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Justification for Other Than Full and Open Competition, Extension

U.S. General Services Administration

PBS, Office of Leasing

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

PROJECT NUMBER: 6CA1237

Agency Name: [redacted]

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

The General Services Administration currently leases 13,588 ANSI BOMA office area square feet (ABOA SF)/14,898 rentable square feet (RSF) of office space at 516 INDUSTRY WAY, IMPERIAL, CA under lease number LCA03477 for three agencies, the [redacted]. The current lease expired on March 30, 2026. Approval is requested to negotiate a lease extension with the incumbent Lessor without full and open competition for continued occupancy at this leased location. The procedures for pursuing a lease extension are detailed in GSAR 570.405 “Lease extensions.”

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

The Government requires an extension of the current lease for 24 months to commence on March 31, 2026. The estimated cost of this lease extension is $[redacted] per rentable square feet per year for an annual cost of $[redacted] and a total contract value of $[redacted]. The rental rate represents a fully serviced lease.

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: FAR 6.103-1 (GSA Class Deviation RFO-2025-06) and GSAR 570.405. In accordance with GSAR 570.405, use of the sole source authority is appropriate when the Government experiences a delay in acquiring replacement space in situations such as, but not limited to, the following:

☐ The agency occupying the leased space is scheduled to move into other Federally controlled space, but encounters unexpected delays in preparing the new space for occupancy

☐ The government encounters unexpected delays outside of its control in acquiring replacement space

☐ The government is consolidating various agencies and the contracting officer needs to extend the terms of some leases to establish a common expiration date

☒ The agency occupying the space has encountered delays in planning for a potential relocation to other federally controlled space due to documented organizational, financial, or other uncertainties

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

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It is in the best interest of the Government to remain at the current location during the extension period to allow for the development of long-term requirements for the tenant agency. In this case, all three tenant agencies ([redacted]) encountered significant organizational and financial uncertainties in the past year which impacted the planning for all three agencies' ongoing space requirements and caused delays in long term requirement development for all three agencies.

Specifically, all three agencies undertook a deep analysis of their organizational structures and ongoing space needs that would result from any planned structural reorganizations. Moreover, and as a direct consequence of this strategic planning, the three agencies encountered delays in delivering funds to GSA for the purposes of procuring the long-term replacement space. Without confirmation from the three agencies as to their respective long-term space requirements, and without funding from each agency, GSA could not adequately define the requirements for a long term lease procurement. It was not until the second quarter of Fiscal Year 2026 that the three tenant agencies confirmed their long-term requirements as well as funding availability to GSA.

These documented organizational and financial uncertainties resulted in significant delays to GSA's ability to plan for and procure potential relocation space.

This extension is further justified because award to other than the current Lessor would require relocation of the entire requirement and would cause all three agencies to incur move and replication costs that would not be recovered through competition.

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

In accordance with GSAR 570.106(d) and 570.405, an advertisement is not required for extensions.

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

Recent market research conducted by the Lease Contracting Officer on June 1, 2026 for Imperial, CA showed the rental rate within the market area ranges from $39.92 to $60.30.

Therefore, the anticipated rental rates for this lease extension of [redacted] per RSF, 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.**

On June 1, 2026, market research was conducted using newly awarded GSA leases. The market research showed the rental rate within the market area ranges from $39.92 to $60.30.

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

Remaining at the current location under a 24-month extension avoids a holdover and allows the Government to continue operations without disruption.

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

N/A

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

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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 (if applicable) 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 lease extension of 24 months for LCA03477 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.

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Cheryl Nolting, Lease Contracting Officer — Date

12. **PREPARER'S TECHNICAL CERTIFICATION.**

I certify that the supporting data used to form the basis of this Justification is complete and accurate to the best of my knowledge and belief.

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Cheryl Nolting, Lease Contracting Officer — Date

Concurred by:

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Carlton Vinston — Date
Branch Chief

Concurred by:

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Charles Vitale — Date
Leasing Director

Reviewed for legal sufficiency by:

Signed by:
[redacted] Sr. Asst. Gen. Counsel
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Mikhail Petersen — Date
Office of the General Counsel, Real Property Law Division

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Approved by:

Signed by:
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Gina Ditommaso
Competition Advocate

8/5/2026 | 19:37:16 BST
Date