



— BUREAU OF —
RECLAMATION

Secretary's Order 3446

"Cutting Red Tape and Reducing Consumer Costs at
Reclamation Construction Projects"
December 19, 2025 Webinar

Agenda for today

- Describe Reclamation's initial implementation approach for SO 3446
- Focus on Section 5, Section 8 and Section 9
- Primarily we'll cover the "what, how and when" of the SO
- Describe planned process for "screening in" candidate entities
- Scope out other parts of the SO
- Describe our plan for collecting input from stakeholders
- SO online: <https://www.doi.gov/document-library/secretary-order/so-3446-cutting-red-tape-and-reducing-consumer-costs-reclamation>



SO 3446, focusing on Section 5.c.

- Reclamation is seeking comment on a variety of documents
- Any proposals that help reduce costs, improve processes or achieve efficiencies are welcome
- States and industry are encouraged to comment
- Reclamation documents will be cross-posted at usbr.gov/SO3446, in addition to their related parts of our web site (e.g. Reclamation Manual section, TSC section, etc)
- Reclamation encourages use of the SO 3446 email box SO3446@usbr.gov



SO 3446

- Focus Sections for today:
- Section 5: Policy Directives
- Section 8: Risk Management and Partner Qualification
- Section 9: FAR Updates
- 'What, how and when'



The North Fork Siphon, a Bonneville Unit feature of the Central Utah Project, was recently replaced and spans one of the many valley crossings that keep water flowing to the Strawberry Reservoir in Wasatch and Utah Counties, UT 2025.



SO 3446 Section 5: 'what, how and when'

- Section 5 Policy Directives: Implement broadly
- Reclamation is engaging with stakeholders to implement
- Reclamation will look to existing contracts where 'qualified entities can assume responsibility for procuring and managing' projects
- Reclamation will prioritize the use of partner-led procurement
- Requirement in Section 5.a. that "partner demonstrates sufficient financial capacity, technical expertise, management capability, and engineering proficiency"



SO 3446 Section 5: the 'what'

- Section 5 Policy Directives: Reclamation will apply this directive to:
 1. Environmental compliance
 2. National Historic Preservation Act compliance
 3. Cost-share programs
 4. Review of draft Risk-Based Review Matrix for the new Engineering Design Review Guideline to better align technical reviews to project complexity
 5. Workload initiation process and resource allocation tools at TSC
 6. Revisions to the Reclamation Manual, and
 7. Exploration of available contracting authorities, including IDIQs



SO 3446 Section 5: the 'how'

- Section 5 Policy Directives
- A standardized suite of information will be used for discussions and posted
- Reclamation will distribute 'standard article' contract language
- Reclamation is concurrently orienting internal BOR and DOI personnel, including at Regional and Area Offices
- Reclamation's 'Communities of Practice', such as O&M community that interacts with transferred works partners, will be central to implementing the SO



SO 3446 Section 5: the 'how'

- Reclamation will 'crowdsource' via stakeholder engagement
- In particular, Reclamation outreach to transferred works operators or tribes with agreements
- Web: www.usbr.gov/SO3446 and Email: SO3446@usbr.gov
- Additional Information Sessions to further flesh out the approach, and cover some of the details not covered today



SO 3446 Section 5: the 'when'

- Section 5 Policy Directives:
- Stakeholders can engage with Reclamation now
- Information responsive to Sections 5 and 8 Qualifications language will be needed
- Web: www.usbr.gov/SO3446 and Email: SO3446@usbr.gov
- Information Sessions will resume and elaborate late January 2026



SO 3446 Section 8: the 'what'

- Section 8: Risk Management and Partner Qualifications
- “BOR shall establish and implement a standardized vetting and approval process”
- Process “must verify that the partner has demonstrated:
 - Sufficient financial stability and bonding capacity
 - Proven technical and engineering expertise
 - Project management systems
 - Documented history of successful contract execution”
- The above will be worked through at your local levels, with support from SOL



SO 3446 Section 8: the 'what'



- Section 8: Risk Management and Partner Qualifications
- “BOR regional and area offices conduct rigorous due diligence and maintain documentation supporting each partnering decision”

Photo: Contractors and a Reclamation inspector place a stick of pipe on the Utah Lake System Pipeline, UT 2025.



SO 3446 Section 8: the 'how'

- Section 8: Risk Management and Partner Qualifications
- Projects will be collected at the local level
- Reclamation will follow the locally-driven model used in implementation of functions like O&M transfers, IRA implementation and WaterSMART awards
- Reclamation will use partner engagement, future webinars, a web page, and email inbox to 'screen in' candidate projects and partners



SO 3446 Section 8: the 'how'

- Some program design will be required per Section 8
- Reclamation will distribute 'standard article' contract language
- Reclamation's Area Offices and 'communities of practice' will again be central
- Web: www.usbr.gov/SO3446 and Email: SO3446@usbr.gov
- Information Sessions will be used to distribute information including on the 'screen in' process



SO 3446 Section 8: the 'when'



Photo: Contractors conduct embankment work for the Highway 152 embankment component of the BF Sisk Dam Raise project, a joint effort between the San Luis and Delta Mendota Water Authority, Reclamation and project partners, CA 2025.

- Section 8: Risk Management and Partner Qualifications
- A standardized suite of information will be posted and used for discussions beginning in January
- Information Sessions will continue late January 2026



SO 3446 Section 9: FAR Updates

- Updates to the Federal Acquisition Regulation (FAR) are underway per Executive Order 14275, “Restoring Common Sense to Federal Procurement”
- Reclamation will adaptively manage to FAR updates as needed
- Reclamation will document where FAR changes warrant adapting the approach with customers
- To date, the interim FAR updates adopted pursuant to the EO align with Reclamation’s SO 3446 approach



SO 3446: other implementation issues

- Legal analysis will be major part of SO 3446 implementation
- Davis-Bacon Act (40 USC Sections 3141-3148 and 29 CFR Part 5) applies for federally-owned projects
- Build American/Buy American (43 USC Chapter 83, 2 CFR Part 184, and PL 117-58 Sections 70901-70927) applies when asset will be federally-owned
- These and other statutory compliance issues will be part of implementation



SO 3446: where to find us

- Also, contact us at SO3446@usbr.gov
- And watch for updates at www.usbr.gov/SO3446
- Rely on Reclamation's Communities of Practice
- We are orienting our Regional and Area Offices
- Your local Reclamation procurements contact, Native American Affairs contact, NEPA contact, NHPA contact, financial assistance contact, etc.
- Usually in an Area Office or Regional Office



In closing...

- Reclamation's tribal and stakeholder community will be central to SO 3446 implementation
- Project proposals will be locally-sourced
- Projects will be selected via a standardized set of 'screen in' data points
- Standard article contract language will be used wherever possible
- Transferred works contracts and existing PL 93-638 agreements with tribes will be leveraged
- Additional webinars to come, but you can contact us now



Contact us at: SO3446@usbr.gov

Updates at: www.usbr.gov/SO3446

Next webinar to come in January 2026



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