[redacted]

[redacted]

JUSTIFICATION REVIEW DOCUMENT – LIMITED SOURCES JUSTIFICATION (LSJ)		
CONTROL #	[redacted]	
Project/Equipment	Modular Facility Lease and Dismantle/Removal, Phase II, Tyndall AFB, Florida	
Authority:	GSAR 538.7104-3(b)(iii)	**AMOUNT** [redacted]
Prepared by:	**Name:** Sophia M. Chin **Title:** Contract Specialist	**Telephone:** [redacted]
Contracting Officer *(See Sections 13-14 Below)*	**Name:** John C. Vandiver **Title:** Contracting Officer	**Telephone:** [redacted]
Technical *(See Section 11 Below)*	**Name:** Steven E. Daniels Jr. **Title:** Project Manager	**Telephone:** [redacted]
Requirements *(See Section 12 Below)*	**Name:** Steven E. Daniels Jr. **Title:** Chief, Tyndall Program Integration Office, Programs & Project Management Division	**Telephone:** [redacted]
Signatures Are Required Below:		
I have reviewed this justification and find it adequate to support other than full and open competition.		
Deputy for Small Business	**Signature:** RODGERS.SONYA [redacted] Digitally signed by [redacted] Date: 2026.05.06 08:33:01 -05'00'	**Date:** *(See Signature)*
	Name: *(See Signature)*	**Telephone:** *(See Signature)*
Project Manager *(If no PM, use N/A)*	**Signature:** DANIELS.STEVEN.E. [redacted] Digitally signed by [redacted] Date: 2026.05.05 12:41:25 -05'00'	**Date:** *(See Signature)*
	NAME: Steven E. Daniels Jr.	**TELEPHONE:** [redacted]
Office of Counsel (OC)	**Signature:** ANGUS.KALEY.ELIZ [redacted] 55 [redacted] 2026.05.11 14:12:54 -05'00'	**Date:** *(See Signature)*
	Name: *(See Signature)*	**Telephone:** *(See Signature)*
Business Oversight Branch (BOB) Chief	**Signature:** James K. Kiesling Date: 2026.05.14 09:46:51 -05'00'	**Date:** *(See Signature)*
	Name: James K. Kiesling	**Telephone:** [redacted]
Chief of Contracting Office (CoCO)	**Signature:** Carl Wade Date: 2026.05.14 14:44:13 -05'00'	**Date:** *(See Signature)*
	Name: Carl Wade	**Telephone:** [redacted]

[redacted]

Limited-Sources Justification
For
Other Than Full and Open Competition

1. **Contracting Activity:** U.S. Army Corps of Engineers (USACE), Mobile District, 100 Canal Street, Mobile, Alabama 36602.

2. **Description of Action:** Approval is requested for an out-of-scope modification to extend the period of performance by two years for firm fixed price task order W9127819F0112 for a Modular Facility Lease to support Phase II at Tyndall Air Force Base (AFB), Florida. The task order is currently funded with Air Force Operation and Maintenance (O&M) funding. Fiscal Year (FY) 2026 Air Force O&M funds are available for the first year of the extended period of performance requested by this Justification. Exercise of the additional requested option year will be dependent upon availability of Air Force O&M funding that is current at the time the options are exercised.

Contractor: Modular Management Group, Inc. (MMG)
Cage Code: 46Y71
Address: 6602 Plaza Parkway, Fort Worth, TX, 76116-2400

3. **Description of Supplies/Services:** The modular facility supports the hurricane recovery effort at Tyndall AFB, Florida by providing office space for displaced Phase II employees while construction of new facilities is in progress. Due to its importance to National Security, it is essential that the AFB be returned to operational status as soon as possible. To accommodate this, temporary facilities were required to provide working space for the returning airmen. While efforts to repair the base have been underway since 2019, there was no confirmed time of completion on the repairs at the time of contract award. The repairs are behind schedule, and it is now expected that the repairs will require an additional two years for completion. The temporary leased facility consists of multiple modular trailers producing approximately 11,220 SF of administrative office space and housing up to 67 Government employees for Phase II. The original contract awarded to MMG provided for onsite construction of the modular facility and a base and four option lease periods that began 15 June 2019. The original contract was extended for two option lease periods that began on 15 June 2024 through LSJ Control # 24-0023 and modifications P00016 and P00017 to the task order. The Option Year 6 period ends 14 June 2026, but the new permanent facility is not complete. Therefore, the need for a temporary leased facility continues. In accordance with Department of the Air Force Guidance Memorandum to Department of the Air Force Instruction 32-1020 (Sep 2022), seven years is the maximum allowable initial duration of use for Relocatable Facilities (RLFs) with appropriate General Officer/Senior Executive Service (GO/SES) approval. The GO/SES approval dated 21 December 2023 approved a total of seven years. This initial extension satisfies the single time extension criteria of DoDI 416556 paragraph 4.1.b, and the authorized and funded MILCON projects satisfy paragraph 4.1.b(2), thereby allowing the RLFs to remain in use until permanent construction is complete. Therefore, the December 2023 RLF extension satisfies the requirement for higher headquarters approval for continued use of these temporary facilities, up until December 2030. The requested modification will extend the period of performance by

incorporating two additional one-year lease options, with the first of these, Option Year 7, beginning 15 June 2026, and the final, Option Year 8, ending 14 June 2028. The estimated cost for the two-year extension is [redacted], as detailed below. The total task order value is increasing from [redacted]

Table 1: Estimated Cost for Two-Year Extension

	Period of Performance	Monthly Estimate	Annual Estimate
Option Year 7	06/15/2026 – 06/14/2027	[redacted]	
Option Year 8	06/15/2027 – 06/14/2028	[redacted]	
Total Estimate			[redacted]

4. **Authority Cited:** The authority permitting acquisition of the requirement by other than full and open competition is GSAR 538.7104-3(b)(iii), "[t]he order should be issued on a sole source basis in the interest of economy and efficiency because it is a logical follow-on to an FSS order already issued on a competitive basis."

5. **Reason for Authority Cited:**

a. Background: On 10 October 2018, Hurricane Michael made landfall at Mexico Beach just to the east of the base. Air Force officials described the damage imparted to the base by the hurricane as "catastrophic", with all the base's facilities being declared "unlivable". Task Order number W9127819F0112 under contract GS07F0222X was awarded on 14 March 2019 competitively under GSA Federal Supply Schedule (FSS) 56 Category 36150, Lease/Rental of Pre-Engineered/Prefabricated Buildings and Structures to MMG to provide the installation of a modular facility with a base one-year lease, four one-year lease options, and option Contract Line Item Numbers (CLINS) to cover the dismantle/removal of the facility at the end of the contract term. While efforts to repair the base were underway at time of award, there was no confirmed time of completion on the repairs. The current contract expires 14 June 2026; however, the military construction projects this facility currently supports are behind and will not be completed for multiple years. A sample of the current ongoing construction projects this facility is supporting are listed below in Table 2. Some of these projects are on schedule while others have experienced delays. The reason for delay has varied project to project such as differing site conditions, user requested changes, and contractor non-performance.

The facilities of the Phase II contract provide office space for the E-9 Alert Pad, Security Forces Administration, the Traffic Management Office (TMO), Fire Station 4, and the Burn Pit Administration. New brick and mortar buildings are being built that will serve as an office for the occupants and will be complete 2027-2028. Failure to remain with the

current contractor would create a significant logistical dilemma for the occupants. The customer would be required to unexpectedly relocate tenants around the AFB with no feasible location to put them. Due to ongoing construction and rebuilding of facilities, there remains a shortage of available space to house tenants across Tyndall AFB until work on permanent facilities is completed.

Table 2: Ongoing Construction Projects at Tyndall AFB

Contract Number	Project Title
W9127822C0023	DB Z5 CE_LRS Complexes
W9127822C0008	Z1 F-35 Flightline Facilities
W9127822C0011	DB Z2 OSS Radar/Firetruck Maint
W9127822C0012	DB Z3 WEG/HQ Maintenance Hngr Apron Fac.
W9127822C0004	DB Z3 WEG Subscale Drone Facility
W9127822C0017	DB Z4 Site Devt. & Utilities PHs I & II
W9127823C0006	Z7 F-35 2PH Munitions Storage Facilities
W9127822C0007	DB Zone7 Munitions Storage Area 7000
W912HN21D3000 W9127822F0121	DB Z9 Marina
W912HN21D3000 W912HN21F3006	DB Z10 Tyndall Lodging
W912HN21D3000 W912HN22F3002	DB Z11 Chapel and Community Commons
W9127822D0047 W9127822F0175	DB Z12 Fire Station # 4
W9127822C0010	DB Z5 CE Maint. Shops & Storage Fac.

**This is not an inclusive list of all projects but a sample of some of the current ongoing construction projects.*

b. Justification: The Government requires an immediate facility to house up to 67 personnel that are working across various critical projects for Tyndall AFB. This facility is already on site provided by MMG under the current expiring contract. Therefore, in the interest of economy and efficiency, the extension of the contract is a logical follow-on, as MMG can meet the Government's minimum needs for an immediate facility without significant disruption. Award to any other source would result in both unacceptable delays and substantial duplication of costs that would not be recovered by competition based on the following:

1) An award to another contractor would disrupt operations at Tyndall AFB for 14 months (two months for MMG to tear down the current RLF, and a minimum of 8-12 months for a new contractor to construct the new RLF). Market research conducted by contacting other contractors (

[redacted]) providing facilities at Tyndall AFB and MacDill AFB confirmed that there are still supply chain issues resulting from Covid and longer lead times for certain components, such as electrical panels and A/C units, which delay the manufacturing process.

2) There is limited space for temporary facilities on the AFB which has required temporary facilities to be relocated when they are in the way of construction. Therefore, these facilities would have to be removed before a replacement facility could be installed in its location. The existing facility is owned by MMG. Therefore, they are the only available source capable of leasing the existing facility remaining to the Government. There are no other means of fulfilling this requirement, on a competitive or non-competitive basis, without causing substantial harm to the USACE, the Air Force customer, and its missions. A 14-month displacement would delay the construction of rebuilding Tyndall AFB by delaying submittal responses and processing. Therefore, in the interest of economy and efficiency, MMG can meet the Government's minimum need of immediately having facilities available and ready for use.

3) It is further determined that a procurement to any other contractor would result in a substantial duplication of cost. Any procurement with another contractor would require the Government to expend [redacted] on the option for MMG to dismantle the current RLFs and an additional estimated [redacted] for the installation and removal of a new RLF, which was the original cost for MMG to provide the RLF. The total cost to reprocure this contract would be approximately [redacted] for the additional set up and tear down of buildings and is not expected to be recovered in competition. In addition to the [redacted] to get a new building on site there would be additional costs of the rental period which are expected to match the costs to award to MMG.

c. Feasible Alternatives:

1) Reprocure the requirement by soliciting for a replacement facility/lease through competitive process. This alternative is rejected because it would not satisfy the government's requirement for an immediate facility. The tenant would need to vacate the current facility, and there is no alternate location available to house these mission critical functions until such time as a new facility and lease can be established. Additionally, the current facility would have to be removed in its entirety at the expiration of the contract on 14 June 2026. As further detailed in paragraph b. Justification above, the limited space due to the ongoing construction does not allow for a new replacement facility to be placed until the existing facility is removed.

2) Purchase of the facility and its removal when the facility is no longer needed. Purchasing the modular facility offers a cost-effective solution but

is not feasible for this Air Force customer for multiple reasons.

i. First, Air Force Civil Engineer Center (AFCEC) does not support the purchase of temporary facilities per Department of the Air Force Guidance Memorandum (DAFGM) to Department of the Air Force Instruction (DAFI) 32-1020 (DAFI32-1020_DAFGM2022-01, 8.3.1) because an RLF is used as a tool for meeting a temporary facility requirement and not a solution to an enduring facility requirement, nor does the AFB have a place to locate the RLF when construction has been completed.

ii. Second, RLFs may be used to satisfy facility requirements for response to disaster relief (DAFI32-1020_DAFGM2022-01, 8.4.2) and in advance of a future facility solution (a programmed MILCON or renovation project, personnel relocation, etc.) (DAFI32-1020_DAFGM2022-01, 8.4.3). In this case, the RLF was procured to house personnel due to the destruction of Tyndall AFB from Hurricane Michael, and the rebuilding of Tyndall AFB has been authorized, and funds have been appropriated by Congress. Therefore, the RLF may be retained in use only until construction of the permanent facility is complete.

iii. Finally, the continued operation and maintenance of the relocatable facilities is not feasible because in accordance with DoD policy, an RLF is a piece of general equipment used as a facility on a temporary basis and is specifically designed and constructed to be readily erected, disassembled, transported, stored and re-used. (DAFI32-1020_DAFGM2022-01, 8.2).

3) USACE leases an Off-Base facility and relocates the current tenants. While this alternative was considered, it was rejected due to the following reasons:

i. A USACE Mobile District Supervisory Realty Specialist confirmed that it would take approximately six months to solicit for and execute a new lease for a facility of this size.

ii. In accordance with Executive Order 14222 "Implementing the President's Department of Government Efficiency Cost Efficiency Initiative", the Office of the Secretary of Defense (OSD) intends to reduce administrative and warehousing lease cost by 30%. As such, all new government leases require OSD approval which would delay the process for leasing new a new facility.

iii. The AFB is located between two coastal resort towns, Panama City and Mexico Beach, FL, which do not have this type of commercial

office space available, and there are no other alternative spaces available within a 12-mile distance of the AFB that is capable of housing the current tenants.

iv. This alternative would displace the current tenants until a new facility could be located and leased, as the current facility would have to be removed at the expiration of the contract on 14 June 2026.

d. Impact: This facility houses up to 67 Government personnel working across various projects for Tyndall AFB. Currently, Phase II has no space to relocate on Tyndall AFB. If the Government had to remove the current facilities and re-procure through another contractor, it would result in non-recoverable costs to the Government of approximately [redacted] which is the difference between the cost of extending the period of performance of the current contract by two years and de-mobilizing the current facility and reprocuring a new facility with a new contractor, and an estimated 14 months of downtime. If this LSJ is not approved, the customer would be displaced with no feasible place to relocate. This displacement would create various communication, organizational and logistical issues for the current occupants, the E-9 Alert Pad, the Security Forces Squadron (SFS), the TMO, Fire Station 4, and the Silver Flag Burn Pit, as none of these entities have complete permanent structures to house their operations. These entities are necessary for the daily operations at Tyndall AFB.

6. **Market Research:** A Special Notice W9127826L002 was posted to GSA eBuy and SAM.gov on 14 October 2025 with a response date of 29 October 2025, which stated the Government's intent to extend the current contract and to determine if any interested parties were available to perform the requirements of this LSJ. No responses were received from the Notice posted on SAM.gov. Only one response was received from the Notice posted on GSA eBuy which provided a capability statement only with no specific information regarding the contractor's capability to perform this requirement. As discussed in paragraph 6.a. above, there are 31 vendors listed under the GSA FSS Category this award was made under. None of those vendors responded to the special notice.

9. **Interested Sources:** Based on the market research results, no other qualified sources, other than MMG, have expressed interest in this action.

10. **Other Facts:** Discuss any other facts supporting the use of other than full and open competition, such as the following:

a. Procurement history:

(1) Contract number and date of the last award:
a. W9127819F0112 awarded on 14 March 2019.

b. LSJ 24-0023 was approved on 28 May 2024 extending the contract by two years through modification P00016 and P00017 to task order W9127819F0112.

(2) Competitive status of this action: The initial task order award was a competitive GSA FSS award. Modifications P00016 and P00017 were awarded as sole source out of scope modifications under LSJ 24-0023.

b. Other facts: N/A

7. **Technical Certification:** I certify that the supporting data under my cognizance which are included in the justification are accurate and complete to the best of my knowledge and belief.

Name: Steven E. Daniels Jr.
Title: Project Manager

DANIELS.STEVEN.E.JR[redacted] Digitally signed by DANIELS.STEVEN.E.JR[redacted] Date: 2026.05.05 12:42:04 -05'00'

Signature

Date: See Signature

8. **Requirements Certification:** I certify that the supporting data under my cognizance which are included in the justification are accurate and complete to the best of my knowledge and belief.

Name: Steven E. Daniels Jr.
Title: Chief, Tyndall Program Integration Office, Programs and Project Management Division

DANIELS.STEVEN.E.JR.[redacted] Digitally signed by DANIELS.STEVEN.E.JR[redacted] Date: 2026.05.05 12:42:20 -05'00'

Signature

Date: See Signature

9. **Best Value Determination:** I hereby determine that the anticipated cost to the Government for this order provides the best value to the government. Pricing review will be based on maintaining the same or lower lease rates than those originally proposed, reviewed and evaluated for the award of task order no. W9127819F0112, which are still considered to be fair and reasonable.

Name: John C. Vandiver
Title: Contracting Officer

John C. Vandiver Digitally signed by VANDIVER.JOHN.C[redacted] Date: 2026.05.12 14:58:04 -05'00'

Signature

Date: See Signature

14. **Contracting Officer Certification:** I certify that this justification is accurate and complete to the best of my knowledge and belief.

Name: John C. Vandiver
Title: Contracting Officer

John C. Vandiver Digitally signed by VANDIVER.JOHN[redacted] Date: 2026.05.12 14:58:27 -05'00'

Signature

Date: See Signature

Approval

Based on the foregoing justification, I hereby approve limiting the sources in the extension of the lease and dismantle/removal of modular facility from Modular Management Group, Inc. on an other than full and open competition basis pursuant to the authority of GSAM/R 538.7104-3(b)(iii) in the estimated amount of [redacted]. The approval is subject to availability of funds, and provided that the services and property herein described have otherwise been authorized for acquisition.

Approved By:

John C. Vandiver

Digitally signed by VANDIVER.JOHN.C[redacted]
Date: 2026.05.12 14:59:08 -05'00'

Date: See Signature

JOHN C. VANDIVER
Contracting Officer
U.S. Army Corps of Engineers, Mobile District