

Justification for Other Than Full and Open Competition
(Limited or Sole Source Justification)
(Refer to FAR 6.303-2 for further guidance on information to be provided)

**Subject of Justification – Sole Source Invasive Species Contract with South Dakota
Department of Game, Fish and Parks**

US Department of Interior, Bureau of Reclamation
Great Plains Region Acquisition Management Division
Billings, Montana

1- Office requesting the action	
Rapid City Field Office	
2- Description of proposed action	
<i>Mark one.</i>	
<input checked="" type="checkbox"/> sole source acquisition <input type="checkbox"/> limited competition acquisition	
3- Description of services or supplies needed	
Invasive species treatments Bureau of Reclamation lands at Angostura, Belle Fourche, Shadehill Reservoirs and James Diversion lands.	
4- Estimated cost	\$ 365,000 (\$73,000 annual x 5 years)
5- Authority	
<i>Mark the primary basis for the proposed action.</i>	
<input checked="" type="checkbox"/> FAR 6.302-1 Only one responsible source <input type="checkbox"/> FAR 6.302-4 International agreement <input type="checkbox"/> FAR 6.302-2 Unusual and compelling urgency <input type="checkbox"/> FAR 6.302-5 Authorized or required by statute <input type="checkbox"/> FAR 6.302-3 Industrial mobilization, engineering, development or research capability; or expert services <input type="checkbox"/> FAR 6.302-6 National security <input type="checkbox"/> FAR 6.302-7 Public interest <i>(Requires determination by the Agency Head.)</i>	
5a- Address specifically how the authority applies	
<i>State conditions related to the requirement, contractor(s) qualifications; etc. (Refer to the "Application" and "Limitation" portion of the applicable FAR citation.)</i>	
<p>Reclamation has Memorandum of Understandings with the South Dakota Department of Game, Fish and Parks (SDGFP) for the management of the above Reclamation lands. SDGFP is the sole agency responsible for these lands regarding recreation, wildlife and related uses. Treating invasive species has been one of SDGFP's tasks related to overseeing these lands. SDGFP is the best agency to perform these tasks because:</p> <ol style="list-style-type: none"> 1. SDGFP has acquired local knowledge and experience with the existing and potential invasive species issues on the approximately 8,763 acres of lands that they have managed for years and sometimes for decades. SDGFP has historic knowledge of where invasives have been treated in the past and if and where follow-up treatments are necessary. SDGFP personnel are trained in invasive species recognition and are guided by a South Dakota state licensed pesticide applicator program. SDGFP is uniquely situated with staff on hand and a constant presence to monitor and rapidly respond to a variety of invasive species infestations. This results in cost savings and good land management practices since infestations are not likely to become large, out of control, costly to treat, and rehabilitate. 	

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2. Reclamation does not have the personnel or resources to provide a constant presence to effectively and efficiently perform the invasive species monitoring, mapping, and treatment activities on these lands. From the Rapid City Field Office, personnel would have to travel 314 miles to James Diversion Dam, 58 miles to Angostura Reservoir, 183 miles to Shadehill Reservoir, and 52 miles to Belle Fourche Reservoir.

6- Effort made to obtain offers from multiple sources

Name the source(s) from which the product(s) or service(s) are to be acquired. Be sure to include discussion as to which exception under 5.202 applies if publicizing is not intended. (This would only apply to actions under the FAR authorities 6.302-2, -3, -5, and -7.)

South Dakota Department of Game, Fish, and Parks

7- Description of market research performed

Explain actions taken and provide (by attachment) documentation of results of the market research, or an explanation of why no market research was done.

For market purpose research comparisons, Reclamation has not entered into large scale invasive species management contracts in the State of South Dakota. A comparison can be made with Seminoe Reservoir's 2009 salt cedar control contract on approximately 97.5 acres in Wyoming. The three bids received were:

Contractor	Bid	\$/acre
Wyoming Helicopters, Inc.	\$17,900	\$184
Back Country Spraying	\$41,995	\$431
Precision Industrial Applicators	\$43,875	\$450

The above bids were for a relatively small area for one invasive plant compared to the SDGFP's invasive species management services, which includes management for many different invasives in many scattered areas within thousands of acres of Reclamation land throughout South Dakota. In addition, SDGFP monitors for invasives on Reclamation's 8,763 acres of lands in South Dakota. This on-site presence gives them flexibility and availability to manage invasives that is not provided by a private weed spraying contractor.

8- Determination of fair and reasonable cost

Explain how we know or will be able to determine reasonableness of costs.

The proposed annual \$73,000 contract, renewable for up to five years, is based on a need for invasive species control and is limited by Reclamation's budget for invasive species control in South Dakota. The determination that it is fair and reasonable is based on past experience of work completed by SDGFP. For example, at Angostura Reservoir the SDGFP Parks and

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Recreation Division manages 2,990 acres of developed recreation, primitive, and concession areas. In 2009, SDGFP treated 183 acres of invasives. Reclamation provided a portion of the funds for this effort, which was \$23,464. The cost per acre for Reclamation funds is \$128. A hidden cost that is not reflected in this per acre account is that SDGFP personnel provide many services under their invasives species program administration that includes, but is not limited to: employee commercial applicator certification, equipment use and upkeep, administration, and monitoring for invasives during their field site visits and daily activities. Monitoring is an important component for early detection and rapid response in any invasives species program. If it is conservatively said that SDGFP personnel monitored just the 823 acres of the developed recreation areas, then the \$23,464 dollars in Reclamation funds can actually equate to \$28.50 per acre. This level of detail would not be possible under current Reclamation personnel staffing levels and existing budget constraints.

9- Other facts supporting use of other than full and open competition
Address applicable items such as why specifications, statement of work, etc., are not or cannot be available timely; harm, financial or otherwise, to the Gov't if not procured as proposed, etc.

- SDGFP is a governmental entity that is not for profit so they may provide an economical service to Reclamation.
- SDGFP's experience results in savings to Reclamation by their ability to be on hand to monitor, provide oversight, and treat invasive species. SDGFP is trained in invasive species recognition, use of different treatments, and will provide control of a variety of invasives, as necessary. Their local knowledge and field reviews allow them to spot infestations and provide the required control without Reclamation needing to supply personnel to survey and create maps of every infestation of every different kind of invasive species on scattered lands throughout the state.

10- List any sources that have expressed interest in this proposed acquisition
 No other sources.

11- Effort to overcome barriers to competition for future acquisition
Explain what can and will be done to improve our ability to obtain competition for these services or supplies when next required.

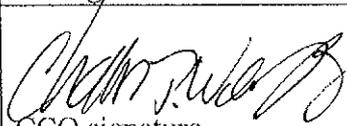
SDGFP has unique qualifications, experience, and resources for invasive species treatments on Reclamation's South Dakota lands that are not available competitively from private weed control contractors.

12- Certification

Preparer's / requestor's name	Preparer's / requestor's title
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I certify that the information and documentation provided with this requested justification are accurate and believe they form a valid basis to proceed with the requested acquisition without full and open competition.	
Preparer / requestor signature _____ Date _____ (Proposed actions \$100k or less, do not require original signature. The request can be transmitted electronically.)	
Approval Requirements (refer to WBR 1406):	
Mark one. <input checked="" type="checkbox"/> The requested action is APPROVED : <input type="checkbox"/> The requested action is DENIED (Explanation is provided below.)	
I certify that this justification is accurate and complete to the best of my knowledge and belief and hereby approve this justification and authorize the action to proceed.	
Contracting Officer's name <i>Approves ≤\$25k; reviews > \$25k</i>	CO signature _____ Date _____
Chief of the Contracting Office's name Chandler Worley <i>Approves >\$25k, up to \$550k; review >\$550k</i>	CCO signature  Date <u>2/4/11</u>
Bureau Procurement Chief's name <i>Approves >\$550k, up to \$11.5mln; reviews >\$11.5mln</i>	BPC signature _____ Date _____
Head of the Contracting Activity's name <i>Approves >\$11.5mln, up to \$57mln; reviews >\$57mln</i>	HCA signature _____ Date _____
DOI Senior Procurement Executive's name <i>Approves >\$57mln</i>	SPE signature _____ Date _____
Explanation of denial:	