonids migrate from the lower South San Francisco Bay to upstream freshwater spawning areas chiefly in the fall, winter and spring when tides and stream flows are generally higher. It appears there are fewer records of salmonid migrations from lower South San Francisco Bay in the summer (NMFS, 2016). Monthly fish sampling in the Alviso Marsh Complex sloughs between 2010 and

2018 (Lewis, et al., 2018) reported more than 50 fish species collected thus far, including migratory striped bass (*Morone saxitalis*) but no salmonids. This report notes that adult steelhead trout and Chinook salmon have been observed in upper portions of these watersheds. In 2021 a steelhead, larger that a smolt was collected in Artesian slough in the late fall (Levi Lewis, personal communication).

Habitat conditions in LSB sloughs are not conducive to juvenile steelhead and salmon rearing, particularly during the summer months, according to NMFS 2016. Natural water quality conditions including high water temperature, especially between late spring and early fall, and brackish salinity have been cited as critical factors precluding juvenile salmonid rearing in these sloughs. Additional factors cited are lack of suitable benthic substrate and lack of satisfactory cover in many of these sloughs (NMFS 2016). Based on this literature review and input from local experts, there is insufficient evidence currently as to whether juvenile salmon and steelhead are able to inhabit the sloughs in the Alviso Marsh Complex other than during short periods when migrating to the Bay and ocean.

3.2 Non-Anadromous Trout

Several reports reviewed by Tetra Tech provided by SFEI and local experts suggest that non-anadromous trout occur upstream of the sloughs in cooler freshwater streams that have habitat features that can support all life stages (see Appendix B for a list of sources reviewed). Upper Coyote Creek and Upper Guadalupe River are a few of the streams that have resident trout populations to varying degrees. The most downstream sites sampled in these and other creeks and rivers that eventually drain to the Alviso Marsh Complex sloughs and LSB are several kilometers upstream of the sloughs where habitat conditions (temperature, cover, salinity) are conducive to trout spawning and rearing . Based on the literature reviewed and discussion with local experts, it is highly unlikely that juvenile (or adult) trout are able to live in the sloughs long-term. This is supported by the fact that trout have not been collected during intensive monthly fish sampling in many of these sloughs over the past 8 years. (Lewis, et al., 2018). However, it is noted that the sampling gear used (Otter trawl) may not be efficient for sampling trout at any life stage.

3.3 Sturgeon

Green and white sturgeon are highly migratory species often found in coastal marine waters or estuaries and generally migrate up large rivers to reach freshwater during spawning season (January-May). Every 1-4 years after reaching maturity, white and green sturgeon inhabit the freshwater tributaries of San Francisco Estuary (SFE) searching for deep, turbulent pools with hard cobble or gravel bottom substrate in which they can spawn. Both sturgeon species have been known to migrate into freshwater reaches to spawn in the early spring/late winter (Feb/March) through June. (CDFW, 2021; UC Davis, 2021). Once hatched, sturgeon gradually migrate towards the SFE in search of habitat suited to their adapted salinity preferences, usually spending much of their young life in freshwater rivers and in less saline estuarine waters. As adults, white sturgeon primarily inhabit brackish estuaries, but will occasionally exist in coastal waters while traveling between estuaries. Green sturgeon adults prefer to spend most of their time in higher salinity coastal marine waters, but will occasionally enter SFE during summer months to feed. (CDFW, 2021). Green and White Sturgeon are benthic feeders, trending towards a diet of crustaceans, mollusks, other macroinvertebrates, and fish. (UC Davis, 2021)

According to the NMFS 2018 recovery plan (NMFS, 2018), the southern distinct population segment (sDPS) of green sturgeon spawns primarily in cool sections of the upper mainstem Sacramento River in

deep pools (averaging 8-9m in depth) containing small to medium sized sand, gravel, cobble, or boulder substrate. Post-spawn fish may hold for several months in the Sacramento River and out-migrate in the fall or winter or move out of the river quickly during the spring and summer months, with the holding behavior most commonly observed.

Sturgeon reporting in the Alviso Marsh Complex has provided evidence of occasional sightings, all of which appear to be white sturgeon adults or subadults (personal communication with Levi Lewis, UC,Davis; Alison Weber-Stover, NMFS; Joe Dillon, NMFS; and Kevin Lunde, California Waterboard). According to Hublein et al (2017), larval and juvenile green sturgeon fitness is impaired at water temperatures above 20 \degree C, which frequently occur in the Alviso Marsh Complex sloughs in late spring through early fall (MacVean, et al., 2018). No juvenile sturgeon have been reported in fish sampling conducted in these sloughs by Lewis and others over the past 8 years (Lewis, et al., 2018); But similar to salmonids, the sampling gear used may not be efficient for sampling sturgeon. More extensive sturgeon monitoring is continuing to be conducted, so more information regarding life history and movement of green and white sturgeon in lower South Bay tributaries may be available in the near future. Currently, it appears that habitat constraints would preclude at least early life stages of sturgeon from inhabiting the sloughs for any period of time.

3.4 Evaluation of Salmonid and Sturgeon Species Using VPA to Develop DO Objectives

As noted in the above discussion, early life stages (e.g., juveniles) of salmonids and sturgeon may be unlikely to inhabit the Alviso Marsh Complex sloughs for rearing and feeding. Natural habitat constraints in these sloughs, including suboptimal water temperature and salinity, during the seasons over which early life stages of these species occur in the region (i.e., primarily spring and early summer), may preclude those life stages from occurring in the LSB sloughs for extended periods of time (e.g., weeks). Adult or subadult salmonid and sturgeon may occur in some sloughs as migratory individuals heading upstream to freshwater spawning and rearing areas and, in the case of steelhead, heading back downstream to the Bay and ocean to feed. Currently it is uncertain how long adults or subadults of steelhead or sturgeon stay in the sloughs but thus far it appears that these species spend very limited time in the sloughs.

Under Task 1.1 in section 2.1 of this report we noted that DO toxicity data for most species listed in Table 3 are based on testing with juveniles and in some cases, even earlier life stages (larvae). In general, early life stages of organisms are more sensitive than adults or subadults to physicochemical stressors such as decreased DO concentration and/or percent saturation due to proportionately greater surface area (including gill area in the case of most fish) as compared to body size resulting in greater susceptibility to water quality stressor exposure (e.g., Franklin 2014). Numerous field studies have reported greater effects of hypoxia on juvenile fish than adults (e.g., Urbina and Glover 2013).

The VPA focuses on DO toxicity data derived from tests using primarily early life stages of aquatic species, particularly for fish where it is often feasible to test juveniles in the laboratory setting. The focus on early life stages is also evidenced by having an additional analysis based on larval recruitment. Water quality criteria protective of early life stages of different species is almost certainly protective of adult life stages as noted above. However, if only adult or subadult life stages of certain species are capable of inhabiting a type of waterbody such as the Alviso Marsh Complex sloughs, then DO objectives based on results of tests with early life stages of those species, may be over-protective. A DO objective based on early life stages of salmonids and sturgeon may be subject to even greater over-protection considering that early

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life stages of these species spend much (or in some cases all) of their time in freshwater not brackish water that typically occurs in the sloughs.. Furthermore, the DO toxicity data used for these species in the VPA (and shown in Tables 3 and 4) were derived from tests conducted in freshwater. Available information suggests that DO sensitivity for euryhaline species is greater as salinity decreases. Thus, the DO sensitivity data used in the VPA for these species may over-estimate their sensitivity as juveniles in brackish or saline waters in the sloughs.

To determine the effect of including salmonids and sturgeon on VPA DO objectives for the sloughs, Tetra Tech ran the VPA calculations with either salmonids or sturgeon excluded or with both genera excluded in Appendix C. Tables 6 and 7 summarize acute and chronic DO objectives based on the VPA for the different scenarios. Factors that affect the outcome of the CMC and CCC values are not only the DO thresholds of the most sensitive species, but also the total number of species for which there is acute or chronic data available, which changes whether species such as sturgeon or salmonids are removed. It is worth noting that in some cases removing salmonids or sturgeon results in a more conservative threshold. This could be because the species that replaces it has a similar threshold value and yet the total number of species in the calculation is decreasing.

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Table 6. Recommended acute (CMC) thresholds calculated based on the inclusion and exclusion of sturgeon.

Table 7. Recommended chronic (CCC) thresholds calculated based on the inclusion and exclusion of salmonids and/or sturgeon

4 Task 1.3: Adding Percent DO Saturation to VPA Criteria

The Virginian Province guidance (EPA, 2000) presented DO data as a concentration mg/L and subsequent efforts typically use these units as well. However, recent efforts in Suisun Marsh, Massachusetts, and Florida discussed the option of using percent saturation to account for the behavior of oxygen solubility at different water temperatures and salinities. There are also advantages to using saturation to acknowledge physiological aspects regarding how organisms assimilate dissolved oxygen. As mentioned previously, Florida DEP (2013) uses percent saturation to set saltwater DO criteria across the state. The equation below from FDEP, 2013 (originally from APHA, 1989) was used to convert DO in mg/I to percent saturation.

DOsat = (Exp((-139.34411 + (157570.1/Temp) - (66423080/Temp²) + (12438000000/Temp³) - $(862194900000/Temp_4^4) - (Sal * (0.017674-(10.754/Temp) + (2140.7/Temp_4^2))))$

% DO = (DOmeasure/ DOsat)*100

Where:

DOsat = DO concentration in mg/L at 100 % saturation, Temp = water temperature in K ($C + 273.15 = K$) DOmeasure = Measured DO concentration in mg/L.

Tetra Tech developed an Excel spreadsheet that converts DO concentration toxicity thresholds (e.g., LC50 as mg/L) to percent saturation based on the temperature and salinity reported for the toxicity tests from the VPA or other sources. An average value of 25°C and 25 ppt was used in the conversion equation for temperature and salinity, respectively, which is representative of most of the acute and chronic tests reported either in the VPA or other sources.

Table 8. shows the acute and chronic threshold values and their subsequent percent saturation values once converted from mg/L.

Table 8. Percent saturation calculated from acute and chronic DO toxicity tests reported as mg/L

Mean temperature, salinity, and DO (mg/L) data collected during the UC Davis otter trawl survey from 2011-2018 were used in determining the mean DO (percent saturation) in four South Bay sloughs (Artesian, Coyote, Dump, and Alviso) (Table 9). It is noted that mean salinity of Artesian slough is much lower compared to the other three locations as a result of treated wastewater that is discharged into this system daily. A comparison of Tables 8 & 9 demonstrates that the objectives recommended based on the VPA, whether in mg/L or percent saturation, are being met or are very close to being met. Given that information provided by local experts points toward the potential for seasonal DO criteria based on the migrations of key species, it should be noted that values are not separated by season in Table 9 but averaged over several years of collection during all 12 months. This indicates that during particular seasons there is a possibility that DO measurements could be meeting and potentially exceeding recommendations.

Table 9. Mean DO percent saturation for four LSB sloughs based on mean temperature, salinity, and DO (mg/l) collected during UC Davis otter trawl survey 2011-2018 (Lewis et al., 2018)

5 Task 1.4: Habitat Resolution and Geographic Scope of Assessment Comparison of Water Quality Conditions in Sloughs

In the report titled "Dissolved Oxygen in South San Francisco Bay: Variability, Important Processes, and Implications for Understanding Fish Habitat", MacVean describes shallow sloughs of LSB reaching summertime highs of 27°C with DO concentrations falling below Basin Plan water quality objectives of 5 mg/L 11-65% of the time during the period of study (Alviso Slough 2013-2017; Guadalupe Slough and Coyote Creek 2015-2017). At times, Alviso and Guadalupe sloughs experienced DO measurements below 2.3 mg/L for durations <24 hours. MacVean used data from moored sensor stations to compare the DO fluctuations in Guadalupe Slough and Alviso Slough and determined that the Pond A8 complex, with its muted velocities and long residence times, appears

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to supply connected sloughs with oxygenated water during times of elevated productivity and organic matter that results in oxygen demand farther down the slough. Despite receiving treated effluent from the Sunnyvale Wastewater Treatment Facility and discharge from Ponds A8 and A3, the relatively stagnant Guadalupe Slough more frequently has DO concentrations below the water quality objective of 5 mg/L (65% of the time since mooring stations were established), regardless of tidal stage when compared to Coyote Creek and Alviso Slough. Coyote Creek and Guadalupe slough were found to have higher DO during high tides than low tides unlike Alviso slough where no difference was found in the percent of observations below 5 mg/L at low tide than at high tide. Measurements of high DO in winter and spring in Coyote Creek is attributed to runoff from winter storms (MacVean, 2018). A universal finding across all sloughs was the measurement of lower DO values in the summertime and higher concentrations in the winter.

The different degrees of available flow seasonally in the different sloughs as noted above and in communications with local experts is a major factor determining whether juveniles of sturgeon and salmonids can use certain sloughs and if so, over what time of year. Connectivity of the sloughs to upstream salmonid spawning areas, and therefore, the ability of adults to migrate through the sloughs and reach spawning areas, appears to be dictated by the timing of precipitation in the region, tides, and other factors affecting flows into and out of the sloughs. Likewise, the degree of connectivity between the LSB and upstream spawning areas via the sloughs in the Alviso Marsh Complex, is a major factor affecting the timing and the occurrence of juvenile salmonid downstream migration to LSB. As noted in Sections 3.1 and 3.3 of this report, adult salmonid migration to upstream spawning areas occurs in fall, winter, or early spring while juvenile migration to LSB occurs in winter and spring when flows are higher and temperatures are cooler. Sturgeon in the LSB, specifically white sturgeon subadults, have also been sighted and captured during the UC Davis Otter Trawl Survey during spring, fall, and winter months. Only once was a sturgeon recorded during the summer since 2012, which was in August of 2016. It is suspected that sturgeon use the LSB sloughs as feeding habitat when conditions are preferable.

Comparison of Biological Conditions in the Sloughs

Figures 3 and 4 depict the spatial variation among sites in mean annual abundance (in units of Catchper-Unit-Effort or -CPUE) and percent composition distribution among sloughs for the -12 most commonly collected fish and macroinvertebrate species as reported by Lewis et al (2018). According to these data spanning 8 years of monthly sampling, total mean fish abundance and fish community structure varied little among sites, with Coyote Creek exhibiting the lowest mean fish abundance (Lewis, et al., 2018).

Temperature and salinity in the Alviso Marsh Complex is variable within and among sloughs in the Alviso Marsh Complex according to Lewis et al (2018), as well as across seasons and years due to differences in water availability (I.e., upstream flows to the sloughs), precipitation, tides, and many other factors. The variability in certain water quality conditions observed within and among sloughs appears to be a dominant driver of the abundance and structure of fish and macroinvertebrate communities in the sloughs. Lewis et al. (2018) note that a variety of habitat types are provided that support a diverse assemblage of aquatic species . Statistical analyses conducted by UC Davis

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researchers determined that the strongest relationships between observed biota assemblage structure or abundance and environmental conditions were seasonal, with greater than 20 °C changes in temperature from summer to winter, and inverse changes in dissolved oxygen, which were lowest during summer as noted in the previous section. Despite concerns over the potential negative effects of hypoxia on fish and macroinvertebrate communities, species abundances are high throughout the summer low-DO period, and many species exhibited highest abundances in waters with lower-DO concentrations (e.g., California Halibut, Striped Bass, and Leopard Sharks).

Although much similarity was observed in fish assemblage structure among sloughs, some sloughs exhibited unique patterns in community structure. For example, Mississippi Silversides were common at most sites, especially Alviso Slough (ALV in Figures 3 and 4) and Artesian Slough (ART), but were rare in both Lower South Bay (LSB) and Coyote Creek (COY). Similarly, Threespine Sticklebacks were ubiquitous, except for in Lower South Bay-. Pacific Staghorn Sculpin were particularly abundant in Alviso Slough while Shokihaze gobies and English Sole were commonly observed in Lower South Bay, Alviso Slough, and Coyote Creek, but -rare at other sites. Striped Bass were commonly observed in Artesian Slough, Dump Slough (DMP), and Upper Coyote Creek (UCOY), but rarely observed elsewhere. Lower South Bay appeared unique from sites within Alviso Marsh, with catches overwhelmingly dominated by Northern Anchovies, and lacking in American Shad, Mississippi Silversides, and Threespine Sticklebacks.

The differences observed in fish assemblage structure by Lewis et al (2018) may provide clues as to dissolved oxygen conditions minimally required to maintain productive populations of aquatic life in the sloughs, both seasonally and year to year. Statistical analyses conducted by UC Davis on their extensive fish and macroinvertebrate dataset were unable to distinguish significant relationships between assemblage structure observed and specific water quality conditions observed in each slough; i.e., their analyses did not identify specific dissolved oxygen, salinity, or temperature thresholds that defined presence or absence of certain species or were significantly correlated with certain species abundance in different sloughs. However, the differences observed in summer versus "non-summer" water quality conditions (specifically temperature, salinity, and dissolved oxygen) in all of the sloughs examined appears to be a driver that favors certain species in summer versus other seasons.

Figure 3. Spatial variation among sites in mean annual CPUE (top) and percent composition (bottom) for the 12 most abundant macroinvertebrate taxa (paracarids omitted) at all sites from the 2015-2018 UC, Davis otter trawl. Error bars reflect 2 standard error for the total combined abundance. UID -unidentified (Lewis et al., 2018)

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6 Summary and Recommendations

Results of VPA analyses suggest that an appropriate **acute dissolved oxygen criterion** for the sloughs is between 3.7 and 3.8 mg/L (46% saturation) depending on whether juvenile sturgeon are included in the calculation or not. Some jurisdictions express the acute criterion as an instantaneous threshold; any observation below this value, regardless of duration, is considered as possible impairment of aquatic life uses. However, laboratory data on which this criterion is based, were derived from testing conducted over at least a 24-hour period (in many cases up to 96 hours for fish). In addition, most jurisdictions acknowledge that aquatic life can tolerate brief periods below the acute criterion as discussed in EPA's VPA document (USEPA 2000).-Therefore, many states, for example, express the acute criterion as a daily average or in some cases subdaily average (e.g., one hour average). If an instantaneous threshold is desired, further analyses of the available DO data compiled in this report could be used to derive such a value.

The VPA analyses in this report identified a **chronic DO criterion** between 4.3 and 5.7 mg/L (corresponding to 53-70% saturation) depending on whether juvenile salmonids and/or sturgeon are included in the calculation. Chronic toxicity data on which these criteria are based, were generally derived from tests conducted over a few weeks or more. Therefore, the chronic criterion is often expressed as a monthly or perhaps weekly average. The larval recruitment criterion of 4.3 mg/L derived in this report, could also be used as a weekly average particularly during the spawning and larval period of biota if appropriate.

As noted in this report, the VPA results are based on laboratory test data and much of it pertains to surrogate species that may or may not be appropriate for biota that occur in the sloughs. In addition, the laboratory data used for the VPA analyses are based on testing with juvenile (sometimes larval) stages of fish and invertebrates. This is particularly critical in considering salmonid and sturgeon species because laboratory toxicity data for these species is based largely on freshwater testing (which juveniles of these species require) and their occurrence as juveniles in the sloughs is presently uncertain.

While much relevant biological data have been collected from sloughs in the Alviso Marsh complex, data are limited with respect to salmonid and sturgeon occurrence and potential use of the sloughs as juvenile rearing habitat. Based on current information from local experts and monitoring studies, it appears that salmonid use of the sloughs, either as adults migrating upstream or as juveniles migrating downstream to LSB, may be limited to the fall, winter, and spring months and less so or not at all between June and September. This timing may support having a lower DO objective for the summer months (e.g., 4.3 mg/L which was derived without salmonids) when salmonids are unlikely to be present and a higher DO objective (5.0 - 5.7 mg/L) in other seasons when juvenile salmonids could potentially use the sloughs. For sturgeon, it appears that spawning activity is limited to the northern part of the Bay and that sturgeon rarely use LSB tributaries for spawning. Thus, a chronic DO objective based on the VPA may not include sturgeon in the calculation, which, with the salmonid spawning timing just noted, would translate to a chronic objective of 4.5 mg/L in summer months and 5.7 mg/L in other seasons. Given the sensitivity of these genera to DO, focused monitoring information is needed that targets the juvenile life stage timing of their migrations to the Bay and how they use the sloughs in terms of timing and duration. This information would help determine how DO objectives should account for these genera temporally and spatially.

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Current information suggests that DO objectives may not necessarily differ among sloughs based on fish and invertebrate monitoring data and general water quality characteristics. However, this may need further evaluation given differences in size and connectivity of sloughs to the Bay. If certain sloughs are shown to have different biological expectations, then DO objectives may need to be adjusted accordingly.

It may be worthwhile to further explore paired fisheries/DO field data from the sloughs to derive species sensitivity distributions and develop an objective based on extirpation or avoidance. This approach was previously used to develop a conductivity benchmark in Appalachian streams.. This would provide grounding for VPA- derived DO objectives, which are driven by taxonomic rather than ecological factors.

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Appendix A: Sources for acute and chronic endpoints and the life stage during laboratory testing for each species.

Appendix B: Literature reviewed for information regarding species presence/absence, life history, age ranges, and seasonality in South San Francisco Bay sloughs

Appendix C: Components used in calculations of CCC and CMC results

 $N = 27$

Variables:

P = cumulative probability *N* = sample size *R* = rank

 S^2 = 10.300796

S= 3.209485

L=-2.131246

A= 0.996973

FAV= 2.710067

Ratio= 1.38 (EPA, 2000)

CMC= 3.7 mg/l

============================

Remaining 23 genera: *Harengula, Cancer, Anchoa, Mugil, Cynoscion, Trachinotus, Menidia, Syngnathus, Morone, Pseudopleuronectes, Paralichthys, Gobiosoma, Mysidae, Crassostrea, Brevoortia, Crangon, Apeltes, Ampelisca, Paleomonetes, Mercenaria, Rithropanopeus, Carcinus, Acartia*

Table C-2. CMC Calculation (Without Sturgeon)

 $N = 26$

Variables:

P = cumulative probability *N* = sample size *R* = rank

 S^2 = 18.962369

S= 4.354580

L= -3.238170

A= 1.006149

FAV= 2.735049

Ratio= 1.38 (EPA, 2000)

CMC= 3.8 mg/l

============================

Remaining 22 genera: *Cancer, Anchoa, Mugil, Cynoscion, Trachinotus, Menidia, Syngnathus, Morone, Pseudopleuronectes, Paralichthys, Gobiosoma, Mysidae, Crassostrea, Brevoortia, Crangon, Apeltes, Ampelisca, Paleomonetes, Mercenaria, Rithropanopeus, Carcinus, Acartia*

Table C-3. CCC Calculation with Salmnids and Sturgeon.

Variables:

P = cumulative probability *N* = sample size *R* = rank

 S^2 = 18.634890

S= 4.316815

L= -2.533105

A= 1.674406

FCV= 5.335624

CCC= 5.3 mg/l

============================

Remaining 12 genera: *Menidia, Mercenaria, Cancer, Brevoortia, Morone, Mysidae(family, genera unknown),Pseudopleuronectes, Paleomonetes, Acartia, Cynoscion, Crassostrea, Fundulus*

For salmonids, EPA's 1986 DO criteria (USEPA, 1986) report a moderate growth impact over a 7-day period when DO is 5mg/L.

Table C-4. CCC Calculation (Without Salmonids)

Variables:

P = cumulative probability *N* = sample size *R* = rank

S ²= 2.320233

S= 1.523231

L= -0.019834

A= 1.464828

FCV= 4.326799

CCC= 4.3 mg/l

============================

Remaining 11 genera: *Mercenaria, Cancer, Brevoortia, Morone, Mysidae(family, genera unknown),Pseudopleuronectes, Paleomonetes, Acartia, Cynoscion, Crassostrea, Fundulus*