Reclamation Manual

Directives and Standards

Subject: Planning for Major Rehabilitation and Replacement of Existing Assets

Purpose: To provide requirements and framework for conducting planning of major rehabilitation and replacement (MR&R) of existing assets, including analysis and plan selection criteria. The benefits of this Directive and Standard (D&S) are improved justification of investment decisions on existing assets, and improved consistency and transparency across Reclamation in planning and budget justification.

Authority: Reclamation Project Act of 1902 (32 Stat. 388) and supplementary acts; Reclamation Safety of Dams Act of 1978 (Pub. L. 95-578, 92 Stat. 2471), as amended; project-specific authorities; Water Resources Development Act (WRDA) of 2007, Section 2031 (Pub. L. 110-114); Omnibus Public Land Management Act of 2009 (Pub. L. 111-11), Title IX, Subtitle G; Water Resources Planning Act of 1965 as amended (42 USC 1962a-2); and Departmental Manual Part 707 DM 1.

Approving Official: Director, Mission Assurance and Protection Organization (MAPO)

Contact: Reclamation Law Administration Division (84-55000)

1. **Introduction.** The WRDA of 2007 called for a revision of the previous Federal water resources planning guidance, *Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies* (P&G). The revised *Principles, Requirements, and Guidelines for Water and Land Related Resources Implementation Studies* (PR&G) became effective June 15, 2015, with an expanded scope to include major modifications, and MR&R activities. Subsequently, the Department of the Interior issued 707 DM 1, *Agency Specific Procedures for Implementing the Council on Environmental Quality's Principles, Requirements, and Guidelines for Water and Land Related Resources Implementation Studies* (DOI ASP). The PR&G and DOI ASP focus on how Federal investments in water resources should be evaluated and recommended. The planning process for MR&R of the Bureau of Reclamation's existing assets uses an analysis scaled commensurately with the cost, risk, and scope of the activity.

2. **Applicability.**

   A. **Personnel.** This D&S applies to Reclamation personnel involved in identifying, planning, preparing, reviewing, and approving implementation of MR&R of existing assets.

   B. **Determination of Planning Requirement for MR&R Activities.**

      (1) **General Applicability and Types of Activities Covered.**

(a) This D&S applies to repairs, replacements, modifications, and modernizations of existing assets. If MR&R of an existing asset creates a new asset without creating new project benefits, then it is covered by this D&S, whereas construction of a new asset that creates new project benefits is not.

(b) For SOD modifications, analyses performed in accordance with Reclamation Manual Policy, *Decisions Related to Dam Safety Issues* (FAC P02); and D&Ss, *Reclamation Dam Safety Program* (FAC 06-01) and *Safety of Dams Modification Reports for Submission to the Congress* (FAC 06-03); and the *Handbook for Economic Analysis of Dam Safety Modifications* (Reclamation 2015) meet the requirements of this D&S.

(c) Emergency actions are excluded.

(d) This D&S applies to MR&R on both transferred and reserved works that meet the applicability criteria. Planning for MR&R on transferred works will be excluded if the activity is funded solely by the transferred works operator.

(2) **Cost Thresholds.** This D&S will apply if any of the following criteria are met:

(a) The total Reclamation cost of the MR&R activity is greater than or equal to $10,000,000; or

(b) The Reclamation cost of the MR&R activity is less than $10,000,000, but the regional director determines that this D&S will apply because the MR&R activity is complex, novel, or risky, or there is a reasonable expectation that costs will exceed $10,000,000 by the time construction commences.

(c) The cost threshold values in paragraphs 2.B.(2) & 2.B.(3) are in 2015 price levels and should be indexed from 2015 to present using the most recently reported composite trend for construction cost indexes in Reclamation's construction cost trends (CCT)[1]. Updated cost threshold information will be communicated in the annual notification memorandum discussed in paragraph 3.A.(11).

(3) **Scaled and Standard Analyses.** The PR&G allows for analyses to be scaled commensurately with the level of risk, cost, complexity, and scope of the proposed action. For MR&R activities covered by this D&S, a scaled analysis will typically be used for activities between $10,000,000 and $20,000,000 Reclamation cost. A standard analysis will typically be used for activities over $20,000,000 Reclamation cost. An MR&R activity up to $20,000,000

[1] Cost indexes for construction are updated and published quarterly by the Technical Service Center's (TSC) Estimation Services Group (86-68520).

Reclamation cost can use a standard analysis if the regional director determines it is risky, novel or complex. An MR&R activity over $20,000,000 can use a scaled analysis if the regional director determines the activity is straightforward, has minimal risk and environmental impacts, and a limited number of alternatives. The requirements for each level of analysis are specified in Paragraph 3 of this D&S.

(4) **Implementation Timeframe.** The requirements of this D&S will take effect for any MR&R activities that are newly identified as one of four project types in accordance with Reclamation Manual D&S, *Project Management* (CMP 07-01).

3. **Planning Process and Report Content Requirements.**

A. **General Considerations.** The PR&G states that Federal investments in water resources should strive to maximize public benefits, with appropriate consideration of costs. Public benefits encompass environmental, economic, and social goals, including monetary and non-monetary effects, and allow for the consideration of both quantified and unquantified measures.

(1) **Federal Objective.** The Federal Objective, as set forth in WRDA 2007, specifies that Federal water resources investments shall reflect national priorities, encourage economic development, and protect the environment by: seeking to maximize sustainable economic development; seeking to avoid the unwise use of floodplains and flood-prone areas and minimizing adverse impacts and vulnerabilities in any case in which a floodplain or flood-prone area must be used; and protecting and restoring the functions of natural systems and mitigating any unavoidable damage to natural systems.

(2) **Level of Effort.** As the costs, level of complexity, and scope of the activity increase, the level of effort will increase. For example, a scaled analysis at the upper end of the cost threshold or with high risk and complexity will have a level of effort close to a standard analysis.

(3) **Duration of Planning Process.** Analyses and all reviews must be completed within 24 months from the start of expenditure of funds on the planning of the XM activity. Regional director approval is required when study schedules exceed 24 months.

(4) **Resiliency.** Alternatives must address a sufficient range of hydrologic conditions to ensure resiliency. Either quantitative estimates or qualitative descriptions of impacts are acceptable. See 523 DM 1, *Climate Change Policy*; Reclamation Manual Policy, *Climate Change Adaptation* (CMP P16), and *Technical Guidance for Incorporating Climate Change Information into Water Resources Planning Studies* (Reclamation 2014) for further requirements and guidance on incorporating hydrological variability into planning analyses.

(5) **Cost Allocation and Repayment.** All MR&R activities including planning requirements of this D&S are intended to be funded through the same processes as recurring O&M responsibilities, budgeting for which is the responsibility of the regional director. Proposed project uses must be permitted under existing authorizing legislation and repayment should be covered under existing contract provisions. If new contracts or contract provisions are required to provide for repayment or cost allocation of the action, existing Reclamation Manual Policy and D&S addressing cost allocation will apply (see, Reclamation Manual D&S, *Extended Repayment of Extraordinary Maintenance Costs,* PEC 05-03).

(6) **Design, Estimating and Construction Review.** Design, Estimating and Construction Review may be required by Reclamation Manual Policy, *Independent Oversight of Design, Cost Estimating, and Construction* (FAC P10) for some XM activities.

(7) **Significant and High-Hazard Dams.** MR&R activities that are not considered SOD modifications, but which are conducted on Significant and High Hazard Dams (as defined by FAC 01-07), must be coordinated with the Dam Safety Office (DSO). If unaware of the status of a dam, contact DSO.

(8) **Value Planning.** Value Planning is required by Reclamation Manual Policy, *Reclamation Value Program* (CMP P05).

(9) **Consistency with National Environmental Policy Act (NEPA) Compliance Documentation.** Planning alternatives, assumptions, information, and evaluation of the environmental effects of the proposed XM activity will be consistent with analysis performed for NEPA compliance. The NEPA process should be integrated as early as possible into planning activities. The DOI ASP Section IV provides additional guidelines on integration of the NEPA process into the planning process.

(10) **Other Environmental and Cultural Resource and Regulatory Reuirements.** In addition to NEPA, XM activities must comply with all environmental and cultural resources legal and regulatory requirements, such as the Endangered Species Act of 1973 (ESA), National Historic Preservation Act of 1966 (NHPA), and any other intergovernmental, Federal or state regulatory compliance requirements.

(11) **Identification of Covered XM Activities and Timing of Planning Activities.** Planning activities must begin as soon as a potential XM activity is identified as meeting the applicability requirements of this D&S within a 5-year funding horizon. An annual notification memorandum developed after the annual MR&R database update will be sent to each region from the MAPO office identifying applicable XM activities. Regional planning, project management, and regional operations and maintenance staff will be copied on this memorandum. The

requirements of this D&S will be met before a decision to construct is made, as specified in CMP 07-01. Preliminary cost estimates may be used to determine applicability. If the cost of an XM activity increases during analysis or design phases, and subsequently exceeds the minimum cost thresholds, then the XM activity must meet the requirements of this D&S.

(12) **Combining Planning for Related XM Activities.** Where possible and appropriate, a single XM Justification Report should be prepared for a larger set of combined or related XM activities to avoid duplication of planning efforts and to avoid preparing multiple similar reports. Combining planning efforts for related XM activities will also serve to better coordinate these activities and consider longer-term, broader impacts of related activities. Splitting or subdividing related activities into separate lower-cost actions for the sole purpose of avoiding the requirements of this D&S is prohibited. For larger XM activities, a phased construction approach may be utilized, but the planning analysis must still be performed for the entire activity. If any conditions change substantially before later phases of construction begin, the regional director must determine whether the significance of the changes warrants a new planning analysis.

B. **Scaled Analysis Requirements.**

(1) **General**. Scaled analyses will be more closely aligned with appraisal-level analyses. The scaled analysis will use information that varies between readily available information and the collection of additional information sufficient to remove unacceptable risks and unknowns. Any drawings, renderings, mapping, and cost estimates must be sufficient to compare alternatives and determine the viability of each alternative, in terms of engineering, economics, financial capability, environmental, safety, and other technical areas. If information is not readily available or is insufficient to determine impacts of the proposed XM activity, new information must be collected.

(2) **Integration with Existing Processes.** For most low-risk scaled analyses with limited options to accomplish the XM activity, the alternative identification process of this D&S can be accomplished during the value planning study.

(3) **Alternatives.** A scaled analysis must use a minimum of two action alternatives in addition to the "no action" alternative. Scaled analyses will generally include less quantification of impacts. For scaled analyses, either a benefit-cost analysis or a cost-effectiveness analysis may be used.

(4) **Cost Estimates.** Cost estimates will be at least the appraisal level for evaluating alternatives and selecting a recommended alternative in a scaled analysis. After the XM planning activities are complete, construction cost estimates must meet the required Percent Final Design level of estimates. See Reclamation Manual D&S, *Cost Estimating* (FAC 09-01) and RM D&S *Representation and*

Referencing of Cost Estimates in Bureau of Reclamation Documents Used for Planning, Design and Construction (FAC 09-03).

C. **Standard Analysis Requirements.** A standard analysis is a more comprehensive analysis, and requires a higher level of detail, compared to a scaled analysis, as specified by the DOI ASP. A standard analysis is generally used for new projects or significant modifications of existing projects, where there are high risks and costs associated with the proposed actions. For Reclamation, a standard analysis is a feasibility study pursuant to Reclamation Manual D&S, *Water and Related Resources Feasibility Studies* (CMP 09-02), and the requirements therein will apply.

D. **XM Activity Planning Process.**

(1) **Identify Problems, Needs, Opportunities, and Determine Level of Analysis.** The first step in XM activity planning is to define the problem being addressed, needs, opportunities, scope of the proposed action, and determine the appropriate level of analysis. Objectives must be defined to avoid dictating a specific or narrow range of alternatives.

(a) The scope of the investigation must be scaled relative to the size, complexity, cost, and degree of controversy surrounding the proposed project. Analysis of potential adverse impacts must consider economic, environmental, and other social effects. The level of analysis must be appropriate for the scale, scope, cost, and potential impacts of the alternatives. Associated analyses, such as those for cultural and natural resources, must also be scaled to correctly assess potential impacts. In addition to the cost thresholds, the following elements must be considered, as relevant and applicable, in determining the appropriate level of analysis[2]:

(i) magnitude and significance of specific problems and opportunities the investment seeks to address;

(ii) significance of natural and cultural resources within the study area;

(iii) magnitude and significance of expected impacts of the investment;

(iv) expected investment scale and costs;

(v) complexity in science, engineering, ecosystems, cultural resources, resource management;

(vi) projected service or operational life of the project or facility;

[2] While not required, other elements may be considered in addition to this list when determining the appropriate level of analysis.

(vii) stakeholder concerns;

(viii) authority under which the investment decision/recommendation is made;

(ix) uncertainty in decision variables and resulting risk exposure;

(x) degree of performance or irreversibility of a potential investment decision;

(xi) nature and extent of tribal trust responsibilities in the study area;

(xii) best scientific information available; and

(xiii) cumulative effects of, or controversy associated with, any of the above.

(2) **Inventory Existing Resources and Forecast Future Conditions.** The second step is to provide the baseline from which the proposed XM activity will alter future conditions. An inventory will be compiled of present and projected future resource conditions that will have a bearing on plan formulation to meet the identified problems, needs, and opportunities regarding the proposed activity. For example, the current water deliveries and power production must be estimated, and future levels of service must be estimated without the XM activity. If conditions change during the planning process, the changed conditions must be taken into account if the policy compliance review has not yet started, and accounting for the changes will not significantly delay completing the XM Justification Report.

(3) **Formulate Alternative Plans.** The third step in XM activity planning is to formulate alternative plans. Alternatives considered in resolving the identified problem or meeting needs or opportunities must be described, analyzed, and compared. Alternative plans must include solutions that are practical, feasible, meet the planning objectives, and seek to minimize adverse impacts on environmental resources. The viability of each alternative must be assessed based on the criteria of completeness, effectiveness, efficiency, and acceptability. See PR&G, DOI ASP and CMP 09-02 for more information on alternative development.

(a) **No Action Alternative.** The actions that would most likely be taken within the project area during the period of analysis (planning horizon) to address the identified problems, needs, or opportunities if the proposed project is not constructed must be described, including the estimated cost of those actions.

(b) **Action Alternatives.** In addition to structural approaches, alternatives must consider nonstructural approaches, such as measures to improve water use

efficiency, reduce water demands through conservation, minimize water losses, operational changes, reduced energy use, or de-commissioning.

(4) **Evaluate Effects of Alternative Plans.**

(a) **General Considerations.** Alternatives must be evaluated based on economic, environmental, and social factors. Each alternative will include a cost estimate. The no action alternative costs are estimated by costs of emergency actions in the event of failure, costs related to excess downtime, potential damage to natural and cultural resources, and the value of lost production or authorized project benefits. If the no action alternative has other unavoidable costs, such as removal of project features, mitigation of impacts at the project site, or long-term site security, then those costs must also be included in the cost of the no action alternative. If multiple separate actions are proposed on a single project or facility, the analysis will consider the effects one action may have on another and the effects of the combined actions. Not all costs of the action need to be monetized to be considered. For example, depending on the level of analysis, impacts to cultural and environmental resources may be described only qualitatively, or they may be estimated quantitatively but not monetized. Any impacts that occur during the period of construction must also be considered.

(b) **Period of Analysis.** The period of analysis is the lesser of 100 years or the expected life of the project, facility, or primary component of the XM activity. The length of the period of analysis must be consistent with the anticipated life of an investment. The period of analysis must be consistent across all alternatives.

(c) **Discounting and Price Levels.** All monetized costs and benefits must be analyzed in the same fiscal year (FY) price level, which must be the most recent FY price level available when the report is prepared. Costs must be presented as total present value costs and average annual costs. In the future without-action condition, the timing of costs of a failure or reduction in service must be estimated based on when a failure or reduction in service is expected to occur and then discounted to present value. A stream of future costs and benefits may be shown as well. Alternatively, given the difficulty of estimating when a failure or reduction in service may occur in the future, it is acceptable to quantify such failures or reductions in service based on the probability of occurrence in any given year instead of predicting the exact year of the failure or reduction in service. In this case, the cost of the failure or reduction in service multiplied by the probability of occurrence will be discounted from the mid-point of the period of analysis. The current water resources planning rate must be used for discounting and amortization unless justification is provided for using a different discount rate or method.

(5) **Compare Alternative Plans.** The different effects of each alternative plan will be compared, highlighting any tradeoffs between alternatives. Comparison of alternatives will be consistent across all alternatives. Qualitatively described effects and quantitative non-monetized effects must be considered when comparing alternative plans. Analyses will consider environmental factors, including the impact to natural and cultural resources. Comparison of plans for a cost-effectiveness analysis consists of evaluating each alternative plan's cost and level of service or output[3]. An alternative is found to be cost-effective when no other alternative provides the same level of service or output at a lower cost, and no other alternative provides a higher level of service or output at the same cost. There can be multiple cost-effective alternatives. The level of service or output does not need to be monetized; it can be evaluated in other units such as annual kilowatt-hours of generation, or annual acre-feet of water deliveries.

(6) **Plan Selection.** Plan selection will be based on the plan that is found to be the most cost-effective or delivers the highest net public benefits, except when another plan is deemed superior after taking into account non-monetized and unquantified costs or benefits. For example, a plan may be selected that is not the most cost-effective but avoids significant unquantified or non-monetized adverse impacts or provides greater operational flexibility or reduces risk and uncertainty. If the no action alternative is the selected plan, then an assessment must be made about whether the activity can be avoided or delayed indefinitely. If avoiding or delaying the activity indefinitely would eventually create a life-threatening emergency situation, then another cost-effective plan must be selected, or decommissioning could be considered as one of the action alternatives. If the regional director recommends the project for suspension of construction or de-authorization, follow criteria and procedures in Temporary Reclamation Manual Release, *Determination to Suspend an Authorized Construction Activity* (CMP TRMR-88).

E. **XM Justification Report Contents.** For each MR&R activity covered by this D&S that is not a SOD modification (or for groups of related activities), an XM Justification Report will be prepared, overseen by the regional director, and addressing the analysis requirements in Paragraphs 5.B. through 5.D., as applicable. For SOD modifications, SOD Modification approval documents will be prepared in lieu of XM Justification Reports. The required content of the XM Justification Report is described in the subparagraphs below. If requirements of this D&S are met while conducting other efforts required for XM activities, the XM Justification Report must summarize, reference, and be based on documentation from those other required activities, such as Value Planning, NEPA compliance, cost estimates, DEC reports, etc., and attach these supporting documents to the XM Justification Report.

[3] Additional information on Cost-Effective Analyses can be found in the DOI ASP.

(1) The Problem and Need section of the XM Justification Report will include a summary of the objectives of the XM activity. The problem statement will address:

(a) the significance of the problem and its impact on water supply and power delivery systems;

(b) any potential threats to public health and safety caused by the condition;

(c) the current need for the XM activity to be performed; and

(d) how not addressing the problem is impacting project performance either currently or in the future.

(2) The Scoping section of the XM Justification Report will identify the level of analysis performed with justification as to why that level of analysis is appropriate.[4] State the risk of significant adverse impacts from the proposed XM activity, or due to no action. Identify constraints which may limit consideration of alternatives. Include a discussion of project partners, project beneficiaries, and stakeholders and their roles with respect to the project and proposed XM activity. List the authorities under which the XM activity is authorized.

(3) The Existing and Future Conditions section of the XM Justification Report will state the current and forecasted future resources and conditions in the project area for both with- and without-action scenarios. Any conditions that changed during the course of the planning analysis and were not accounted for in the analysis must be described qualitatively.

(4) The Alternatives Formulation section of the XM Justification Report will include a detailed description of each alternative, and how alternatives would address the need for the XM and overall project or program objectives. A description of potential impacts upon natural and cultural resources must be included. The risks and uncertainties associated with the no action alternative must be identified, along with the potential consequences if nothing is done to address the problem and need. Action alternatives that address the problem and meet the needs of the XM must be described in a similar level of detail using narrative, maps, drawings, and photographs, as appropriate. The viability of each alternative must be described based on the criteria of completeness, effectiveness, efficiency, and acceptability.

(5) The Alternatives section of the XM Justification Report will include a summary table showing the different effects of each alternative plan, highlighting any

[4] This scoping process applies only to determine the level of analysis to be used for planning, and it should not be confused with the scoping process for NEPA.

tradeoffs between alternatives. The summary table will include potential economic, environmental, and other social or cultural effects. The method of display and level of detail must be consistent across all alternatives. Each action alternative will include a cost estimate, and estimated costs of the no action alternative will be shown.

(6) The Plan Selection of the XM Justification Report will identify the recommended alternative. It will state the justification for plan selection and details of the selected plan.

F. **XM Justification Report Reviews.**

(1) **MAPO.** The MAPO office will review XM Justification Reports for compliance with this D&S. Policy compliance review periods for scaled analyses will be approximately 30 days, unless the regional director and the MAPO Director agree to deviate from this timeframe. Timeframes for policy compliance reviews for standard analyses will comply with CMP 09-02. Significant findings from policy compliance reviews of XM Justification Reports will be transmitted to the regional director and Commissioner after completion of the review. Included in the finding's memorandum will be a determination that the Justification Report did or did not meet the D&S compliance requirements. For SOD modifications, MAPO's participation in a SOD Modification approval document certification review team will constitute compliance with this review requirement.

(2) **Regional Director.** Regional directors will oversee XM planning activities and ensure XM justification Reports and supporting documentation are technically adequate, conform to Federal law, and comply with all applicable RM and DM release. Regional directors will review MAPO's findings and take the appropriate action. If the Finding is that the Justification Report meets the D&S requirements without further revisions, then a memorandum will be prepared to transmit the regional director's approval of the Report to the MAPO Director and the Commissioner. If there are Findings that prevent MAPO from determining that the Report complies with the D&S, the regional director will review the Findings and take the required actions to address the Findings and prepare another version of the Justification Report. The regional director will transmit the responses and/or revised XM Justification Report to MAPO for review according to Paragraph 3.F.(1) above.

4. **Definitions.** The following definitions apply for the purposes of this D&S.

A. **Asset.** A capitalized facility, building, structure, authorized project feature, power production equipment, recreation facility, or quarters, as well as capitalized and non-capitalized heavy equipment, motor vehicles, and other installed equipment that is used to achieve the mission of Reclamation to manage, develop, and protect water and

related resources in an environmentally and economically sound manner in the interest of the American public.

B. **Emergency Actions.** Actions that Reclamation determines are necessary to minimize the risk of imminent harm to public health or safety, or property.

C. **Extraordinary Maintenance (XM).** Major nonrecurring maintenance to Reclamation-owned or operated facilities, or facility components, that is intended to ensure the continued safe, dependable, and reliable delivery of authorized project benefits, and is greater than 10 percent of the contractor's or the transferred works operating entity's annual operation and maintenance (O&M) budget for the facility, and greater than $100,000.

D. **MR&R Activity.** MR&R activities include XM actions and SOD modifications.

E. **Reclamation Cost.** All costs associated with the MR&R activity that are paid for with Reclamation's annual appropriations.

F. **Reserved Works.** Reclamation-owned facilities for which Reclamation manages and performs O&M, either through Reclamation employees or a maintenance contract.

G. **Routine O&M.** Routine O&M includes the recurring activities, required for the continuing safe operation of Reclamation facilities in the manner necessary to provide authorized project benefits. The definition includes tasks, activities, practices, management, and programs that are recurring based on a finite time period, condition analysis, or another metric. Facility inspections and minor maintenance are also included within this category.

H. **SOD Modification.** An action to resolve a 'dam safety issue' as defined in Reclamation Manual Policy, *Decisions Related to Dam Safety Issues* (FAC P02), Paragraph 3.B.

I. **Transferred works.** Reclamation-owned facilities for which the responsibility to manage and perform O&M has been transferred by contract or agreement to a non-Federal operating entity.

J. **XM Justification Report.** Documentation of the planning associated with XM activities performed in compliance with this D&S.

5. **Review Period.** The originating office will review this release every 4 years.

RECLAMATION
Managing Water in the West

RECLAMATION MANUAL TRANSMITTAL SHEET

Effective Date: **10/27/2020**

Release No. **601**

Ensure all employees needing this information are provided a copy of this release.

Reclamation Manual Release Number and Subject

CMP 09-04 Planning for Major Rehabilitation and Replacement of Existing Assets

Summary of Changes

1. Paragraph 3.A.(10) has been revised to note the projects will be identified through an annual notification memorandum sent from Policy & Programs to each region. Applicable projects identified as part of the annual notification memorandum will be developed after the annual MR&R database update, noting only those projects 5 years out or less. Regional planning, project management, and regional operations and maintenance staff will be copied on this memorandum.
2. Paragraph 2.B.(2)(c) has been updated to indicate the cost thresholds will be communicated in the annual notification memorandum discussed in paragraph 3.A.(10).
3. The prior Responsibilities paragraph has been removed per RM guidance and responsibilities have been incorporated throughout the D&S (Policy Director responsibilities referenced in Paragraph 3.F.(1) and Regional Director responsibilities referenced in 2.B.(3) and (4), 3.A.(3), (5) and (12), 3.D.(6), and 3.F.(2)).
4. Policy & Administration has been replaced with Policy and Programs to reflect new directorate name, and to update the Director's title.
5. The paragraph containing Definitions has been moved to the second to last paragraph, per RCD 03-01 requirements.
6. A review period of every 4 years has been included, per RCD 03-01 requirements.

***Administrative change effective on 10/22/23: Policy and Programs was changed to Mission Assurance and Protection Organization (MAPO).**

NOTE: This Reclamation Manual release applies to all Reclamation employees. When an exclusive bargaining unit exists, changes to this release may be subject to the provisions of collective bargaining agreements.

Filing instructions

Remove Sheets	Insert Sheets
CMP 09-04 pp 1-13	**CMP 09-04 pp 1-12**

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Filed by: **Maria F. Clardy**

Date: **10/23/2023**