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Justification for Other Than Full and Open Competition, Succeeding Lease

U.S. General Services Administration

Office of Leasing

High Risk Acquisition Division, East

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

PROJECT NUMBER: 2IN0180

Agency Name: [redacted]

1. **NATURE AND/OR DESCRIPTION OF ACTION BEING APPROVED.**

The General Services Administration currently leases 99,107 ABOA/ 110,531 rentable square feet (RSF) of office and related space at [redacted] under lease number LIN18064 for [redacted] The [redacted] has occupied space in the building since 2011 under a lease that expires on August 3, 2026. Approval is requested to negotiate a 20-year succeeding lease with the incumbent Lessor, without full and open competition, for continued occupancy at this leased location. The procedures for pursuing a succeeding lease are detailed in GSAR 570.402: Succeeding Leases.

2. **DESCRIPTION OF THE SUPPLIES OR SERVICES REQUIRED TO MEET THE AGENCY'S NEEDS (INCLUDING ESTIMATED VALUE).**

[redacted] mission is to protect the American people and uphold the U.S. Constitution, acting as both a law enforcement agency and an intelligence service. The [redacted] has [redacted] field offices located in metropolitan areas throughout the United States. The field office locations carry out investigations, assess regional crime threats, and work with partners on cases and operations. The [redacted] field office in Indianapolis, Indiana covers [redacted]. The current location at 8825 Nelson B. Klein Parkway was a build-to-suit lease completed in 2011 for the [redacted] as the sole tenant. The [redacted] has a continuing need for housing to ensure mission continuity and the current location meets its needs. The agency anticipates maintaining its latest space requirements beyond the proposed term of this lease (20 years). The proposed succeeding lease will result in utilization rate improvement, housing of additional personnel, and maintaining mission readiness to provide efficient operations.

Prospectus Number PIN-01-IN-23 was submitted to the Office of Management and Budget (OMB) on October 24, 2023, was approved by the House Committee on Transportation and Infrastructure on July 15, 2025, and the Senate Committee on Environment and Public Works on November 20, 2024. The prospectus provides approval for up to 20 years and up to 110,531 RSF with a rent rate of [redacted] While the approved rent rate is [redacted] we anticipate negotiating the rental rate below the approved prospectus rent rate.

This requirement is for 99,107 ABOA/ 110,531 RSF of space for a 20-year term to commence on August 4, 2026. The estimated cost of this lease is [redacted] per rentable square feet per year for an annual cost of [redacted] and a total contract value of [redacted] The delineated area is 96th Street to Raceway Road to County Line Road to Carroll Road in Indianapolis. There is no vacant Federal Space available.

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3. **IDENTIFICATION OF STATUTORY AUTHORITY PERMITTING OTHER THAN FULL AND OPEN COMPETITION.**

41 U.S.C. 3304(a)(1): Only one responsible source and no other supplies or services will satisfy agency requirements. This statutory authority is implemented through GSAR 570.402. In accordance with GSAR 570.402, use of the sole source authority is appropriate where it is determined that award to any other offeror would result in substantial duplication of costs to the Government that are not expected to be recovered through competition.

4. **DEMONSTRATION THAT THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS OR NATURE OF THE ACQUISITION REQUIRES THE USE OF THE AUTHORITY CITED.**

It is in the best interest of the Government to remain at the current location. Award to other than the current Lessor would require relocation of the entire requirement and would cause the [redacted] to incur move and replication costs that would not be recovered through competition. Relocation costs are estimated to be [redacted]. Additionally, this allows the Government to make use of existing tenant improvements, avoiding replication costs of [redacted]. The [redacted] Field Office has highly secured (Level 4) space including vehicle barriers and permitter gates, uninterruptible power supply systems, weapons vault, full size vehicle bays, a guard booth and other complex spaces that would have to be replicated if they were to move. A cost-benefit analysis was completed following the procedures set forth in GSAR 570.402-6. The cost of relocating [redacted] using the Bullseye market average rental rate exceeds the cost of remaining at [redacted]. The total savings to the Government is [redacted]

5. **DESCRIPTION OF EFFORTS MADE TO ENSURE THAT OFFERS ARE SOLICITED FROM AS MANY POTENTIAL SOURCES AS IS PRACTICABLE.**

Per the requirements of GSAR 570.402, the GSA Lease Contracting Officer placed an advertisement on the Contracting Opportunities domain of SAM.gov on October 17, 2024 for thirty days. In addition, PBS conducted market research using CoStar.

6. **DEMONSTRATION BY THE CONTRACTING OFFICER THAT THE ANTICIPATED COST TO THE GOVERNMENT WILL BE FAIR AND REASONABLE.**

This requirement is less than 75% office space and is, therefore, excluded from the GSA Bullseye program assessments. However, recent market surveys conducted by PBS in Indianapolis, IN showed the rental rate for office space within the delineated area ranges from $22.00 - $24.00 per RSF according to CoStar, CBRE-EA, and REIS market data. The higher anticipated rental rate for the unique requirements of this [redacted] (private parking garage and annex facilities, advanced security, 24/7 operations, etc.) reflect the significant investments required to operate and maintain the facility.

Therefore, the proposed rental rates for this succeeding lease of a maximum of [redacted] levelized over a 20 year term, are within the current market range for this submarket and are deemed fair and reasonable by the GSA Lease Contracting Officer.

7. **DESCRIPTION OF MARKET RESEARCH CONDUCTED AND THE RESULTS.**

GSAR 570.402-5 allows for negotiation with the incumbent Lessor when a cost-benefit analysis shows that the Government cannot expect to recover relocation and duplication costs through competition.

On January 5, 2026 PBS conducted market research using CoStar and Bullseye and identified zero (0) potentially acceptable locations (other than the incumbent) that might meet the agency's needs within the delineated area. In addition, PBS posted an advertisement conforming to GSAR 570.402-2 on the Contract Opportunities domain of SAM.gov website on October 17, 2024. There were three expressions of interest received as noted in the below paragraph, but none were capable of meeting the agency's requirements.

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8. **OTHER FACTS SUPPORTING USE OF OTHER THAN FULL AND OPEN COMPETITION**
N/A

9. **LIST OF SOURCES, IF ANY, THAT EXPRESSED, IN WRITING, AN INTEREST IN THE ACQUISITION.**

1.	[redacted]	Rustom Khouri III Carnegie Mgmt. & Development Corp (440) 892-6800 (o) rkhouri3@carnegiecorp.com	The current lessor has provided a proposal including upgrades to the existing space
2.	Offeror fine tuning potential land parcels	Thomas E. Finan, Managing Director Trammell Crow Company 888 16th Street, NW Suite 555| Washington, DC 20006 O +1 202.295.3825 C +1 703.625.6999 tfinan@trammellcrow.com	The offeror has provided numerous examples of prior work and are proposing a built to suit option to meet the requirement.
3.	3600 N Gale St, Indianapolis, IN 46218	Sharie Beach CEO | Beach & Boyd Associates Corporation 317-600-1900 sbeach@bbacconsultingcontrators.com www.bbacconsultingcontrators. com	Location appears to be an old high school.
4.	6650 Telecom Drive, Indianapolis, IN	Annaliza Proctor Director of Development & VP of Franchise Relations Email annaliza@ghomangroup.com	The offeror claims that FBI would be the sole tenant and even though the building is oversized they will give us the space for free.

10. **STATEMENT OF ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS TO COMPETITION BEFORE ANY SUBSEQUENT ACQUISITION.**

There are no systemic barriers to competition. If the agency has a continuing need for space upon lease expiration, GSA will follow all authorities, regulations and policies applicable to lease acquisition. Should there be remaining useful life in the Government's tenant improvements, the Government will consider the cost of moving from the existing location, and the cost to build out new space when deciding whether to undergo a competitive action.

Additionally, objective scrutiny will be given to the customer agency's mission and security requirements to eliminate unnecessary agency space requirements that may be deemed unduly restrictive.

11. **CONTRACTING OFFICER CERTIFICATION.**

By signature on this Justification for Other than Full and Open Competition, the GSA Lease Contracting Officer certifies that the award of a succeeding lease of 110,531 RSF is in the Government's best interest and that this Justification is accurate and complete to the best of the GSA Lease Contracting Officer's knowledge and belief.

Certified by: DocuSigned by: Rita Bradley F5F408C2BB404C1... Date 3/4/2026 | 18:04:27 GMT

Rita Bradley, Lease Contracting Officer

Concurred by:

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Glenn Harvey, Division Director

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Jeannette Rios, Deputy Assistant Commissioner

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Leigh Erin Izzo, Senior Assistant General Counsel

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Crofton Whitfield, Assistant Commissioner and Head of Contracting Activity

Approved by:

Signed by:
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Date 3/6/2026 | 13:51:27 GMT

Jeff Koses, Senior Procurement Executive