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Justification for Other Than Full and Open Competition, Succeeding Lease

U.S. General Services Administration

Office of Lease Production Operations

Moderate Risk Lease Acquisition Division (PRACA)

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

PROJECT NUMBER: 3ID0139

Agency Name: [redacted]

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

The General Services Administration currently leases 16,619 ABOA / 18,442 rentable square feet (RSF) of office space at 877 West Main Street, Suite 404, Boise, Idaho under lease number GS-10P-LID07270 for the [redacted]. The current lease expires April 10, 2026. Approval is requested to negotiate a 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).**

The [redacted] submitted a continuing need letter on November 6, 2023, for 18,442 rentable square feet of office and related space. To satisfy the [redacted]'s mission requirements, the facility must be in the geographical center of its service area, which is the urban area of Boise, Idaho. This requirement is for 16,619 ABOA/18,442 RSF of space for 15 years; 10 years firm term to commence on 4/11/2026. The estimated cost of this lease is $[redacted] per RSF (years 1-10 firm term rate) for an annual cost of $[redacted]. The estimated cost for the soft term is $[redacted] per RSF (years 11-15 soft term rate) for an annual cost of $[redacted] and a total contract value of $[redacted], which includes a reduced TI and BSAC that will be amortized in the Lease.

There is no vacant Federal Space available.

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 model deviation 6.103-1 of the FAR Council's model deviation to FAR Part 6 (adopted by GSA RFO-2025-06, Class Deviation for FAR Part 6) and 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.**

The Agency is requesting minor security Tenant Improvements, estimated to be approximately $[redacted] and is included in the Succeeding Lease Tool. 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] plus another $[redacted] in BSAC costs. Additionally, this allows the Government to make use of existing tenant improvements, avoiding replication costs of $[redacted]. The Agency has the following special use space:

- 150 SF computer room with UPS and dedicated HVAC.
- [redacted].
- [redacted].
- [redacted].
- FSL Level II.

A cost-benefit analysis was completed following the procedures set forth in GSAR 570.402-6. The cost of relocating the [redacted] using the low-cost quote exceeds the cost of remaining at 877 West Main Street, Suite 404, Boise, Idaho. According to the Succeeding Lease Tool, the total savings to the Government are $[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 28, 2025, for 14 days. In addition, Cushman & Wakefield conducted market research using CoStar.

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

A recent market survey conducted by and comps provided by Cushman & Wakefield in Boise, Idaho showed the rental rate within the delineated area for Class A/B space ranges from $[redacted] to $[redacted] per RSF Fully Serviced and $[redacted] per RSF to $[redacted] per RSF Fully Serviced for recent comps. CoStar was used for the market survey and Cushman and Wakefield internal data was used for the comps.

Therefore, the proposed rental rate for this succeeding lease of $[redacted] per RSF is within the current market range for this submarket and is 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 October 22, 2025, Cushman & Wakefield conducted market research using CoStar and identified 5 potentially acceptable locations plus the incumbent that might meet the agency's needs within the delineated area. Additionally, an advertisement was placed on SAM.gov conforming to GSAR 570.402-2 on the Contract Opportunities domain of SAM.gov website on October 28, 2025, that could potentially meet the requirement. Two responses were received from the SAM.gov ad including the incumbent Lessor. Both properties were previously identified from market research. The incumbent Lessor's expression of interest indicated that the rate would be $[redacted] per RSF. The building, with the lowest cost from market research, had a rate of $[redacted] per RSF in its expression of interest.

See Figure 1 below for the results of the market research and SAM.gov advertisement, including the incumbent.

Address	Source	Asking Fully Serviced Rental Rate

1. 877 West Main Street Suite 404 with 18,422 RSF (Incumbent Lessor)	Expression of Interest response	$[redacted] / RSF for years 1-5 + $[redacted] per RSF work letter for Tis + adjustment for years 6-10
2. 395 Bannock Street 10th floor with 20,000 SF floor plate (Class A – under construction)	CoStar	Negotiable
3. 1111 West Jefferson Street 4th floor with 43,035 SF floor plate (Class A – Built 1971, Renovated 2019)	Expression of Interest response & CoStar	$[redacted] / RSF + 3% annual escalations + $[redacted] per RSF work letter for TIs
4. 213-237 North 9th Street 2nd and 3rd floors with 11,620 SF floor plates (Class B – Built 1999)	CoStar	$[redacted] / RSF
5. 521 West Front Street 1st floor * with 21,354 SF floor plate	CoStar	$[redacted] / RSF NNN
6. 800 West Main Street 15th floor with 19,577 SF floor plate (Class A – Built 2014 - LEED Certified)	CoStar	Negotiable

From the above, 521 West Front Street is not acceptable as it is on the 1st floor where the requirement must be on the 2nd floor or higher due to the [redacted]'s security requirements.

See Figure 2 below for recent market comps for recently signed leases.

Address	Source [EOI/CoStar, etc.]	Effective Fully Serviced Rental Rate
1111 West Jefferson Street Suite 400 (New) (Class A – Built 1971, Renovated 2019)	Internal Cushman & Wakefield database	$[redacted] / RSF Fully Serviced (10-year term)

1111 West Jefferson Street Suite 500 (Renewal) (Class A – Built 1971, Renovated 2019)	Internal Cushman & Wakefield database	$[redacted] / RSF Fully Serviced (3-year term)
999 West Main Street Suite 1300 (Renewal) (Class A – Built 1975, Renovated 2023)	Internal Cushman & Wakefield database	$[redacted] / RSF Fully Serviced (21 Months)
1111 West Jefferson Street Suite 430 (renewal) (Class A – Built 1971, Renovated 2019)	Internal Cushman & Wakefield database	$[redacted] / RSF Fully Serviced (7-year term)
101 South Capitol Boulevard Suite 1100 (Class A – Built 1978, Renovated 2005)	Internal Cushman & Wakefield database	$[redacted] / RSF Fully Serviced (7-year term)
999 West Main Street Suite 1300 (Sublease) (Class A – Built 1975, Renovated 2023)	Internal Cushman & Wakefield database	$[redacted] / RSF Fully Serviced (9 Months) **

* The 521 West Front Street property is on the 1st floor so it was discarded.

** The $[redacted] per RSF rate for 999 West Main Street is discarded due to the short 9 months of the lease term in comparison to the 10 year firm term for the requirement.

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

The most recent building inspection was performed on June 17, 2025, which verified the space was well maintained and identified no apparent deficiencies.

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

1. The incumbent Lessor for 877 West Main Street responded to the SAM.gov advertisement with the existing [redacted] floor space.
2. Boise Plaza, 1111 West Jefferson Street, Boise, ID, for the partial 4th floor

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 (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 succeeding lease of 18,422 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.

DocuSigned by:
[redacted], _____ **Date** 4/1/2026 | 15:57:42 BST
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[redacted], Lease Contracting Officer/Branch Chief (PRACA)

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.

DocuSigned by:
[redacted], _____ **Date** 4/1/2026 | 15:28:29 BST
2234BEA39EEF48A...
[redacted], **Commercial Broker**

[redacted]. under contract with Cushman & Wakefield

13.**Concurred by:**

Signed by:
[redacted] _____ **Date** 4/3/2026 | 14:22:25 BST
2ADFC1C04E334F8...
[redacted], Acting Director
Moderate Risk Acquisition Division (PRAC)

14. **Legal Review by**:

DocuSigned by:
[redacted] _____ **Date** 4/3/2026 | 14:57:36 BST
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[redacted] Office of the General Counsel (LR)

15. **Approved by:**

Signed by:
[redacted] _____ **Date** 4/3/2026 | 15:33:46 BST
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[redacted], Competition Advocate (PR)