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FAR Part 6 Justification and Approval for
Other than Full and Open Competition

Base Operations and Maintenance Support Services

[redacted]

[redacted]

Control No: 2026-57

Justification Review Document
FAR Part 6 Justification and Approval for Other than Full and Open Competition

Program/Equipment: Fort Carson Base Operations and Maintenance Support Services at U.S. Army Garrison Fort Carson.

Authority: 10 U.S.C. 3204(a)(1) as implemented by FAR 6.103-1 (DFARS CD 2026-O0017) -- Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.

Amount: $7.6 million

Prepared by: [redacted]

Contracting Officer: [redacted]

Technical: [redacted]

Requirements: [redacted]

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition.

Chief, O&M Div, DPW:

[redacted]

Local Legal Counsel:

[redacted]

Control No: 2026-57

Director, MICC- Ft. Carson:

[redacted]

Local Small Business Professional:

[redacted]

FAR Part 6 Justification and Approval
for Other than Full and Open Competition

1. **Requiring Activity:** Directorate of Public Works (DPW), Fort Carson, Colorado.

2. **Contracting Activity:** 918th Contracting Battalion, U.S. Army Mission and Installation Contracting Command (MICC-Fort Carson), 1676 Evans Street, Bldg. 1220, Fort Carson, Colorado 80913-5198.

3. **Description of Action:** Request approval to award a cost-plus-fixed-fee (CPFF) modification to extend the existing Base Operations (BASOPS) and Maintenance Support Contract for two months, extending performance through 31July 2026. Contract W911RZ-19-C-0002 was awarded to T&H Services LLC, [redacted] on 19 February 2019, covering a base year and four option years. FY 2026 Operations and Maintenance, Army (OMA) funds will be utilized to support this extension.

Modification P00069 extended the service by six months under FAR 52.217-8, Option to Extend Services, with the expectation that a follow-on contract would be awarded by 30 June 2025. The total contract value [redacted] The period of performance length of the contract increased to 66 months

Modification P00073 extended the service by an additional five months, with the expectation that a follow-on contract would be awarded by 30 November 2025. Approval was obtained from the SCO to authorize an exception to FAR 17.204(e), allowing for a contract modification that exceeds the standard 5-year limitation. This extension was issued in accordance with FAR 6.302-1 and deemed in the best interest of the Government. The POP end date revised from 30 June 2025 to 30 November 2025. [redacted] The POP total contract duration was increased to 5 years and eleven months or 71 months.

Modification P00076 extended the service for an additional three months with options for up to three additional months. This extension was issued in accordance with FAR 6.302-1. Approval was obtained from the SCO to authorize an exception to FAR 17.204(e), allowing for a contract modification that exceeds the standard 5-year limitation. The new POP end date was revised from 30 November 2025 to 28 February 2026 with options for up to three additional months ending 31 May 2026. [redacted] The POP total contract duration was increased for a total of 6 years and 5 months or 77 months.

4. **Description of Supplies/Services:** DPW, Fort Carson, Colorado requires a broad range of non-personal base operations and maintenance services in support of Fort

Carson mission. Areas of service provided by this contract will include Grounds Maintenance, Facility, Electrical & Mechanical, Systems Maintenance & Repair Locksmith Services, Natural Gas Distribution & Regulation System, Industrial Wastewater Treatment Plant, Clean Fill Site, Warehousing & Supply, Cathodic Protection, Locksmith Services, Natural Gas Distribution & Regulation System, Industrial Wastewater Treatment Plant, Central Vehicle Wash Facility, Sanitary Wastewater Treatment & Collection System, Water Systems & Distribution Services, General Interior & Exterior Work, and post miscellaneous work (i.e. special events) in support of the DPW at Fort Carson and Piñon Canyon Maneuver Site (PCMS), Colorado. The Fort Carson BASEOPS contract will provide management, supervision, quality control, financial control, materials, supplies, labor, and equipment, except that specified as Government-furnished, necessary to accomplish the services outlined in the Performance Work Statement.

Period	Period of Performance (POP)	Estimated Value
CLIN 9001	01 JUN 2026 — 31 JUL 2026	$3.8 M
CLIN 9002	01 JUL 2026 — 31 JUL 2026	$3.8 M
	Total Value:	**$7.6 M**

5. Authority Cited: 10 U.S.C. 3204(a)(1), as implemented by FAR 6.103-1(b), Only one responsible source and no other supplies or services will satisfy agency requirements.

6. Reason for Authority Cited: The proposed acquisition for a two-month extension of Base Operations (BASEOPS) services must be accomplished through other than full and open competition to prevent a critical failure of life, health, and safety services at U.S. Army Garrison Fort Carson. The authority cited in paragraph 5, 10 U.S.C. 3204(a)(1) as implemented by RFO FAR 6.103-1(b) (Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements), applies to this acquisition because T&H Services is the only responsible source capable of sustaining continuous municipal operations during the upcoming contract transition. Attempting to compete in a full and open competition for a two-month period would result in an unacceptable service gap and severely degrade mission readiness.

a. Background: MICC-Installation Readiness Center (MICC-IRC) has a projected [redacted] for the follow-on contract. Once awarded, an additional 60 days of performance is required in the current contract (W911RZ-19-C-0002) to execute a structured phase-in/phase-out transition. This extension of the current contract ensures the incoming vendor can properly mobilize while the incumbent maintains uninterrupted operations.

b. The Government evaluated all alternatives and determined that an extension of the current contract with T&H Services is the only acceptable solution. Suspending operations is unacceptable because it would cause immediate, severe health and safety impacts to the installation, as detailed in section (d). Utilizing in-house personnel is logistically impossible, as Fort Carson DPW lacks the specialized workforce and heavy equipment to temporarily assume installation-wide municipal operations. Finally, competing the requirement for a new vendor is unacceptable because a new contractor requires a standard 30-to-90-day mobilization period, guaranteeing a service gap. Furthermore, replacing the fully mobilized incumbent would incur an estimated [redacted] in duplicated, unrecoverable mobilization and transition costs.

c. It is neither cost-effective nor realistically achievable to expect another contractor to perform these services during a brief 60-day extension of the current contract. A new contractor would face insurmountable manning barriers, requiring them to recruit, relocate, clear, and badge hundreds of specialized personnel for a contract ending almost immediately after it begins. Furthermore, assuming responsibility for Fort Carson's infrastructure requires a complex joint inventory and transfer of Government Furnished Property (GFP). Forcing a new vendor to execute this massive start-up process only to immediately begin phase-out procedures would destroy continuity of service.

d. If this extension of the current contract is not approved, Fort Carson will experience an immediate gap in BASEOPS coverage, severely jeopardizing the life, health, and safety of installation personnel. Specifically, the wastewater treatment plant would cease operations, risking environmental contamination and biological health hazards. Centralized heating and cooling utility plants would shut down, and non-deferrable emergency maintenance for military barracks would halt. Without these foundational municipal services, Fort Carson would lose the ability to securely house its forces and execute its excepted operations, resulting in direct mission failure.

7. Efforts to Obtain Competition: In accordance with FAR 5.001, Definitions. Contract action means an action resulting in a contract, including actions for additional supplies or services outside the existing contract scope. This does not include actions within the scope and terms of the existing contract, such as contract modifications issued under the Changes clause, or funding and other administrative changes. This action is within scope modification and will not be synopsized.

a. Effective Competition: This is a sole source action; effective competition is not applicable.

b. Subcontracting Competition: [redacted] Per FAR 19.301(d), the Contracting

Officer will not require a subcontracting plan for this extension since FAR 25.219-9 is not in the contract. Notably, the Government received Limitation of Subcontracting compliance documentation from the contractor 12 February 2026, restricting the overall volume of work that can be outsourced. Subcontracting competition will be maintained by the prime, T&H Services continued use of its established, competitively selected subcontractors. For any emergent requirements during this 60-day extension, the Government will ensure T&H Services adheres to FAR 52.244-5, Competition in Subcontracting, by soliciting multiple vendor quotes to the maximum extent practicable.

8. Actions to Increase Competition: The primary action to increase competition is the ongoing source selection for the follow-on Fort Carson BASEOPS contract, which is being competitively solicited by the MICC-Installation Readiness Center (MICC-IRC). While a previous sole-source extension of the current contract was executed, unforeseen administrative delays during the evaluation and pre-award phases of the follow-on acquisition have necessitated this secondary 60-day extension. The Government is actively finalizing the competitive follow-on contract, which has a projected [redacted]. In accordance with J&A requirements, a copy of the previous justification is included to assist the approval authority in determining the status of planned actions to remove barriers to competition. Furthermore, subcontracting competition during this brief interim period will be maximized by requiring the prime contractor to adhere to FAR 52.244-5 for any emergent requirements.

9. Market Research: In accordance with Army Federal Acquisition Regulation Supplement (AFARS) PGI 5110.090 and the MICC Desk Book, market research in support of other than full and open competition was conducted within the 12 months preceding this acquisition. The data was compiled and the market research was completed on 13 May 2026 by the Contract Specialist. The research targeted NAICS Code 561210, Facilities Support Services, to determine if capable sources existed to fulfill a two-month extension for Base Operations (BASEOPS) at U.S. Army Garrison Fort Carson. While alternative sources exist in the marketplace for standard, long-term BASEOPS contracts, market research confirms that no other contractor can meet the requirements of this specific, short-term acquisition.

a. AbiltyOne Program, See RFO FAR 8.103(a)(4). The Contract Specialist reviewed the AbilityOne Procurement List on 13 May 2026 and identified similar services. An authorized AbilityOne vendor, [redacted], contacted the Government to express interest and capability in fulfilling this requirement. However, following further discussions with the [redacted] POC, it was determined that the vendor cannot mobilize within the short suspense required to execute a two-month period of performance.

b. Federal Prison Industries (FPI) Inc., See RFO FAR 8.103(a)(3). FPI's website was reviewed on 13 May 2026 by the Contract Specialist. Federal Prison Industries cannot support this requirement.

c. Mandatory Federal Supply Schedules (FFS), see RFO FAR 8.104(a). The Contract Specialist conducted market research via GSA on 13 May 2026. Although similar services were identified on the GSA website, existing schedule contracts contain order limitations that restrict the allowable task order value for this requirement. Additionally, awarding a short-term, two-month phase-in/phase-out extension to a contractor other than the incumbent would result in an unacceptable duplication of effort and administrative costs that are not expected to be recovered through competition.

d. In accordance with Defense Federal Acquisition Regulation Supplement DFARS 206.103-170(d), and DFARS Procedures, Guidance and Information (PGI) 206.103-170(d), a sources sought was posted to SAM.Gov on 07 MAY 2026 for 5 days and the results of interested vendors are listed below:

Vendor Name & Point of Contact	Capability Assessment
[redacted]	a preliminary evaluation of their capability confirmed they are unable to mobilize within the required short-suspense period for only a 60-day contract of this caliber.
[redacted]	a preliminary evaluation of their capability confirmed they are unable to mobilize within the required short-suspense period for only a 60-day contract of this caliber.
[redacted]	a preliminary evaluation of their capability confirmed they are unable to mobilize within the required short-suspense period for only a 60-day contract of this caliber.
[redacted]	a preliminary evaluation of their capability confirmed they are unable to mobilize within the required short-suspense period for only a 60-day contract of this caliber.
[redacted]	a preliminary evaluation of their capability confirmed they are unable to mobilize within the required short-suspense period for only a 60-day contract of this caliber.

10. Interested Sources: In accordance with FAR 6.301(a), The agency will make publicly available the justification required by 6.104 as required by 10 U.S.C. 3204(f) and 41 U.S.C. 3304(f). All other potential sources were rejected based on their inability to satisfy the Government's requirement for immediate, continuous base operations without an unacceptable duplication of effort and cost. Transitioning this two-month extension to a non-incumbent would result in a critical break in life, health, and safety services at Fort Carson, which the Government cannot risk during a contract transition. Although vendors expressed interest, a preliminary evaluation of their capability confirmed they are unable to mobilize within the required short-suspense period for only a 60-day contract of this caliber.

11. Other Facts: Reasonable efforts to retrieve the following items from computer records, contract files, or other sources were utilized. Historically, the Fort Carson BASOPS contract has been competitively procured as a HUBZone set-aside. Contract numbers and dates of the contracts known for this requirement are indicated on the table below. There are no unusual patterns that may be revealed by the procurement history.

Contract Number & Contractor	Set-aside	Contract Type	Amount	Period of Performance
W911RZ-19-C-0002 T&H Services (745J0)	HUBZone	CPFF	$226,001,340.49	02/20/2019 - 11/30/2025
W911RZ-17-C-0002 T&H Services (745J0)	8(a) Alaskan Native Corporation Direct Award	CPFF	$112,000,000.00	04/01/2017 - 03/14/2020
W911RZ-16-C-0009 T&H Services (745J0)	8(a) Alaskan Native Corporation Direct Award	CPFF	$20,213,156.99	09/29/2016 - 04/30/2017
W911RZ-15-D-0007 Kira, Inc. (0SR38)	Only One Source--Other (FAR 6.302, Other (FAR 6.302--1)	CPFF	$39,121,183.77	09/28/2015 - 09/30/2016
W911RZ-05-C-0009 Kira, Inc. (0SR38)	Awarded as a HUBZone Small Business/Currently a Large Business	CPFF	$278,000,000.00	06/01/2005 - 09/29/2015

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

[redacted]

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

[redacted]

14. Fair and Reasonable Cost Determination: I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable. I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable based on the following factors: FAR 15.404-1(b)(5) (CD 2026-O0048), Comparison of proposed prices with the Independent Government Cost Estimate will primarily be an analysis of the Contractor's proposed cost. The cost proposal will also be evaluated for cost realism and price reasonableness using one or more proposal analysis techniques prescribed by FAR 15.404-3.

[redacted]

Contracting Officer

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

[redacted]

Contracting Officer