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U.S. General Services Administration

GSA Region 7

Leasing Division (7PR)

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

PROJECT NUMBER: 2TX1267

Agency Name: Federal Bureau of Investigation (FBI)

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

The General Services Administration currently leases 28,417 ABOA/28,417 rentable square feet (RSF) of warehouse and office space at Parc 114-Building 6, 6651 N. Belt Line Road, Irving, TX, under lease number GS-07P-LTX16696 for the FBI. The current lease expires 9/22/26. 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).**

FBI submitted a continuing need letter on 1/25/24 for 28,417 RSF of warehouse and related space. To satisfy the FBI's mission requirements, the facility must be in Irving, TX.

This requirement is for 28,417 ABOA/28,417 RSF of space for [redacted] commence on 9/23/26. 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:

- North: W state Highway 114
- East: N Walton Walker Texpress (Toll Road)
- South: E/W Airport Freeway (Texas 183 Texpress)
- West: Highway 121

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 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 FBI to incur replication costs that would not be recovered through competition. Relocation costs are estimated to be

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[redacted] Additionally, this allows the Government to make use of existing tenant improvements, avoiding replication costs of [redacted] A FSL level II of special security requirements would all 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 the FBI using the low-cost quote exceeds the cost of remaining at 6651 N Belt Line Road. 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 2/6/25 for 14 days. In addition, Public Properties, GSA's Broker Contractor, conducted market research using CoStar and outreach to local brokers.

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

Recent market surveys conducted by Public Properties, GSA's Broker Contractor, in Irving, TX, showed the rental rate within the delineated area ranges from [redacted] Sources for market rental rates include the CoStar database and communications with local brokers.

Therefore, the proposed rental rates for this succeeding lease of [redacted] 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 11/21/24, Public Properties, GSA's Broker Contractor, conducted market research using CoStar and identified [redacted] that might meet the agency's square footage 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 2/6/25. The incumbent Lessor's expression of interest indicated that the rate would be [redacted] The interested party that provided the lowest cost quoted a rate of [redacted] 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 [EOI/CoStar, etc.]	Asking Full Service Rental Rate
[redacted]	[redacted]	[redacted]

Figure 1: Market Research Comparables

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

A FSL level II of special security requirements, SCIF space, a fully climate controlled warehouse, hardened security fencing with automatic sliding access gate and man doors, would all have to be replicated if they were to move.

Past performance documentation and LAM reports were reviewed and deemed satisfactory. All deficiencies were cured.

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

6651 N Belt Line Road (incumbent)
[redacted]

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. **Prepared by.**

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.

[redacted]

12. **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 28,417 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.

[redacted]

13. **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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[redacted]

14. **REVIEW, CONCURRENCE, AND APPROVAL**.

Concurred by:

[redacted]

Reviewed by:

[redacted]

Concurred by:

[redacted]

Approved by:

[redacted]