



CHAPTER 1:

Requirements Development

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1. Overview

This chapter describes the process for identifying and refining a client agency's space requirements. Requirements development for major leases involves essentially two components:

- *Strategic requirements development:* The first component is strategic requirements development, which refers to the early preplanning efforts that establish an agency's requirements in general terms. Before there can be a lease, there is a broad agency need that must be thoroughly explored and effectively defined. Although the Leasing Specialist may not participate directly or to a great extent in this process, it is important for the Leasing Specialist to appreciate the background context of extensive customer engagement that must occur—before undertaking a specific lease action—for GSA to fully understand and capture a client agency's needs.
- *Operational requirements development—preparing specific requirements for a lease action:* The second component involves preparing to initiate a specific lease action, whether that means a new or replacing lease, a succeeding or superseding lease, or any of the other types of lease actions discussed in the other chapters of this Leasing Desk Guide. During this part of requirements development, the responsible GSA associate further develops the more specific information and documentation necessary to fulfill the client agency's need. He or she undertakes or coordinates activities such as defining essential components of an agency's request for space, establishing or refining the delineated area, consulting with local officials, and making final confirmation of the agency's requirements. This information is summarized into a requirements package that GSA will use to deliver the space.

GSA employees in a variety of occupational titles from different business lines collaborate to perform these two components. Each region must identify the designated individuals responsible for requirements development, project management, and implementing location policy. Regardless of regional variations, during strategic requirements development, these specialists prepare the general outlines of information necessary to identify the client agency's mission and space needs. Understanding this preparatory work will help the Leasing Specialist produce a better outcome in the form of a well-crafted lease acquisition and related documents and, ultimately, space in a location that closely fits the client agency's requirements. During operational requirements development, the Leasing Specialist may work in tandem and close coordination with these specialists as they refine the requirements and finalize a requirements package for a specific lease acquisition.

In many leasing projects, the Leasing Specialist's involvement begins at a point when there is already an existing lease, so the activity in such projects focuses on the second component, preparing for a follow on lease action by reviewing and confirming an agency's specific requirements. In every case, however, the goal is to incorporate clear and enforceable requirements into the Request for Lease Proposals (RLP) and lease contract. This chapter provides solid principles that will assist in gathering technical requirements that will meet that goal.

2. Strategic Requirements Development

GSA's ability to deliver space that will meet client agencies' needs directly correlates to how well we understand our clients' requirements. Developing these requirements may call for a professional analysis of the client agency's mission, goals, business processes, and space standards. Some client agencies have well-established, highly developed requirements that will require less research. Others, however, will require extensive research and collaboration with space development specialists such as architects, space planners, or interior designers.

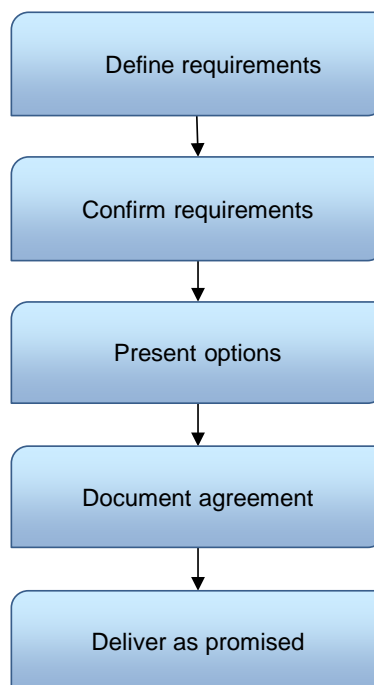
a. Engaging the Customer

The foundation for effective requirements development is to build and maintain close partnering relationships with customer agencies. This consultative way of thinking means that the GSA representatives responsible for requirements development proactively engage with clients as early as possible to ensure that GSA understands their needs and collaborates with the customer to solve their problems, not just reactively filling their orders.

Key Customer Interactions

Figure 1 below illustrates several pivotal interactions with customers in this general approach, from establishing the requirements through delivering the space. This chapter of the Leasing Desk Guide focuses on the first two interactions, defining and confirming the requirements. Subsequent chapters explain how GSA uses different types of lease actions to generate options through the RLP solicitation process, finalize agreed-upon space solutions with the customer agency and lessor, and deliver the space that meets the customer's needs.

Figure 1. Key Interactions in Engaging the Customer



Consulting with Local Officials

This approach is also useful for proactive consultation with local officials in community relations meetings, as described later in this chapter under section 5, Contacting Local Officials. It is important to understand how requirements may affect local communities. Strategic information from an agency may be relevant to meetings with local officials.

b. Key Pricing Policy Concepts

In many respects, the process of requirements development is driven by pricing policy. The Pricing Desk Guide establishes the Public Buildings Service (PBS) pricing policies governing real estate and related services for Federal tenant agencies, across the entire PBS owned and leased portfolio. Besides guiding PBS employees in performing their work, the Pricing Desk Guide also helps tenant agencies understand PBS policy and its application. Among the key considerations of pricing policy are the preparation of the initial draft of the Occupancy Agreement (OA) and determining the components of the rent that will be paid by the client agency. Much of the work during requirements development is directed toward comprehensive collection and documentation of the information necessary for defining these components.

Occupancy Agreement

The Occupancy Agreement (OA) plays a central role in space delivery. It is a statement of the business terms governing the relationship between PBS and a client agency for a specific space. PBS prepares the OA, and both the tenant agency and GSA sign it. The document consists of the signed agreement and a financial summary.

By signing the OA, a client agency agrees to the financial terms and conditions for occupying the space. The OA, however, is not to be confused with the lease contract. Whereas the OA is a formal agreement between PBS and the tenant agency, the lease is a legally enforceable contract between the Government and the lessor.

The OA is developed and updated through successive iterations, beginning with initial preliminary budget estimates, continuing through space acquisition and development, and ending in the final, definitive billing OA. During requirements development, the responsible PBS representative prepares a draft OA, which initially serves as a preview of the tenant agency's total rent charges and helps in budget planning. Later on, when finalized, the OA defines the subsequent rent amount that the tenant agency will submit to PBS for the space and related services throughout the term of the Lease.

The role of the OA in confirming agency funding is discussed below in paragraph 6.b, Funding, as well as in sections of other Leasing Desk Guide chapters where relevant.

Components of Rent

The Pricing Desk Guide contains detailed explanations of the individual components of the rental rate in the lease, which together represent the financial bottom line cost to the agency for what GSA delivers. The following are among the major components of rent:

- Building shell—the complete enveloping structure, the base building systems, and the finished common areas (building common and floor common) of a building that adjoin the tenant areas
- Tenant improvements (TI)—the finishes and fixtures that typically take space from the shell condition to a finished, usable condition

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- Operating costs—the recurring costs of operating a building, such as utilities and cleaning
- Real estate taxes—the tenant agency's proportionate share of the local municipality's taxes paid by the building's lessor
- Building Specific Amortized Capital—security countermeasures recommended by the Interagency Security Committee and requested by the Facility Security Committee funded through the lease.

These cost components are discussed in greater detail in other chapters of the Leasing Desk Guide where they are relevant to assembling the RLP and lease documents for various types of lease actions.

c. “Freeze the Footprint” and “Reduce the Footprint” Policies

A key consideration that client agencies face when determining their requirements concerns Federal policy aiming to limit growth in Federal space. The Federal government's responsibility for reducing its real property footprint is outlined under several policy memoranda, starting with the presidential memorandum “Disposing of Unneeded Federal Real Estate” (published June 2010).

In 2013, the Administration issued the “Freeze the Footprint” (FTF) policy to freeze the Federal Government's real estate footprint and restrict the growth of excess or underutilized properties. This policy required agencies to first consider and pursue available co-location or consolidation opportunities to offset any growth in total office and warehouse space within the Government's real estate inventory that will result in no net growth in the size of agencies' overall real property inventory. In 2015, the “Freeze the Footprint” policy was superseded by the National Strategy for Real Property and OMB Management Procedures Memorandum No. 2015-01, “Implementation of OMB M-12-12 Section 3: Reduce the Footprint.” Under these policies, agencies are required to reduce, rather than freeze, their footprint beginning in FY 2016. Under “Reduce the Footprint”, agencies are required to set annual square foot reduction targets for federal domestic buildings and adopt design standards to optimize federal domestic office space usage.

Together with OMB, GSA monitors and supports implementation of the policy through data management and analytics to identify real property efficiency opportunities.

Specifically, GSA collaborates with customer agencies so that they are aware of the policy and have considered its requirements as they pertain to space actions. Executive agencies need to be aware that, by signing their submitted requirements and Occupancy Agreement, they have taken into consideration OMB's implementation guidance to reduce the size of their overall civilian real estate inventory.

d. Utilization Rates

Agencies are increasingly focused upon space utilization, which indicates how efficiently an agency is currently using space, often identified in housing plans, space requirement reports, and space tracking documents. The “Utilization Rate” or “UR” is traditionally calculated for both office only and all-in (total usable square footage) rates by dividing the area of the space, by the personnel that occupy the space. UR should always be calculated in ABOA (Usable) square footage. The region's representative responsible for requirements development should confirm whether the agency has a pre-established UR goal.

e. Location Factors

GSA's policy is to consider the environmental and socioeconomic impacts of their location decisions and to work with customer agencies to comply with location-related Executive Orders, such as 12072, 12898, 13834, 13853, and 13006. When considering where to locate and when setting their delineated areas, agencies must consider four factors: 1) local and regional planning and economic development goals and impacts; 2) sustainability and transportation infrastructure and plans (with an emphasis on locating in areas that would allow for multiple commuter options that promote transportation choice, and help reduce road congestion and greenhouse gas (GHG) emissions); 3) new and existing infrastructure and resources; and 4) the protection of the natural environment.

Consideration of these factors should occur at this early stage of the leasing process. GSA should confirm customer agencies are both aware of these factors, and have carefully considered each in their requirements.

f. Developing Strategic Requirements

Strategic requirements development is a business process for collecting, developing, and documenting space-related client requirements through the use of standardized tools, templates, and guidance. It is the first step in the planning process and may take anywhere from 2 to 8 months to develop, depending on the complexity of the requirements and the extent of interest and involvement by stakeholders (for example, labor unions). This anticipated requirements development period is in addition to and precedes the time Leasing Specialists typically require to procure new leased space, and should begin 36 months before lease expiration. Prospectus leases, because of their complexity and the congressional approval process, may require significant additional time and it is recommended to begin 60 months prior to lease expiration. (See Chapter 11, Prospectus-Level Leases).

Union Stakeholders

Many agencies, including PTO, NSF, SEC, SSA, NLRB and PBGC, have strong unions and it's important that they engage their union early in the process to avoid delays later in the procurement.

During this preplanning phase, the focus is on obtaining strategic-level requirements, such as the delineated area, total square footage, and major components of that requirement. It is not necessary yet to obtain specific design-related requirements, such as a space plan or carpet specifications. This is also a good time to ascertain whether the agency has programmatic requirements that may influence the delineated area. For example, an agency may require its space to be on certain floors of a building or near public transportation, or by policy it is not permitted to locate within a certain distance from other types of facilities such as schools. It is important to identify such constraints as early as possible to determine how they may limit the potential number of sources of suitable space.

For lease acquisition purposes, requirements development means gathering the pertinent information from the client so that GSA can procure the correct amount and type of space from a responsible source in a location that will meet the mission needs of the agency. Clearly defined space requirements must be communicated to the market during the market survey and solicitation process in order for offerors to ascertain whether their space meets the minimum requirements and for GSA to hold the successful offeror accountable to deliver the space as specified.

The following sections describe some of the information sources, steps, and tools used to develop strategic requirements.

Program of Requirements

In some instances, an agency may have well-developed requirements, which it conveys to GSA in the form of a program of requirements for the procurement, or the agency will otherwise supply most or all of the data necessary for describing its requirements.

Early Action

Some requirements call for funding in advance, such as to analyze space utilization, and the overall process can be lengthy. For this reason it is important for GSA to work with customers well in advance of the required occupancy date.

A program of requirements is typically a comprehensive document prepared by architectural/engineering professionals, whether on staff at the client agency or contracted. It identifies the client agency's total space requirement, which is determined by the amount of space needed for each employee (including projections for growth) in each work unit as well as the amount of space needed for various specialized areas.

The terminology "program of requirements" should not be confused with what GSA refers to as its "requirements package," which is typically a compilation of several separate documents (e.g., special requirements package), forms (e.g., SF-81), or other attachments that contain the detailed information necessary to produce a well-crafted RLP and lease contract.

In other instances, agencies may not prepare a program of requirements or may rely on GSA to capture their space needs. When the client agency comes to GSA for services or GSA calls upon the client agency because of an impending lease expiration, forced move, or other circumstances, the GSA representative responsible for the customer engagement must meet or otherwise coordinate with the appropriate agency space management specialist to gather the requirements information. In such cases, establishing requirements involves a wide-ranging and complex interaction between GSA and the client agency, using a variety of resources and templates that assist GSA associates with developing clear, thorough, and consistent client requirements. This development process seeks to produce a complete understanding of the client agency's needs, time frames, and any special requirements.

Strategic Requirements Tools

The Workplace Program Management Office (PMO) has a sophisticated, strategic set of requirements development tools to perform in-depth workplace and organizational analysis. This toolkit was previously known as Workplace 20.20, POR+, or Deep Dive. To leverage the costs of a more involved, strategic engagement with the client, this type of requirements development is most appropriate for client agency organizational units that:

- Are undergoing a change in mission and may benefit from a space move to improve the space layout to increase their effectiveness;
- Have a national program, which may benefit from a larger strategic engagement to affect future solicitations nationally;
- Are particularly large and complex; or
- Request assistance in analyzing and redesigning their workplace.

Leasing Specialists should consult with their region's representative responsible for requirements development if the project exhibits one or more of these traits.

Workplace PMO Needs Assessment Interview Tool

Among the primary resources for defining strategic requirements is the Workplace Needs Assessment Interview Tool (NAIT), whose purpose is to engage GSA Workplace specialists with the client agency in a close working relationship that will elicit a complete understanding of the client agency's needs. It creates the framework for a conversation with the client agency to understand its needs by suggesting probing questions in a number of areas that have proven critical to project success. This interview tool is not intended to be sent to clients to be filled out on their own as with a conventional questionnaire; merely sending it to the clients without personal interaction could prove to be counterproductive both in eliciting the required information and in building a productive client relationship.

The exact steps and level of detail required on each individual project varies based on the complexity of the project, the needs and receptiveness of the client, and the estimated value of a potential change. The Regional Workplace Executive (RWE) is available to help project teams assess the value a project represents and choose the direction and level of effort required.

Compiling Background Information

Background information is often available and can be collected before contacting the client agency. The following information can be gathered by speaking with the PBS Lease Administration Manager, Regional Account Manager, Lease Contracting Officer, or other PBS colleagues. PBS databases, e-tools, electronic inventories, and billing document systems, as well as the client Web site, are also good resources for collecting the following background information:

- The client agency's organization chart and mission statements, which help explain the agency's programs and goals and provide a general context for understanding its space needs;
- Current and future staffing requirements;
- Agency space standards and design guides;
- General agency information (agency mission, initiatives or trends, Tenant Satisfaction Survey, person or position within the agency authorized to approve the OA);
- Floor plans and/or furniture plans; and
- Current space assignment information.

Data Gathering

During strategic data gathering, GSA representatives responsible for requirements development collect information by performing interviews, conducting work sessions, and completing forms. They may also assist by using this information to develop a space-planning report and technical requirements for interior buildout, if necessary. (Depending on the size and complexity of the project, a Leasing Specialist may also be involved in gathering this information.)

Tools and templates can be found on the PBS Total Workplace Program Management Office Web site at <http://insite.gsa.gov/totalworkplace>.



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When agency-provided information is insufficient, the Leasing Specialist should consult with the project team. Although doing so is crucial when agency information is incomplete, this practice of collaboration and consultation can be useful for all projects.

g. Team Resources

Subject Matter Experts

The Total Workplace Program Management Office has organized a network of professionals available for advice and consultation on requirements development issues. The SMEs are experienced individuals with workplace design backgrounds who can help with:

- Reviewing space programs for accuracy and logic errors;
- Consulting with a client on workspace questions (for example, “Would you help me find a consolidated, central filing solution,” or “We’re teleworking—how can I shrink my square footage?”);
- Advising on whether additional workplace analysis is needed, or strategic requirements development (as described); and
- Pursuing resources for analysis related to strategic requirements development.

Resources

The following resources are available to assist in developing requirements on the Total Workplace Program Management Office Web site at <http://insite.gsa.gov/totalworkplace>:

- A one-source repository for tools and guidance;
- List of SMEs;
- Library of agency space standards; and
- Library of workplace photos.

3. Operational Requirements Development

Strategic requirements development seeks to broadly outline the client agency’s space needs. In contrast, in preparing to initiate a lease action, GSA associates take the requirements development process operational, in terms of a specific leasing action, by further developing the more specific information and documentation necessary to fulfill that need. They perform or coordinate activities such as defining essential components of an agency’s request for space, establishing the delineated area, consulting with local officials, and making final confirmation of the agency’s requirements. This information is summarized into a requirements package that GSA will use to deliver the space.

a. Managing the Project

In accordance with the [PBS National Project Intake Guide \(NPIG\)](#), all projects must have an initial risk determination (IRD) performed before assigning a Project Manager. The risk should be assessed using the tools referenced in the NPIG. Medium and high risk projects should be assigned a Project Manager that is separate from the Lease Contracting Officer. Only low risk projects should have the Lease Contracting Officer assigned also as the Project Manager.

3. Operational Requirements Development

Additionally, the appropriate level Federal Acquisition Certification for Program and Project Managers (FAC-P/PM) must be assigned. Certification levels can be found in [PBS Procurement Instructional Bulletin 15-02](#). The Project Manager assigned to the project (whether separate or a dual-hatted LCO) should follow the processes and procedures outlined in the [PBS National Project Intake Guide \(NPIG\)](#) and the [PM Guide](#).

This IRD process also affects whether or not a separate Project Management Plan (PMP) is required. Currently, the combined Acquisition Plan (AP)/Project Management Plan (PMP) generated by G-REX will only meet the requirements for low-risk projects and is insufficient for medium and high-risk projects. For medium-risk projects, Project Managers have the option of using either the Suite of Planning Tools (SOPT) or the Leasing PMP template in Microsoft Word to develop the PMP. For high-risk projects, the Project Manager must use the PMP in the SOPT.

b. GSA Leasing Support Services (GLS) Contract

Under the GLS contract, GSA may task our national broker contractors to provide requirements development services for expiring leases. This task is not intended to replace other GSA contracts which provide tenant agency assistance in developing a complete program of requirements. The broker contractor is not required to provide space planning or any similar services provided by GSA pricing policy to complete this task. Once a task order is issued to the broker contractor to complete requirements development, the project should remain a broker assigned project through lease award and post award services where such services are ordered. The broker, when applicable, can be introduced to the client agency at the onset of the Requirements Development following tasking. Prior to the introduction, any client agency history or information about that specific procurement should be shared to ensure that the project team is successful in developing the requirements for the project. The GLS contract provides the specific tasks the broker is responsible for within Requirements Development relative to this LDG Chapter. Refer to the GLS webpage at <http://www.gsa.gov/portal/content/164527> for further details.

c. Decision to Lease

When GSA and the client agency first discuss a need for space, GSA's first obligation is to check its inventory of Government-owned and Government-controlled leased space. Until the space requirement is fully developed and the square footage established, it may be difficult to decide whether the agency's need can be satisfied in vacant space. Use GSA's vacant space inventory to determine whether there is potential suitable vacant space available to meet the agency's need within the defined delineated area.

If no suitable Government-owned space is available to satisfy the client agency's need, a leasing action will be required. If Government-controlled leased space is available and able to meet their needs, a backfill lease action will be necessary. Backfills are discussed in Chapter 6, Change in Square Footage—Expansion and Reduction.

This Leasing Desk Guide is applicable when GSA has decided that leasing space is the appropriate action to meet the clients' needs, because Federal space is either unavailable or unable to satisfy the need.

d. U.S. Postal Service Inventory

After checking the availability of GSA-controlled Federal space and determining there is no suitable vacant space, GSA is also required to extend consideration to the available space in buildings owned by the U.S. Postal Service (USPS). See Federal Management Regulation (FMR)

102-73.20, and 102-79.55 and the most recent agreement between GSA and the USPS. GSA should confirm that the space meets our requirements in accordance with GSA fire life safety standards, ABAAS, and seismic safety and work with the client agency to ascertain if the space is suitable in terms of mission and program needs.

e. Ascertaining the Need

During requirements development, it is important to determine whether there is a memorandum of understanding (MOU) between the agency and GSA and, if so, how it would affect the delivery of space. Other documents such as service level agreements and union agreements can also have an impact on the schedule and delivery.

When developing requirements for a continuing need, depending on the size or complexity of the project, the Leasing Specialist, Project Manager, or designee should make every effort to visit the current space in question and determine what changes are necessary for the space, if any. Refer to Chapter 5, Succeeding Lease, Superseding Lease.

When a client agency does not provide the necessary requirements information in a timely manner or approve the requirements developed by GSA, the responsible GSA associate should escalate contacts with the client agency’s authorized ordering official and within GSA PBS to reach a solution (See Leasing Alert entitled “Continuing Need Letters and Escalation Protocol”). Note that, in an expiring lease scenario where the agency is occupying space but has not provided timely requirements, GSA may take action to protect the Government’s financial interests, as further described under Chapter 5, Succeeding Lease, Superseding Lease.

Needs Assessment Questionnaire

A Leasing Specialist may conduct interviews with key personnel. (These interviews may be conducted by other regional representatives responsible for requirements development.) A Needs Assessment Questionnaire similar to the Workplace PMO tool is available in G-REX as a guide to analyzing client needs in terms of the critical factors driving the request, such as the amount of space, the lease term, budget, space quality, or other similar factors. Not all of the questionnaire items will be necessary for each project.

Documenting the Requirements

One approach to confirming the requirements is to use the Needs Assessment Questionnaire as a discussion guide between PBS and the client agency. It allows PBS to work with client agencies consistently across all 11 regions and can be used by anyone who conducts requirements development.

A summary letter should be included in the documentation sent to the client agency, summarizing the requirements established from the needs interview. The letter provides a broad written summary of PBS’ interpretation of the client’s needs, thereby allowing the client agency to verify that our understanding of the requirements is correct. Note: The responsible GSA associate may use or modify the letter template in the Lease Options Package to document specific issues, if required.

Common Pitfalls in Requirements Development

- Incorrect amount of space requested
- Special requirements (“must haves”) that are not clearly defined
- Unclear delineated area (too broad or too narrow)
- Incorrect use of award factors
- Outdated information about the client agency
- Conflicting information from the local agency contact versus the agency headquarters

3. Operational Requirements Development

If the scope of the need warrants, the responsible GSA associate may also consult with space planners and perform a space utilization study. This may involve examining the agency's current location to assess its efficiency and/or to determine whether the existing location can meet the new requirements.

f. Request for Space

Documentation produced in relation to an agency's request for space must be filed in Lease File Tab 1 (Requirements Development) under SF-81 or Other Request for Space, as well as under Agency Special Requirements or Agency Specific Requirements (ASR).

Every agency is obligated to plan and budget for upcoming space needs at least 24-36 months in advance of the occupancy date. For new requirements, expansions, or alterations, agencies are usually proactive in requesting space from GSA. However, GSA often must initiate a space action with the agency as the expiration of an existing lease is approaching and a replacing lease is required. Typically, GSA should begin reaching out to expiring lease tenants approximately 36 months in advance of the expiration to determine whether a continuing need exists and to remind the agency of the need to provide GSA with a request for space. Some procurements, especially those for new construction, will require additional time. Prospectus procurements may need to begin 60 months in advance.

The request may be a formal SF-81, Request for Space; this form is no longer required, although some agencies still use it and it is still available in the GSA Forms Library. Other request methods are acceptable, including phone calls, letters, or emails from the agency.

Regardless of the format of the request, it should originate from an authorized ordering official—someone who has the appropriate authority to request space and obligate the agency financially. GSA should always deal with an authorized ordering official and exercise caution toward any request coming directly from a local agency contact. In most cases, agencies have space acquisition specialists who will initiate requests at a national or regional level. If the authority of the requesting party is questionable, contact the appropriate GSA Regional Account Manager (RAM) for the client agency to verify that the requestor is authorized, and provide documentation for the file. Refer requestors who do not possess the proper authority to their appropriate internal agency contact.

Client agency requirements, at a minimum, must include the following components:

- Square footage;
- Type of space;
- Number of personnel;
- Agency Special and Agency Specific Requirements (ASRs), if developed by the agency;
- Proximity to public transportation;
- Parking (See LDG Appendix H, "Parking Acquisition");
- Delineated area; and

- Required occupancy date.

Square Footage

The amount of square footage a client agency needs can be determined by the number of personnel involved, the office and support space required, and circulation space. The amount of square footage can also be determined by the agency's mission. If the agency employs auditors, for example, these auditors may be out in the field auditing Government contracts most of the time, and a full time workstation may not be required. In identifying the amount of space required to house the agency's personnel and equipment, care must be taken to confirm that the space requirement provided by the client is expressed as ANSI BOMA Office Area square feet, not rentable square feet. If the agency does not have the expertise to provide this information, seek professional guidance from the region's GSA requirements development subject matter expert, or from a contracted workplace consultant or space planner. This standard of space measurement is discussed in more detail in Chapter 2, New or Replacing Lease.

Note that for prospectus-level projects, as matter of policy GSA does not award a lease that exceeds the rentable square footage authorized by the prospectus resolutions.

Type and Use of Space

GSA uses four broad categories to identify the type of space: general purpose/office, parking, warehouse, and unique. In addition to the type, the intended use of the space and its designated square footage should also be established. Typical uses of space include the following:

- Storage
- Support office areas
- Computer rooms
- Mission-related areas
- Laboratories.

The intended use of the space is as important as the square footage required, because it will shape the rest of the space selection and procurement process. For example, an agency may require a mixed-use space with a majority of office space, but if this same space will have an active warehouse/dock with heavy traffic, then a central business district location may not be appropriate. Refer to the GSA National Business Space Assignment Policy for definitions with respect to these types of space as they apply to Portfolio leases. This policy guide and subsequent updates can be found online at <http://www.gsa.gov/portal/content/102002>.

Number of Personnel

It is important to identify the total number of personnel expected to occupy the space in order to calculate the Utilization Rate, as discussed earlier under section 2. Personnel count is the total number of onboard government fulltime equivalent employees who are permanently assigned to that location, including onsite virtual staff, plus the total number of resident contractors. Seasonal hires (i.e., interns), other temporary staff (i.e., 3-month detailees), and remote employees (i.e., individuals who permanently work from home) are not counted. Employees who telework up to five days a week but who are permanently assigned to that location are counted.

Special Requirements and Agency Specific Requirements

GSA's customers provide information regarding their space needs. When using the tenant improvement (TI) allowance method, these are generally referred to as an agency's special requirements. When using the turnkey method it is necessary to go further than what is typically provided for special requirements in order to develop Agency Specific Requirements (ASR), which reflect a biddable scope of work.

Developing either special requirements or Agency Specific Requirements is a data-gathering process. When the agency requires assistance creating either special requirements or Agency Specific Requirements, the responsible GSA associate should involve other team members with these skills. He or she should exercise care to identify the requirements that apply to specialized build-out as well as those that affect the suitability of potential locations, such as a floor requirement, security setback, or proximity to public transportation. While most agency special and specific requirements will become part of the Lease requirements, those affecting location eligibility must be incorporated into the RLP.

Agency Special Requirements and Specifications

When the acquisition approach involves a standard TI allowance method, the requirements package should indicate any requirements identifying needs beyond the shell and tenant improvement language in the RLP. Not all special requirements must be identified before starting a lease acquisition. However, at a minimum, GSA needs to know the special requirements and "go/no-go" factors (minimum requirements) that an offeror's location must meet in order to support a client agency's mission. Examples of these include:

- Loading dock at the building;
- Floor restrictions;
- Minimum column spacing.

It is also important to understand the distinction between an agency's special requirements, which must be met in all instances, and its *preferences*, which could be used as award factors in a best value trade off procurement. For example, a Leadership in Energy and Environmental Design (LEED) silver certification may be required, but gold would be preferred. Refer to Chapter 13, Source Selection, for information on the use of award factors.

The final version of the special requirements may be filed under Tab 3 (Solicitation Phase) of the lease file along with the RLP. If this is the case, place a memo in Tab I (Requirements Development) indicating where to find this information.

Agency Specific Requirements and Turnkey Leases

The term "Agency Specific Requirements" refers to the agency's build-out requirements when GSA will use a turnkey process to obtain TI pricing, as opposed to the TI Allowance method. The goal is to enable offerors to submit a firm, fixed-price offer for the tenant improvements prior to lease award.

The process of developing these requirements is primarily a data gathering effort. Only in rare instances should GSA or the agency have to design or create new information for them. GSA can use the Needs Assessment Questionnaire and the ASR template to help identify the agency's requirements, which are typically information that the agency either has readily available or can

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research from similar projects. Many agencies currently supply “Special Requirement Packages” that contain most of this information and can be easily adapted to the ASR format.

ASRs fall into four main categories:

- **Room Schedule and Build-Out Details**—A breakdown of the agency’s ABOA square footage requirement to show how the space will be used. The agency can either use GSA’s standard build-out description or specify a different build-out requirement when necessary.
- **Design Schematic Layout**—A generic layout showing the ideal space configuration, which offers use to adapt the layout to their offered space. For larger projects, this can be supplemented with additional information such as adjacency diagrams.
- **Special Requirements**—Non-office standard build-out requirements, such as special wall types, gun vaults, interview counters, and other similar special areas.
- **General Requirements**—Build-out requirements that apply to the entire space, such as IT and tenant requested security requirements (at Level I and II).

When combined, the ASRs provide a scope of work that offerors use to submit an offer that includes the actual cost for the tenant improvements, as opposed to submitting their offer with a generic allowance figure. This process is known as turnkey leasing. Turnkey leasing offers many advantages:

- The actual cost of occupying the space, including build-out, is known before award.
- The award decision is based on the actual cost of occupying the space, as opposed to an estimated cost using the TI allowance.
- The tenant agency is aware of any RWA requirements that exceed TI costs before award, allowing GSA to receive all necessary funding up front before entering into a contract.
- The post-award period of turnkey leases is much shorter due to a shorter design period and the elimination of the separate TI bid and negotiation process.
- The act of identifying the agency’s ASRs allows many issues to be identified up front, when they can be more easily corrected.

It is important to discuss the possibility of using the turnkey process with the customer agency during the initial planning phase with the customer, during the requirements development process. Although a turnkey approach is advantageous, it is important to consider the specifics of each project and determine whether the turnkey process is the best one. The process of awarding leases with a TI allowance figure and determining the actual cost of TIs after award may be the best option for projects where the agency is either unable or unwilling to identify its ASRs up front, or when the build-out requirements are very complex. Complex build-out requirements can be fulfilled using the turnkey process, and prospectus projects have utilized this method, but identifying turnkey ASRs for larger projects often requires significant time and assistance from other GSA professionals. The GSA project team should be aware of the benefits of both methods and use the one best suited for each project.

Regional Special Requirements

The responsible GSA associate should confirm any GSA regional best practices that may affect the project or schedule.

Design Intent Drawing (DID) Workshops

A DID Workshop is a method of creating DIDs that involves a face to face meeting between the Government (i.e., GSA and the client agency) and Lessor representatives. Using this method the DID is developed over the course of a 1-2 day meeting. This meeting is typically hosted by the Lessor after award but can be done prior to lease award when there are limited offerors involved. A DID workshop allows for much greater collaboration between the Government and Lessor resulting in a better overall space solution for the customer and a shorter design period. DID Workshops can also reduce the project cycle time significantly and can be used with either the turnkey or traditional TI Allowance process. GSA should encourage the agency to participate in a DID workshop for every project, although it is important to understand the commitments required for a successful DID Workshop and to identify if the customer is willing to make these commitments before including a DID Workshop in projects. Some things to consider include;

- Who is required to attend the workshop from the agency in order to complete and approve the DIDs during the workshop? Can the agency commit to having those individuals present? Note: In some cases individuals can be available virtually, but this is only recommended for those individuals with a limited involvement in the design effort.
- How much time will be needed?
- Does the agency have the required information available at or before the DID workshop to complete the design effort? Note: When the agency has identified their ASRs, these should include the required information.
- What approvals are necessary to finish the DID? Can these approvals be obtained at the workshop?
- A GSA representative must be present—ideally in person, or else via virtual/web participation—for the entire workshop

While most DID workshops occur post-award, GSA can also do a pre-award DID Workshop. Pre-award workshops must be conducted with each offeror in the competitive range separately to maintain procurement integrity. Pre-award DID Workshops are an excellent way to complement the turnkey lease method by allowing the Government and the offerors to meet and work through the actual DID that will become the basis for the Offeror's TI bid. This allows the offeror to better understand the agency's ASRs and ensure that they properly price the required tenant improvements. It also allows the Government to more fully realize the cost savings from re-using any acceptable existing improvements. Pre-award DID Workshops are recommended when the agency can identify their ASRs and when there are a limited number of offerors. Otherwise, a post-award DID workshop can be utilized with either the turnkey or TI Allowance method of pricing tenant improvements.

Proximity to Public Transportation

Client agencies should clearly identify public transportation requirements to accommodate their employees and the visiting public. Note that generalized statements such as “within 2 blocks of

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public transportation” does not adequately communicate the need and leaves room for interpretation. Ideally, public transportation requirements should state:

- Distance to public transportation, using quantifiable measurements such as feet or miles, not blocks
- Type of public transportation system(s) (e.g., bus, commuter rail service, etc.)
- Frequency of operation (e.g. hourly weekday service).

Public transportation is also an important sustainability consideration and is one of the four location factors listed under GSA Order ADM 1097.1, discussed in more detail under section 4 of this chapter.

Parking

Parking is an important consideration when the Government leases space, and is discussed in detail in Appendix H, Parking Policy. In general, the Government will require on-site parking for official Government vehicles (GOVs), both owned and leased. Government Accountability Office (GAO) rules have established that the cost of parking personally owned vehicles (POVs) associated with an employees’ daily commute to and from work is a personal expense and cannot be paid for with Government funds, and individuals are required to acquire their own parking when choosing to drive POVs to and from work, unless the agency provides a written justification. Parking for POVs is typically not required to be available on site, but only to be commercially available within a reasonable distance of the proposed leased location, although the offeror may provide sufficient parking on site for both GOV and POV parking, such as in suburban locations.

During requirements development, the responsible GSA associate should discuss the requested parking spaces and identify whether they are for GOVs or POVs. If they are for POVs, the agency must provide the appropriate justification. There are exceptions to this rule, which are further explained in Appendix H, Parking.

Delineated Area

The client agency’s approved space requirements must identify a delineated area for the space acquisition. The agency identifies the delineated area consistent with its geographic service area and GSA approves the delineated area after it verifies that it complies with Executive Orders 12072 and 13834, CICA, and other policies such as ADM1097.1. Delineated area means the specific boundaries within which space will be obtained to satisfy an agency space requirement. Sites to be included as part of a market survey must be within this delineated area, consistent with FMR 102-83 and must consider all Executive orders and regulations governing location policy. Prospectus-level projects may have a specifically defined delineated area in the congressional committee resolutions that must be followed in the procurement. The GSA project team should contact the National Office of Leasing and regional counsel if the delineated area in the resolution needs to be adjusted.

See [section 4 below](#) for more detailed guidance on establishing the delineated area.

g. Consultation with FPS

At a minimum, the client agency and the facility security level must be established in consultation with the Federal Protective Service (FPS) and the client agencies. Additional client agency

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security needs and requirements must be identified, as they can affect the minimum requirements in the procurement.

FPS will assist GSA and the client agency in reviewing or developing security-related requirements for a particular location to enhance employee security and/or safeguard sensitive Government information, and developing the Independent Government Estimates for such services. See Chapter 19 of the Leasing Desk Guide for additional information.

h. Deliverables

Basic Space Program

The Basic Space Program is a spreadsheet that details the client agency's space calculations. It is an optional resource that may be used to either capture agency requirements or double-check those already submitted. The Basic Space Program can be used in lieu of the Request for Space (SF-81) and includes more detailed information, such as the size and characteristics of office space. If a client agency provides an SF-81 or a space calculation sheet, the GSA representatives responsible for requirements development should enter the data into the Basic Space Program to confirm data accuracy and obtain a clear understanding of the requirement. Sometimes a customer may forget circulation or miscalculate the total amount of space needed. GSA representatives responsible for requirements development must verify the accuracy and methodology behind client-developed requirements.

Requirements Package

The GSA representative responsible for requirements development and the Leasing Specialist collaborate to compile the collected information into a requirements package that is used to document agreed-upon strategy-level requirements with the client and develop an RLP that contains clear and enforceable client agency requirements.

The requirements package should include a summary of the Needs Assessment Questionnaire and the Basic Space Program or other calculation tool results. This summary must, at a minimum, include the items listed above:

- Basic Space Program:
 - Square footage;
 - Type of space;
 - Personnel headcount
- Agency special requirements;
- Public transportation, parking, security, and hours of operation needs; and
- Delineated area.

Looking Ahead

If the leased building will be Security Level IV or 100-percent occupancy Level III, sensitive but unclassified (SBU) building information requirements apply. The GSA order is available online at:

https://insite.gsa.gov/portal/mediaId/658518/fileName/PBS_P_34902_Document_Security_for_Sensitive_But_Unclassified_Building_Information_-_Signed_on_Sept_2_2014

Homeland Security Policy Directive-12 clearance will also apply to contractors and others requiring regular access to the space.

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It may also include the following information:

- Agency mission, goals, and major business processes;
- Agency objectives and constraints related to new requirement;
- Workspace description—general outline of offices, cubicles, and support space;
- Adjacency needs;
- Organization chart; and
- Furniture and equipment needs

The requirements development deliverable for the client is a requirements package, as described above. The requirements package must be filed in Tab 1 (Requirements Development) of the lease file.

This document, along with portions of GSA's RLP package, becomes the foundation for the lease and will affect the agency's occupancy for years into the future.

4. Establishing the Delineated Area

This section explains how to draw a clear delineated area; confirm that a delineated area complies with Federal regulations; consult with local officials or internal GSA points of contact on location decisions; and counsel client agencies if a proposed delineated area needs to be changed.

a. Defining the Delineated Area

As referenced in FMR § 102-83, a delineated area is defined as the specific boundaries within which space will be obtained to satisfy an agency space requirement. The requiring agency identifies the delineated area based on its mission and program requirements and provides approved space requirements which must identify a delineated area for the space. GSA approves the final delineated area based on Federal location policy, including ADM1097.1, and in consideration of the Competition in Contracting Act of 1984 (CICA). CICA requires that an agency “specify its needs and solicit bids or proposals in a manner designed to achieve full and open competition for the procurement” (41 U.S.C. § 3306(a)(1)(A)). It also requires that agency solicitations “include restrictive provisions or conditions only to the extent necessary to satisfy the needs of the executive agency or as authorized by law” (41 U.S.C. § 3306(a)(2)(B)).

Location, Location, Location: Minimum Requirements

Setting the right delineated area is fundamental to meeting client needs and GSA location policy goals. But in large delineated areas, this can be an incomplete strategy to address important location characteristics.

New data tools (discussed in part 4.g) enable the use of quantifiable thresholds for transit service, walkability, and other location criteria that until recently could only be looked at subjectively.

Together with the right delineated area, using these thresholds in the minimum requirements can be an effective tool to differentiate among locations in the market.

The delineated area must be clearly expressed. Avoid vague boundaries, such as a radius expressed in miles or blocks, or awkward, gerrymandered boundaries whose purpose may be perceived to exclude a certain zone. The examples in Figures 2 and 3 illustrate the difference between a well-defined and poorly defined delineated area. Buildings that have frontage on the boundary streets are deemed to be within the delineated area.

b. Program Delineated Areas (PDA)

In accordance with ADM 1097.1, GSA may establish pre-defined (or recommended) program delineated areas in major markets, through consultation with local officials and analysis of the four factors described below in part 4.f. The Office of Portfolio Management is responsible for leading the consultation, analysis, and final definition of the program delineated areas, which will often occur in the context of local portfolio planning.

During the requirements development phase, the responsible GSA associate should determine if a local portfolio plan exists for the relevant market and consider the analysis and strategy included in the plan. Where a program delineated area exists, GSA must use this as the delineated area for the procurement, unless the customer provides a written justification for doing otherwise.

c. Expanding the Delineated Area

In addition to market conditions, new or changing missions or organizational realignments that affect space requirements can impact the need to expand the delineated area. Disagreements concerning expanded delineated areas should be resolved early in the requirements development process. GSA will continue to work on the requirements development and other activities related to the requesting agency's space requirements; however, Leasing Specialists will not proceed to satisfy a lease requirement until the GSA representative responsible for requirements development provides a copy of the final delineated area.

d. Delineated Areas for Prospectus Level Lease Projects

As referenced in Chapter 11, Prospectus Level Leases, GSA must seek approval by the Senate and the House of Representatives if the dollar value of the lease project exceeds the prospectus threshold. The prospectus development process takes into consideration all applicable statutes, regulations, and policies, and where a prospectus is required the determination of the delineated area must take place very early in the process. As a general rule, the body of the prospectus document contains a narrative description of the delineated area and the names of the streets marking the northern, eastern, southern, and western boundaries of the area. The prospectus establishes the final delineated area; therefore, the delineated area in the Request for Lease Proposals must be identical to the delineated area in the approved prospectus transmitted to Congress. Where the prospectus defines a delineated area, GSA must use that exact delineated area; if a change is needed, then the Administrator must provide an explanatory statement to notify the authorizing committees in writing of the change **before** exercising the authority in the prospectus.

e. Delineated Areas Involving Multiple Congressional Districts

Expanding the delineated area into new or multiple congressional districts is oftentimes an area of concern, because it may require an agency to relocate its workforce and incur move, furniture, and telecommunication costs. In addition, for major lease procurements involving the relocation of a work force, agencies must consider how a possible move will affect employees, including those of low and moderate incomes.

In addition, if a delineated area for a new lease crosses over congressional districts, it is the client agency's responsibility to contact the representatives of the affected congressional districts. However, regional managers (congressional liaison staff) may also want to contact the agency or the representatives or both, to ascertain that this contact has occurred.

f. Federal Policy Governing Location Decisions

In addition to CICA, several other Federal statutes, regulations, Executive orders, and implementing guidance documents govern where Federal agencies should or may locate their facilities. The potential for disagreements over the delineated area can be minimized by advising agencies beforehand about these legal requirements. When disagreements arise, they should be resolved early in the requirements development process at the lowest possible GSA management level.

Location Policy Terminology

In order to meet the intent of Federal location policy, Leasing Specialists and other members of the project team responsible for developing or approving delineated areas need to understand the meaning of various terms for types of locations.

Rural Area and Urban Areas

The FMR (§102-83.55) basically defines “rural area” as any area that is not considered to be an “urban area”—and further defines such urban areas as including Census tracts that meet the definition of “urbanized area.” Similarly, “urban area” (§102-83.80) is basically defined as a metropolitan area that does not meet the definition of a rural area. As written in the FMR, these definitions are more circular than helpful, but for GSA leasing actions they may be interpreted as follows:

- Urban areas are all those areas that meet the Census definition of “urbanized areas” of 50,000 people or more (§102-83.60);
- Rural areas are all other areas.

The GSA project team should be mindful that these definitions have effect at a relatively fine grain (Census tract). When differentiating between urban and rural areas for a space action then, the most straightforward method to determine exact boundaries is with GSA’s online mapping tools. The Urban Development program’s tool [MAP tool](#), for example, has the ability to display boundaries for urban areas, as well as Core Based Statistical Areas (explained below), counties, and congressional districts.

Principal/Central Cities

The Office of Management and Budget (OMB) Bulletin 15-01 delineates various types of geographical areas for use in Federal statistical activities. These include Core Based Statistical Areas (CBSAs), Metropolitan Statistical Areas (MSAs), and Micropolitan Statistical Areas (μSAs). Previously, OMB defined “central cities” within an MSA. Because OMB no longer defines central cities, the term is obsolete, although it is still present in regulation and policy documents.

For GSA leasing actions, CBSA is now the most appropriate and updated reference standard. Within each CBSA, OMB now identifies one or more “principal cities.” Like the previously used ‘central cities,’ although based on slightly different criteria, principal cities are the CBSA’s most significant centers of population and employment.

Within a CBSA, the largest principal cities form the CBSA’s name, with the most populous principal city listed first. For example, in the ‘*Washington, DC-Arlington-Alexandria CBSA*,’ Washington, Arlington, and Alexandria are all principal cities, but Washington is the largest.

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In most instances, the largest principal cities in the CBSA are the nexus of regional transit and highway networks, the location of civic centers, and they are centrally located for most residents of the region. The CBSA of the largest principal city is usually the historic urban core of the metropolitan area, which was the focus for Federal development envisioned in EO 12072. Similarly, Federal development in and around the largest principal city may provide better opportunities to leverage existing infrastructure or offer more diverse transportation options (including walking, biking and transit) for Federal employees and visitors, in accordance with EO 13834, which upholds the Guiding Principles for Sustainable Federal Buildings.

Central Business Area, Central Business District

The terms “central business area” (CBA) and “central business district” (CBD) are interchangeable. Most Federal policy refers to CBAs, which is the preferred term used in this Leasing Desk Guide. FMR § 102-83.85 defines a CBA as the centralized community business area and adjacent areas of similar character, including other specific areas that may be recommended by local officials in accordance with Executive Order 12072. GSA associates will often hear local government personnel and other urban planning professionals refer to CBDs. A CBA, or CBD, is the primary commercial area within a city, the boundaries of which are determined by the local government.

How the Terminology Comes Into Play

Each of the concepts and terms defined above becomes important in implementing location policy, so Leasing Specialists and other responsible GSA associates should be well versed in their appropriate uses.

- GSA must determine whether an area is urban or rural in order to give first consideration to locations in a rural area.
- When agencies seek space in an urban location, GSA must identify the statistical area’s principal cities and give prioritization to locating in them, and more specifically locating in the CBAs of those cities.

Rural Location: The Rural Development Act

This step produces justification documentation for lease file Tab 1 (Requirements Development) under Rural Development Act Compliance.

First Priority for Rural Areas

The Rural Development Act (RDA), implemented in FMR § 102-83.50, directs Federal agencies to give first priority to locating new offices and other Federal facilities in rural areas, unless their mission or program requirements call for locations in an urban area. The intent of the RDA is to revitalize and develop rural areas and to help foster a balance between rural and urban America. It does not override agency mission requirements, nor does it conflict with EO 12072, which applies only after an agency has given first priority to the rural area and has determined that their mission or program requirements call for location in an urban (non-rural) area, as discussed further below.

Affirmation Required

If a client agency’s mission calls for a location in an urban area, the agency must provide a written statement affirming that it has given first priority to rural areas, but that an urban location is required. The written statement should include the requesting agency’s name, identify the

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geographic area (city or town), and identify the space requirement. The statement may take the form of a letter, facsimile, or e-mail. It must be signed by—or in the case of an e-mail, addressed from—an authorized ordering official. The statement serves as a record for the file.

If the agency's delineated area is wholly within a rural area as defined above, this RDA affirmation is not needed.

EO 12072: Locating in Central Business Areas

EO 12072, Federal Space Management, requires all executive agencies that have a mission requirement to locate in an urban area to give "first consideration" to locating Federal facilities in "a centralized community business area and other areas of similar character," currently defined as the "central business areas" of a "central city," the latter term now replaced by "principal city" in OMB and Census guidance. The intent is to make downtowns attractive places to work, conserve existing resources, and encourage redevelopment of American cities.

First Consideration

"First consideration" means that when suitable existing Federally owned or controlled space is unavailable, an agency request for space in an urban area must be satisfied within the applicable CBA and adjacent areas of similar character, including other specific areas which may be recommended by local officials within a principal city of the designated CBSA, unless the requesting agency provides GSA with a written justification explaining why the agency cannot efficiently perform program functions within the central business area. It is GSA's policy that the delineated area should be the entire CBA, unless the client agency provides adequate justification for restricting it further. This requirement affects all space requests, including those for expiring leases. Delineated areas may be expanded beyond, but should still include CBAs. The delineated area may also be outside the CBA completely, where properly justified.

Justification Required if Locating Outside the CBA

The client must provide a justification if proposing a delineated area that is not fully encompassed within the boundaries of the central business area or is completely outside the CBA. In addition, GSA must also notify the local officials of the jurisdiction in question that an agency will be locating outside the CBA. (See section 5 for further explanation of the notification and consultation requirements.)

Agencies bear a heavy burden in justifying a location completely or partially outside a central business area. The agency's written justification must set forth facts and considerations sufficient to demonstrate that it has given first consideration to the CBA and to support the determination that the agency cannot perform mission and program functions within that area. At a minimum, pursuant to EO 12072 paragraph 1-203(a), justifications must address "the efficient performance of the missions and programs of the agencies, the nature and function of the facilities involved, the convenience of the public served, and the maintenance and improvement of safe and healthful working conditions for employees."

Justification is not required if the delineated area adheres to the program delineated area that GSA has developed for the market, even if the delineated area does not include the CBA. While program delineated areas typically include the CBA, they may also include other areas outside the CBA which have been targeted for local and federal investment. GSA develops program delineated areas in close consultation with local officials and after careful analysis of Federal location policy goals, therefore program delineated areas should be used for lease procurements whenever it is possible to do so without disrupting customer mission or competition.

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The sufficiency of some justifications will be readily apparent—for example, with a Federal Aviation Administration request for a location at an airport outside a central business area. Justifications are insufficient if they are based on executive or personnel preferences or other matters that do not have a material and significant effect on the efficient performance of agency program functions. The agency is not required to submit a justification when GSA expands the delineated area beyond but including the CBA in order to increase competition.

Requesting agencies must comply with all requirements of EO 12072 before submitting their request for space in urban areas to GSA. Agency justifications are submitted to and reviewed by GSA. GSA is responsible for approving the final delineated area applicable to an agency's proposed space action. As the procuring agency, GSA must conduct all acquisitions in accordance with the requirements of the Executive order and other applicable laws and regulations.

As discussed in Leasing Desk Guide Chapter 2, if competition in the CBA is insufficient, after consultation with local officials, the delineated area may be revised to expand beyond the CBA; however, the revised delineated area should include the entire CBA, as well. No justification from the client agency is required under this circumstance.

Executive Order 13853: Consideration of Qualified Opportunity Zones

Executive Order 13853, Establishing the White House Opportunity and Revitalization Council, establishes a White House Council to encourage public and private investment in urban and economically distressed areas, including qualified opportunity zones. Opportunity Zones were added to the U.S. tax code by the Tax Cuts and Jobs Act on December 22, 2017 and are economically-distressed communities where new investments, under certain conditions, may be eligible for preferential tax treatment.

Consistent with 26 USC 1400Z–1, a “qualified opportunity zone is a population census tract that is a low-income community that is designated as a qualified opportunity zone. A population census tract that is a low-income community is designated as a qualified opportunity zone if—

- not later than the end of the determination period, the chief executive officer of the State in which the tract is located—
 - nominates the tract for designation as a qualified opportunity zone, and
 - notifies the Secretary of the Treasury in writing of such nomination, and
- the Secretary certifies such nomination and designates such tract as a qualified opportunity zone before the end of the consideration period.

Section 5 of this chapter outlines the requirement under Executive Order 12072 that GSA consult with or provide written notice to local government officials and consider their recommendations for and objections to a proposed selection site or space acquisition. As part of this consultation effort and to implement Executive Order 13853, GSA will request information from the appropriate local government officials concerning Qualified Opportunity Zones (<https://www.cdfifund.gov/Documents/Designated%20QOZs.12.14.18.xlsx>) and will consider their recommendations about these zones in establishing the delineated area.

The lease file should include documentation of this notice/ consultation process with local officials.

GSA Order ADM 1097.1: Location Factors to Consider

In September 2015, the Administrator issued GSA Order AMD 1097.1 CHGE 1, Incorporating Principles of Sustainability, Economic Development and Efficiency into GSA Business Practices and Location Decision-making. The Order reiterates GSA's commitment to sound location policy and includes guidelines for implementing EOs 12072 and 13693¹ by analyzing the following four factors:

Local and regional planning and economic development goals

The Order directs GSA to give first consideration to the central business area, when meeting Federal space needs in urban areas and to prioritize locations in existing and planned rural town centers. It also directs GSA to consult with local officials to identify specific local initiatives that should be considered when making decisions about Federal space needs, and consider the impacts of investments by other Federal, State and local agencies when making decisions about Federal space needs.

Sustainability and transportation infrastructure and plans

GSA should prioritize locations that are compatible with existing and planned public transit and other transportation infrastructure, with an emphasis on locating in areas that would allow for multiple commuter options that promote transportation choice, and help reduce road congestion and greenhouse gas (GHG) emissions. These locations should also allow easy employee access to businesses and services, and be accessible to affordable housing in the metro region. Finally, GSA's location decisions should be compatible with the sustainability priorities of states, local governments, and tribal communities.

New and existing infrastructure and resources

GSA's location decisions should prioritize localities that have sufficient public infrastructure, including power, water, sewer, telecommunications (including access to broadband) to efficiently deliver services to meet all Federal needs. This means we should avoid locations that require new infrastructure to support only the Federal need (unless new infrastructure is consistent with State and local infrastructure plans) and should instead choose previously developed but currently unused or underused locations. GSA should avoid previously undeveloped land ("greenfields"). The Order also emphasize the reuse of historic assets and locating appropriate new facilities in historic districts.

Protection of the natural environment

In addition to compliance with statutes, regulations, and Executive Orders, GSA must include consideration of regional and local climate preparedness priorities and adaptation plans and consideration of locations that optimize climate-resilient design and management elements in location decisions.

¹ EO 13693 has since been superseded by EO 13834, Efficient Federal Operations, but the fundamental components related to efficient space decisions discussed here in this guide and memorialized in the Guiding Principles for Sustainable Federal Buildings (still in effect), are similar.

EO 13006: Historic Properties Check

This step produces documentation for lease file Tab 2 (Pre-Solicitation Phase) under Historic Preservation Compliance Check.

In accordance with EO 13006, Locating Federal Facilities on Historic Properties in Our Nation's Central Cities, GSA requires both a price preference for historic properties and certain procedures for new construction, repairs, and alterations to historic properties. To comply with GSA order ADM 1020.2, "Procedures for Historic Properties," check the National Register of Historic Places (<http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome>) to determine whether historic properties exist within the delineated area and whether they are subject to the price preferences of GSAR 552.270-2, "Historic Preference." This is a useful starting point, but even properties that are not registered may be subject to the special requirements enumerated in the "Historic Preference" clause of the RLP, so the Leasing Specialist may also need to consult the GSA Regional Historic Preservation Officer (RHPO).

Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior (36 CFR 800.16(l)(1)). Offerors may demonstrate that a property not listed in the National Register is nonetheless eligible for inclusion by submitting either of the following:

- A letter of opinion signed by the State Historic Preservation Officer (SHPO) stating that the property appears to meet the National Register criteria. 36 CFR 60 requires the SHPO to issue a response within 60 days of receiving a properly documented Request for Nomination application.
- A copy of the National Register announcement listing the property address with the notation "cover documentation accepted" (or "listed"). The National Register produces a weekly announcement listing all properties for which a formal nomination was received, and those approved and listed.

EO 13006 requires the Federal government to "utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in our central business areas."

The National Historic Preservation Act does not distinguish between historic properties in urban and rural areas. To comply with this statute, new construction, alterations, and repairs to historic properties must follow strict guidelines, regardless of their location.

The Archeological Resources Protection Act (ARPA) applies to both historic properties and sites that may be eligible for inclusion in the National Registry of Historic Places. This means that even sites not listed in the Registry, and sites that have not been considered for inclusion, may still be protected by ARPA.

Further discussion of the compliance requirements for historic properties is in Leasing Desk Guide Chapter 2, New or Replacing Lease. In addition, consult Lease Acquisition Circular (LAC) 2014-06, Lease Requirements for Protection of Environmental, Archaeological, and Historic Resources.

EO 13834: Efficient Federal Operations

EO 13834, Efficient Federal Operations, directs agencies to reduce waste, cut costs, enhance the resilience of Federal infrastructure and operations, and enable more effective accomplishment of their mission. EO 13834 revoked Executive Order 13693, Planning for Federal Sustainability in the Next Decade, but both Orders uphold the Guiding Principles for Sustainable Federal Buildings. The Guiding Principles draw from the Implementing Instructions for Sustainable Federal Locations and direct agencies to consider options to lease space in sustainable buildings in accordance with the aforementioned standards, and to incorporate as many of the Guiding Principles as possible in new lease actions where cost effective. The Guiding Principles also direct Federal agencies to “align, where possible, with local and regional planning goals.”

Federal agencies can achieve these goals by including existing principal cities and, in rural communities, existing or planned town centers that are pedestrian-friendly, near existing employment centers, and accessible to multiple transportation modes. Collaboration with local officials will guide Federal agencies in identifying which areas suit not only Federal agency needs, but also local economic and environmental development goals.

It's All Relative

In many lease actions, especially those where the delineated area could be expanded beyond a CBA, Leasing Specialists may want to consider whether a best value tradeoff approach would be the best strategy.

A tradeoff approach may be the best way to consider the relative non-price value of other sustainability factors. New data tools are available to help evaluate and document these factors quickly and confidently.

Additional guidance about the acquisition strategy can be found in Leasing Desk Guide Chapter 13, Source Selection.

Floodplains and Wetlands

Executive Orders 11988, “Floodplain Management,” and 11990, “Protection of Wetlands,” direct GSA and other agencies to avoid leasing space in buildings located within floodplains and to evaluate the potential effects of lease procurements and construction on wetlands unless it is determined that there is no practicable alternative. Executive Order 13690, “Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input,” issued in 2015, amended Executive Order 11988.

On December 27, 2016, GSA PBS issued a revised PBS Desk Guide for Floodplain Management to implement Executive Order 13690. However, Executive Order 13690 has since been revoked and PBS is now following policies in conformance with the prior Executive Order 11988 until PBS can complete the updating of its Floodplain Management Desk Guide. GSA’s existing floodplain process will remain in effect until the updated Desk Guide is issued. An eight-step decision-making process must be followed to comply with the Executive Order. In its lease process, GSA must determine whether required space is for a “critical” government function (e.g., storage of irreplaceable records), identify potential floodplain impacts for projects, identify alternatives that avoid the floodplain, and coordinate compliance with the National Environmental Policy Act (NEPA) process.

The PBS Wetland Desk Guide defines “wetlands” as those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances do or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands are often associated with floodplains and undergo a similar evaluation process to ensure compliance with EO 11990. GSA Order ADM 1095.5 and the PBS Wetland Desk Guide provide implementing instructions and sample language for use in lease construction and other lease actions involving discharges to wetlands and coordinates compliance with the U.S. Army Corps of Engineers (COE). The U.S. Fish and Wildlife Service maintains the National Wetlands Inventory. To access the wetlands data and mapping tool, and learn more about the National Wetlands Inventory, visit <http://www.fws.gov/wetlands/Data/Mapper.html>.

Further discussion of the compliance requirements for floodplains and wetlands is in Leasing Desk Guide Chapter 2, New or Replacing Lease.

g. Using Mapping Tools to Assist Clients and Identify Space

As discussed above, client agencies must designate a delineated area as part of their approved space requirements. However, Leasing Specialists or other GSA employees often find it necessary to help clients redefine the delineated area, either to comply with Federal location policy or increase competition. GSA can use these tools to help agencies consider location factors, such as whether an area is pedestrian-friendly or accessible to public transit, when identifying their delineated area.

In this regard, the Multi Asset Planning (MAP) tool (available on the [GSA InSite page](https://insite.gsa.gov/organizations/public-buildings-service/design-and-construction/urban-development/gismap-tools/map-app) at <https://insite.gsa.gov/organizations/public-buildings-service/design-and-construction/urban-development/gismap-tools/map-app>) and [ArcGIS Online \(AGOL\)](#) are powerful tools for mapping and spatial analysis that can be used independently or in conjunction with one another. To check whether a delineated area or specific address falls in an urban or rural area, GSA can use the layers in the [Multi Asset Planning tool](#) which contains the Census TIGER/line boundaries. As explained above, setting the delineated area in an urban area requires identifying and giving prioritization to locating in the CBA of a statistical area’s principal cities.

MAP

The **Multi Asset Planning (MAP)** tool contains pre-loaded data about PBS buildings, leases, and Occupancy Agreements. Map layers can be turned on and off quickly, or filtered for certain characteristics, such as to identify all leases expiring in the next 12–18 months or vacant Federally owned space within a given delineated area. In addition to being able to visualize the filtered data on a map, query results can also be exported in spreadsheets for further analysis. Other functionality in MAP includes basic drawing, distance and area measurements, and overlay analysis.

MAP is the ideal tool to use for quick analyses that do not need to be saved, and that involve only the pre-loaded data layers. Examples where one would want to use MAP include checking to see whether a particular delineated area overlaps with the 100-year floodplain, identifying seismic requirements for a particular location, determining the congressional district in which a delineated area lies, or finding vacant space near an upcoming expiring lease.

AGOL

To be able to save and/or share interactive versions of a map, or to include customized data layers in an analysis, use **ArcGIS Online (AGOL)**. Unlike MAP, the cloud-based AGOL portal can be accessed outside the GSA firewall, including during off-site meetings with clients. Although the data in MAP is fixed, the AGOL interface allows users to add their own data and combine data from multiple sources. One can, for example, combine the results of a series of MAP queries in a single map, or visualize third-party data such as market information from CoStar or LoopNet, or the location of Energy Star buildings. The AGOL portal also contains a rich collection of base maps and third-party data layers that can help one better understand local conditions. Examples of such data layers include floodplains, wetlands, transportation networks, historic or business districts, Census and political boundaries, and others.

Most program delineated areas will be documented in an AGOL map as part of the Local Portfolio Plan for the market. GSA associates can check with the Local Portfolio Planning team in the region to access this AGOL map, which should also document other relevant spatial data resulting from local consultation and GSA analysis (e.g. the CBA, targeted development areas, opportunity zones, new infrastructure investment, etc.).

The responsible GSA associate can use these tools to counsel client agencies about how to best draw the delineated area to meet mission needs, while also encouraging competition and opportunities for space consolidation. For more detailed information see the video tutorials available through the Urban Development Program InSite page at <https://insite.gsa.gov/services-and-offices/public-buildings-service/design-and-construction/office-of-the-chief-architect/urban-development/gis-map-tools/gis-training-in-urban-development>.

Smart Location Calculator

The Smart Location Calculator (SLC) is a web-based tool that predicts the relative impact that selecting one work site over another would have on employee commuting patterns and subsequent greenhouse gas emissions.

Developed by the Urban Development Program at GSA in partnership with the U.S. Environmental Protection Agency, the SLC was intended to support Federal agencies in their site selection analysis. It allows Leasing Specialists or other GSA representatives and their client agencies to better understand the impacts of various location alternatives—including transportation, traffic, congestion, environmental factors, and other development impacts on local and regional communities—to inform GSA decision-making.

↳ 5. Contacting Local Officials

Users can both browse a map of “Smart Location Scores” and additional data fields or calculate and compare scores for specific facility addresses. Scores range from zero to 100, with 100 being the best or most location-efficient score for a given region and zero being the worst. A score of 72, for example, indicates that a given Census Block Group (CBG) is in the 72nd percentile for CBGs in that metropolitan region. The tool also includes data about the relative accessibility by transit of a given workplace location, allowing users to visually identify areas of the metropolitan region that are the most accessible by transit and where employees are the least likely to produce emissions driving to work.

Using the SLC map to understand the built environment and transportation infrastructure of the metro area is an important step in setting the delineated area. Setting a delineated area in low scoring areas of the map (which appear red/orange) is likely to result in offers with lower than average location efficiency available for the metro region. When compatible with customer agency mission, delineated areas should include higher scoring areas of the metro region (which appear in green in the SLC).

For more information or to use the Smart Location Calculator, see the Urban Development Insite page: <https://insite.gsa.gov/organizations/public-buildings-service/design-and-construction/urban-development/smart-location-calculator>.

h. Subsequent Revision of Delineated Area

During preparation for the market survey, or based on its results, it is possible that the delineated area may need to be revised or expanded. If such a change is contemplated, the client agency must concur in writing. See Chapter 2 for further guidance on the market survey process and documentation requirements.

i. Attachments

Attachments 1 and 2 at the end of this chapter are optional templates for documenting compliance with the requirements of the Rural Development Act and Executive Order 12072. The templates are provided for reference and adaptation as appropriate. Regions may adapt the language to best fit their unique circumstances.

5. Contacting Local Officials

This step produces documentation for lease file Tab 1 (Requirements Development) under Notification to City Official.

Consultation with local officials is required by EO 12072, which states that agencies must “consult with appropriate Federal, State, regional, and local government officials and consider their recommendations for and objections to a proposed selection site or space acquisition.” GSA engages local stakeholders in multiple ways. Leasing Specialists should identify what, if any, recent consultation has already occurred with local officials before beginning any additional outreach. Sources if

How to find the “appropriate” officials

In most regions, Asset Managers (Portfolio) or regional Urban Development Officers take the lead in notifying the appropriate local officials.

this information include:

- The office of the Regional Administrator;
- Urban Development Officers/Teams; and
- Office of Portfolio Management, and in particular, Local Portfolio Plans and Planning teams.

a. Consultation versus Written Notice

Consultation is distinguished from merely giving local officials written notice of GSA's location decisions. Consultation means that GSA invites local officials to provide input and receives a documented response from the officials, making every reasonable effort to contact them and offer an opportunity for their input. It includes but is not limited to a written notice. The documented response may be in the form of meeting notes, a phone call log, or a return letter or email. It is important that the consultation occur during requirements development or during prospectus development, so that local officials can meaningfully contribute to the final delineated area.

Consultation is required:

- on all lease construction projects; or
- for all lease prospectus-level projects.

The consultation requirement may be met in person or by phone contact. Preference is given to in-person contact where feasible.

Lease actions that are neither lease construction nor prospectus-level are required to provide written correspondence that includes an invitation to meet in person or speak via telephone, and is followed up with a phone call to confirm that the letter has been received. Exceptions to this written notice requirement are disaster leases, Small (3626) leases, and On-Airport leases. This written correspondence should:

- Inform local officials that GSA is considering the specified delineated area.
- Provide general information about the space size/number of employees anticipated.
- Invite the local officials to provide information about:
 - CBA boundaries
 - Qualified opportunity zones
 - Local planning priorities
 - Targeted development areas
 - Existing/planned transit.
 - Ways GSA can support community sustainability.

↳ 5. Contacting Local Officials

- Ways GSA can align its lease actions with regional long-range plans and objectives.
- Offer to meet with the local officials or speak on the phone, if they so desire.

A suggested template for this letter is included in Attachment 2, Section 1.

Some local officials may respond more readily than others to GSA on location decisions, and leasing projects should allow sufficient time in the schedule to enable local officials to respond. Written correspondence to local officials should ask them to acknowledge receipt (also in writing) and express any interest in consulting further with GSA on a given location decision within a reasonable time frame. If this first notice does not generate a response within a week or two, it is a best practice to follow up with a second form of outreach, such as a telephone call or email, to account for the possibility that the initial notice was misdirected. If reasonable effort is made to allow local officials to respond to GSA's letter, but local officials do not respond, GSA may proceed with its lease project without further consultation.

In addition to the requirements above, consultation is **recommended as a best practice** when an agency in an existing lease is likely to leave or return to a CBA. This best practice may be met through in-person, phone, or written communication, with preference given to in-person when feasible.

Records of all communications and notes related to efforts to meet the consultation requirements must be included in the lease file Tab 1 (Requirements Development) under Notification of City Officials. A record of how local planning and development objectives were considered in the Leasing process should also be included in the lease file (see suggested template in Attachment 2, Section 2).

For lease actions other than prospectus-level and lease construction, the requirement to consult with local officials may be waived if in the past 36 months GSA has held a community relations and planning meeting with local officials, as discussed below, and GSA has considered the information presented in that meeting. The requirement may also be waived for any action if GSA's action is consistent with the local portfolio plan or program delineated area for the market. In such a case, written notification to local officials would be sufficient after the GSA project team confers with the GSA employee most familiar with the proceedings of the meeting and confirms that input from the meeting is appropriate to the planned leasing action. The notice must be sent to local officials at least 30 days prior to GSA finalizing the requirements development so that local officials may weigh in with updates or concerns. Documentation of this internal conference and consideration of the information presented should be included in lease file Tab 1 (Requirements Development) under Notification to City Officials.

b. Community Relations and Planning Meetings

GSA regional Urban Development Officers and Local Portfolio Planning teams conduct community relations and planning meetings with local officials to discuss upcoming Federal space needs and general municipal plans. In some regions, these meetings may also include the office of the Regional Administrator. These meetings may satisfy the need to consult with local officials regarding specific lease locations if such meetings occur within 36 months of the lease action and includes a discussion of local planning goals and objectives.

The intent of these meetings is to strategically engage with local officials about how upcoming Federal space needs can best complement local planning objectives, as envisioned under EO

12072. Such consultations can be particularly effective if conducted outside the pressures—political and otherwise—of specific space actions. Many regions find that regular meetings with city officials where GSA has multiple leases are mutually beneficial. When local officials understand GSA’s leasing process, it can be easier to work through local concerns. Understanding local planning objectives, in addition, can enable GSA to more effectively analyze offers, such as with respect to plans for local transportation or other infrastructure improvements.

Participants in Community Relations and Planning Meetings

Community relations and planning meetings can be set up and facilitated by GSA Regional Urban Development Officer or Local Portfolio Planning teams. However, employees from other business lines may play a role. Some regions may already regularly meet with local officials in contexts outside leasing, and it is appropriate to include strategic leasing issues (discussed below) on the agenda of such existing meetings.

Depending on the regional office, asset managers, leasing branch chiefs, Urban Development Officers, or others may have existing relationships or experience dealing with local officials. Those business lines should be responsible for conducting meetings and maintaining historical meeting records for access by the GSA project team. In addition, regional Urban Development Officers, in coordination with the responsible business line in each region, will maintain an up-to-date database of contacts within local jurisdictions. For identification of your regional Urban Development Officer, please visit www.gsa.gov/urbandevelopment.

Local officials may include the mayor’s office, economic development officials, and/or planning officials, generally as designated by the mayor’s office.

Meetings can be in-person, ideal for building relationships, or a conference call if there are travel restrictions.

Key Topics

Community relations and planning meetings should provide local officials with information about GSA’s procurement process and Federal location regulations and give them an opportunity to share relevant planning information with GSA. At a minimum, the leasing component of these meetings should:

- Explain to local officials how [FedBizOpps](#) works so they can monitor future announcements in their jurisdiction;
- Provide a high-level overview of GSA’s portfolio, as relevant to their municipality, such as the number and size of existing leases, upcoming expirations, etc.;
- Solicit input from local officials on development priorities and planning goals for their community, including transportation planning; and
- Solicit input from local officials on how GSA can support community sustainability and how GSA can align its lease actions with regional long-range plans and objectives.

Proceedings should be documented and made available to the GSA project team for reference in future lease actions.

6. Confirming Agency Requirements

a. Requirements Package

The client agency reviews and approves the requirements package, and the responsible GSA associate uses this information to complete the formal request for space. The client agency confirms the final space requirements by letter or email to GSA. The letter or email should be placed in the lease file under Tab I (Requirements Development). For smaller or less complex leases, the OA may be sufficient to capture the requirements.

b. Funding

Funding must be obligated by the client agency for every space action. Even if no SF-81 is submitted, the space request must confirm funding availability with an authorized agency official's signature on the first draft of the OA. Agency requirements whose cost exceeds the standard TI allowance must be funded by a lump-sum Reimbursable Work Authorization (RWA). Refer to Chapter 2, New and Replacing Leases, for additional information on obtaining RWAs.

c. Schedule

The client agency should also receive a project schedule from GSA, even if it includes only the G-REX project milestones schedule at the beginning of the project. In the early stages of the project, the purpose of the schedule is to help inform the client agency and prompt discussion of topics that the agency may not have considered, such as furniture or telecommunications. GSA also provides a revised schedule at the conclusion of the requirements development process.

d. Requirements That Cannot be Met by Available Commercial Space

If the client agency requirements, viewed in the context of the current market, indicate that lease construction should be considered as a solution, the Leasing Specialist must understand that one or both of the following actions may be triggered:

- Below-prospectus lease construction review; or
- Prospectus-level lease construction submittal.

Refer to Chapter 14, Lease Construction, for details on these reviews.



Attachment 1: Template for Documenting Compliance with Location Policy

This template contains two sections for documenting compliance with the location policy requirements of the Rural Development Act (RDA) and Executive Order 12072. Complete each section as appropriate by either selecting the checkbox that affirms compliance with the requirement or providing the information necessary to document the reasons otherwise.

Template Section	Instructions
Section 1: Rural Development Act (RDA) Compliance	All Agencies: Complete Section 1 and sign in the space at the end of Section 1. If the requested space is in a rural area, there is no need to complete Section 2.
Section 2: EO 12072 Compliance	If the requested space is not in a rural area: Complete Section 2 and sign on the last page.

AGENCY NAME: [Agency Name]

CITY, STATE: [City, State]



Section 1: Rural Development Act (RDA) Compliance

The Rural Development Act of 1972 mandates that all Federal agencies first consider locating within a rural area. See FMR Subchapter C—Real Property, Part 102-83.50. If an agency’s mission calls for a location in an urban area, the agency must provide a written statement affirming that it has given first priority to rural areas, but that an urban location is required.

Select option 1 below if you are locating within a rural area, sign your name at the end of this section, and return Section 1 of this Location Policy compliance template. If you select this option, you do not need to complete Section 2 of this template.

Otherwise, if your delineated area is not within a rural area, select option 2 and complete statement (a) or (b). Your statement must identify the requirement that rural space cannot meet (for example, conflicts with mission, availability of space, etc.). Then complete Section 2.

[Agency Name] _____ has given first priority to a rural area as follows:

- 1. Our agency is requesting space in a rural area and gave consideration to rural communities with existing or planned town centers.

OR

- 2. A rural area cannot meet our agency’s space needs for the following reasons:

- a. Conflicts with the following mission requirements: [identify the requirement that the rural space cannot meet]

- b. Other: _____

 Agency Signature Date



Section 2: Executive Order 12072 Compliance

Executive Order 12072 mandates that all Federal agencies locating in an urban area give first consideration to the central business area (CBA) or other similar area recommended by local officials of the selected principal city of a Core Based Statistical Area (CBSA), as defined by OMB. An agency request for space in an urban area must be satisfied within the applicable CBA unless the requesting agency provides GSA with a written justification sufficient to demonstrate that first consideration has been given to the CBA and to support the determination that the agency program functions involved cannot be efficiently performed within the CBA. Specifically, justifications must address, at a minimum,

“the efficient performance of the missions and programs of the agencies, the nature and function of the facilities involved, the convenience of the public served, and the maintenance and improvement of safe and healthful working conditions for employees. See EO 12072 and FMR Subchapter C—Real Property, Part 102-83—Location of Space, for further information regarding EO 12072 compliance.

Check off option 1 below if you are locating in the CBA of a principal city in an urban area. Otherwise select option 2 and complete statement (a) or (b).

[Agency Name] _____ gave consideration to the central business area.

- 1. Our agency is requesting space in the central business area (CBA) of a principal city in an urban area.

OR

- 2. The CBA cannot meet our agency’s space needs for the following reasons:
 - a. The CBA conflicts with the following mission requirements:[\[justification should address the following four factors: the efficient performance of the missions and programs of the agencies, the nature and function of the facilities involved, the convenience of the public served, and the maintenance and improvement of safe and healthful working conditions for employees.\]](#) _____

- b. Other: _____



↳ Attachment 1: Template for Documenting Compliance with Location Policy

Agency Signature

Date

Attachment 2: Template for Documenting Written Notice or Consultation with Local Officials

Consultation with local officials is required by Executive Order 12072 and is distinguished from merely giving local officials written notice of GSA's location decisions. Consultation should help GSA understand local planning objectives so the agency can consider community priorities before setting the delineated area.

For lease actions other than prospectus-level and lease construction, the requirement to consult with local officials may be waived if in the past 36 months GSA has held a community relations and planning meeting with local officials, as discussed below, and GSA has considered the information presented in that meeting. The requirement may also be waived if GSA's action is consistent with the local portfolio plan or program delineated area for the market. In such a case, written notification to local officials would be sufficient after the GSA project team confers with the GSA employee most familiar with the proceedings of the meeting and confirms that input from the meeting is appropriate to the planned leasing action.

The letter template in Section 1 on the following page serves to inform local officials of the Federal interest in consulting with them and invites them to engage GSA in a conversation (or correspondence) about local planning objectives and priorities.

The additional template that follows in Section 2 can be used to document how GSA met the consultation requirement.

Use of both templates is optional.



Section 1: Template for Written Correspondence with Local Officials

Dear _____,

[Urban Development Officers or Asset Managers in Portfolio can assist in identifying the local officials who should receive this letter.]

Executive Order 12072 directs Federal agencies to consult with local officials and consider their recommendations and community development priorities with regard to Federal space acquisition.

GSA anticipates seeking expressions of interest to provide approximately _____ square feet of leased office space to accommodate approximately _____ employees in your **city/town/county**. We are currently considering the following boundaries as the delineated area for this space search:

In preparation for this lease action, we invite you to provide GSA with any relevant information regarding:

- the boundaries of your central business areas;
- qualified opportunity zones;
- local planning goals and priorities;
- targeted development areas in your community;
- existing or planned transit infrastructure; and/or
- other such information relevant to this anticipated lease action.

GSA requests a response to this letter in no later than ____ days in order to meet our procurement schedule deadlines. We are also available to speak with you about these issues. Please contact us at your earliest convenience.

Sincerely,

[Provide contact information for an individual at GSA (not an office) who can act as the point of contact for the consultation process, with both an email address and a phone number.]



Section 2: Template for Documenting Consultation

This template is a suggested format to document how GSA met the requirement to consult with local officials and that the information they shared was considered in the leasing process. This form should be included in the lease file under Notification to City Officials.

- A high-level community relations and planning meeting occurred in the last three years with [names and positions of officials]

 on [date] _____

- Consultation occurred with [names and positions of officials]

 on [date] _____

- Written correspondence was sent to [names and positions of officials]

 on [date] _____

- Received response
- Did not receive response. GSA followed up by:

[\[continued on next page\]](#)

