

Scientific Basis to Assess the Effects of Nutrients on San Francisco Bay Beneficial Uses

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San Francisco Bay Regional Water Quality Control Board
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Contract Manager: Naomi Feger

Martha Sutula
Southern California Coastal Water Research Project, Costa Mesa CA

David Senn
San Francisco Estuary Institute, Richmond, CA

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EXPERT WORKGROUP

Gry Mine Berg
Applied Marine Sciences, Santa Cruz, CA

Suzanne Bricker
NOAA National Centers for Coastal Ocean Science, Silver Spring, MD

James Cloern
U.S. Geological Survey, Menlo Park, CA

Richard Dugdale
Romberg Tiburon Center, San Francisco State University, Tiburon, CA

James Hagy
U.S. Environmental Protection Agency
Office of Research & Development, Gulf Ecology Division, Gulf Breeze, FL

Lawrence Harding
Department of Earth and Atmospheric Sciences, University of California Los Angeles, CA

Raphael Kudela
Ocean Sciences Department, University of California, Santa Cruz, CA

EXECUTIVE SUMMARY

San Francisco Bay (SFB) has long been recognized as a nutrient-enriched estuary; however, until recently, it has exhibited resistance to symptoms of nutrient overenrichment due to a number of factors such as high turbidity, strong tidal mixing, and grazing by bivalves. Recent observations have reinforced the need to identify numeric water quality objectives and management actions to protect SFB from the potential effects of nutrient over-enrichment. The purpose of this work was to develop a quantitative framework, hereto referred to as an *assessment framework*, to assess eutrophication in the SFB, based on indicators of dissolved oxygen (DO), phytoplankton biomass (chlorophyll-a), gross primary productivity, the prevalence of harmful algal blooms (HAB) and toxins.

A group of experts in the ecology of SFB, as well as international experts in assessment frameworks (AF) and nutrient criteria, worked in concert to define core principles for the AF. These principles include the geographic scope, recommended Bay segmentation of subembayments for assessment, and the protocols and recommended spatial and temporal frequency of monitoring that would support use of the framework to assess nutrient effects on SFB. A quantitative scheme was developed to classify SFB subembayments in tiers of ecological condition, from very high to very low, based on risk of potential adverse effects of nutrient overenrichment and eutrophication. Decisions on classification bins were supported by a combination of existing literature and guidance, quantitative analyses of existing SFB data from the USGS research program, and expert best professional judgment. Analyses of two decades of phytoplankton species composition, chlorophyll-a, and dissolved oxygen (DO), and 3 years of toxin data from solid phase adsorption toxin tracking (SPATT) samplers were used to support decisions on the AF and demonstrated: 1) significant increases in chlorophyll-a, declines in DO, and a high prevalence of HAB species and toxins across most SFB subembayments and 2) strong linkage of increasing chlorophyll-a to declining DO and HAB abundance. Statistical approaches were used to define thresholds in chlorophyll-a relating to increased risks of HABs and declining DO. These thresholds were used, in combination with expert best professional judgment, to develop an AF classification scheme. A qualitative summary of uncertainty associated with each indicator was made for the purpose of focusing future research, monitoring, and modeling on AF refinement.

The AF is intended to provide a decision framework for quantifying the extent to which SFB is supporting beneficial uses with respect to nutrients. This AF is comprised of three important elements: 1) a set of conceptual models that defines what a problem would look like in SFB, if it occurred, 2) a set of core principles supporting the AF, and 3) classification tables. The AF supports and is supported through the other major science elements. The conceptual models and AF core principles provide a sound scientific foundation for informing modeling and monitoring. Through early interactions with the stakeholder community, these two components of the AF appear to have the greatest consensus and the least “uncertainty.”

The classification scheme is a critical element of the AF, because it represents a quantitative and transparent mechanism through which SFB data can be interpreted to assess, nutrient-related beneficial use support. Given its importance, the authors of this document fully acknowledge the uncertainty in the AF classification scheme and need for refinement, through multiple iterations of basic research, monitoring, and modeling. We suggest that the near-term use of the AF

classification system be focused on a scientific “test drive” focused on understanding how to collectively use and improve efficiencies for assessment, monitoring and modeling. The “test drive” of the AF can be conducted in tandem with research, monitoring, and modeling to improve the scientific foundation for the AF, aimed at the following six major recommended actions:

1. Improve the scientific basis for nutrient-related segmentation of SFB.
2. Reduce sources of uncertainty in chlorophyll-a, HAB abundance and toxin classification by: 1) Better assessment and characterization of the ecological and human risk of HABs in SFB, 2) Co-location of chlorophyll-a and monitoring of toxins in Bay surface waters, shellfish and SPATT to improve documentation of linkage of chlorophyll-a to HAB toxin concentrations, 3) Expand SPATT samplers to include other toxins and conduct better validation of SPATT toxin data relative to surface waters or mussel toxin tissues, 4) Assemble a scientific workgroup to evaluate and provide recommendations on the chronic effects of HAB toxins, and 5) Improve monitoring through better spatial and temporal coverage of HAB data to link chlorophyll-a to DO.
3. Optimize spatial and temporal sampling of AF indicators to best align quality of the information produced, while balancing costs, logistics, and power to detect trends.
4. Improve the scientific basis for dissolved oxygen classification and monitoring in future iterations of the AF. Current recommendations focus on indicators of phytoplankton. We recommend: 1) synthesis of DO expectations for SFB species types and the seasonal use of specific habitat types (deep channel, shallow subtidal, tidal sloughs, etc.) within SFB subembayments; 2) improved characterization of the diel variability of DO at key points within the deep water and shallow margin habitat of each subembayment in order to better characterize support of species and habitats; and 3) improved mechanistic understanding of the physical and biological factors influencing DO within and between the deep channel and shallow water margin habitat.
5. Include diked baylands, restored salt ponds and tidal sloughs in future iterations of the AF, which is currently focused on open water habitats.

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118 **1 INTRODUCTION**

119 **1.1 Background and Purpose**

120 The San Francisco Bay Regional Water Quality Control Board (Water Board) is developing
121 nutrient water quality objectives for San Francisco Bay. Water Board staff favor an ecological
122 risk assessment approach (EPA 1998), in which ecological response indicators (e.g. change in
123 algal abundance and assemblage, dissolved oxygen) are used as the endpoints to assess whether
124 the San Francisco Bay (SFB) is supporting designated uses. A model would then be used to link
125 those endpoints to nutrients and other factors that comprise management options to (e.g. best
126 management practices). In this risk-based approach, nutrients are considered a resource that
127 should be managed at levels that support SFB beneficial uses. The key is managing nutrients at
128 levels that pose a low risk of adverse effects, while ensuring the system doesn't become nutrient-
129 limited. This approach is consistent with that being used for nutrient objective development for
130 other waterbodies in California, including other estuaries (SWRCB 2014).

131
132 The process of selecting appropriate endpoints begins with a synthesis of science and the
133 development of a framework for interpreting the endpoints that is ultimately based on policy
134 decisions by the Water Board, taking into consideration advice from its advisory groups. In this
135 document, we refer to the product of scientific synthesis as a **nutrient assessment framework**
136 (**AF**), defined as a structured set of decision rules that specify how to use monitoring data to
137 categorize specific subembayments of SFB from very high to very low ecological condition,
138 using indicators that have a direct linkage to nutrients and support of SFB beneficial uses. Thus,
139 while the decision on regulatory endpoints should be informed by science, it is ultimately a
140 policy decision. The ultimate goal of this effort is that the Water Board would propose numeric
141 endpoints for SFB, based on the synthesis of science represented in the AF and feedback from
142 the SFB stakeholders and scientific peer review.

143
144 The purpose of this document is to describe the SFB nutrient AF, the scientific synthesis upon
145 which it is based, and key data gaps and recommendations for its future refinement.

146

147 **1.2 Document Audience, Authorship, and Organization**

148 This report was written to address the information needs of both scientists and technically-
149 oriented decision makers and stakeholders involved in the SFB Nutrient Management Strategy.
150 With that audience in mind, the report assumes a certain baseline familiarity with SFB as well as
151 a basic understanding of the biology, nutrient cycling, biogeochemistry, and physical processes
152 in estuaries. The scientific synthesis supporting this report was developed collaboratively with a
153 team of co-authors consisting of scientists whose areas of expertise cover a range of relevant
154 disciplines and much of whose work has focused on SFB.

155

156 This document is organized as follows:

- 157 Section 1 Introduction, Purpose, and Organization
- 158 Section 2 Context: Detailed Background, Process for AF Development, and Review of
159 Existing Approaches
- 160 Section 3 Proposed AF Core Principles and Classification Tables
- 161 Section 4 Summary and Recommendations

162 Appendices Key definitions, supporting literatures reviews and quantitative analyses

163 **2 CONTEXT FOR FRAMEWORK DEVELOPMENT: DETAILED BACKGROUND,** 164 **PROCESS FOR DEVELOPMENT, AND REVIEW OF EXISTING APPROACHES**

165 166 **2.1 San Francisco Bay: A Brief History and Context for Nutrient Management**

167 SFB encompasses several subembayments of the San Francisco Estuary, the largest estuary in
168 California. SFB is surrounded by remnant tidal marshes, an array of intertidal and subtidal
169 habitats, tributary rivers, the freshwater “Delta” portion of the estuary, and the large mixed-land-
170 use area known as the San Francisco Bay Area. San Francisco Bay hosts an array of habitat
171 types, many of which have undergone substantial changes in their size or quality due to human
172 activities (Conomos (ed.) 1979). Urban residential and commercial land uses comprise a large
173 portion of Bay Area watersheds, in particular those adjacent to Central Bay, South Bay and
174 Lower South Bay. Open space and agricultural land uses comprise larger proportions of the areas
175 draining to Suisun Bay and San Pablo Bay. The San Joaquin and Sacramento Rivers drain 40%
176 of California, including agricultural-intensive land use areas in the Central Valley. Flows from
177 several urban centers also enter these rivers, most notably Sacramento which is ~100 km
178 upstream of Suisun Bay along the Sacramento River.

179
180 SFB receives high nutrient loads from 37 public owned wastewater treatment works (POTWs)
181 servicing the Bay Area’s 7.2 million people (Association of Bay Area Governments,
182 www.abag.ca.gov). Several POTWs carry out nutrient removal before effluent discharge;
183 however, the majority are designed to have secondary treatment without additional N or P
184 removal. Nutrients also enter SFB via stormwater runoff from the densely populated watersheds
185 that surround SFB. Flows from the Sacramento and San Joaquin Rivers deliver large nutrient
186 loads, and enter the northern estuary through the Sacramento/San Joaquin Delta.

187
188 SFB nutrient loads and ambient nutrient concentrations are among the highest of the U.S.
189 estuaries (2012). However, SFB has long been considered relatively immune to its high nutrient
190 loads. For example, the first San Francisco Bay Regional Basin Plan from 1975 stated that only
191 limited treatment for nutrients was necessary because the system was considered to be light-
192 limited (SFRWQCB, 1975). Research and monitoring over the last 40 years have identified
193 several factors that impart SFB with resilience to high nutrient loads, i.e., control on
194 phytoplankton production (e.g., see Cloern and Jassby 2012; Cloern et al., 2007), including high
195 turbidity, strong tidal mixing, and abundant filter-feeding clam populations.

196
197 However, recent studies indicate that the response to nutrients in SFB is changing. These shifts
198 in nutrient responses may be triggered by one or more recently documented changes in SFB,
199 including shifts in the timing and extent of freshwater inflow and salinity intrusion, decreasing
200 turbidity, restructuring of plankton communities, and reduced metal contamination of biota, and
201 food web changes that decrease resistance of the estuary to nutrient pollution (Cloern and Jassby
202 2012).

203
204 Since 1969, a USGS research program has supported water-quality sampling in the San
205 Francisco Bay. This program collects monthly samples between the South Bay and the lower

206 Sacramento River to measure salinity, temperature, turbidity, suspended sediments, nutrients,
207 dissolved oxygen and chlorophyll-a. The USGS data, along with sampling conducted by the
208 Interagency Ecological Program (IEP), provide coverage for the entire San Francisco Bay-Delta
209 system. Although these data are critical to our current understanding of the Bay-Delta Estuary,
210 the USGS program is a research program and, thus, is not intended to serve as a comprehensive
211 SFB nutrient monitoring program.

212
213 The Nutrient Strategy highlights the need to lay the groundwork for a regionally supported, long-
214 term monitoring program that should be organized in such a way as to collaborate with ongoing
215 research efforts to provide the information that is most needed to support management decisions
216 in the Bay.

217
218 The technical approach underpinning the SFB Nutrient Management Strategy is compatible with
219 a major statewide initiative, led by the California State Water Resources Control Board (State
220 Water Board), to develop nutrient water quality objectives for the rest of the State's estuaries
221 www.swrcb.ca.gov/water_issues/programs/nutrient_objectives/.
222

223 **2.2 SFB Nutrient Management Strategy: Management Questions, Major Work** 224 **Elements, and Linkage to AF**

225
226 To address growing concerns that SFB's response to nutrients is changing and that conditions
227 may be trending toward adverse impacts due to elevated nutrient loads, the Water Board worked
228 collaboratively with stakeholders to develop the San Francisco Bay Nutrient Management
229 Strategy (herein referred to as "the Strategy"; SFRWQCB 2012), which lays out an approach for
230 gathering and applying information to inform management decisions. The Strategy identified
231 four overarching management questions:

- 232 • Is SFB currently experiencing nutrient-related impairment, or are there signs of future
233 impairment?
- 234 • What are appropriate guidelines for identifying a problem?
- 235 • What nutrient loads can the Bay assimilate without impairment of beneficial uses?
- 236 • What are the contributions of different loading pathways, and how do they vary in
237 importance as a function of space and time?

238
239 To address these management questions, the Strategy identified five major work elements:

- 240 • Conceptual model development, scientific synthesis and basic research
- 241 • Nutrient assessment framework
- 242 • Modeling
- 243 • Monitoring and special studies
- 244 • Characterization of nutrient loads, sources and major pathways

245
246 This report consists of the proposed AF and the analyses and literature that supported its
247 development. Other major elements exist and are in various stages of progress
248 (<http://sfbaynutrients.sfei.org/>).
249

250 The nutrient AF is intended to provide a decision framework for quantifying the extent to which
251 SFB is supporting beneficial uses with respect to nutrients. It also is integral to the other major
252 elements by:

- 253 • Defining monitoring requirements (the core indicators, spatial and temporal frequency of
254 sampling) needed to support routine assessments of SFB
- 255 • Identifying a set of management endpoints that should constitute the output of SFB water
256 quality models that will improve the mechanistic understanding of the linkage of
257 nutrients to adverse outcomes in SFB
- 258 • Contributing to key science needs and analyses needed to further refine the AF
259

260 This last bullet point is a critical product of this effort, as the authors of this document fully
261 acknowledge the considerable uncertainty in the AF classification scheme and need for
262 refinement, through multiple iterations of basic research, monitoring, and modeling.
263

264 **2.3 Conceptual Approach, Desired Attributes of a Nutrient AF and Process for** 265 **Development**

266 Conceptual Approach to AF Development

267 Nutrient objectives are scientifically challenging because nutrients are required to support life
268 and the assessment of how much is “too much” is not straightforward. Typical paradigms used to
269 set thresholds for toxic contaminants do not apply, in part because the adverse effects of nutrient
270 over-enrichment are visible at orders of magnitude below recognized toxicity thresholds for
271 unionized ammonia and nitrate. In addition, the effects of nutrient discharges often occur via
272 indirect exposure pathways, which are spatially and temporally disconnected from their points of
273 discharge.
274

275 The conceptual approach for AF development is anchored in an ecological risk assessment
276 approach (EPA 1998), which consists of multiple ecological response indicators (e.g., algal
277 abundance and assemblage, dissolved oxygen) as endpoints to assess whether SFB is supporting
278 beneficial uses (Tetra Tech 2006). A hydrodynamic and water quality model is then used to link
279 those assessment endpoints to nutrients and other factors that comprise management options
280 (e.g., best management practices). In this risk-based approach, nutrients are considered a
281 resource that should be managed at levels to maintain SFB designated uses, while maintaining a
282 low risk of adverse effects. If the nutrients present – regardless of actual magnitude – have a low
283 probability of impairing uses, then water quality standards can be considered met. This approach
284 is consistent with EPA guidance for nutrient criteria development (e.g., cause-effect approach;
285 EPA 2001) and with guidance being used by the State Water Board for nutrient objective
286 development for other waterbodies in California (SWRCB 2014), including other estuaries
287 (Sutula 2011).
288

289 This ecological risk-based approach has two important advantages. First, it offers a more direct
290 linkage with beneficial uses and is generally thought to lend itself to a more precise diagnosis of
291 adverse effects. Second, the alternative approaches, such as stress-response or reference-based
292 approaches, are particularly problematic in estuaries. SFB and other estuaries within California
293 are highly variable in how they respond to nutrient loading, due to differences in physiographic
294 setting, salinity regime, frequency and timing of freshwater flows, magnitude of tidal forcing,

295 sediment load, stratification, residence time, denitrification, etc. This combination of “co-
296 factors” results in differences in the dominant primary producer communities (i.e.,
297 phytoplankton, macroalgae, benthic algae, submerged aquatic vegetation, emergent
298 macrophytes). It also creates variability in the pathways that control how nutrients cycle within
299 the estuary. At times, these co-factors can play a larger role in mitigating estuarine response to
300 nutrient loads or concentrations, blurring or completely obscuring a simple prediction of primary
301 productivity limited by nutrients.

302

303 Thus, the Water Board is working to develop an AF based on the following key tenets:

304

- 305 1. *Ecological response indicators (e.g., dissolved oxygen, primary producer abundance,*
306 *productivity and assemblages) should provide a more direct risk-based linkage to*
307 *beneficial uses than to nutrient concentrations or loads.* The AF should be based on
308 assessing eutrophication (or other adverse effects), rather than nutrient over-enrichment
309 per se.
- 310 2. *A weight-of-evidence approach with multiple indicators can produce a more robust*
311 *assessment of eutrophication.* Wherever possible, the use of multiple indicators in a
312 “weight-of-evidence” approach provides a more robust means to assess ecological
313 condition and determine impairment. This approach is similar to the multimetric index
314 approach, which defines an array of metrics or measures that provide limited information
315 on biological status on an individual basis, but when integrated, serve to inform overall
316 biological condition.
- 317 3. *Models can be used convert response indicators to site-specific nutrient loads or*
318 *concentrations.* A key premise of the NNE framework is the use of models to convert
319 numeric endpoints, based on ecological response indicators, to site-specific nutrient goals
320 appropriate for permitting and TMDLs. A key feature of these models is that they
321 account for site-specific co-factors, such as light availability, temperature, and hydrology
322 that modify the ecological response of a system to nutrients. Thus, nutrient forms and
323 ratios are not an explicit element of the AF, but become linked to assessment endpoints
324 through modeling of ecological processes.

325

326 Desirable Attributes of an AF

327 The goal of the nutrient AF is to provide a structured set of decision rules that specify how to use
328 monitoring data to categorize specific subembayments of SFB, from very high to very low
329 ecological condition, using indicators that have a direct linkage to nutrients and support of SFB
330 beneficial uses.

331

332 To achieve this goal, a nutrient AF for SFB should offer the following features:

333

- 334 • The AF should employ indicator(s) that have a strong linkage to Bay beneficial uses. This
335 linkage should be scientifically well-supported and easily communicable to the public.
- 336 • One or more primary indicators of the AF should have a predictive relationship with
337 surface water nutrients and/or nutrient loads to the Bay.
- 338 • The AF should employ the indicator(s) that classify the Bay subembayments from very
339 high ecological condition to very low ecological condition. It should be explicit as to how

- 340 the magnitude, extent, and duration of the effects cause the subembayments to be
341 classified differently.
- 342 • The AF should be spatially explicit for different subembayments of the Bay and different
343 habitat types (deep vs. shallow subtidal), as warranted by the ecological nature of
344 response to nutrients.
 - 345 • The AF should specify what appropriate methods are used to measure the indicator and
346 the temporal frequency and spatial density of data required to make that assessment.
 - 347 • It should provide guidance on how the data should be analyzed to categorize the Bay
348 subembayments.
- 349

350 Methodology Used to Develop AF

351 The methodology used to develop the AF consisted of five main steps:

- 352
- 353 1. **Empanel a team of scientific experts to guide AF development.** These experts
354 represented a diverse body of knowledge of SFB hydrology, estuarine ecology and
355 nutrient biochemistry, as well as expertise in nutrient criteria and AF development. This
356 team is listed as contributing authors on this document.
 - 357 2. **Review existing approaches to nutrient AF development.** A white paper was
358 completed identifying candidate indicators and metrics, summarizing existing literature
359 for how those indicators have been used to assess ecological condition, and
360 recommending a suite of options to consider for further exploration (Appendix 1).
 - 361 3. **Identify AF core principles,** including geographic scope and key habitats, key indicators
362 and recommended measures, and the spatial and temporal frequency of sampling required
363 for assessment.
 - 364 4. **Analyze existing data to develop supporting information to develop a classification**
365 **scheme.** Existing data were utilized to test out existing classification schemes and to
366 quantify relationships between key variables of interest. These analyses are summarized
367 in Section 3, and additional methods and supporting information are provided in
368 Appendix 2.
 - 369 5. **Develop AF classification scheme and quantify/describe major uncertainties.**
370 Existing literature and supporting analyses were used to develop the AF classification
371 scheme. For each indicator, uncertainties corresponding to classification “bins” were
372 summarized. Key science needs required for the refinement of the classification scheme
373 and core principles were summarized.
- 374

375 Testing the AF with existing or newly collected monitoring data, and further refinement based on
376 monitoring and modeling, are steps envisioned for the AF in subsequent phase(s) outside the
377 scope of this document.

378

379 **2.4 Review of Existing Frameworks to Assess the Effects of Nutrient Over-** 380 **Enrichment on Estuaries**

381 We reviewed the existing regulatory and non-regulatory approaches to the assessment of the
382 effects of nutrient over-enrichment in estuarine waterbodies worldwide in order to consider an
383 appropriate approach to AF development (see white paper in Appendix B). A wide variety of
384 methodologies exist (Table 2.1). All of the conceptual models reviewed focused on ecological

385 impacts (i.e., eutrophication), rather than on nutrients' direct effects on ecological condition (i.e.,
386 toxicity).

387

388 The white paper (Appendix B) arrived at the following conclusions:

389

390 • **The eutrophication AFs reviewed have a common set of conceptual models.** These
391 conceptual models show linkages to nutrients and relevant co-factors, as well as the risk
392 pathways of “impairment” of ecosystems services and beneficial uses. These pathways of
393 impairment include (1) increased harmful algal blooms, which can produce toxins that
394 adversely affect both human health and aquatic life, (2) hypoxia and anoxia triggered by
395 frequent algal blooms, which change the long-term balance of organic matter cycling and
396 accumulation within an estuary (Nixon 1995) and can adversely affect habitat and aquatic
397 life, (3) shifts in the dominance assemblages and size class of phytoplankton, which lead
398 to degradation of food quality for estuarine consumers, including commercial and
399 recreational fisheries, and (4) overabundance of algae, which results in reduced light
400 availability for benthic primary producers (e.g., seagrass).

401

402 • **A common set of response indicators are used, focusing on dissolved oxygen and**
403 **primary producers (e.g., Bricker et al. 2003, Zaldivar et al. 2008), that link to these**
404 **major conceptual models.** Among primary producer indicators used, phytoplankton
405 biomass (water column chlorophyll-a) is the most common (Table 2.1). The frequency
406 and magnitude of harmful algal blooms and toxin concentrations have also been used,
407 either directly as an indicator or indirectly using chlorophyll-a as a proxy for the
408 increased probability of occurrence of HAB events. Phytoplankton assemblage has been
409 used in assessment of ecological condition, but only in estuaries that can use a reference
410 approach to defining the envelope of reference assemblages. Where TN and TP are used
411 (typically in regulatory programs), they have been determined as a proxy for primary
412 productivity either through statistical or process modeling to primary producer numeric
413 targets (e.g., regulatory programs such as Chesapeake Bay and Florida), or through a
414 reference water body approach (Andersen et al. 2011).

415

416 • **Among non-regulatory AFs (Bricker et al. 2003, Zaldivar et al. 2008), estuarine**
417 **subembayments are binned into multiple condition classes, representing a**
418 **disturbance gradient of high to low ecological condition (e.g., Zaldivar et al. 2008) or**
419 **trophic state (Bricker et al. 2003).** These condition classes are developed through a
420 combination of scientific data analyses and expert best professional judgment.

421

422 • **There is some degree of convergence on the thresholds or ranges represented within**
423 **the various classification scheme, particularly for chlorophyll-a (see white paper,**
424 **Appendix B).** This suggests consensus among experts who developed these frameworks
425 that the ranges representing condition classes correspond to real ecosystem decline. That
426 said, two points are worth mentioning. First, there is great variability in the temporal
427 statistic (e.g., annual average, season max, 90th percentile) used to make the assessment.
428 Second, the differences in the ranges, while small, represent large differences in estuarine
429 productivity, especially on annual timescales.

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- **Inherent in these AFs are key differences in temporal statistic, spatial density of data used to make an assessment and, in some cases, the way that multiple indicators are combined into a single score (Table 2.2).** These details are less obvious, but can have large effects on scoring (McLaughlin et al. 2013).

436 **Table 2.1 Methods of eutrophication assessment and examples of biological and physico-chemical indicators used and integration**
 437 **capabilities (pressure-state and overall; modified from Borja et al. 2009). From Ferreira et al. 2011.**

Method Name	Biological indicators	Physico-chemical indicators	Nutrient load related to impairments	Integrated final rating
TRIX ^b	Chl	DO, DIN, TP	no	yes
EPA NCA Water Quality Index ^a	Chl	Water clarity, DO, DIN, DIP	no	yes
ASSETS ^e	Chl, macroalgae, seagrass, HAB	DO	yes	yes
TWQI/LWQI ^c	Chl, macroalgae, seagrass	DO, DIN, DIP	no	yes
OSPAR COMPP ⁸	Chl, macroalgae, seagrass, phytoplankton indicator species	DO, TP, TN, DIN, DIP	yes	yes
WFD ^f	phytoplankton, Chl, macroalgae, benthic invertebrates, seagrass,	DO, TP, TN, DIN, DIP, water clarity	no	yes
HEAT ^d	Chl, primary production, seagrass, benthic invertebrates, HAB, macroalgae	DIN, DIP, TN, TP, DO, water clarity	no	yes
IFREMER ^h	Chl, seagrass, macrobenthos, HAB	DO water clarity, SRP, TP, TN, DIN, sediment organic matter, sediment TN, TP	no	yes
STI ⁱ	Chl, Primary Production	DIN, DIP	no	no

^a USEPA, 2005, 2008.
^b Vollenweider *et al.*, 1998.
^c Giordani *et al.*, 2009.
^d HELCOM, 2009.
^e Bricker *et al.*, 1999, 2003, 2007.
^f Devlin, pers.Com.
⁸ OSPAR, 2002, 2008.
^h Souchu *et al.*, 2000.
ⁱ Ignatiades, 2005.

438

439
440

Table 2.2. Summary of approaches used for assessment of eutrophication applicable to shallow and deepwater unvegetated subtidal habitat. Adapted from Devlin et al. 2011.

	UK WFD	OSPAR	TRIX	ASSETS	EPA NCA	TWQI/LWQF	HEAT	IFREMER	
Grouping of Variables	Causative Factors	Nutrient Load	DIN and DIP concentration, ratios, and loads	DIN and TP concentration	DIN and DIP loads	DIN, DIP conc	TN, TP, DIN and DIP conc.	DIN and DIP	PO4, NOX, NH4, TN, TP
	1 ^{ary} effects	Chl-a, PP indicator species, seasonal changes in cell abundance of diatoms/dinoflagellates, SAV, macroalgae	Chl-a, PP indicator species, macroalgae, microphytobenthos, SAV	Chl-A	Chl-a macroalgae	water clarity, chl-a	Chl a, SAV, macroalgae	Chl a, water clarity, SAV,	Chl a, turbidity
	2 ^{ary} effects	DO	DO, zoobenthos and/or fish kills, organic carbon	DO	Nuisance/toxic blooms	DO	DO	Benthic invertebrates	DO percent saturation
	Other		Algal toxins						
Temporal sampling framework	Annual chl-a and DO, winter DIN, monthly PP groups	Growing season chl-a (Mar-Sept), Winter DIN, summer DO	Annual	Annual	One sample per year (per station) within summer index period	Results can be derived based on one time or multiple periods	Growing season chl-a (Mar-Sept), Winter DIN, summer DO	Annual	
Spatial sampling framework	Sampling in estuaries and nearshore defined by salinity, reported by waterbody	Sampling defined by salinity in estuaries, nearshore	Sampling mostly in larger offshore systems; results reported by region	Sampling in salinity zones, synthesized to waterbody, region, national, with reporting at all levels	Sampling is regional, synthesized to national level, reported at regional and national level	For shallow, benthic PP dominated. Can be applied to single stations or groups of stations.	Sampling defined by salinity in Baltic Sea	For shallow, benthic PP dominated. Can be applied to single stations or groups of stations.	
Assessment of indicators	Deviation from reference conditions	Deviation from reference conditions	Placement on scale from 1-10 TRIX units	Deviation from reference conditions	Deviation from reference conditions	Deviation from reference condition	Deviation from reference condition	Deviation from reference	
Combination Method	Indicator scores are averaged within an indicator group. Final score gives classification status	One out, all out for individual categories and overall classification	Linear combo of logarithm of variables modified by scaling coefficient	Scores of avg. primary and secondary indicators combined in a matrix	Indicators assessed individually. WQI based on % of samples in 4 categories.	TWQI scores combined as the sum of weighted quality values for individual indicators.	One out, all out for individual categories and overall classification	One out all out	

441 **3 FRAMEWORK TO ASSESS THE EFFECTS OF NUTRIENTS ON SAN FRANCISCO**
442 **BAY BENEFICIAL USES**

443 **3.1 AF Core Principles**
444

445 **Geographic Scope and Focal Habitats**

446 The geographic scope for the SFB AF is defined by the Golden Gate Bridge as the oceanward
447 boundary, and Broad Slough in the Sacramento River as the upstream boundary, which is just
448 upstream of Winter Island (the boundary between the San Francisco and Central Valley Water
449 Boards; Figure 3.1).

450
451 SFB is comprised of deep and shallow water subtidal habitats and intertidal wetlands, and
452 remnant tidal marshes (Figure 3.1). Deepwater and shallow subtidal habitats are the focus of this
453 AF.

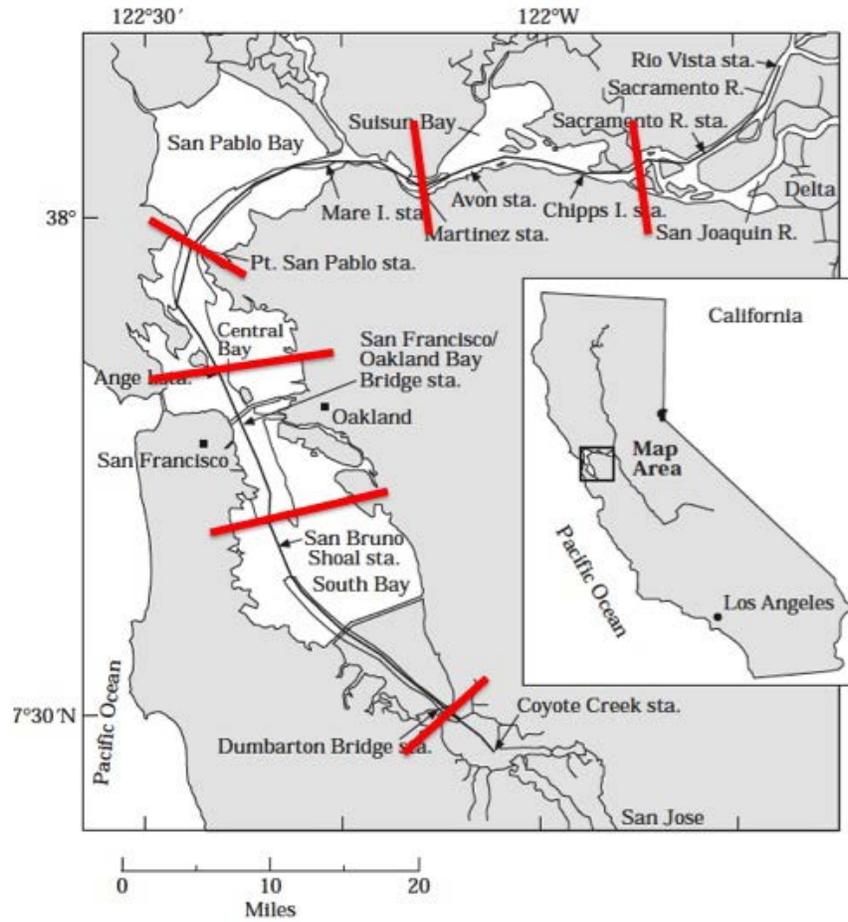
454
455 Although diked baylands, restored salt ponds, and tidal sloughs also are present in SFB and are
456 important, they are excluded in this initial assessment work. That said, preliminary data indicate
457 that these habitats may be in questionable ecological condition (Topping et al. 2009, SFEI
458 2014a); thus, we recommend development of an AF targeting these habitats in a subsequent
459 phase of framework development.

460
461 **Segmentation**

462 SFB has six subembayments with very different physical, biogeochemical, and biological
463 characteristics that shape their individual responses to nutrients. For this reason, the AF should
464 be spatially explicit for these regions (herein referred to as subembayments) of SFB, as
465 warranted by the ecological nature of response to nutrients.

466
467 The physical features in SFB provide natural breakpoints for segmentation, as documented by
468 Jassby et al. (1997) for chlorophyll-a, TSS and salinity. These breakpoints or subembayment
469 boundaries are also obvious in other ecological data. The SFB Regional Monitoring Program
470 (RMP) uses a segmentation scheme that differs slightly from that of Jassby et al. (1997); this
471 segmentation scheme was derived based on a variety of different contaminant and environmental
472 gradients not necessarily relevant for nutrients.

473
474 For the AF and supporting analyses, we used subembayment classification based on Jassby et al.
475 (1997; Table 3.1., Figure 3.1). That said, we strongly recommend reanalysis of existing data in
476 the Jassby et al. (1997) methodology, using newly available and relevant ecological data, to
477 finalize this segmentation scheme.
478



479

480 **Figure 3.1 Map of SFB showing geographic scope of AF, focal habitats and subembayment**
 481 **boundaries. Subembayment names are designated on the map.**

482

483 **Table 3.1. Size and locations of boundaries defined by preliminary AF classification scheme (from**
 484 **Jassby et al. 1997).**

Stratum no.	Description	Size \pm SD (km)	Northing (km)	Easting (km)
1	South of Dumbarton Br.	6.9 \pm 0.3	<151.4	
2	Dumbarton Br. to San Bruno Shoal	23.3 \pm 0.6	151.4–165.3	
3	San Bruno Shoal to Angel I.	28.7 \pm 0.7	165.3–188.8	
4	Angel I. to Mare I.	37.3 \pm 2.2	\geq 188.8	<564.6
5	Mare I. to Martinez	13.1 \pm 1.1	\geq 188.8	564.6–574.5
6	East of Martinez	51.8 \pm 1.7	\geq 188.8	\geq 574.5

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486

487 Key Indicators and Linkage to SFB Beneficial Uses

488 A core principle of the AF is the use of several indicators as multiple lines of evidence for
 489 potential adverse impacts (Figure 3.2), assuring a more robust assessment of the ecological
 490 condition of SFB subembayments. In the SFEI 2014b report, experts arrived at consensus
 491 regarding what undesirable conditions would plausibly manifest in SFB in response to adverse
 492 nutrient-related impacts – and how each undesirable state would impact beneficial uses (Table
 493 3.2). The undesirable states were divided into seven categories that represent specific examples
 494 extending from more general adverse impact pathways (Figure 3.2).

495

496 The undesirable states can be measured by six key indicators representing the multiple lines of
 497 evidence within this AF:

498

- 499 1. Phytoplankton biomass (as chlorophyll-a)
- 500 2. Gross and net phytoplankton production (hereto referred to collectively as GPP)
- 501 3. Harmful algal bloom species abundance
- 502 4. HAB toxin concentrations
- 503 5. Phytoplankton assemblage, expressed as phytoplankton food quality, percent of
 504 biovolume < 0.5 microns, and other metrics of community change
- 505 6. Dissolved oxygen

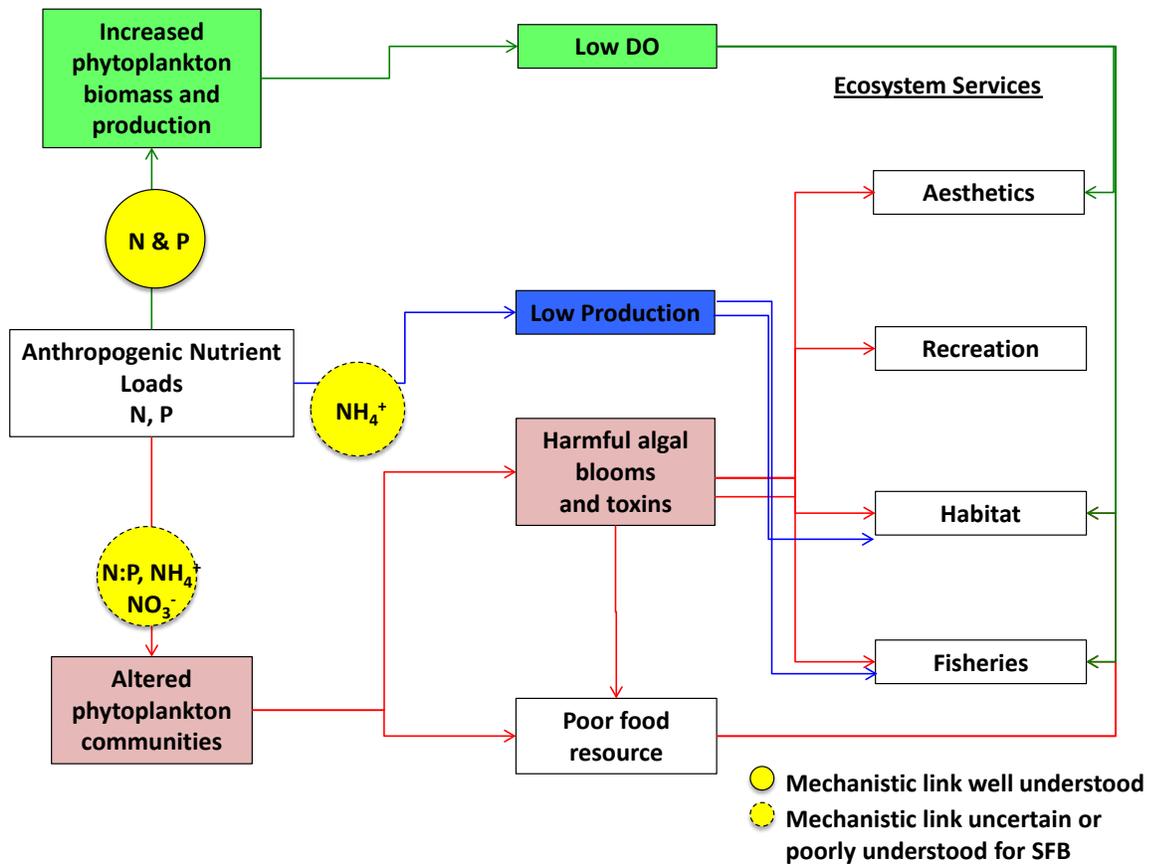
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507 The remainder of this section is devoted to analyzing the seven undesirable states and the role
 508 that the six condition indicators can play in assessing these undesirable conditions.

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513 **Figure 3.2 Potential adverse impact pathways: linkages between anthropogenic nutrient loads and**
 514 **adverse ecosystem response. The shaded rectangles represent indicators that are recommended**
 515 **for measurement along each pathway to assess condition. From SFEI 2014b).**

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518

519 **Table 3.2 Plausible undesirable states and link to beneficial uses (adapted from SFEI 2014b).**

Undesirable State (S)	Rationale or Link to Beneficial Uses
<p>S1. High Phytoplankton Biomass and Productivity High phytoplankton biomass and productivity of sufficient magnitude, duration, and spatial extent that it impairs beneficial uses due to direct or indirect effects (S2-S3). This could occur in deep subtidal or in shallow subtidal areas.</p>	<p>Direct effects on noncontact water recreation (REC2) due to aesthetics via odors and surface scum. Other main concern is through increased organic matter accumulation causing low dissolved oxygen (S2-S3) and proliferation of pathogenic bacteria, leading to degraded contact and noncontact water recreation (REC1 and REC2).</p>
<p>S2 and S3. Low Dissolved Oxygen <i>Deep subtidal:</i> Low DO in deep subtidal areas of the Bay, over a large enough area and below some threshold for a long enough period of time that beneficial uses are adversely affected. <i>Shallow/margin habitats:</i> DO in shallow/margin habitats below some threshold, and beyond what would be considered “natural” for that habitat, for a period of time that it impairs beneficial uses.</p>	<p>Fish kills, die-off of beneficial benthos, loss of critical habitat that result in lowered survival or spawning/reproductive success or recruitment success of fish and beneficial benthos. These consequences directly affects EST, RARE, etc. beneficial uses.</p>
<p>S4. HAB Abundance and Algal Toxins <i>HABs and toxins:</i> Occurrence of HABs and/or related toxins at sufficient frequency or magnitude of events that habitats reach an impaired state, either in the source areas or in areas to which toxins are transported. <i>NABs:</i> Occurrence of nuisance algal blooms with sufficient frequency and magnitude that they impair beneficial uses; for example, similar to the red tide bloom in Spring 2004</p>	<p><i>HABs and toxins:</i> Passive or active uptake of toxins, or ingestion of HAB-forming species and accumulation of toxins. Ingestion of bioaccumulated toxins is harmful to both wildlife and humans through consumption of toxins via shellfish or fish. Skin contact and inhalation can also be problematic. <i>NABs:</i> Some species are considered HABs for reasons other than toxins (e.g., directly impairing biota at very high levels, e.g., coating fish gills, birds wings, rapid biomass production leading to low DO). Impaired aesthetics, surface scums, discoloration, odors. These adverse effects directly impact EST, WILD, SHELL, RARE, and COMM beneficial uses.</p>
<p>S5. Low Phytoplankton Biomass and Productivity Low phytoplankton biomass in Suisun Bay or other habitats due to elevated NH_4^+, which would exacerbate food supply issues.</p>	<p>Suisun Bay is considered a food limited system, and low levels of phytoplankton biomass and productivity may contribute to impairment in this highly altered system. These adverse effects directly impact EST, SHELL, RARE, and COMM beneficial uses.</p>
<p>S6. Suboptimal Phytoplankton Assemblages that Impact Food Quality Nutrient-related shifts in phytoplankton community composition, or changes in the composition of individual cells (N:P), that result in decreased phytoplankton food quality, and have cascading effects up the food web.</p> <p>S7. Other Nutrient-Related Impacts Other direct or indirect nutrient-related effects that alter habitat or food web structure at higher trophic levels by other pathways. Several additional nutrient-related impacts on food webs in the northern estuary have been proposed that are not captured by S1-S6.</p>	<p>Phytoplankton primary production is the primary food resource supporting food webs in SFB. Changes in the dominant assemblages and their relative size fractions would impact food quality. These adverse effects directly impact EST, SHELL, RARE, and COMM beneficial uses.</p>

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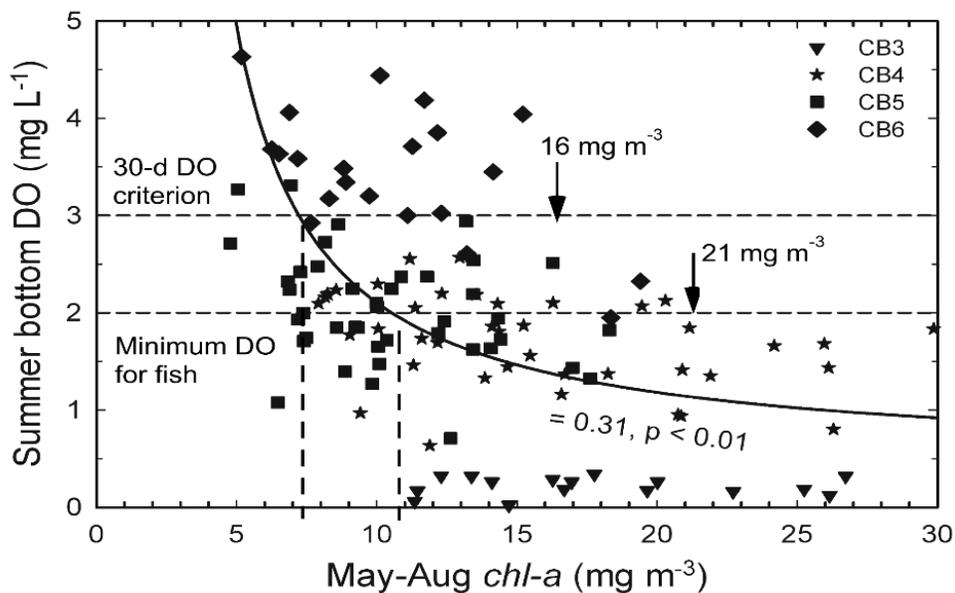
522 **High phytoplankton biomass and primary productivity** (S1, Table 3.2) can have direct effects
523 on REC2 in SFB via nuisance scums and odors.

524

525 However, among the most common and problematic impairments due to high phytoplankton
526 biomass is **low dissolved oxygen** (S2 and S3, Table 3.2) in subtidal areas that results through
527 metabolism of phytoplankton-derived organic matter by oxygen-consuming microorganisms
528 (e.g., Figure 3.3). Because aquatic organisms rely on DO for survival, growth and reproduction,
529 the consequences of sub-optimal DO in SFB include die-offs or low production of fish and
530 benthos and loss of critical habitat due to lowered survival or spawning/reproductive success or
531 recruitment success (Figures 3.4). These adverse effects directly impact EST, SHELL, RARE,
532 and COMM beneficial uses.

533

534



535

536 **Figure 3.3. Example of dissolved oxygen as a function of chlorophyll-a in Chesapeake Bay. From**
537 **Harding et al. 2013. Scientific bases for numerical chlorophyll criteria in Chesapeake Bay.**
538 ***Estuaries and Coasts* doi:10.1007/s12237-013-9656-6**

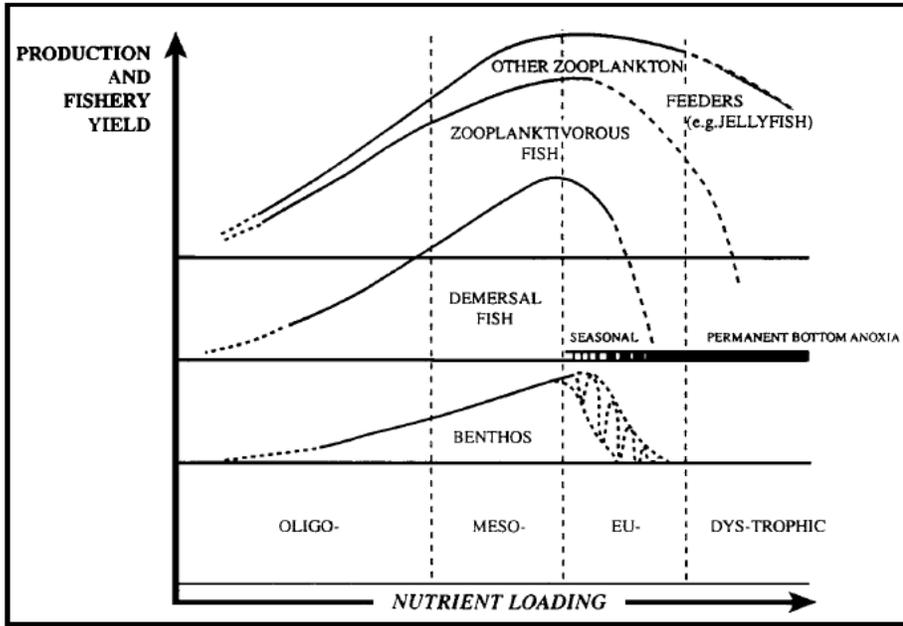
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541 Elevated nutrient concentrations, or changes in relative abundance of nutrient forms, could
542 increase the frequency with which **harmful algal blooms (HAB) and algal toxins** (S4, Table
543 3.2) occur, including abundance, duration, and spatial extent. Algal toxins, such as microcystin
544 and domoic acid, bioaccumulate and can exert toxicity to consumers at all levels of the food web,
545 including humans. Some HAB exudates also exert direct toxicity (e.g., skin contact). High
546 nutrient loads may also increase the frequency of so-called nuisance algal blooms (NABs), which
547 are not toxic but may degrade aesthetics due to surface scums or odors. Elevated phytoplankton
548 biomass is typically correlated with increased probability of HABs (and NABs) and toxins (e.g.,
549 Figure 3.5).

550

551



552

553 **Figure 3.4. Comparative evaluation of fishery response to nutrients along continuum of**
 554 **oligotrophic, mesotrophic, eutrophic and dystrophic states of primary productivity (Nixon 1995).**
 555 **Although higher nutrient inputs initially increase the productivity of fisheries, ecological systems**
 556 **worldwide show negative effects as nutrient loading increases and hypoxic or anoxic conditions**
 557 **develop. Each generic curve in the lower half of the figure represents the reaction of a species**
 558 **guild to increasing nutrient supplies. From Diaz and Solow (1995).**

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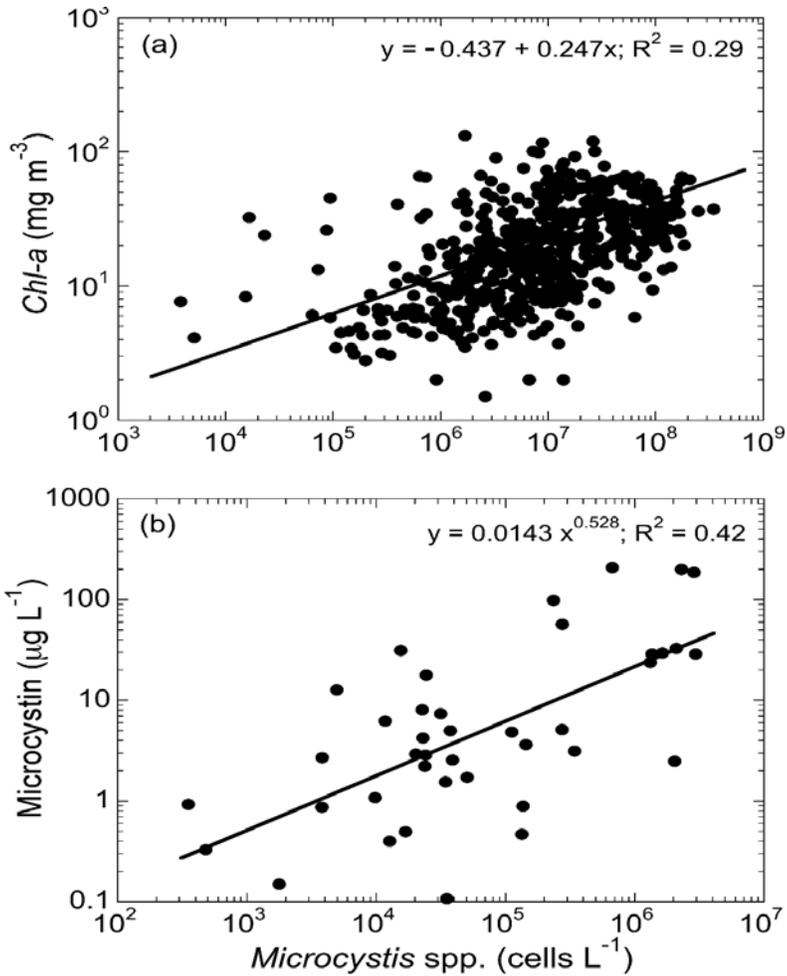
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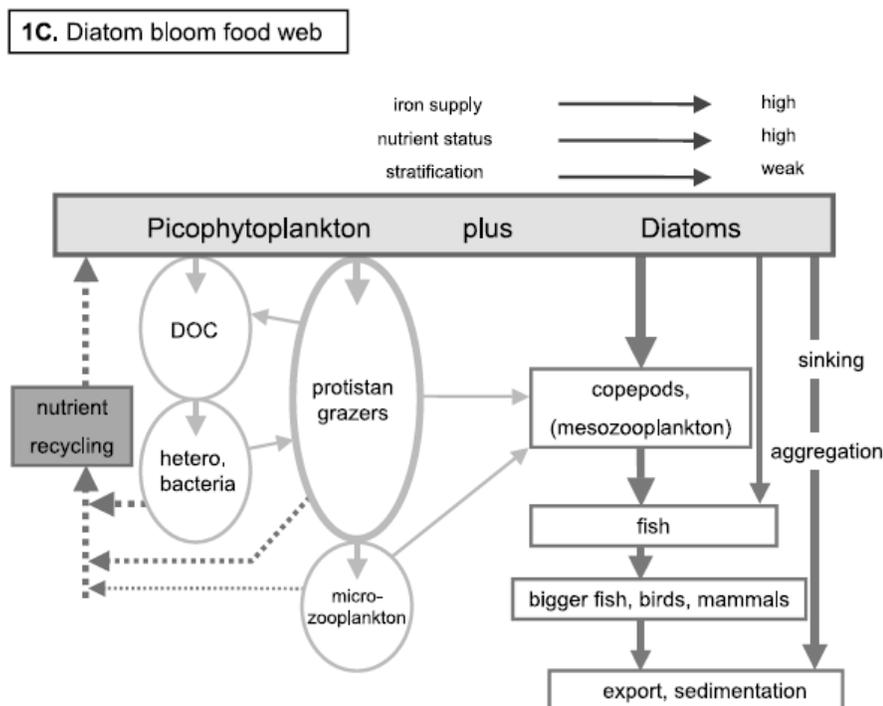
600 **Figure 3.5. Example of relationships between chlorophyll-a, cyanobacteria *Microcystis* spp.**
601 **abundance, and toxin concentrations, From L. W. Harding et al. 2013. Scientific bases for**
602 **numerical chlorophyll criteria in Chesapeake Bay. *Estuaries and Coasts* doi:10.1007/s12237-013-**
603 **9656-6**

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A number of factors can lead to **low phytoplankton biomass and productivity** (S5, Table 3.2) and **suboptimal phytoplankton assemblages that impact food quality** (S6, Table 3.2), a phenomenon marked by a shift in phytoplankton community composition away from assemblages found under minimally disturbed conditions, toward smaller, suboptimal compositions that do not adequately sustain organisms at higher trophic levels.

611 Two metrics have been discussed for measuring adverse changes to phytoplankton communities:
612

- 613 1) **Fraction of small-sized phytoplankton:** Fisheries yields are correlated to phytoplankton
614 biomass (e.g., biovolume) and primary productivity (Friedland et al. 2012; Figure 3.6).
615 When the portion of picophytoplankton (< 5 microns) grows, the result is a comparatively
616 lower trophic transfer of energy and carbon up the food web (e.g., Figure 3.6) than is seen
617 with other phytoplankton, which results in lower fisheries yields.



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Figure 3.6. Example of a marine food web showing the complex pico-phytoplankton and diatom food web structure in diatom-dominated blooms. For simplicity, the regeneration paths are shown only on the left side of the figure (Source: Barber and Hisock 2006).

622

- 2) **Index of phytoplankton food quality:** This index utilizes data on phytoplankton composition to characterize the “food quality” that phytoplankton represent in supporting productivity of upper trophic levels. This is a key pathway to link phytoplankton composition to beneficial uses, such as commercial and recreationally important fisheries (i.e., EST, COMM, RARE). The concept of a phytoplankton food quality index is based on laboratory experiments showing that growth efficiency of crustacean zooplankton is highest when they are fed algae enriched in highly unsaturated fatty acids (cryptomonads and diatoms), and lowest when fed algae poor in these essential fatty acids (e.g., cyanobacteria; Brett and Müller-Navarra 1997).

632

Based on Galloway and Winder (2015), the fatty-acid food quality index (FQI) can be computed from the average composition of long chained essential fatty acids (LCEFA) at the algal taxonomic group level (Park et al. 2003, Galloway and Winder 2015).

636

The scale of the index (0–1; Equation 1) is defined by calculating the relative quality of each algal group (AG_i) compared to the maximal LCEFA content of all AG:

639

$$\text{Equation 1. } \text{FQI} = \text{AG}_{\text{cy}} \cdot \text{P}_{\text{cy}} + \text{AG}_{\text{gr}} \cdot \text{P}_{\text{gr}} + \text{AG}_{\text{di}} \cdot \text{P}_{\text{di}} + \text{AG}_{\text{cr}} \cdot \text{P}_{\text{cr}}$$

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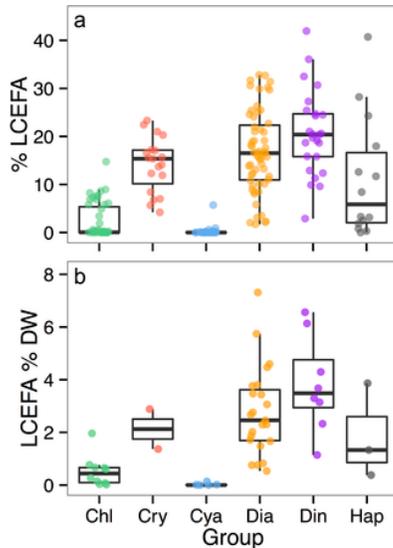
where the FQI is the biovolume weighted average of the AG_i for each individual group, and P_{cy}, P_{gr}, P_{di}, and P_{cr} are the proportions of phytoplankton biovolume in a sample contributed by cyanobacteria, green algae, diatoms, and cryptomonads. Figure 3.7 shows

641

642

643

644 the separation in AGi by phytoplankton taxonomic group. The concept has recently been
645 applied to phytoplankton composition data collected by the USGS in the Lower
646 Sacramento River through Suisun Bay from 1992 to 2014 (Cloern et al. 2015).
647



648
649 **Figure 3.7. From Galloway and Winder 2015. Boxplots of species averages of Σ long-chain**
650 **essential fatty acids (LCEFA) in six major phytoplankton groups. (a) Shows the percent**
651 **total fatty acids (% FA) dataset, consisting of 208 averages from 666 raw profiles. (b)**
652 **Shows the percentage of algal dry weight (FA % DW) dataset, consisting of 55 averages**
653 **from 105 raw profiles. Group name abbreviations follow Fig 1. The heavy line is the**
654 **median, box boundaries are the 25th and 75th percentiles, and whiskers extend to the**
655 **most extreme value within 1.5*IQR (interquartile range). The y-axis is set to show the**
656 **extent of whiskers; thus, some extreme outliers are not plotted (outliers were included in**
657 **calculation of average group LCEFA).**

658
659
660 We propose that a number of metrics for phytoplankton community composition be deployed in
661 routine assessments of SFB. In addition to tracking HAB abundance and toxin concentrations,
662 phytoplankton metrics should be developed with the intent to create classification schemes in the
663 future, if warranted, as these metrics (in combination with chlorophyll-a and GPP, discussed in
664 more depth in Section 3.2) can give a more robust understanding of SFB condition and
665 ecological change.
666

667 One final note: Nutrient forms and ratios are not explicitly considered as metrics within the
668 present AF, although they will most certainly be included within the framework of monitoring
669 and mechanistic modeling. The reason is that while several authors have hypothesized that high
670 nutrient concentrations, elevated NH_4^+ , or altered N:P are currently adversely impacting food
671 webs in SFB (Table 3.1, S6; Dugdale et al., 2007; Parker et al., 2012a,b; Dugdale et al., 2012),
672 scientific consensus is lacking on the importance of these hypothesized pathways relative to
673 other controls on phytoplankton production and community composition.
674

675 **3.2 Protocols, Temporal and Spatial Frequency Recommended for Measurement**
 676 **of Key Indicators**
 677

678 An important attribute of an AF is clarity in the methods used to measure the indicators, as well
 679 as the temporal and spatial frequency in which they should be measured in order to make an
 680 assessment. Table 3.3 provides a list of six key indicators and the specific analytes associated
 681 with each. This table is not inclusive of the longer list of parameters required for data
 682 interpretation or for other Nutrient Strategy program elements. The SFB Monitoring Strategy
 683 (SFEI 2014c) provides a more comprehensive picture of those data needs, as well as specific
 684 recommendations on protocols for measurement of key indicators.
 685

686 DO and metrics of phytoplankton quantity and quality are the two principal groups of indicators
 687 proposed for the SFB nutrient AF. The Water Board’s basin plan already contains numeric
 688 objectives for DO, and Water Board staff has expressed interest in reviewing the existing DO
 689 objectives.
 690

691 **Table 3.3 Recommended indicators, analytes and basis for classification scheme.**
 692

Indicator	Analyte	Basis for Classification Scheme
Dissolved oxygen	Dissolved oxygen as % saturation and concentration	SF Water Board Basin Plan (2016)
Phytoplankton biomass	Water column chlorophyll-a	Analysis of existing data (Appendix C)
Depth integrated, annual gross and net primary production	Chlorophyll-a, photic depth and surface irradiance, recalibrated on a frequency to be determined by direct measures of GPP (per Cole and Cloern 1984)	Nixon (1995)
HABs abundance (Alexandrium spp, cyanobacteria ¹ , Pseudo-nitzschia spp., Dinophysis spp.)	Genus and/or species cell counts and biovolume	Existing state, federal or international guidance—Appendix C for specifics by HAB species
HAB toxin concentrations		Existing state, federal or international guidance
Phytoplankton composition	Genus and/or species cell counts	
	% of Biovolume < 0.5 microns	No classification scheme proposed.
	Phytoplankton Food Quality Index (Galloway and Winder 2015)	

693
 694 ¹ Cyanobacteria of interest include, but are not limited to, *Cylindrospermopsis* spp., *Anabaena* spp., *Microcystis* spp., *Planktothrix*
 695 spp., *Anabaenopsis* spp., *Aphanizomenon* spp., *Lyngbya* spp., *Raphidiopsis* spp., *Oscillatoria* spp., and *Umezakia* spp.
 696

697 Review of the science supporting SFB DO objectives is beyond the scope of this initial phase of
698 AF development. Thus, the present recommendations focus on phytoplankton indicators.

699
700 Until further work is undertaken to consider and refine DO objectives and/or optimize sampling,
701 assessments of DO are assumed to occur at the same frequency and location as those for the
702 phytoplankton indicators.

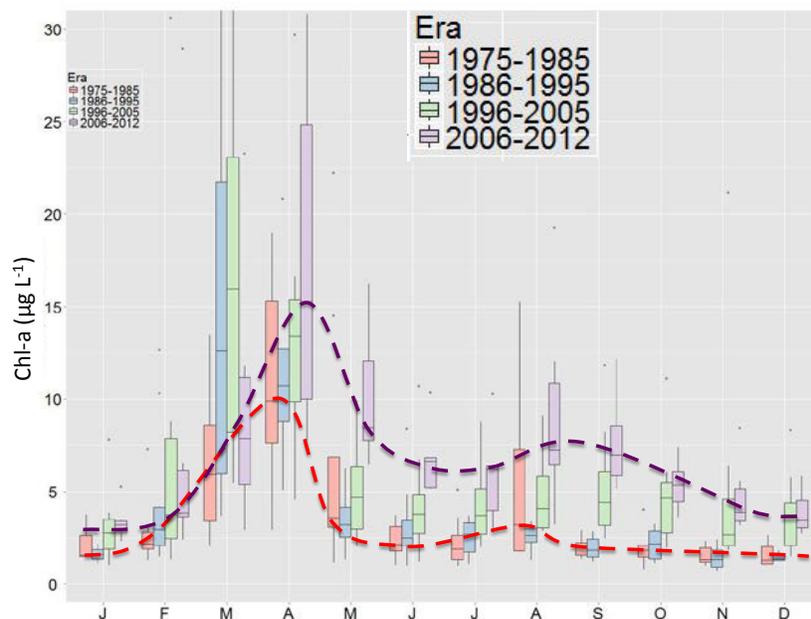
703
704 Because dissolved oxygen, phytoplankton biomass, productivity and phytoplankton composition
705 are all extremely variable across both time and space, the following two sections outline
706 recommendations regarding the temporal and spatial elements of the AF and how to align them
707 with the monitoring program to optimize capturing this variability, while also balancing costs,
708 logistics and power to detect trends.

709 710 Temporal Scales of Interest and Recommended Frequency

711 For phytoplankton indicators, four temporal components are of interest for documenting
712 ecosystem change (Figures 3.8 and 3.9):

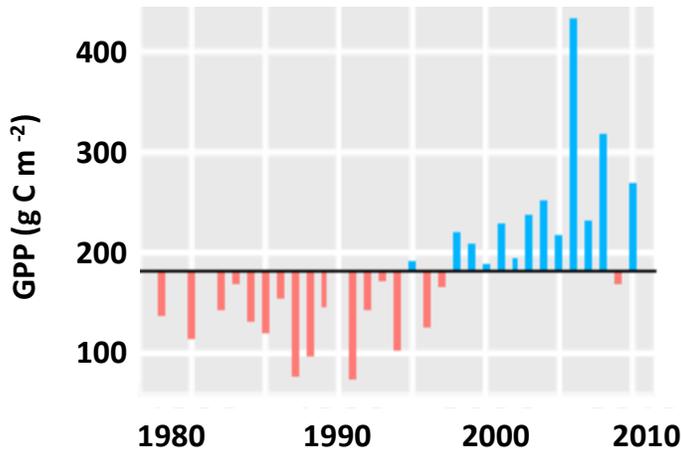
- 713 • Magnitude of spring blooms
- 714 • Emergence and magnitude of fall blooms
- 715 • Elevated baseline occurring during non-blooms periods (typically during June-September)
- 716 • Interannual variability and trends

717



718

719 **Figure 3.8. 10-year rolling average chlorophyll-a by month of the year in Lower South Bay,**
720 **illustrating the four elements of interest in phytoplankton variability: (1) spring bloom, (2) fall**
721 **bloom, (3) elevated baseline during non-bloom periods, and (4) interannual variability. Source:**
722 **Jim Cloern, USGS**



723

724 **Figure 3.9. Trends in estimated annual GPP over time. From Cloern and Jassby (2012). Drivers of**
 725 **change in estuarine-coastal ecosystems: discoveries from four decades of study in San Francisco**
 726 **Bay. Rev. Geophys., 50, RG4001, doi:10.1029/2012RG000397.**

727

728 Considering this variability, we recommend a sampling frequency of no less than monthly via
 729 ship-based sampling, with weekly sampling possible in order to better characterize bloom events.
 730

731

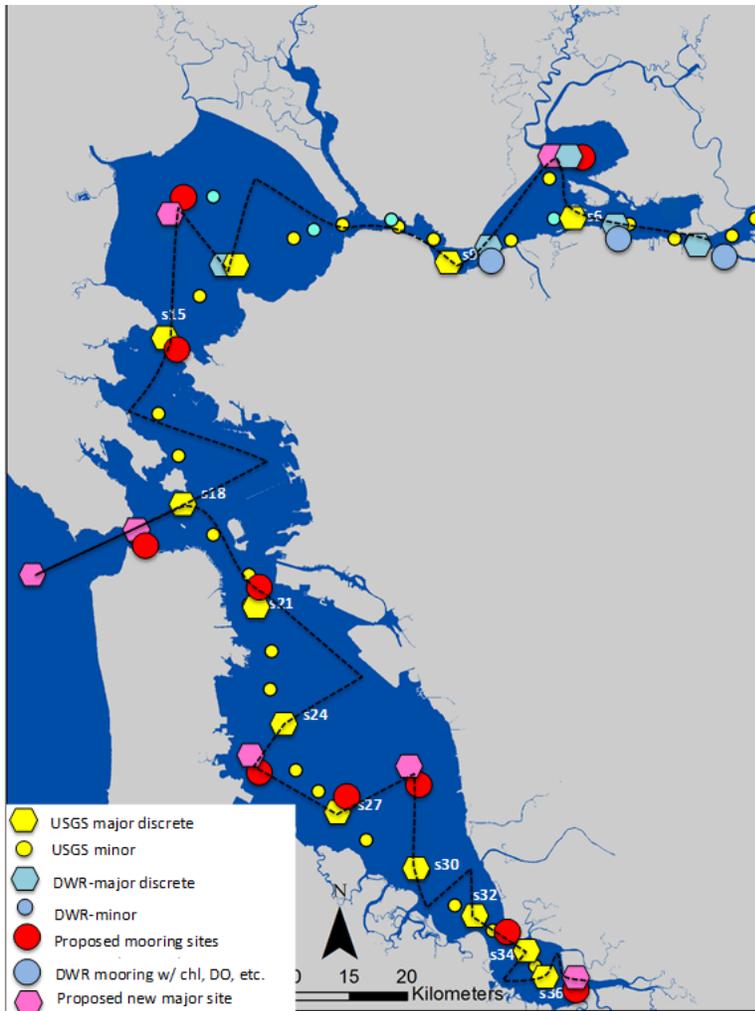
732

Spatial Elements and Minimum Recommended Density

733 To adequately capture spatial gradients, we recommend sampling that encompasses (1) the SFB
 734 subembayments defined by Jassby et al. (1997), (2) both deep-channel parts and shallow parts of
 735 the Bay, (3) vertical gradients in the water column, either as grabs with depth or conductivity-
 736 temperature-depth (CTD) profiles, and (4) both the upstream, oceanic boundary conditions, as
 737 well as other potential “seed” sources of HABs, e.g., salt ponds.
 738

739

740 We used best professional judgment to recommend preliminary placement of ship-based
 741 transects, water quality stations and moorings by subembayment (Figure 3.10). These locations
 742 should be considered provisional, subject to funding availability and optimization in concert with
 743 other nutrient strategy components that require monitoring (e.g., model development, etc.).
 744 Locations of historic USGS stations are preserved to maintain continuity of the long-term data
 745 set. Additional stations were added while balancing the logistics and cost of ship-based
 746 sampling. No stations are placed in tidal sloughs and restored salt ponds; consideration of
 747 monitoring in these habitats should be undertaken in a subsequent phase of AF development.
 748 Additional data analyses have been recommended to optimize the placement of stations (Senn et
 al. 2014).



749
750

751 **Figure 3.10. Recommendation of sampling stations representing minimum effort needed to**
 752 **support ambient nutrient assessment of SFB subembayments. Locations should be considered**
 753 **provisional, subject to funding availability and optimization in concert with other nutrient strategy**
 754 **components that require monitoring (e.g., model development, etc.).**

755

756 **3.3 Proposed AF Classification Tables, Justification, and Sources of Uncertainty**

757 As noted above, we have proposed classification frameworks for five of the six indicators of SFB
 758 ecological condition: phytoplankton biomass (chlorophyll-a), gross primary productivity, HABs
 759 abundance, HABs toxins, and dissolved oxygen (Table 3.3).

760

761 For the sixth indicator – phytoplankton community composition – we explored two metrics that
 762 could be used to assess adverse changes (Section 3.1), and also made recommendations
 763 regarding temporal and spatial considerations (Section 3.2), but are stopping short of proposing a
 764 classification table for phytoplankton community composition.

765

766 Among the other five indicators, dissolved oxygen already has a classification table in use in
767 SFB, and we recommend that the next step be a review of the need to refine the Basin Plan DO
768 objectives (Section 3.2).

769
770 Our approach to developing classification tables for the four remaining indicators consisted of
771 separating Bay subembayments into categorical bins of ecological condition, from high to low,
772 based on indicators that are linked to ecosystem services (i.e., beneficial uses). An intent was
773 made to be as explicit as possible on the precise metrics used to measure the indicators, as well
774 as the temporal and spatial density of data required to make assessments and to specify how the
775 data would be used to report on status and trends.

776
777 Existing guidance and the results of the quantitative analyses were synthesized, using expert
778 opinion, into a classification scheme to assess ecological condition for multiple subembayments
779 of SFB for each of the four indicators. For each indicator, a scheme was developed to parse SFB
780 subembayments into a maximum of five ecological condition states (very high, high, moderate,
781 low, very low), analogous to ecological condition frameworks developed for the European Union
782 Water Framework Directive (Zaldivar et al. 2008). Existing guidance and quantitative analyses
783 were used to inform the “thresholds” that define the range of values within each bin.

784
785 For most indicators, guidance exists in the form of established WQOs, state, federal or
786 international guidance, or published studies that form the scientific foundation for their use in a
787 classification scheme. For chlorophyll-a, we lacked confidence that an expert-derived existing
788 guidance developed for estuaries around the world (e.g., Zaldivar et al. 2008) could be applied,
789 without question, to SFB. For this reason, analyses of existing data were used to investigate the
790 linkage between chlorophyll-a and potential pathways of impairment, detailed in Appendix C.
791 Quantitative analyses and existing published guidance were supplemented by best professional
792 judgment to address key data gaps and describe uncertainty and level of confidence in the
793 classification.

794
795 For the purpose of reporting on status and trends, we recommend that classification occurs
796 annually by subembayment, thus characterizing the spatial extent if the results are viewed on the
797 whole for SFB or for each subembayment. The AF was designed to be applied using a data set
798 that includes a minimum of monthly, ship-based discrete samples and CTD profiles, with spatial
799 resolution given in Figure 3.10 (Senn et al. 2014a).

800
801 The following sections describe development of classification tables for each of the four
802 indicators: phytoplankton biomass (chlorophyll-a), gross primary productivity, HABs
803 abundance, and HABs toxins (the two HABs indicators are merged into one section). The final
804 section offers recommendations regarding the future of indicator development work for
805 dissolved oxygen.

806 807 **Phytoplankton Biomass (Chlorophyll-a)**

808 Chlorophyll-a has formed a cornerstone of standardized approaches to assess eutrophication
809 (Bricker et al., 2003, Zaldivar et al. 2008) and to support regulatory water-quality goals in
810 estuaries (Harding et al., 2013) because it is a well-recognized indicator that integrates nutrient
811 loadings and represents adverse effects to ecosystems. Decisions based on quantitative endpoints

812 can be based on deviations from “reference” conditions, or on quantitative relationships with
813 ecosystem impairments (e.g., Harding et al. 2013). In SFB, records of chlorophyll-a prior to
814 human disturbance are not available, complicating development of reference chlorophyll-a
815 ranges. An extensive, multi-decadal dataset is available to explore quantitative relationships
816 between chlorophyll-a and potential pathways of adverse effects, as a means for establishing
817 chlorophyll-a endpoints.

818
819 We analyzed a multi-year dataset that included chlorophyll-a (1993-2014), phytoplankton
820 species composition (1993-2014), DO (1993-2014), and algal toxins (2012-2014) to (1) explore
821 trends in HAB abundance, toxins, and DO concentrations and their relationships with
822 chlorophyll-a, and (2) quantify chlorophyll-a thresholds and related uncertainty that correspond
823 to categories of “protected” and “at risk” in the context of current DO WQOs and HAB alert
824 levels. Quantile regression and conditional probability analysis were used to identify thresholds
825 of chlorophyll-a, corresponding to categories of increasing risk in the context of current DO
826 WQOs (SFRWQCB 2015) and HAB alert levels (Appendix C).

827
828 We found that HAB toxins and species can be routinely detected in SFB subembayments.
829 Increased occurrences of HAB species and declining DO were correlated with increased
830 chlorophyll-a over the 20-year period. Monthly chlorophyll-a “thresholds” corresponding to
831 increased risk of HABs were identified, aggregating across all subembayments. The analyses
832 were also sufficiently robust to estimate chlorophyll-a thresholds relating to DO for South Bay
833 and Lower South Bay. Taken together, these analyses were used to support a preliminary set of
834 chlorophyll-a assessment thresholds aimed at defining a gradient of ecological condition (from
835 low to high risk) for increased HAB events and low DO in SFB subembayments.

836
837 Classification of chlorophyll-a linked to HABs is based on a monthly timescale because the HAB
838 alert guidance is based on acute risk. In contrast, classification based on the linkage to dissolved
839 oxygen was based on the mean concentration of monthly values from February to September, the
840 time period in which biomass has been observed to be changing over the last two decades in
841 SFB. This difference in temporal statistic reflects a more contemporaneous linkage between
842 chlorophyll-a and HABs, as compared to the lagged response of organic matter production and
843 the eventual increased potential for DO depletion. For DO, the differences in classification by
844 subembayment reflect regional differences in hydrogeographic factors affecting DO dynamics.

845
846 **Classification of Chlorophyll-a Linked to HABs.** Categorization of monthly mean chlorophyll-
847 a is directly linked to the outcome of quantile regressions and CPA relating the acute risk of
848 HABs as a function of increased chlorophyll-a (Table 3.4, Appendix C: Figures 6-8). The highest
849 category of ecological condition is defined by monthly mean chlorophyll-a values $< 13 \text{ mg m}^{-3}$,
850 which represents a baseline probability of ~0.39 to 0.4 for HAB abundance and ~0.3 for domoic
851 acid and microcystins. Ecological condition is downgraded as monthly values in the range of 13-
852 25 mg m^{-3} show increased probabilities of exceeding HAB alert values to up to 0.44 for HAB
853 abundance and 0.6 or greater for toxins. Chlorophyll-a concentrations in the range of 40 mg m^{-3}
854 represent a 0.5 to 0.68 probability of a HAB event; while there are only two data points for
855 toxins between $20\text{-}60 \text{ mg m}^{-3}$, the CPA suggests a probability of 0.6-0.7 within this range of
856 chlorophyll. Occurrence of HABs on a more frequent basis represents a potentially chronic

857 exposure to toxins (e.g. Ger et al. 2009; Goldstein et al. 2008), and thus, condition is downgraded
 858 as the annual frequency of occurrence in monthly samples increases (Table 3.4).
 859

860 For context, on a Bay-wide scale, 13 mg m⁻³ corresponds to the 90th percentile of monthly
 861 surface chlorophyll-a over the last 20 years. On a sub-embayment scale, Central, North Central,
 862 San Pablo and Suisun Bay stations were below 13 mg m⁻³ for greater than 95% of the time over
 863 the last 20 years. The range of chlorophyll-a at Lower South Bay and South Bay stations was
 864 slightly higher. The ranges were below 13 mg m⁻³ 74% and 85% of the time, respectively, in
 865 Lower South Bay and South Bay, and below 25 mg m⁻³ 88% and 93% of the time, respectively
 866 (Figure S3, supplemental materials in Appendix C).
 867

868 **Table 3.4. Chlorophyll-a Classification Table Linked to HAB Abundance, Based on Annual**
 869 **Frequency of Occurrence in Monthly Samples. Classification should be applied to each**
 870 **subembayment.**
 871

Subembayment Monthly Mean Chlorophyll-a Linked to HAB Abundance (µg L ⁻¹)	Ecological Condition Based on Annual Frequency of Occurrence in Monthly Samples			
	1 of 12	2-3	4-6	6+
≤ 13	Very high	Very high	Very high	Very high
>13 – 25	Good	Moderate	Moderate	Low
>25 – 40	Moderate	Moderate	Low	Very Low
>40 – 60	Moderate	Low	Very Low	Very Low
>60	Low	Very low	Very low	Very low

872
 873 **Classification of Chlorophyll-a Linked to DO.** While chlorophyll-a was negatively correlated
 874 with DO in all subembayments, only in South Bay and Lower South Bay were these
 875 relationships consistently significant to quantify thresholds supporting classification decisions.
 876 Conceptually, the mechanism resulting in an expected negative relationship between summer DO
 877 and February-September mean chlorophyll-a is that high primary production during this time
 878 scale is expected to promote increased abundance of planktonic and benthic detritus, which
 879 during summer leads to an increasing probability of net ecosystem heterotrophy (Caffrey 2003).
 880 In some areas of San Francisco Bay, and at some times in all subembayments of the Bay,
 881 biological effects on DO are dominated by physical processes such as fluvial transport,
 882 stormwater and treated wastewater inputs, water exchange between subembayments, and mixing
 883 or exchange between habitats within a subembayments (Smith and Hollibaugh, 2006). The
 884 modulating factors are generally very important in both Central and Suisun Bays, which are most
 885 proximal to and have greater exchange with the coastal ocean and the Delta, respectively. It may
 886 still be possible to establish chlorophyll-a thresholds at which DO will begin to decline to
 887 unacceptable levels in the Central and North SFB subembayments, using other modeling
 888 approaches than what was employed by Sutula et al. (in prep, Appendix C).
 889

890 In developing a chlorophyll-a classification scheme linked to DO for South and Lower South
 891 Bays, we relied principally on the predicted chlorophyll-a thresholds produced from quantile
 892 regressions of DO concentration that represent a range of ecological condition, from 7 to 4 mg L⁻¹

893 ¹ (Table 3.4, Appendix C: Tables 1-2). We note that the three-month median percent saturation
 894 WQO of > 80% is ~ 7 mg L⁻¹ at summertime mean temperature and salinity in South SFB.
 895 According to the proposed European Union Water Framework Directive (EU WFD) for
 896 classification of estuarine waters based on DO (Best et al. 2007), 5.7 mg L⁻¹ at marine salinities
 897 is equivalent to 7 mg L⁻¹ in freshwater criteria, with chronic values considered to be supportive
 898 of salmonid reproduction and survival, which is not a designated use in South SFB. Thus, the
 899 “very high” tier of 7.0 mg L⁻¹ is roughly equivalent to meeting the three-month median percent
 900 saturation objective, while the “moderate” condition category has 90% probability that the 5 mg
 901 L⁻¹ concentration objective would be met (Table 3.5). This approach is comparable, though with
 902 higher expectations, than is used in Best et al. (2007). Without specific analyses that clarify the
 903 seasonal and habitat-specific DO acute and chronic criteria required to support beneficial uses,
 904 we have more heavily weighted our DO classification bins to align with existing SFB WQOs.
 905 We used the lower 95% confidence interval of the predicted 0.1 Tau quantile of February to
 906 September mean chlorophyll-a (Sutula et al., in prep, Appendix C) as the basis for the
 907 classification bin, because it gives greater confidence that chlorophyll-a falls above the predicted
 908 lower end of the classification bin.

909
 910 **Table 3.5. Chlorophyll-a Classification Table Based on Risk of Falling Below DO Water Quality**
 911 **Objectives, Based on Annual February-September Mean Chlorophyll-a, for South Bay and Lower**
 912 **South Bay only.**

Classification of ecological condition based on mean February - September chlorophyll-a (mg m ⁻³) linked DO benchmarks - South Bay and Lower South Bay Only		
Category	Lower South Bay	South Bay
Very high)	≤23	≤14
High		>25 - 32
Moderate	>23 - 35	>32 - 44
Low	>35 - 51	>44 - 58
Very Low	>51	>58

914
 915 In South Bay, quantile regression results provided in Appendix C suggest that a February to
 916 September mean chlorophyll-a of 13-16 mg m⁻³ is “protective” of the three-month median DO
 917 percent saturation WQO (80% or ~7 mg L⁻¹ at summertime mean temperature and salinity in
 918 South SFB). At a February-September mean of 13 mg m⁻³, 90% of the DO is predicted to be
 919 above 7 mg L⁻¹, while at 42 mg m⁻³, 90% of the DO is predicted to be above 5.0 mg L⁻¹
 920 (Appendix C: Table 2). Ninety-five percent of the February-September mean chlorophyll-a
 921 measured at South Bay sites over the 20-year record is below 14 mg m⁻³ (Appendix C: Figure
 922 A4), reflecting the fact that primary production in combination with physics in the deep channel
 923 habitat of South Bay promotes largely normoxic conditions – greatly improved from the periods
 924 of hypoxia recorded prior to implementing advanced wastewater treatment in the 1970s (Cloern
 925 and Jassby, 2012). Uncertainty in this classification is low (see 95% confidence intervals,
 926 Appendix C: Table 2), given the significance of the quantile regression. However, we note that
 927 existing data were limited to ship-based data that do not capture a diel curve, contributing to
 928 uncertainty that existing relationship does not capture true DO minima. These analyses should be
 929 repeated with continuous DO data that better characterizes physical and biological exchanges

930 with the shallow water margin habitat. Such data do not exist and we recommend that they be
931 collected.

932

933 CPA and quantile regressions were also used to support a chlorophyll-a classification scheme for
934 Lower South Bay, albeit with more uncertainty than for South Bay. The reasons for this greater
935 uncertainty are two-fold. First, biological and physical exchanges between Lower South Bay and
936 the adjacent shallow margin habitats are unquantified. While CPA analyses could only be used to
937 suggest a threshold in which the subembayment is “at risk” of falling below the 80% percent
938 saturation WQO ($\sim 13 \text{ mg m}^{-3}$), neither CPA nor quantile regression could be used to derive a
939 chlorophyll-a value that would be “protective” of the percent saturation WQO. It is likely that an
940 additional source of DO water $< 80\%$ saturation (from either the tidal slough or restored salt
941 ponds) is exchanging with Lower South Bay deep channel habitat. These margin habitats have
942 been documented to routinely fall below 5 mg L^{-1} DO on diel timescales (Thebault et al, 2008;
943 Shellenbarger et al, 2008, SFEI 2014a). Considering that these intertidal habitats rich in organic
944 carbon may have natural sources of low DO water, the expectations for DO in these habitats and
945 their physical and biological exchanges with Lower South Bay need to be considered in setting
946 appropriate expectations for Lower South Bay deep channel habitat (Sutula et al. 2012, Bailey et
947 al. 2014). Second, it is noteworthy that while these data show that Lower South Bay is meeting
948 the 3-month median DO saturation objective only 72% of the time, it is above 5 mg L^{-1} 97% and
949 above 5.7 mg L^{-1} 90% of the time over the past 20 years, with 95% of the February to September
950 mean chlorophyll-a less than 25 mg m^{-3} . Best et al. (2007) have proposed $> 5.7 \text{ mg L}^{-1}$ as a
951 benchmark to represent the highest ecological condition category for estuaries assessed under the
952 European Union Water Framework Directive. Given this, it will be helpful to review the science
953 supporting existing DO WQOs in SFB specifically with respect to both deep water and shallow
954 margin habitats, as is currently being done for Suisun Marsh as part of development of a DO
955 TMDL (Bailey et al. 2014).

956

957 **Major Sources of Uncertainty in Chlorophyll-a Classification.** Overall, uncertainty exists in
958 this proposed chlorophyll-a classification framework and our ability to quantify that uncertainty
959 is constrained. Five major types of uncertainties exist in the chlorophyll-a framework linked to
960 HABs and DO impairment pathways: (1) significance of the ecological and human risk of HABs
961 in SFB, (2) linkage of chlorophyll-a to HAB cell counts, rather than toxin concentrations, as the
962 foundation for the risk paradigm; SPATT toxin data were used to supplement the analyses, but
963 the calibration of SPATT relative to particulate or mussel toxin tissues is still ongoing and
964 should be a continued management focus, (3) uncertainty in the risk to aquatic life, since the
965 HAB alert levels are focused on risk to human health rather than aquatic life, (4) uncertainty in
966 capturing risks of chronic exposure to HABs, stemming from the fact that alert levels are based
967 on acute toxin exposure, (5) the underlying mechanism of the correlation between February-
968 September chlorophyll-a and summer DO, and (6) appropriate DO expectations for shallow
969 water margins, tidal sloughs and intertidal wetland habitat, and portions of the SFB open water
970 habitat that are strongly linked to the margins (e.g. LSB).

971

972 Our classification tables for chlorophyll-a are somewhat distinct from the other indicators in that
973 they rely on relationships with other SFB attributes (e.g. HAB abundance and DO). We know
974 from other long-term observational programs that changes can also include shifts in the
975 efficiency with which nutrients are assimilated into algal biomass (Riemann et al. 2015). SFB’s

976 high nutrient concentrations imply a potential to produce phytoplankton biomass at levels that
977 impair water quality. To illustrate this point we computed median concentrations of dissolved
978 inorganic nitrogen (DIN) and chl-a across four subembayments of the estuary (Appendix C:
979 Table 3). We then computed potential chl-a as the sum of measured chl-a plus the quantity of
980 chl-a that could be produced if all remaining DIN was assimilated into phytoplankton biomass,
981 assuming a conversion factor of 1 g chl-a per mol N (Eppley et al. 1971). If this potential is
982 realized then the median chl-a concentrations in all Bay subembayments would increase by an
983 order of magnitude. Given the uncertainty in SFB's trajectory amidst global change, it is this
984 potential for high biomass production that motivates establishment of chl-a thresholds to support
985 nutrient management in SFB. Though we like to think of these relationships as fixed, in reality,
986 these chl-a thresholds can change as fundamental drivers such as oceanic exchange, top-down
987 grazing, light limitation, etc. that control the nature of the relationship between chl-a, HAB cell
988 density and DO can change with climate variability and climate change, (Cloern et al. 2014,
989 Riemann et al. 2015).

990
991 This point underscores the critical need to continuously reevaluate these relationships through a
992 long-term consistent monitoring program in SFB. A consistent monitoring program would go a
993 long way to reduce some of the remaining uncertainties in the existing data, given the large data
994 gaps and inconsistent available data between sites, for the analyses conducted here (Sutula et al,
995 (in prep), Appendix C).

996 997 **Gross and Net Primary Production**

998 Annual GPP is proposed as an AF indicator, to be measured via an empirical method utilizing
999 chlorophyll-a, photic depth, surface irradiance (per Cole and Cloern 1984), recalibrated with
1000 specified direct, discrete measures of GPP (e.g., Cloern et al. 2014). GPP is complementary to
1001 chlorophyll-a, which does not provide a direct measure of the internal supply rate of biological
1002 oxygen demand, nor the rate of turnover of phytoplankton carbon. Annual GPP would be
1003 assessed based on the identical temporal and spatial data collected to support chlorophyll-a.
1004

1005 Decisions on classification thresholds for GPP were based on Nixon (1995), who proposed
1006 definitions of the trophic state of estuaries as oligotrophic ($< 100 \text{ g C m}^{-2} \text{ yr}^{-1}$), mesotrophic
1007 ($100\text{-}300 \text{ g C m}^{-2} \text{ yr}^{-1}$), eutrophic ($>300\text{-}500 \text{ g C m}^{-2} \text{ yr}^{-1}$), and hypereutrophic ($> 500 \text{ g C m}^{-2} \text{ yr}^{-1}$).
1008 For the purposes of assessment of SFB subembayments, we collapsed these into three
1009 categories (Table 3.6). Hypereutrophic represents the boundary between moderate and low/very
1010 low ecological condition ($>500 \text{ g C m}^{-2} \text{ yr}^{-1}$). Oligotrophic and mesotrophic are combined into
1011 one category (very high/high ecological condition), expressly to avoid categorizing very low
1012 production values as indicative of very high ecological condition, since some level of production
1013 is considered important.

1014
1015 Nixon did not specify a method for measurement of GPP; Cloern et al. (2014) documented how
1016 differences among methodologies can have a large impact on estimated GPP. We propose
1017 confirming proposed GPP classification boundaries using the SFB water quality model, once
1018 calibrated for DO, in order to provide an additional confirmation of these proposed classification
1019 thresholds.

1020

1021 **Table 3.6. Gross Primary Productivity Classification Table Based on Annual Rate (g m⁻² yr⁻¹).**
 1022 **Classification should be applied to each subembayment.**
 1023

Category	Gross Primary Productivity (g m ⁻² yr ⁻¹)
Very high/High	≤300
Moderate	>300 - 500
Low/ Very Low	≥ 500

1024
 1025 **Major Sources of Uncertainty in Classification of GPP.** The greatest source of uncertainty in
 1026 the proposed GPP classification is the lumping of highly oligotrophic GPP into the highest
 1027 category. We acknowledge that, while it would be desirable to identify some level of GPP that is
 1028 too low, the Expert Workgroup felt that we did not have the scientific basis to determine at what
 1029 level that is. This remains a source of uncertainty in this classification. Another source of
 1030 uncertainty is the use of an indirect approach to estimate GPP. Although other sources of
 1031 uncertainty in estimates of GPP exist (e.g. short term pulses missed by monthly sampling
 1032 programs, Gallegos and Neele, 2015), we feel that if these indirect estimates are calibrated on a
 1033 frequent basis with direct measures, this uncertainty will be constrained.
 1034

1035 **HAB Abundance and Toxins**

1036 Classification of HAB cell counts and toxins is based on the assumption that values exceeding
 1037 thresholds or alert levels used in comparable systems (Table 3.7), or trends of increasing
 1038 occurrence, are evidence of reduced water quality. This is consistent with findings from the U.K.
 1039 Undesirable Disturbance Study Team (Tett et al. 2007) and is supported by recent syntheses
 1040 examining the relationship between HABs and coastal water quality (Heisler et al. 2008;
 1041 Anderson et al. 2008).
 1042

1043 **Table 3.7. Potential HABs from San Francisco Bay, and alert levels used in other regions.**

<i>Organism</i>	<i>Alert Level</i> (cells/L)	<i>Reference</i>
<i>Alexandrium spp.</i>	Presence	http://www.scotland.gov.uk/Publications/2011/03/16182005/37
<i>Blue-Green Algae</i>	100,000	WHO, 2003; California Guidance (OEHHA, 2012)
<i>Dinophysis spp.</i>	100-1,000	http://www.scotland.gov.uk/Publications/2011/03/16182005/37 ; Vlamis et al. 2014
<i>Heterosigma akashiwo</i>	500,000	Expert opinion
<i>Karenia mikimotoi</i>	500,000	Expert opinion
<i>Karlodinium veneticum</i>	500,000	Expert opinion
<i>Pseudo-nitzschia</i>	10,000-50,000	Cal-HABMAP ; Shumway et al. 1995; Anderson et al. 2009

1044
 1045 The classification scheme assumes data collection similar to the USGS monitoring program data
 1046 described above, and includes regular (monthly) monitoring of phytoplankton species and total

1047 (particulate and dissolved) toxin from the top 2 m of the water column using grab samples,
1048 deployment of SPATT or similar integrative samplers as part of Bay-wide surveys, and targeted
1049 collection of tissue samples from bivalves and marine mammals. For the assessment, the expert
1050 working group assumed maximum toxin concentration and maximum cell abundance by Bay
1051 subembayment would be used as a metric because of the potential risk to human and ecosystem
1052 health, and the likelihood of undersampling given the relatively coarse temporal and spatial
1053 scales. As with the classification scheme for chlorophyll-and DO, we consider this initial set of
1054 recommendations to be hypotheses that should undergo further testing and refinement when
1055 more data are available.

1056
1057 **Classification of HAB Toxins.** Guidance for toxins is currently restricted to domoic acid,
1058 microcystins, and paralytic shellfish toxins (PSTs) since those three classes of toxins are both
1059 persistent and regulated in the State of California. The scheme could be extended to other toxins
1060 given sufficient information about acceptable levels. Since existing guidance is based on acute
1061 exposure or Tolerable Daily Intake (e.g. World Health Organization guidelines for microcystins),
1062 we did not include a “duration” of exposure, and consider chronic effects to be an area of
1063 emerging concern (e.g., Ger et al. 2009; Goldstein et al. 2008; Hiolski et al. 2014) that should be
1064 considered as more data become available.

1065
1066 For toxin concentrations, progressions among classification bins are treated the same, based on
1067 existing alert levels, where we classify 50% of the regulatory closure level as a “warning level”
1068 and the closure limit as a (regulatory) action level. Ecological condition states are therefore: non-
1069 detect to 10% of the warning level, 10-100% of the warning level, above the warning level and
1070 below an action level, and above an action level. Since there is no direct correlation between
1071 SPATT toxin concentrations and grab sample concentrations, we assigned categories based on
1072 historical data from the region, corresponding to those categories and based on comparison of
1073 SPATT with grab and tissue samples (Lane et al. 2010; Kudela 2011). We acknowledge that this
1074 is a weak point of the classification scheme and a major source of uncertainty, but the advantages
1075 of SPATT for routine monitoring (Mackenzie et al. 2004) outweigh these concerns.

1076
1077 Tables 3.8, 3.9, and 3.10 provide classification schemes for microcystins, domoic acid, and
1078 saxitoxins. Note that SPATT is not routinely used for saxitoxins and has been omitted from
1079 Table 3.10. For microcystins, water concentrations are based on OEHHA 2012 guidance, which
1080 sets the alert level for recreational contact, domestic animals, and livestock at 0.8 ppb for
1081 microcystins LR, RR, YR, and LA. For mussel tissue, values are based on WHO guidance of
1082 0.04 µg/kg body weight per day, assuming 100 g consumption of tissue and a 60 kg individual; it
1083 is assumed that these values can be scaled to other organisms. Tables 3.9 and 3.10 provide the
1084 same classification scheme for domoic acid and paralytic shellfish toxins. Alert levels are based
1085 on California Department of Public Health guidelines for tissue of 20 ug/g for domoic acid and
1086 80 ug/100g for PSTs for protection of human health. For all three toxins, annual assessment of
1087 ecological condition would be based on the lowest rating for the year to provide the most
1088 protective classification.

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1090
1091

1092 **Table 3.8. Toxin Classification Table for Microcystin. Classification should be applied to each**
 1093 **subembayment. If multiple occurrences in different media (particulate, SPATT, tissue) are**
 1094 **detected within a subembayment on an annual basis, the lowest rating for the year should be**
 1095 **applied.**
 1096

Toxin Concentration	Ecological Condition Based on Annual Frequency of Occurrence in Monthly Samples			
	1 of 12	2-3	4-6	6+
Particulate concentration				
Non-detect	Very high	Very high	Very high	Very high
Detectable, but < 0.8 ppb	High	Moderate	Moderate	Low
0.8 - 20 ppb	Moderate	moderate	Low	Very Low
>20 ppb	Low	Very Low	Very Low	Very Low
SPATT				
Below the warning level <100 ng/g)	Very high	Very high	Very high	Very high
100-250 ng/g	Moderate	Low	Very low	Very Low
>250 ng/g	Low	Very Low	Very Low	Very Low
Mussel Tissue				
Non-detect	Very high	Very high	Very high	Very high
Detectable, but < 12 ng/g	High	Moderate	Moderate	Low
12-24 ng/g	Moderate	moderate	Low	Very Low
> 24 ng/g	Low	Very Low	Very Low	Very Low

1097
 1098

1099 **Table 3.9. Toxin Classification Table for Domoic Acid. Classification should be applied to each**
 1100 **subembayment. If multiple hits in different media (particulate, SPATT, tissue) are detected within a**
 1101 **subembayment on an annual basis, lowest rating for the year should be applied.**
 1102

Toxin Concentration	Ecological Condition Based on Annual Frequency of Occurrence in Monthly Samples			
	1 of 12	2-3	4-6	6+
Particulate concentration				
Non-detect	Very high	Very high	Very high	Very high
0-100 ug/L	High	Moderate	Moderate	Low
100 - 1000 ug/L	Moderate	moderate	Low	Very Low
> 1000 ug/L	Low	Very Low	Very Low	Very Low
SPATT				
<30 ng/g	Very high	Very high	Very high	Very high
30-75 ng/g	Moderate	Low	Very low	Very Low
>75	Low	Very Low	Very Low	Very Low
Mussel Tissue				
Non-detect	Very high	Very high	Very high	Very high
< 10 ppm	High	Moderate	Moderate	Low
10-20 ppm	Moderate	moderate	Low	Very Low
> 20 ppm	Low	Very Low	Very Low	Very Low

1103
 1104

1105 **Table 3.10. Toxin Classification Table for Paralytic Shellfish Toxins. Classification should be**
 1106 **applied to each subembayment. If multiple hits in different media (particulate, SPATT, tissue) are**
 1107 **detected within a subembayment on an annual basis, lowest rating for the year should be applied.**
 1108

Toxin Concentration	Ecological Condition Based on Annual Frequency of Occurrence in Monthly Samples			
	1 of 12	2-3	4-6	6+
Particulate Concentration				
Non-detect	Very high	Very high	Very high	Very high
Detectable	Low	Very low	Very low	Very Low
Mussel Tissue				
Non-detect	Very high	Very high	Very high	Very high
< 40 µg/100 g	High	Moderate	Moderate	Low
40-80 µg/100 g	Moderate	moderate	Low	Very Low
> 80 µg/100 g	Low	Very Low	Very Low	Very Low

1109
 1110
 1111 **Classification of HAB Abundance.** The classification scheme for presence of HAB organisms
 1112 is based on a similar metric as for toxins (Table 3.11). An alert level is defined based on existing
 1113 monitoring programs, and condition is graded based on expert opinion relative to those alert
 1114 levels. For *Alexandrium* specifically, because all monitoring programs consider presence of
 1115 *Alexandrium* to be a potential impairment, only three cell abundance categories are used (not
 1116 detected, detected at up to 100 cells/L, and more than 100 cells/L). For BGA, the criteria are
 1117 restricted to stations or locations where salinity is less than or equal to 2, and the alert level is
 1118 based on OEHHA 2012 guidance of 1E6 cells/mL (i.e., scum-forming blooms). Given the
 1119 prevalence of BGA toxins in SFB (Appendix C-Figure 3), more conservative cell abundances
 1120 were chosen for transitions from high Very High to Very Low condition compared to an alert
 1121 threshold of 1E6 cells/mL.
 1122

1123 **Table 3.11. HAB Abundance Classification Table. Classification should be applied to each**
 1124 **subembayment. If multiple HABs are detected within a subembayment on an annual basis, lowest**
 1125 **rating for the year should be applied.**
 1126

Cell Count By Taxonomic Group	Ecological Condition Based on Annual Frequency of Occurrence in Monthly Samples			
	1 of 12	2-3	4-6	6+
Cyanobacteria ¹ . Applies at salinities ≤ 2 ppt.				
Absent to < 20,000 cells per ml	Very high	Very high	Very high	Very high
20,000 – 10 ⁵ cells per ml	High	Moderate	Low	Very Low
10 ⁵ – 10 ⁷ cells per ml	Moderate	Low	Very Low	Very Low
> 10 ⁷ cells per ml	Low	Very Low	Very Low	Very Low
Pseudo-nitzschia spp.				
<100 cells per l	Very high	Very high	Very high	Very high
100 to 10,000 cells per l	High	High	Moderate	Low
10,000 -50,000 cells per l	Moderate	Low	Low	Very Low
> 50,000 cells per l	Low	Very Low	Very Low	Very Low
Alexandrium spp.				
Non detect	Very high	Very high	Very high	Very high
Detectable to < 100 cells	High	Moderate	Low	Very low
>100 cells	Low	Very low	Very low	Very Low

1127
 1128 ¹ Cyanobacteria include: Cylindrospermopsis, Anabaena, Microcystis, Planktothrix, Anabaenopsis, Aphanizomenon, Lyngbya,
 1129 Raphidiopsis, Oscillatoria, and Umezakia

1130
 1131
 1132 **Uncertainty Associated with HAB Abundance and Toxin Classification.** There are three
 1133 major sources of uncertainty associated with the classification of HAB abundance and toxin
 1134 concentrations. The first source derives from the use of existing guidance on cell counts and
 1135 toxin concentrations. Standard guidelines have not been adopted at the State or federal level.
 1136 Second, while HABs represent a palatable risk to human and ecological threat in SFB,
 1137 uncertainty exists in the significance of that threat. For humans, the uncertainty lies in the level
 1138 of risk given the amount of contact and noncontact recreation that occurs, as well as consumption
 1139 of shellfish from SFB. Improved data on the concentrations of toxins in mussel tissue and
 1140 shellfish consumption survey may help to better quality that risk. For aquatic organisms, this risk
 1141 is difficult to characterize, particularly because existing guidance is oriented towards human
 1142 health rather than ecological endpoints and on acute rather than chronic exposure to toxins.
 1143 Because of the high baseline of HAB occurrence in SFB, uncertainty about values corresponding
 1144 to this pathway of chronic exposure becomes a significant concern. The third source of
 1145 uncertainty is the inclusion of SPATT-derived toxins in the classification scheme. SPATT as a
 1146 tool has not undergone rigorous calibration. Because of its utility as a monitoring tool,

1147 calibration of SPATT relative to particulate or mussel toxin tissues should be a continued
1148 management focus.

1149

1150 Dissolved oxygen

1151 Dissolved oxygen (DO) is considered to be keystone indicator within the AF. DO is necessary to
1152 sustain the life of all aquatic organisms that depend on aerobic respiration and, thus, it has a
1153 direct linkage to aquatic life and beneficial use protection (see Sutula et al. 2012 for
1154 comprehensive review). Eutrophication produces excess organic matter that fuels the
1155 development of hypoxia and, in some cases, anoxia as that organic matter is respired (Diaz
1156 2001). Low dissolved oxygen (DO) has direct effects on the reproduction, growth and survival of
1157 pelagic and benthic fish and invertebrates (USEPA 2000, Bricker et al. 2003, Best et al. 2007).
1158 The response of aquatic organisms to low dissolved oxygen will depend on the intensity of
1159 hypoxia, duration of exposure, and the periodicity and frequency of exposure (Rabalais and
1160 Harper 1992). Thresholds for assessment of effects of DO are derived from criteria deemed to be
1161 protective of the most sensitive species from acute (timescales of days) and chronic (time scales
1162 of weeks to months) exposures to low dissolved oxygen.

1163

1164 In this work, we chose explicitly to defer work on a classification scheme for DO, citing the need
1165 to prioritize the development of classification for phytoplankton related indicators and the fact
1166 that DO objectives already exist for SFB. The following recommendations are intended to
1167 encourage future discussion of DO classification schemes for SFB, given that no scheme is being
1168 proposed at this time.

1169

1170 Existing DO WQOs exist for SFB, based on a combination of DO concentration and percent
1171 saturation objectives. The SFB Water Board staff is considering revising the Basin Plan to allow
1172 for deviation from these numeric objectives in Suisun Marsh (Howard et al. 2014) and is
1173 entertaining a similar undertaking for shallow margin and intertidal habitats in South and Lower
1174 South Bay. Once this has been established, modeling could be used to refine expectations for the
1175 deep channel habitats of South SFB. Considering that these intertidal habitats rich in organic
1176 carbon may have natural sources of low DO water, and may experience natural conditions of low
1177 DO, the expectations for DO in these habitats and their physical and biological exchanges with
1178 open water habitat need to be considered in setting appropriate expectations for the deep channel
1179 habitat.

1180

1181 One question that should be addressed in future iterations of the SFB AF is the need to develop a
1182 DO AF that captures a fuller gradient in condition than expressed through binary classification
1183 associated with meeting established WQOs (i.e., above or below established objectives). Best et
1184 al. (2007) have proposed a DO classification scheme for European Union Water Framework
1185 Directive (EU-WFD) based on observed impacts of hypoxia on benthic and demersal fauna, as
1186 well as expert opinion, that is targeted to be relevant in a wide range of estuarine environments
1187 (Vaquer-Sunyer and Duarte 2008). The thresholds proposed by Best et al. (2007) are similar to
1188 those calculated for California species, including those found in SFB (5.7 mg L^{-1} as chronic-
1189 effects criteria protective of 95% of the non-salmonid population and 2.8 mg L^{-1} as acute effects
1190 criteria; Sutula et al. 2012). For salmonids, Sutula et al. (2012) calculated 6.3 mg L^{-1} as chronic
1191 effects criteria and 4.0 mg L^{-1} as acute effects criteria, but notes that the effects data used to

1192 calculate these criteria were based of freshwater exposure studies. Thus, applying fixed criteria
1193 to habitats that represent a continuum along a salinity gradient can be problematic. The Best et
1194 al. (2007) thresholds have the advantage of incorporating the effects of salinity on oxygen
1195 solubility and, thus, can reconcile a threshold protective of all life history stages for salmonids
1196 from 7 mg L⁻¹ in freshwater to 5.7 mg L⁻¹ at marine salinities. The ASSETS upper threshold of
1197 5.0 mg L⁻¹ is roughly equivalent to this threshold but does not take into account salinity (Bricker
1198 et al. 2003). Both ASSETS and EU-WFD (Bricker et al. 1999, 2003) utilize the 5th and 10th
1199 percentile, respectively, to integrate over time, similar to the SFB Basin Plan calculation of 10%
1200 frequency of non-compliance. The use of the percentile approach integrates the duration and
1201 frequency of low DO events and doesn't distinguish between high frequency short duration
1202 events and low-frequency but long-duration events. The effect of these two examples can be very
1203 different on biota, depending the timing and number of reproductive cycles in the year, number
1204 per brood, etc.

1205

1206 Estuarine subtidal habitat and associated intertidal margin habitats are prone to development of
1207 density-driven stratification, precluding diffusion and mixing of oxygen to bottom waters
1208 (Largier et al. 1991, 1996). Sutula et al. (2012) note that natural hypoxia in bottom waters of
1209 stratified estuaries is an issue for interpretation of existing Water Boards' DO objectives. Stacey
1210 (2015, Appendix D) analyzed the frequency of stratification events in South Bay; he found that:
1211 (1) salinity-stratification most often occurs during periods of peak freshwater flow to SFB
1212 (winter-spring), (2) duration of stratification seldom persists for periods greater than two weeks
1213 due to tidal mixing associated with spring tides, and (3) observed periods of low DO in South
1214 Bay do not typically coincide with stratification events. Incursions of low DO water into SFB is
1215 possible when oceanic deep waters upwell at the mouth of SFB (J.E. Cloern, personal
1216 communication). Although these are currently rarely observed, it is possible that these events
1217 will occur with increased frequency due to rising coastal hypoxia (Booth et al. 2013).

1218

1219 Finally, in the first phase of AF development, we chose not to recommend a prescribed
1220 monitoring program for DO. Such recommendations were outside the scope of our current effort,
1221 yet we believe that this is an important issue – one that should be coupled to a better
1222 characterization of the seasonal DO requirements of the most sensitive species and their
1223 important habitats in SFB. Future science plans related to DO should address this important
1224 aspect.

1225

1226 **3.4 AF Indicators as Multiple Lines of Evidence**

1227 A core principle of the AF is that it be comprised of several indicators that should be used as
1228 multiple lines of evidence in the determination of overall ecological condition. In this
1229 preliminary AF, we have chosen not to specifically address combining each indicator into a
1230 multi-metric index, pending refinement of the classification through improved monitoring,
1231 modeling and other research. However, we can offer some simple guidance on the relative
1232 weight that these indicators can be given in view of their status and relative degree of associated
1233 uncertainty. This relative importance, presented as multiple lines of evidence, can be revised as
1234 uncertainties are reduced and our understanding of risk to beneficial uses from each impairment
1235 pathway improves.

1236

1237 Three indicators should be given strong weight in motivating management attention the near
1238 term, given their strong linkage to beneficial uses: (1) dissolved oxygen, (2) HAB toxins,
1239 particularly if found to be accumulating to levels of concern in shellfish or other aquatic
1240 organisms, and (3) gross and net primary productivity. We note that DO already serves as an
1241 independent line of evidence, as it is already in the SFB Water Board Basin plan.
1242

1243 HAB abundances should be given moderate weight in motivating management action. For HAB
1244 abundances, this weight could be refined pending better characterization of HAB risk in SFB.
1245

1246 Chlorophyll-a should be given moderate weight in motivating nutrient management action in the
1247 short term, because of the considerable uncertainty in the linkage of chlorophyll-a with HAB
1248 toxins and DO, particularly in shallow margins with SFB. The trend in chlorophyll-a should be
1249 given as much weight as the absolute magnitude. However, given the importance of the linkage
1250 of chlorophyll-a and GPP with nutrient loads, reduction in the uncertainty surrounding
1251 chlorophyll-a classification should be a high priority in the SFB Nutrient Science Plan.
1252

1253 Finally, for metrics of phytoplankton composition, emphasis should be on research and data
1254 visualization to communicate the ecological significance of trends over time. We would expect
1255 that a classification system for phytoplankton food quality index should be forthcoming after a
1256 period of piloting and demonstration in SFB. However, poor phytoplankton food quality, as well
1257 as other shifts in phytoplankton composition, can be driven by factors other than nutrients. For
1258 this reason, this indicator will likely serve as a supporting rather than primary line of evidence
1259 going into the future.
1260

1263 **4 SUMMARY OF FINDINGS, VISION FOR NEAR-TERM USE, AND** 1264 **RECOMMENDATIONS FOR AF REFINEMENT**

1266 **4.1 Summary of Findings**

1267 San Francisco Bay has long been recognized as a nutrient-enriched estuary; however, it has
1268 exhibited resistance to some of the classic symptoms of nutrient overenrichment, such as high
1269 phytoplankton biomass and hypoxia, due to a number of factors such as high turbidity, strong
1270 tidal mixing, and grazing that limit organic matter accumulation within the estuary. These
1271 observations have reinforced the need to identify numeric WQOs or a specific implementation
1272 plan for the existing narrative objective to protect the estuary from the potential effects of
1273 nutrient over-enrichment, especially following recent documentation of shifts in the timing and
1274 extent of freshwater inflow and salinity intrusion, decreasing turbidity, restructuring of plankton
1275 communities, elimination of hypoxia and reduced metal contamination of biota, and food web
1276 changes that decrease resistance of the estuary to nutrient pollution.
1277

1278 In this study, we utilized an expert workgroup to develop a quantitative framework to assess
1279 eutrophication in the SFB, based on indicators of phytoplankton biomass (chlorophyll-a), gross

1280 primary productivity, the prevalence of harmful algal blooms (HAB) and toxin, and DO. Experts
1281 defined core principles including geographic scope, recommended Bay segmentation, linkage of
1282 key indicators to beneficial uses, and the protocols and recommended spatial and temporal
1283 frequency of monitoring that would support a core assessment of nutrient effects on SFB.
1284

1285 We discussed a quantitative scheme to classify SFB subembayments in tiers of ecological
1286 condition, from very high to very low, based on risk to adverse effects of nutrient
1287 overenrichment and eutrophication. Decisions on classification bins were supported by a
1288 combination of existing literature and guidance, quantitative analyses of existing SFB data from
1289 the USGS research program, and expert best professional judgment.
1290

1291 Analyses of two decades of phytoplankton species composition, chlorophyll-a, and dissolved
1292 oxygen (DO), as well as three years of toxin data from solid phase adsorption toxin tracking
1293 (SPATT) samplers, were used to demonstrate (1) significant increases in chlorophyll-a, declines
1294 in DO, and a high prevalence of HAB species and toxins across most SFB subembayments, and
1295 (2) strong linkage of increasing chlorophyll-a to declining DO and HAB abundance. Statistical
1296 approaches were used to define thresholds in chlorophyll-a related to increased risks of HABs
1297 and low DO. In development of the AF classification scheme, a qualitative summary of
1298 uncertainty associated with each indicator was made for the purpose of focusing future research,
1299 monitoring, and modeling on AF refinement.
1300

1301 **4.2 Vision for Near-Term Use of AF**

1302 The nutrient AF is intended to provide a decision framework for quantifying the extent to which
1303 SFB is supporting beneficial uses with respect to nutrients. This AF is comprised of three
1304 important elements: (1) a set of conceptual models that defines what a problem would look like
1305 in SFB, if it occurred, (2) a set of core principles supporting the AF, and (3) classification tables.
1306 The AF supports and is supported through the other major elements through:

- 1307
- 1308 • Defining monitoring requirements (the core indicators, spatial and temporal frequency of
1309 sampling) needed to support routine assessments of SFB
 - 1310 • Modeling to identify a set of management endpoints that should constitute the output of
1311 SFB water quality models and improve mechanistic understanding of the linkage of
1312 nutrients to adverse outcomes in SFB
 - 1313 • Informing science by identifying analyses needed to further refine the AF and
1314 highlighting areas in which monitoring, modeling and core synthesis should be improved

1315
1316 Given this philosophy, we feel that it is important to provide a statement of the appropriate use of
1317 the AF, given existing uncertainties.

1318
1319 The conceptual models and AF core principles provide a sound scientific foundation for
1320 informing modeling and monitoring. Through early interactions with the stakeholder community,
1321 these are the components of the AF that appear to have the greatest consensus and the least
1322 “uncertainty.”

1323
1324 The classification scheme is a critical element of the AF, because it represents a quantitative and
1325 transparent mechanism through which SFB data are interpreted to assess, ultimately, nutrient-
1326 related beneficial use support. Given its importance, the authors of this document fully
1327 acknowledge the uncertainty in the AF classification scheme and need for refinement, through
1328 multiple iterations of basic research, monitoring, and modeling.

1329
1330 We suggest that the near-term use of the AF classification system be focused on a scientific “test
1331 drive” that seeks to understand how to collectively use and improve efficiencies for assessment,
1332 monitoring and modeling. This “test drive” should also consider whether or how to combine
1333 indicator results into multiple lines of evidence, particularly for communication to the public.
1334 Finally, this test drive should be conducted in tandem with research, monitoring and modeling to
1335 refine the AF.

1336

1337 **4.3 Recommendations for Refinement of the AF**

1338 From this initial work, a number of recommendations emerge for refining and potentially
1339 expanding the AF. Please note that these recommendations have not been prioritized, and that
1340 early discussions to incorporate these needs into the SFB Nutrient Management Science Plan
1341 have already begun.

1342

1343 1. **Improve scientific basis for nutrient-related segmentation of SFB.** Our
1344 recommendation that the preliminary segmentation be based on Jassby et al. (1997) is a
1345 departure from the existing subembayments used by the SFB Water Board for
1346 assessments and permit-related activities. We strongly recommend reanalysis of existing
1347 data to be repeated using the Jassby et al. (1997) methodology, using newly available and
1348 relevant ecological data, to finalize this segmentation scheme.

1349

1350 2. **Include diked baylands, restored salt ponds and tidal sloughs in future iterations of**
1351 **this AF.** Deepwater and shallow subtidal habitats are the focus of this AF; diked
1352 baylands, restored salt ponds, and tidal sloughs are excluded in this first phase of work.
1353 We believe that these shallow water margin habitats are critical components of the SFB
1354 ecosystem and should be include in future iterations of the AF.

1355

1356 3. **Include dissolved oxygen classification and recommendations for monitoring in**
1357 **future iterations of the AF.** Current recommendations for AF focus on indicators of
1358 phytoplankton. We recommend science and synthesis to accomplish the following:

1359

- 1360 a. Improve understanding of what species, representative of different beneficial
1361 uses, are the most sensitive to low DO and what are the temporal and spatial
1362 scales of their use of SFB subembayments as habitat
- 1363 b. Identify DO criteria representing acute and chronic tolerances to low exposure,
1364 and individual and population scales
- 1365 c. Improve characterization of the diel variability of DO at key points within the
1366 deep water and shallow margin habitat of each subembayment in order to better
1367 characterize support of species and habitats
- 1368 d. Improve mechanistic understanding of the physical and biological factors
1369 influencing DO within and between the deep channel and shallow water margin
1370 habitat

1371

1372 4. **Optimize spatial and temporal sampling of AF indicators to best align quality of the**
1373 **information produced, while balancing costs, logistics, and power to detect trends.**

1374 Dissolved oxygen, phytoplankton biomass, productivity and phytoplankton composition
1375 are all extremely variable across both time and space. The temporal and spatial elements
1376 of the AF and the monitoring program must be aligned and optimized to capture this
1377 variability in a manner that is also cost-effective. This could be done by conducting an
1378 intensive field observation program coupled interpolated with hydrodynamic model
1379 simulations, then conducting power analyses to understand how to best capture
1380 variability, given real constraints in available resources. Another approach is to invite
1381 subject matter experts to provide perspective about how this was done in systems of
1382 similar size and complexity (e.g. Chesapeake Bay).

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5. **Reduce sources of uncertainty in chlorophyll-a, HAB abundance and toxin classification.** Three major recommendations are given to reduce uncertainty in the chlorophyll-a classification. These include:
- e. Better characterization of the significance of the ecological and human risk of HABs in SFB through more intensive monitoring of subembayments
 - f. Co-location of chlorophyll-a, particulate, shellfish and SPATT monitoring to improve linkage of chlorophyll-a to HAB toxin concentrations, rather than cell counts as the foundation for the risk paradigm
 - g. Expansion of SPATT samplers to include other toxins, particularly PSTs
 - h. A work element to better validate SPATT toxin data relative to particulate or mussel toxin tissues: While this has historically been difficult, precedence exists (Lane et al. 2010), and because SPATT were originally designed for lipophilic toxins (Mackenzie et al. 2004), an obvious next step would also be to analyze SPATT samplers for okadaic acid, dinophysistoxins, and yessotoxins.
 - i. Assembly of a scientific workgroup to synthesize scientific understanding of chronic effects of HAB toxins on SFB food webs and human health
 - j. Monitoring improvements through better spatial coverage and temporal coverage of data to link chlorophyll-a to DO, focused specifically on South SFB, coupled with improved understanding of DO expectations for shallow water margins, tidal sloughs and intertidal wetland habitat (see Recommendation C above).
6. **Link HABs more specifically to nutrients.** Although deliberately excluded from this analysis, sufficient data exist to develop more complex multidimensional statistical models for harmful algal species and toxins (e.g. Kudela 2012) or to apply existing estuarine and coastal models to SFB (e.g. Lane et al. 2010; Anderson et al. 2009, 2010). This would also more directly link condition to nutrients.
7. **Fund a Nutrient Monitoring Program.** Since 1969, a USGS research program has supported water-quality sampling in SFB. This USGS program collects monthly samples between the South Bay and the lower Sacramento River to measure salinity, temperature, turbidity, suspended sediments, nutrients, dissolved oxygen and chlorophyll a. The USGS data, along with sampling conducted by the Interagency Ecological Program, provide coverage for the entire San Francisco Bay –Delta system. The San Francisco Bay Regional Monitoring Program (RMP) has no independent nutrient-related monitoring program, but instead contributes approximately 20% of the USGS data collection cost. Thus, there is currently an urgent need to lay the groundwork for a locally-supported, long-term monitoring program to provide information that is most needed to support nutrient-related management decisions in the Bay.

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1699 **APPENDIX A. DEFINITIONS OF KEY TERMS AND SFB BENEFICIAL USES**

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1716 **APPENDIX B REVIEW OF APPROACHES TO ASSESSMENT OF NUTRIENT EFFECTS**
1717 **ON ESTUARIES**

1718 **APPENDIX C QUANTITATIVE ANALYSES SUPPORTING DECISIONS ON**
1719 **CHLOROPHYLL-A ASSESSMENT ENDPOINTS (SUTULA ET AL. MANUSCRIPT IN**
1720 **PREP FOR SUBMISSION TO A SCIENTIFIC JOURNAL)**

1721 **APPENDIX D. SUPPLEMENTAL ANALYSES SUPPORTING DISCUSSION OF THE**
1722 **IMPORTANCE OF STRATIFICATION ON THE RELATIONSHIP BETWEEN**
1723 **DISSOLVED OXYGEN AND CHLOROPHYLL-A IN SF BAY (STACEY AND SENN,**
1724 **2015 TECHNICAL MEMO)**