**LIMITED SOURCES JUSTIFICATION AND APPROVAL**
**For Orders or BPAs established under Federal Supply Schedules**

In accordance with FAR 8.405-6, the proposed contractual action is pursuant to the statutory authority under the Multiple Award Schedule Program [Title III of the Federal Property and Administrative Services Act of 1949 (41 U.S.C. 251, et seq.) and Title 40 U.S.C. 501, Services for Executive Agencies]. This template is required for all limited sources justifications over the micro-purchase threshold, including brand name.

1. **Agency and Contracting Activity (FAR 8.405-6(c)(2)(i)).**
   U.S. Department of the Interior, Bureau of Reclamation (Reclamation), Interior Region 8: Lower Colorado Basin, Acquisition and Assistance Management Office, Boulder City, Nevada.

2. **Nature/Description of Action (FAR 8.405-6(c)(2)(ii))**.
   A Firm-Fixed Price task order, under General Services Administration (GSA) Federal Supply Schedule, with 1 base year and 3 option years, is anticipated to be awarded for this action.

3. **Description of Supplies/Services (FAR 8.405-6(c)(2)(iii))**.
   Reclamation requires specialized technical support services for the continued development, maintenance, and operation of RiverWare based water modeling systems used to support Colorado River operations, salinity forecasting, water quality analysis, groundwater modeling, and system optimization. These models are used to inform critical water management decisions and support international treaty obligations, including ongoing compliance and negotiation activities. The contractor shall provide modeling support, forecasting, reporting, and system updates to ensure continuity and accuracy of model outputs used in mission critical operations. The period of performance is August 1, 2026, through July 31, 2030, consisting of a base year and three option years. The total estimated value of this requirement is approximately [redacted]

4. **Authority and Circumstance Justifying Limiting Sources (FAR 8.405-6(c)(2)(iv) and 8.405-6(c)(2)(xi)).**

| | Authority | Circumstance |
|---|---|---|
| ☐ | FAR 8.405-6(a)(1)(i)(A) | An urgent and compelling need exists, and following the procedures would result in unacceptable delays. |
| ☒ | FAR 8.405-6 (a)(1)(i)(B) | Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized. |

| | Authority | Circumstance |
|---|---|---|
| ☐ | FAR 8.405-6 (a)(1)(i)(C) | In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or BPA must not have been previously issued under sole-source or limited-sources procedures. |
| ☐ | FAR 8.405-6(b)(1) | Brand name specifications shall not be used unless the particular brand name, product, or feature is essential to the Government's requirements, and market research indicates other companies' similar products, or products lacking the particular feature, do not meet, or cannot be modified to meet, the agency's needs. |

A. **Proposed Contractor Name.**
Hydros Consulting Inc. 1628 Walnut Street Boulder, Colorado 80302-6343

B. **Rationale Supporting the Circumstance to Limit Sources**
The RiverWare models supported under this requirement are used to inform critical water management decisions for Colorado River operations, including salinity forecasting, water quality analysis, groundwater modeling, system optimization, and activities related to treaty compliance and ongoing negotiations. Continuous, accurate model operation is essential to support mission critical decision making and to avoid disruption to operational planning and compliance related activities.

Hydros Consulting Inc. is the original developer and long-term maintainer of the RiverWare-based models and possesses unique institutional knowledge of their architecture, calibration, integration, historical development, and operational application. The requirement is highly specialized and involves not only software familiarity, but also detailed understanding of how the models function within Reclamation's broader operational environment and associated platforms.

Transition to another contractor is not practicable within the required timeframe. A successor contractor would require substantial time to obtain knowledge transfer, understand the structure and dependencies of the models, validate outputs for operational use, and become sufficiently familiar with the integrated systems and datasets to perform without unacceptable performance risk. Reclamation estimates this transition would require at least one year, which would exceed the available timeframe for uninterrupted support.

Any disruption in support, maintenance, or updating of these models would create unacceptable risk to continuity of operations, data reliability, forecasting accuracy, and timely water management decision making. Such disruption could impair Reclamation's ability to support critical Colorado River operations and fulfill treaty related and compliance obligations. Accordingly, only Hydros Consulting Inc. can provide the required services at the level of quality required and within the timeframe necessary to avoid unacceptable operational risk.

5. **Best Value Determination (FAR 8.405-6(c)(2)(v))**.
   The proposed contractor is a current GSA schedule holder, and pricing for services offered under the schedule have been determined fair and reasonable by GSA. The government will evaluate the proposed pricing to ensure it is reasonable.

6. **Description of Market Research (FAR 8.405-6(c)(2)(vi))**. Market research was conducted through review of the GSA Federal Supply Schedule, historical federal contract awards via sam.gov, and the federal procurement data system. This research identified that similar RiverWare modeling support requirements across multiple regions have consistently been awarded to Hydros Consulting Inc. No other vendors were identified as having comparable experience in developing, maintaining, and integrating the RiverWare, MODFLOW, and CE-QUAL-W2 models required to support this effort. Based on this research and the highly specialized nature of the requirement, it was determined that only Hydros Consulting Inc, is capable of meeting the government's need.

7. **Any Other Supporting Facts (FAR 8.405-6(c)(2)(vii)).** Hydros Consulting Inc. has supported Reclamation for over 15 years in the development and maintenance of RiverWare models used for operational decision making. These models are critical to managing Colorado River operations, supporting water conservation efforts, and ensuring compliance with international treaty obligations.

8. **Actions Taken to Remove or Overcome Barriers to Restricted Consideration (FAR 8.405-6(c)(2)(viii)).** This requirement was previously competed; however, due to the highly specialized nature of the RiverWare based models and Hydros Consulting Inc.'s role as a developer and long-term maintainer, only Hydros Consulting Inc. is capable of providing the required services without unacceptable risk to the operations and continuity. The government will continue to assess opportunities to increase competition in future acquisitions. However, due to the specialized nature of the requirement, competition is not feasible at this time. Future efforts may evaluate opportunities for knowledge transfer or documentation to support increased competition where practicable.

**PREPARED BY:**

[redacted]

**CONTRACTING OFFICER (CO) CERTIFICATION (FAR 8.405-6(c)(2)(ix)): (All Values)**
*This justification is accurate and complete to the best of my knowledge and belief.*

[redacted]

**CHIEF of the CONTRACTING OFFICE CONCURRENCE (CCO) ((FAR 8.405-6(d)(1), DOI-AAAP-0024, and WBR 1408.4): (> $250K)**

[redacted]

**BUREAU COMPETITION ADVOCATE (FAR 8.405-6(d)(2)): (> $750K)**

[redacted]