

# Conveyance Capacity

## I. Introduction

Water management activities by SWP subcontractors in San Luis Obispo and Santa Barbara Counties (Central Coast Contractors) will frequently require use of conveyance capacity in the California Aqueduct and the Coastal Branch Aqueduct (Figure 1). These facilities are operated by different agencies, with different patterns of availability and different rules. The California Aqueduct and Coastal Branch reaches upstream of Polonio Pass, are operated by DWR as part of the overall SWP. The downstream portion of the Coastal Branch (below Polonio Pass) is operated by CCWA. The two operators – DWR and CCWA – have different operating rules, which affect use of their facilities by subcontractors and other agencies.

Following the initial discussion of operations for both the California Aqueduct and Coastal Branch, descriptions of the facilities involved are presented along with information related to physical and operational capacities. This conveyance capability discussion touches on constraints upstream and downstream of San Luis Reservoir, analyses of CALSIM-2 and historical capacities for the California Aqueduct, and comparison of design capacity and historical deliveries for the Coastal Branch. Finally, a high-level summary of available capacity in various reaches is presented.

Overall, the summary identified major constraints in available capacity in summer months (generally June through September) in years of above average deliveries along the California Aqueduct east of Coalinga, due to historic subsidence. There are also lesser, but still often significant, limitations in capacity along most Coastal Branch reaches during the summer. Alternatively, there is plentiful available capacity in the October through May period in nearly all years in the conveyance facilities serving the Coastal Branch Contractors.

## II. Conveyance Facility Operation and Access by Outside Entities

DWR constructed and operates the California Aqueduct and Coastal Branch reaches through Polonio Pass for the SWP and their primary purpose is to deliver SWP water to its contracting water agencies. Although SWP contractors are assigned a share of capacity (and associated costs) in the reaches of the facility providing their water supply, the SWP water supply projects do not give SWP contractors direct rights to use that capacity. The Department of Water Resources (DWR) operates the SWP as a whole and does not instantaneously constrain contractor water supplies to their allocated share of capacity. Contractors submit annual water delivery request schedules to DWR and DWR strives to meet contractor water supply needs to the extent possible by optimizing available capacity. DWR only limits contractor use of conveyance for SWP water to their assigned capacities under extreme circumstances. SWP contractors, including CCWA and SLOFCWCD, have rights to move non-SWP water through available capacity under Article 55 of the water supply projects. Additionally, any entity has a right to use unused conveyance capacity with the payment of fair compensation under Water Code Section 1810.

The Coastal Branch downstream of Polonio Pass is operated by CCWA. CCWA's prime purpose in operating its portion of the Coastal Branch is also to deliver SWP water to its subcontractors on their

38 requested schedule. CCWA does not have any defined provisions for allowing use of its facilities by  
 39 member agencies or outside entities. As with any public agency conveyance facilities, Water Code  
 40 Section 1810 provides for the use of unused conveyance capacity for an outside entity.

41 **III. State Water Project Operational Features of the California Aqueduct and a Portion of the**  
 42 **Coastal Branch Aqueduct**

43 As described above, DWR operates the SWP, including California Aqueduct and a portion of the Coastal  
 44 Branch Aqueduct. The configuration of SWP California Aqueduct and Coastal Branch Aqueduct is shown  
 45 in Figure 1.

46 *Figure 1: Placeholder for Figure of California Aqueduct*

47 SWP contractors, including Santa Barbara County Flood Control and Water Conservation District  
 48 (SBCFCWCD, administered by Central Coast Water Authority) and San Luis Obispo County Flood Control  
 49 and Water Conservation District (SLOCFCWCD), are provided water by the SWP and are responsible for  
 50 payment of assigned costs for their portion of the SWP. Table 1 shows the allocation of Central Coast  
 51 Contractors’ capacity in the State Water Project for upstream reaches of the California Aqueduct and the  
 52 Coastal Branch. These capacities are used by DWR primarily for cost allocation purposes, but under  
 53 extreme circumstances they could also be constraining in the event of continuing shortage in conveyance  
 54 capacity.

55 **Table 1**  
 56 **California Aqueduct: Capacity Provided for SWP Contractors, by Reach\***

	<b>SBCFCWCD Share</b>	<b>SLOCFCWCD Share</b>	<b>Design Total</b>	<b>Current Estimated Total</b>
Reach	Capacity (cfs)	Capacity (cfs)	Capacity (cfs)	Capacity (cfs)
1	72.03691	39.0471	10,300	10,300
2A	72.02638	39.04134	10,000	10,000
2B	71.61539	38.81848	10,000	10,000
3	71.48536	38.74804	13,100	13,100
4	71.34908	38.67414	13,100	13,100
5	71.17955	38.58213	11,800	11,800
6	70.9241	38.4437	8,350	6,900
7	70.84246	38.39943	8,100	6,900
8C	70.73959	38.34363	8,100	8,100
8D	70.73761	38.34264	8,100	8,100
31A	70.60034	38.26825	450	450
33A	70.06459	37.9774	71	71

57 \*(Includes Consideration of Scheduled Outages and Operational Losses)

58 In addition to SWP project deliveries (including Table A amounts, Turnback Pool, Carryover Water and  
 59 Article 21 Water), the California Aqueduct system is also commonly used for conveyance of other  
 60 supplies on behalf of SWP contractors (and potentially outside agencies). While DWR attempts to meet  
 61 all SWP contractor conveyance needs, in situations with extended periods of limited capacity, a SWP

62 contractor may be limited to their proportional share of remaining capacity after SWP project needs  
63 have been met.

64 Generally, limitations to conveyance availability are likely to occur in the summer months of high-  
65 delivery (wet) years. SWP facilities for SWP agricultural contractors were designed to meet water  
66 demands on an irrigation demand schedule, which has high peaks during summer months. Additional  
67 conveyance constrictions can occur in Aqueduct reaches where SWP contractors purchased additional  
68 Table A amounts or where outside factors (such as groundwater subsidence or facility outages) have  
69 limited operational capacity.

70 As an example, if the SWP is using 80 percent of the capacity in a reach for SWP purposes, Article 55  
71 provides that the remaining 20 percent could be allocated among contractors proportional to each  
72 contractor's assigned capacity of that reach. Central Coast Contractors access to conveyance facilities for  
73 non-SWP purposes will normally be on an "as available" basis, subject to primary use by the SWP or by  
74 other project participants.

75 To address the potential for limited conveyance access on an "as available" basis, this discussion  
76 quantifies both the physical capacity of conveyance facilities and the primary facility use for purposes of  
77 delivering SWP water. The primary facilities described here are the California Aqueduct and the Coastal  
78 Branch Aqueduct. The overall approach used was to compare historical or projected Aqueduct use for  
79 representative Aqueduct reaches with physical capacities, and quantify the amounts of available, or  
80 unused, capacity. For purposes of this study, analysis is limited to available conveyance probabilities on  
81 a monthly basis, with totals indicated for annual potential conveyance. The approach to defining  
82 available conveyance capacity is different for each facility, as described below.

#### 83 **IV. SWP Conveyance Constraints Upstream of San Luis Reservoir**

84 The California Aqueduct begins at Clifton Court Forebay in the Sacramento-San Joaquin Delta and  
85 terminates in Southern California. For Reaches 1 through 4 (from Clifton Court Forebay to San Luis  
86 Reservoir), DWR has designated the California Aqueduct as having two purposes – conveyance (labelled  
87 "transportation"), for delivering water to meet SWP contractor demands, and storage (labelled  
88 "conservation"), for delivering water to San Luis Reservoir for storage during wet periods for later use to  
89 meet SWP contractor demand.

90 While Aqueduct Reaches 1-4 were designed with capacities of up to 10,300 cubic feet per second to  
91 provide for both direct SWP deliveries and storage of water at San Luis Reservoir, in actual operations  
92 that apparent high capacity is not usable to the SWP for a variety of reasons:

- 93 • A U.S. Army Corps of Engineers permit for Banks Pumping Plant (Reach 1) limits its use to 6,680  
94 cfs, with provision for somewhat higher capacities under limited circumstances for limited  
95 periods, for reasons relating to levee protection.
- 96 • Fisheries and water rights permits for Banks Pumping Plant and Sacramento-San Joaquin Delta  
97 operations generally restrict allowable exports at Banks Pumping Plant for extended periods  
98 from November through June.

- 99 • Upstream California Department of Fish and Wildlife flow regulations limit the ability to increase  
100 Oroville Reservoir releases at times when permitted Banks Pumping Plant capacity is available.

101 As a result of these various regulatory and physical constraints at Banks Pumping Plant, constraints from  
102 water supply availability and upstream flow management limitations, there is essentially a four-month  
103 period (July through October) when unused capacity in Reaches 1-4 is available. While the physical  
104 capacity in Banks Pumping Plant and the California Aqueduct is 10,300 cfs, the capacity that is actually  
105 allowable considering applicable regulations is usually 6,680 cfs or less. In most wetter-than-average  
106 runoff years, the SWP normally uses all available permitting pumping capacity at Banks Pumping Plant  
107 (and Aqueduct Reaches 1-4) for filling San Luis Reservoir with available high Delta outflows and for  
108 conveying Oroville Reservoir releases to SWP contractors. It is only in below-average runoff years that  
109 there is unused available capacity in Aqueduct Reaches 1-4. Even in those below-average runoff years,  
110 capacity can be limited and its availability is frequently difficult to predict.

111 As described in the earlier water supply discussion, DWR allocates Table A amounts to SWP contractors  
112 based on a combination of availability of water in the Delta (either from natural flows or from Oroville  
113 Reservoir releases), permitted pumping capacity at Banks Pumping Plant and water stored over the  
114 winter in San Luis Reservoir. The SWP's annual Table A allocation is the amount available for SWP  
115 contractors after adjusting for the most limiting of available unregulated Delta flows, Oroville and San  
116 Luis Reservoir storage and ability to convey water to SWP contractors on requested delivery patterns.

117 Considering the purpose of this discussion is to describe the potential for capacity use by Central Coast  
118 Contractors, unused capacity on the California Aqueduct upstream of San Luis Reservoir has not been  
119 quantified. While transfers of North of Delta water supplies are theoretically an option, their availability  
120 is uncertain as is the ability to deliver them through Aqueduct facilities south of the Sacramento-San  
121 Joaquin Delta. The underlying assumption for Central Coast water management is that water  
122 management measures would be limited to water that is already south of the Delta. The water available  
123 for Central Coast Contractor water management has been assumed to be limited to SWP Table A  
124 allocations (which are effectively made available to contractors by DWR at San Luis Reservoir) and other  
125 potential South of Delta water supply sources and management measures such as SWP Table A  
126 Transfers, exchanges with SWP or other water agencies and South of the Delta groundwater banking  
127 programs.

128 **V. Analysis of SWP Conveyance Capacity Availability Downstream of San Luis Reservoir**

129 To evaluate the impacts of California Aqueduct capacity constraints, a comparison of two analyses were  
130 conducted at Reach 7 (Check 21), Reach 31A (Badger Hill Pumping Plant), Reach 33A (Polonio Pass  
131 Pumping Plant). The first analysis reviews historical SWP deliveries compared to physical capacity.  
132 Where CALSIM-2 data is available, a second analysis relies on data extracted from CALSIM-2 model  
133 simulations of the California Aqueduct. The historical and CALSIM-2 projection analyses provide  
134 different types of information. While the historical analysis is a likely indication of actual operational  
135 practices for SWP and Central Coast Contractors, it does not account for factors that may change in the  
136 future. Factors such as Delta regulatory requirements, changes in upstream SWP facility operations and

137 increased future use of contracted water supplies by downstream SWP contractors are not represented  
138 in historical operations but are included in CALSIM-2 simulations. While CALSIM-2 operations studies are  
139 generally not as accurate in indicating the nuances of SWP contractor actual operations, they have the  
140 advantage of considering known factors that can affect future availability of conveyance capacity. Next  
141 the two analysis are compared. Where historical and CALSIM-2 estimates of available capacity are  
142 similar, there can be strong confidence in the accuracy of their results. Where they differ, this summary  
143 offers an interpretation of which is more likely and provides a recommended outcome.

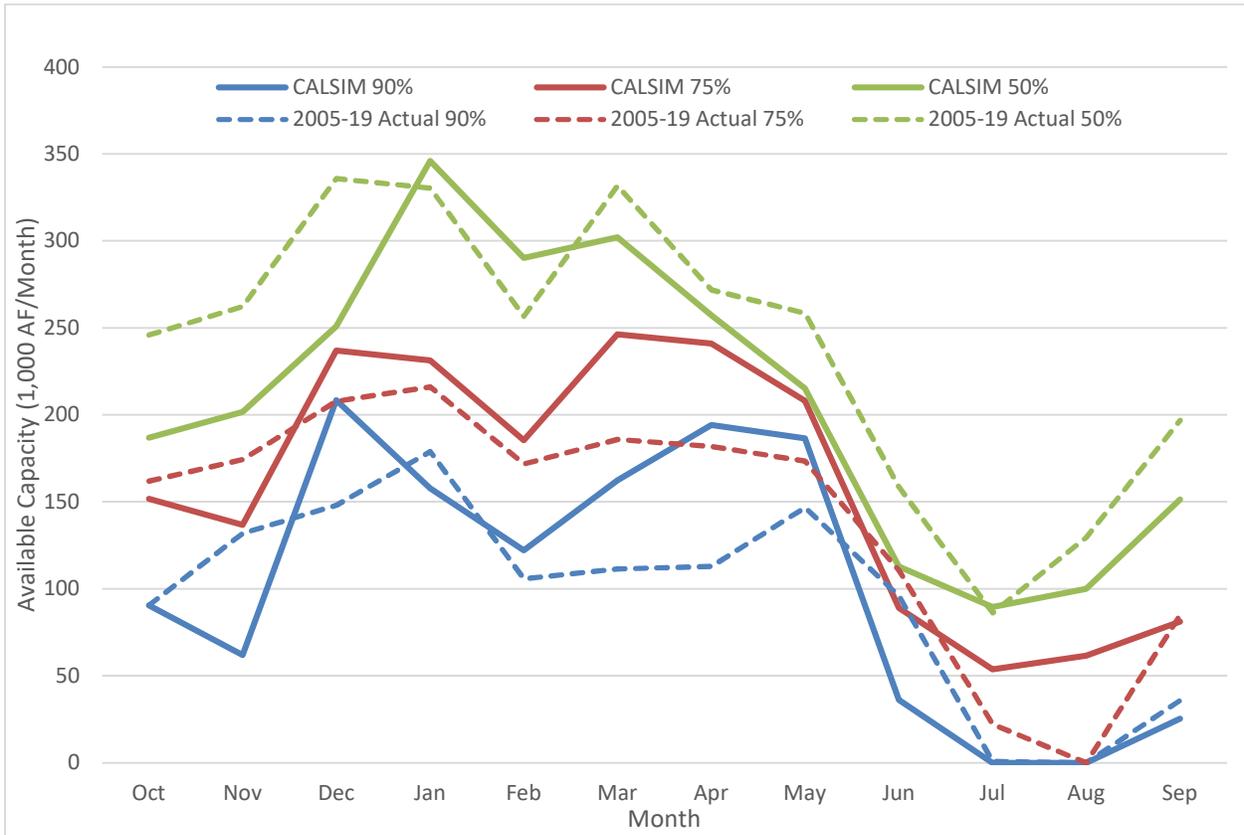
144 **i. California Aqueduct Reach 7 (Check 21)**

145 Conveyance capacity south of the San Luis Reservoir has been reduced from design amounts by  
146 subsidence. High groundwater pumping in the westside of the San Joaquin Valley along the California  
147 Aqueduct alignment has resulted in subsidence that has lowered local ground surface elevations. The  
148 decline in the ground surface has been uneven and has reduced gradients in many parts of the California  
149 Aqueduct, with corresponding reductions in conveyance capacity. A 2019 DWR analysis of ground  
150 surface declines to date and their impacts on the California Aqueduct, identified reductions in capacity  
151 that varied by reach of the Aqueduct. The analysis showed that California Aqueduct capacities remained  
152 at design levels through Pool 19 (generally, north of Huron). Aqueduct Pools 20 through 29 were  
153 identified as having some level of capacity reductions. The largest reduction in Aqueduct capacity was  
154 identified in Pool 20 of Reach 7, which lost 1,450 cfs of its design capacity of 8,350 cfs, leaving a reduced  
155 operational capacity of 6,900 cfs.

156 This historical analysis of SWP deliveries from 2005 to 2019 compared actual Aqueduct flows with the  
157 reduced 6,900 cfs capacity available in Aqueduct Reach 7, near Kettleman City.

158

159 *Figure 2: California Aqueduct Reach 7 (Check 21) Capacity Availability*



160  
 161 The analyses for Reach 7 (Check 21) capacity show similar results based on both CALSIM-2 projections  
 162 and actual historical operations. In both analyses, severe limitations on capacity are projected in wetter  
 163 years (90-percentile usage) for the months of July and August, and lesser limitations are projected in the  
 164 months of June and September. There is significant available capacity for the remainder of the months,  
 165 October through May. For the 75-percentile usage, actual historical operations show significant  
 166 constraints during the months of June through September, which are consistent with CALSIM-2  
 167 projections. For the 50-percentile and lesser use conditions, both historical and CALSIM-2 analysis  
 168 indicates minimal capacity constraints year-round.

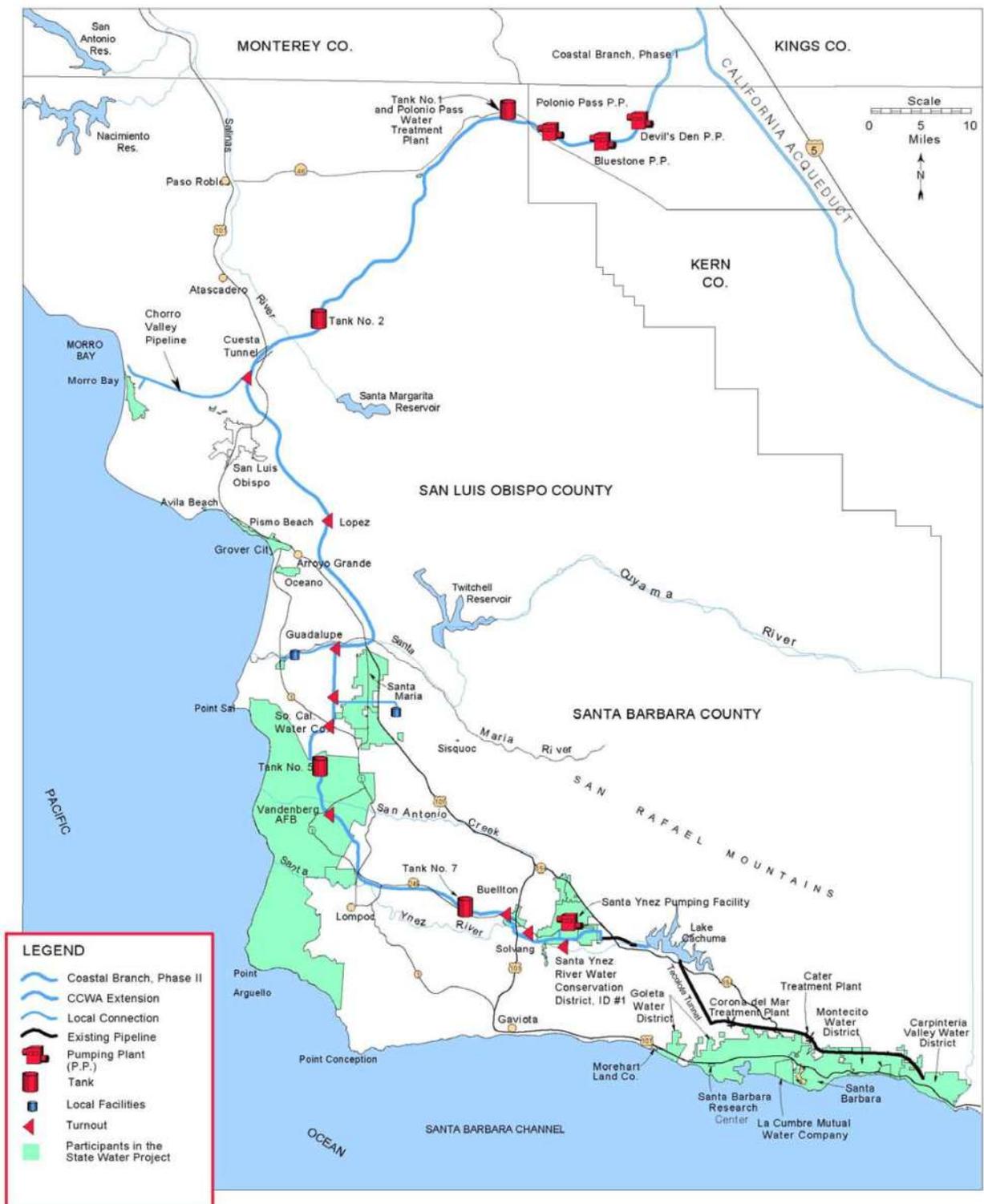
169 Overall, the actual historical operations are consistent with CALSIM-2 projections, with both showing  
 170 significant constraints in available capacity during the June through September period for high use (90-  
 171 percentile and 75-percentile) periods. There is significant available capacity in all year types October  
 172 through May.

173 **ii. Coastal Branch Aqueduct (Reach 31A)**

174 The Coastal Branch breaks off from the California Aqueduct at Avenal Gap, just south of Kettleman City.  
 175 Aqueduct Reach 31A (shown as Coastal Branch Phase 1 and including Las Perillas and Badger Hill  
 176 Pumping Plants, provides deliveries for CCWA, SLFCWCD, Santa Clarita Valley Water District (for the  
 177 former Devils Den Water District), Kern County Water Agency (for their member agency Berrrenda Mesa

178 Water District), and a potential future SWP water contractor. Figure 2 shows the alignment and major  
 179 features of the Coastal Branch Aqueduct.

180 *Figure 3: Diagram of Coastal Branch Aqueduct*

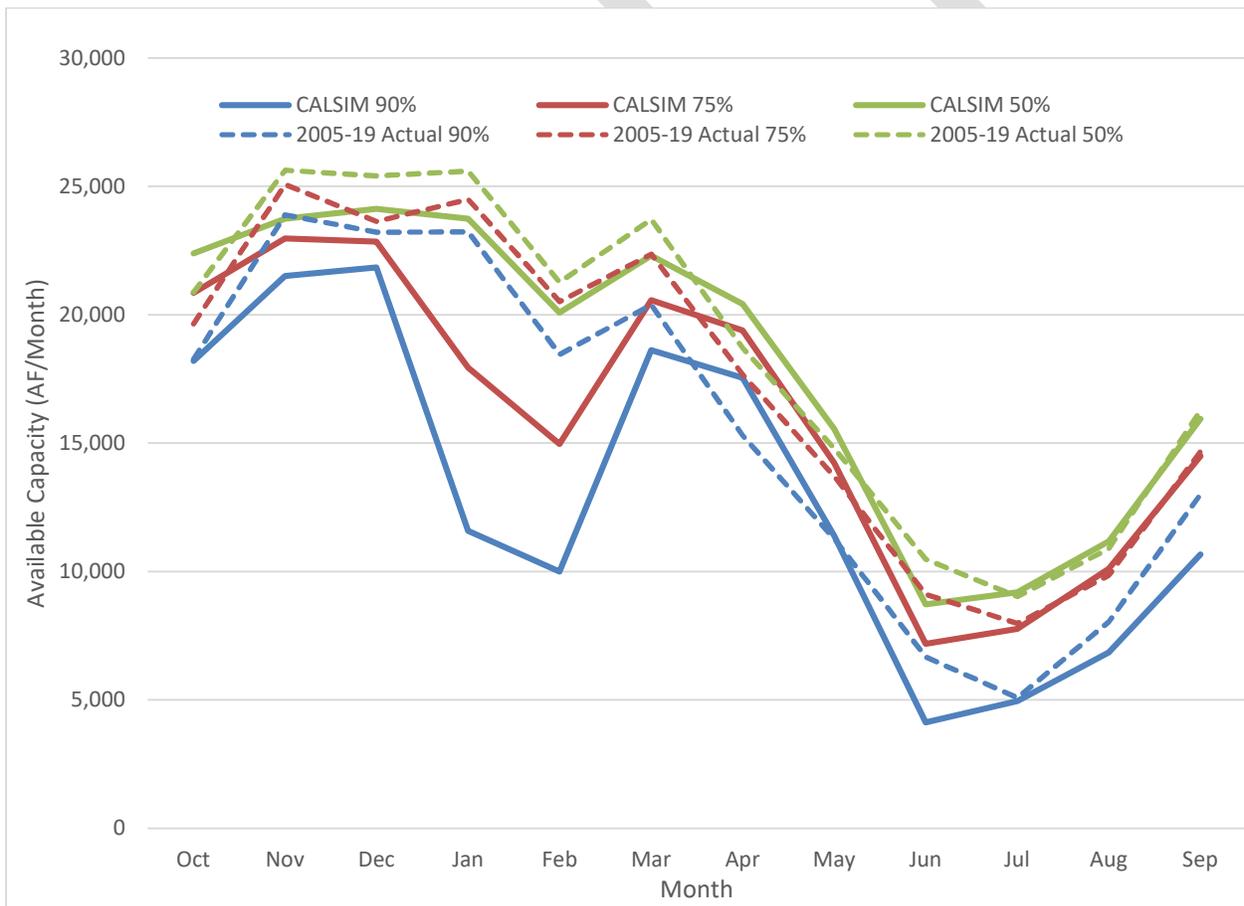


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182 As with the California Aqueduct, 2005-2019 historical water flows for Badger Hill Pumping Plant were  
 183 reviewed along with CALSIM-2 projections of a 1922-2003 long term period. As there are minimal SWP  
 184 delivery turnouts until the end of Reach 31A, the Badger Hill Pumping Plant analysis is considered  
 185 representative of Reach 31A. The design capacity for Badger Hill Pumping Plant is 454 cfs, which is  
 186 equivalent to a monthly capacity of 27,000 to 29,000 acre-feet.

187 As with Reach 7 (Check 21) capacity analyses, Badger Hill Pumping Plant available capacity was  
 188 consistent for both actual historical flows and CALSIM-2 projected flows. In both analyses, available  
 189 capacity at Badger Hill Pumping Plant is limited during the months of June through September for the  
 190 90-percentile use level particularly, and, to a lesser extent, for the 75-percentile use level. Capacity is  
 191 likely to be available for the remainder of the months, October through May, at the 90-percentile use  
 192 level. Additionally, considerable capacity is available in essentially all months for the 50-percentile use  
 193 level and drier conditions.

194 *Figure 4: Coastal Aqueduct Badger Hill Pumping Plant Capacity Availability*



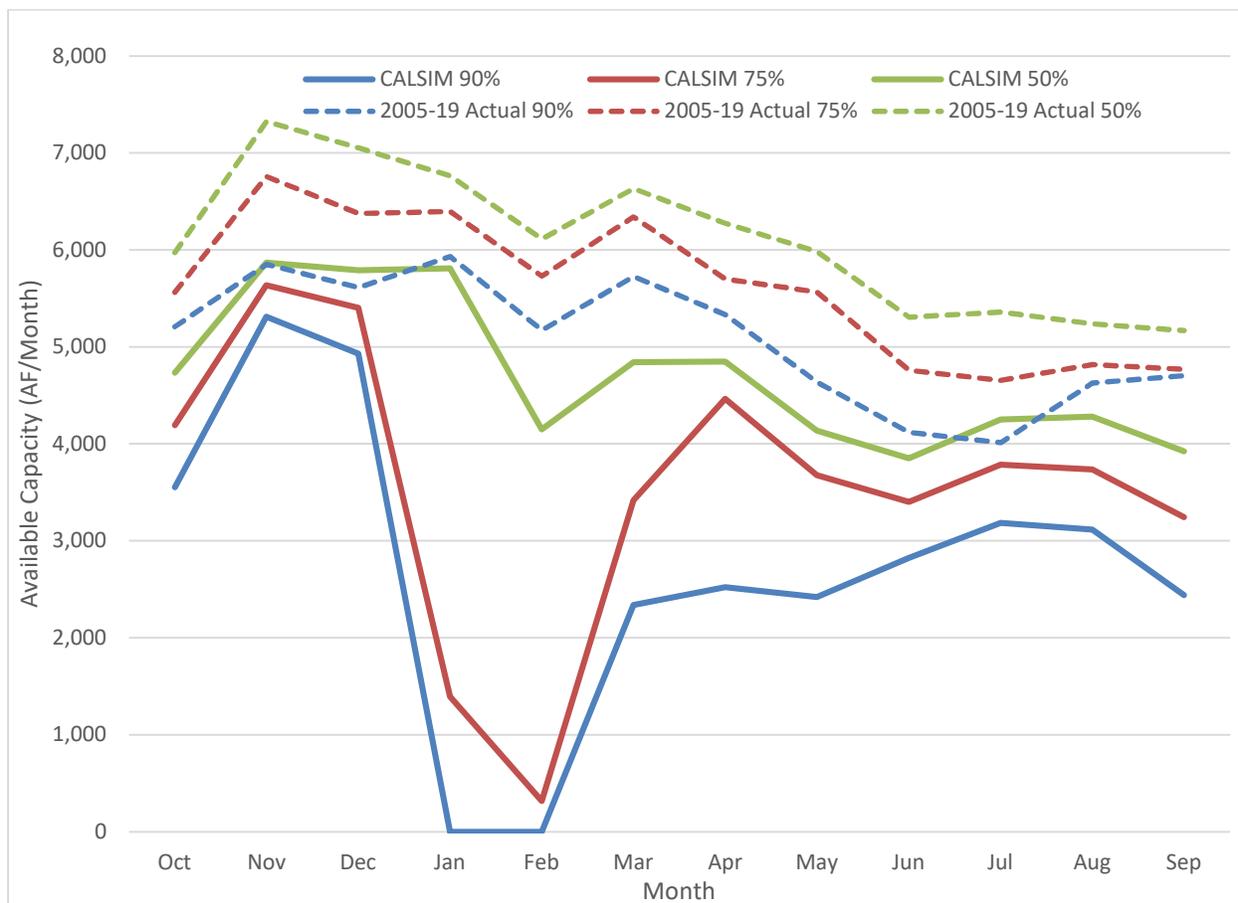
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196 **iii. Coastal Branch Aqueduct (Reach 33A)**

197 The Coastal Branch has reduced capacity in Reach 33A with CCWA and SLOFCWCD being the only  
 198 participant SWP contractors. There are three pumping plants in Reach 33A: Devils Den, Bluestone and

199 Polonio Pass. These three plants each have design capacities of 134 cfs (roughly 8,000 to 8,200 acre-feet  
 200 per month), which were intentionally designed with higher capacities than needed for CCWA and  
 201 SLOFCWCD. The purpose of the higher capacity is to allow for more energy efficient off-peak pumping  
 202 operation. The higher capacity would enable the SWP to pump water to Polonio Pass Water Treatment  
 203 Plant during evenings and low power cost periods as a means to reduce overall SWP power costs.

204 *Figure 5: Coastal Aqueduct Polonio Pass Pumping Plant Capacity Availability*



205  
 206 Figure 5 shows available capacity for Polonio Pass Pumping Plant using both actual historical operations  
 207 data for 2005-2020 and CALSIM-2 projections. Unlike similar comparisons for Check 21 and Badger Hill  
 208 Pumping Plant, the review of Polonio Pass Pumping Plant data shows significant differences between  
 209 the CALSIM-2 projections and actual historical operations. The actual operations data shows essentially  
 210 no periods of restricted capacity for any of the evaluated exceedances. There is essentially 50% available  
 211 capacity (about 4,000 acre-feet per month) in even driest conditions. The CALSIM-2 projections included  
 212 what are likely questionable assumptions about the delivery patterns for CCWA and SLOFCWCD that  
 213 have high delivery amounts in the months of January and February in some of the higher delivery years  
 214 (90-percentile and 75-percentile.) These delivery patterns resulted in low-capacity availability in high  
 215 delivery years, which do not match historical experience and appears to be an unrealistic modeling  
 216 artifact. The poor representation of Polonio Pass flows by CALSIM-2 is likely due to modeler's focusing

217 on operational issues on the main California Aqueduct and minimal attention to operations on the  
 218 Coastal Branch. For purposes of the current water management study, the CALSIM-2 data for Polonio  
 219 Pass is being ignored and the capacity available in actual historical operations will be used instead. As  
 220 noted, the actual historical data show essentially no limitations on available unused conveyance capacity  
 221 based on likely potential use.

222 Based on the actual historical use data for Badger Hill and Polonio Pass Pumping Plants, there is limited  
 223 available capacity in upstream reaches of the Coastal Branch in the summers (June through September)  
 224 in most high delivery years (any years above 50-percentile). In dry years and in non-summer months,  
 225 there is good availability of capacity.

226 Continuing downstream of the California Aqueduct to the Coastal Branch Aqueduct, the remainder of  
 227 this discussion focuses on the Coastal Branch design capacities, making a conservative estimate of actual  
 228 operational capacity that could be available on a consistent basis.

229 **VI. Analysis of CCWA Conveyance Capacity Availability**

230 At Polonio Pass, CCWA treats water at its Polonio Pass Water Treatment Plant (WTP). Downstream of  
 231 the Polonio Pass WTP, CCWA operates remaining reaches of the Coastal Aqueduct. The capacity of  
 232 Polonio Pass WTP is 43 million gallons per day (66.5 cubic feet per second), which can be a limiting  
 233 factor for use of the Coastal Branch.

234 To evaluate the impacts of Coastal Branch capacity constraints, available Coastal Branch capacity on  
 235 selected downstream reaches of the Coastal Branch was reviewed comparing historic delivery data for  
 236 1997-2020 provided by CCWA with the design capacities shown in Table 2. Note that no analysis of  
 237 CALSIM-2 results was prepared, as CALSIM-2 does not include operation of the Coastal Branch  
 238 downstream of Polonio Pass.

239 **i. Coastal Branch Reach 33B**

240 Design capacities for the Coastal Branch reaches are shown in Table 2. A 2011 hydraulic analysis  
 241 conducted for CCWA identified modeled flow capacities for the Coastal Branch that were higher than  
 242 design estimates. In Reach 33B, modeling indicated potential short term flow rates of up to 84.5 cfs. In  
 243 Reaches 34, modeled flow capacity of up to 77 cfs was identified. While the hydraulic flow modeling  
 244 indicates higher capacities than used for design, the higher capacities are considered a short-term  
 245 peaking capability and it is uncertain that they could be maintained on a consistent basis. For the  
 246 analysis here, the design rates are being used as representative of sustained flows that can be  
 247 maintained under normal operations.

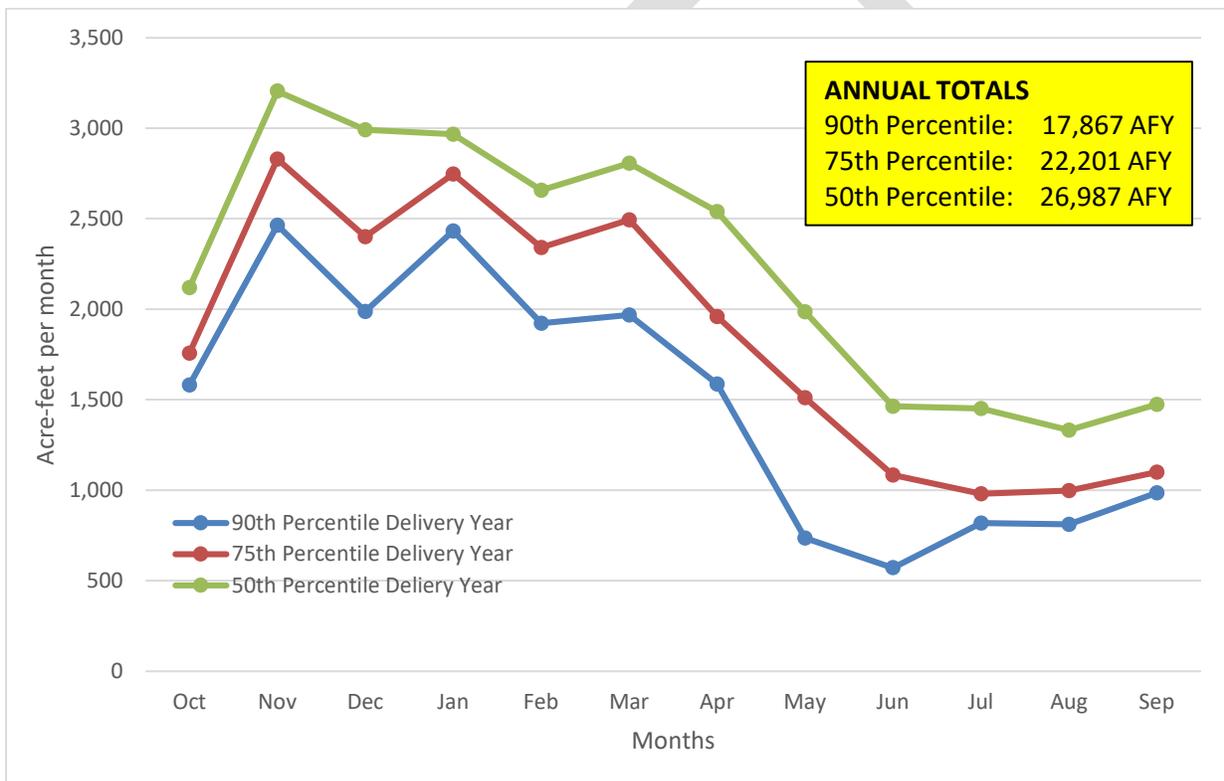
248 **Table 2**  
 249 **Coastal Branch Design Capacity**

Reach(s)	Upstream	Downstream	Design Capacity (cfs)
33B	Polonio Pass WTP	Chorro Valley TO	71
34	Chorro Valley TO	Lopez TO	68
35	Lopez TO	Guadalupe TO	64

37	Guadalupe TO	Southern Pacific RR	64
38	Southern Pacific RR	Tank 5	33
MH II	Tank 5	McLaughlin Rd	35/26
SY I	McLaughlin Rd	Santa Ynez PP	26
SY II	Santa Ynez PP	Cachuma Reservoir	22

250 During actual historical 1997-2020 CCWA delivery operations, the upstream reaches of the Coastal  
 251 Branch (Reaches 1-4), with a design capacity of 71 cfs, had monthly availability as shown in Figure 6. This  
 252 figure indicates the potential for limited availability capacity for the months of May through September. This  
 253 figure indicates the potential for limited availability capacity for the months of May through September.  
 254 Available monthly capacity during this May through September period was limited to less than 1,000 AF  
 255 for the 90<sup>th</sup>-percentile high delivery year. Available capacity is also near 1,000 AF for the months of Jun  
 256 through September at the 75-th percentile. Conversely, available conveyance capacity of 1,500 AF or  
 257 higher is regularly available for the months of October through April.

257 *Figure 6: Coastal Branch 33B Historic (1998-2020) Capacity Availability*



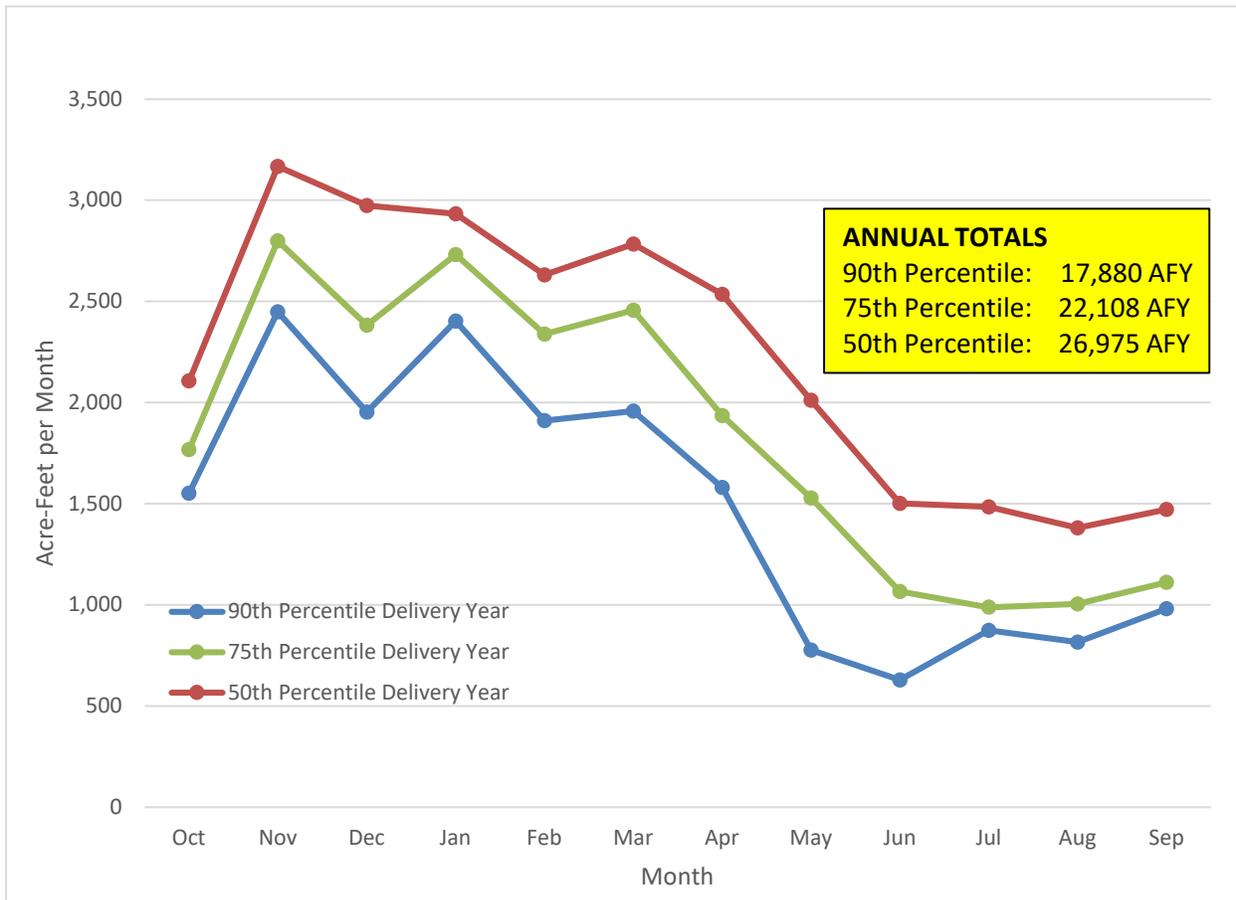
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259 **ii. Coastal Branch Reach 34**

260 Available capacity for Reach 34 of the Coastal Branch was computed based on the design capacity of 68  
 261 cfs. These reaches cover the Coastal Branch Aqueduct roughly from Santa Margarita to the San Luis  
 262 Obispo County line. This review identified the available capacities shown in Figure 7, which are generally  
 263 similar to those shown for Reaches 1-4. Available capacity is regularly limited during the months of May  
 264 through September and is relatively open for the months of October through April.

265

266 *Figure 7: Reach 34 Historic (1998-2020) Capacity Availability*



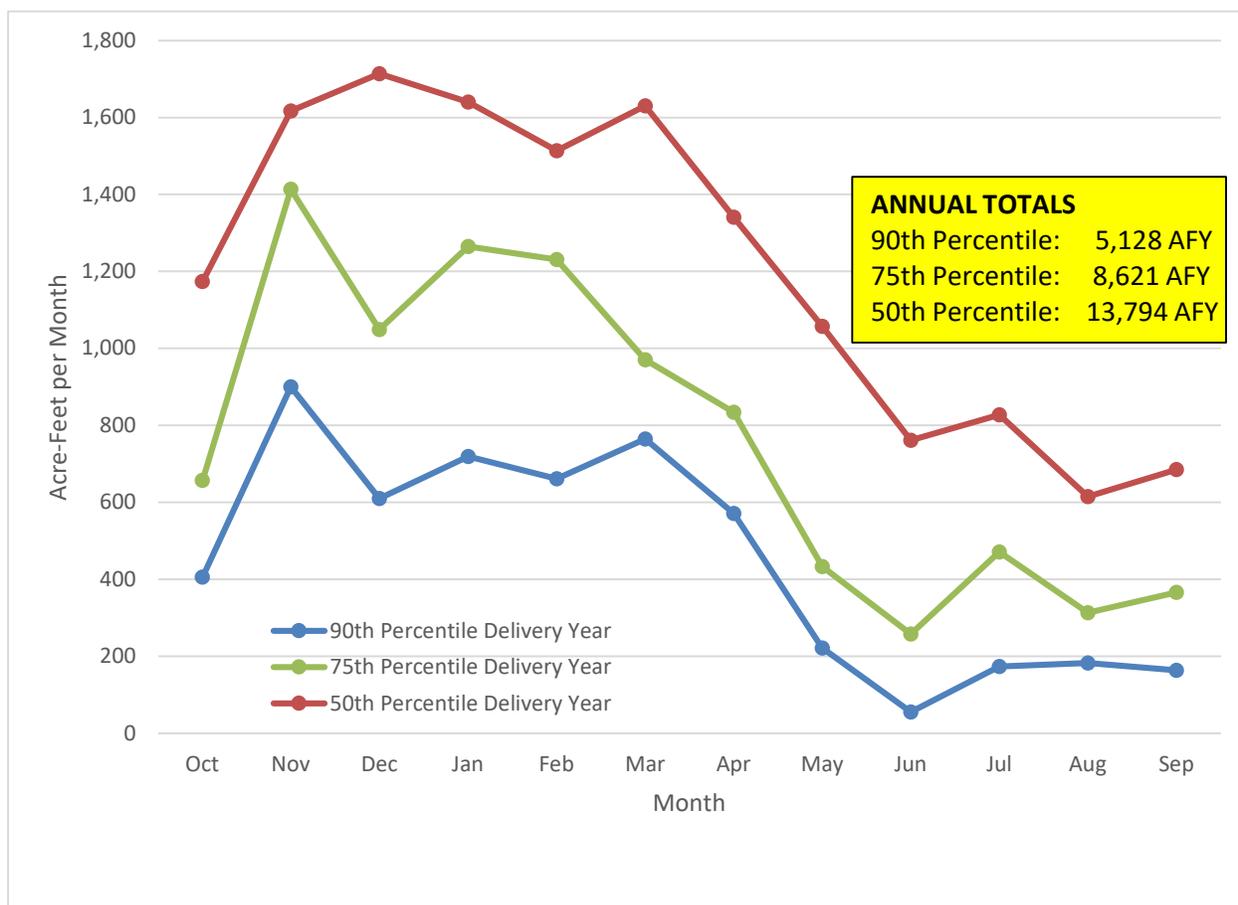
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268 **iii. Coastal Branch Reach 38**

269 Reach 38 is located south of the City of Santa Maria. This reach has a design capacity of 33 cfs, which is  
 270 significantly lower than upstream reaches and reflects the high turnout capacity at the City of Santa  
 271 Maria. Figure 8 shows very limited available capacity in the peak delivery season for high delivery years  
 272 (greater than 75<sup>th</sup> percentile), with available capacities less than 500 AF for the months of May through  
 273 September. During the remainder of the year (October through April), monthly capacities of 1,500 AF  
 274 and greater are available.

275

276 *Figure 8: Reach 38 Historic (1998-2020) Capacity Availability*

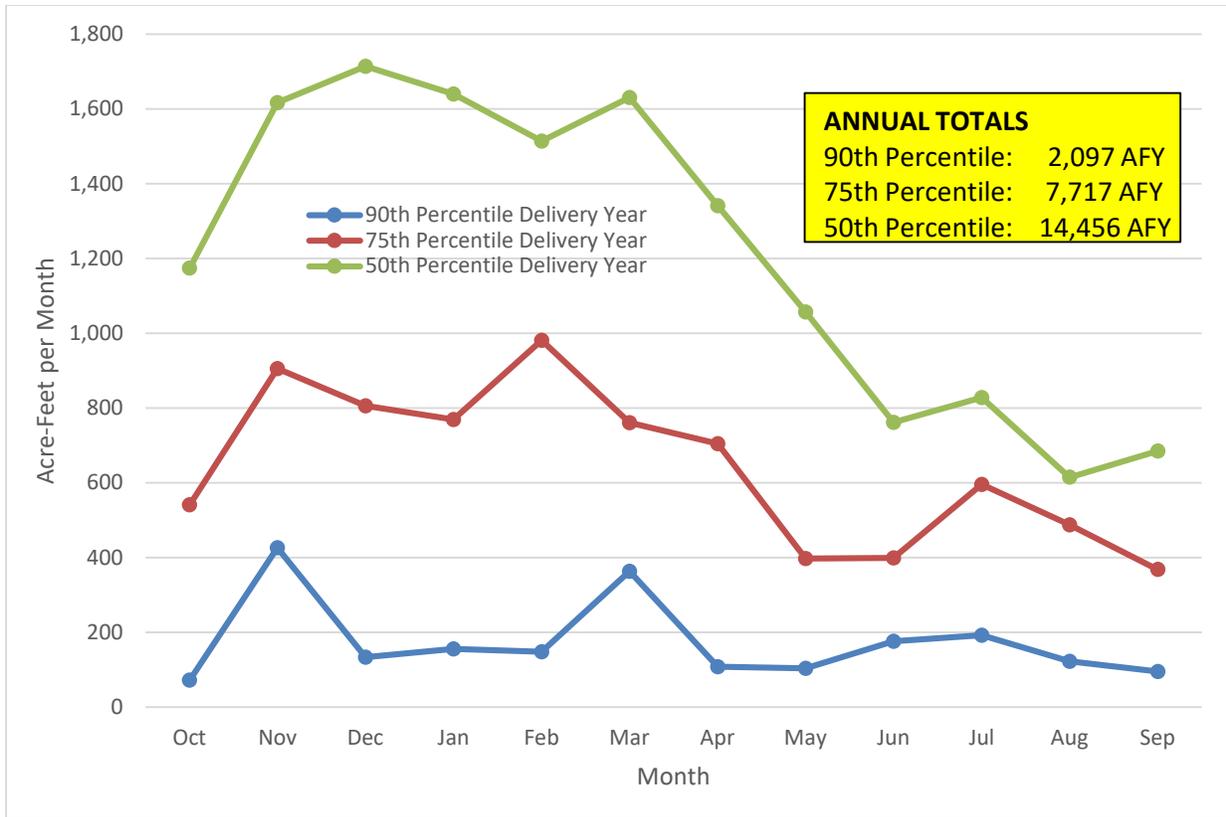


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278 **iv. Coastal Branch Reach SY II**

279 The last reach of the Coastal Branch that is analyzed is Reach SY II, located downstream of the Santa  
 280 Ynez Pump Station. This reach has a design capacity of 22 cfs, which (being the most downstream reach)  
 281 is the lowest capacity on the Coastal Branch. Figure 9 shows very limited available capacity in the peak  
 282 delivery season for high delivery years (greater than 90<sup>th</sup> percentile), with available capacities less than  
 283 200 AF for all but two months (November and March). In the 75<sup>th</sup> percentile delivery year and lower,  
 284 there is consistent relatively high capacity available for the months of October through April.

285 *Figure 9: Reach SY II Historic (1998-2020) Capacity Availability*



286

287 **VII. Conveyance Constraints Summary**

288 The review of available capacity in the California Aqueduct between the San Luis Reservoir and the  
 289 CCWA portion of the Coastal Branch indicates good availability of capacity in dry years and in non-  
 290 summer months. At Reach 7 (Check 21) there is significant available capacity in all year types from  
 291 October to May. At Reach 31A there is available capacity from October to May in high-use wet years  
 292 and in all months in drier years (50<sup>th</sup> percentile and drier). At Reach 33A there are no limitations in  
 293 available capacity even in the driest conditions. Historical actual data and CALSIM-2 modeling show  
 294 similar capacity availability results at both Reach 7 and Reach 31A but differ for Reach 33A with  
 295 historical actual data having more validity.

296 The review of available capacity in the Coastal Branch indicates that there is limited available capacity  
 297 from May through September in high-use years for all reaches. Consistently high capacity is available for  
 298 use by Coastal Branch Contractors in all years in the months of October through April as well as in low  
 299 delivery years (less than 50<sup>th</sup> percentile) in all months.

300