



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ADMINISTRATION
AND RESOURCES
MANAGEMENT

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
PART I – BACKGROUND

1. Date: June 3, 2010
2. Program Office: Climate Change Division/Program Integration Branch
3. Program Officer: Tom Wirth, COR, 202-343-9313, wirth.thomas@epa.gov, 6207J
4. Project Identification: EP-W-08-013 “National Agriculture Greenhouse Gas Inventory Reporting of Soil Organic Carbon and Nitrous Oxide Emissions”
5. Supplies/Services Required: Develop the national inventory for greenhouse gas emissions and sinks for reporting to the United Nations Framework Convention on Climate Change and support EPA in its efforts to improve green house gas reporting to the UNFCCC. CSU shall contribute to improvement of greenhouse gas reporting to UNFCCC as well as work in related areas.

6.

Option Year	Current Ceiling Level (\$)	Increase to Funding Ceiling	Adjusted Ceiling
Base Period	315,432	N/A	315,432
Option Year 1 (through 1/13/2010)	254,807	N/A	254,807
Option Year 2 (through 1/13/2011)	230,508	\$296,152	526,660
Option Year 3 (through 1/13/2012)	251,301	\$346,248	597,549
Option Year 4 (through 1/13/2013)	250,889	\$340,256	591,145
TOTAL	1,302,937	\$982,656	2,285,593

7. Colorado State University
ATTN: Stephen Ogle
Fort Collins, CO 80523

PART II JUSTIFICATION

In accordance with FAR 6.303-2 and Contracts Management Manual 7.3K the following provides justification for other than full and open competition for raising the funding ceiling for contract EP-W-08-013 with Colorado State University (CSU).

As specified under FAR 6.303-2(a)(2) and FAR 6.303-2(a)(3) the following is an account of the action being approved and a description of the services and estimated value of this action. As shown in the table under item 6 above, this action is intended to raise the funding ceiling for the contract by a total of \$982,656 over the three option years remaining. This additional funding, largely made available through a recently initiated Interagency Agreement (IA) with USAID, will be used to expand ongoing efforts on greenhouse gas inventory capacity building in developing countries and further refine and deploy the Agriculture and Land Use (ALU) software tool developed by CSU as part of an ongoing six-year project. An expansion to planned work on the US greenhouse gas inventory related to the soil carbon and soil nitrous oxide source categories will also take place utilizing EPA funds. Additionally, the characterization of the US land base—as required by the Intergovernmental Panel on Climate Change (IPCC) for greenhouse gas inventories submitted to the United Nations Framework Convention on Climate Change (UNFCCC)—will also be undertaken utilizing EPA funds. It should be noted that this action does not change the scope of the current statement of work, however, a modified statement of work that incorporates an addendum will be included that describes the work to be completed as a result of the increase to the funding ceiling.

FAR 6.303-2(a)(4) requires an identification of the statutory authority permitting other than full and open competition, which is FAR 6.302-1. This statutory authority allows for other than full and open competition if only one responsible source and no other supplies or services will satisfy agency requirements. As required by FAR 6.303-2(a)(5) and FAR 6.303-2(a)(9) the following provides a demonstration of the unique qualifications of the proposed contractor and the justification for determining them to be the only responsible source to satisfy the government's requirement:

Dr. Stephen Ogle, Dr. Bill Parton, Dr. Stephen Del Gross and Dr. Keith Paustian, the lead researchers from CSU for this effort, along with other staff at CSU, are uniquely qualified to complete this work for EPA. The CSU team has developed extensive expertise in utilizing the IPCC methodology for estimating soil carbon stocks in the US and remains the only group of scientists who have successfully applied the IPCC methodology to the existing US activity data for generation of national soil carbon estimates. EPA has utilized the soil carbon estimates generated by the CSU team over the last eight years in the annual publication of the *US Inventory of Greenhouse Gas Emissions and Sinks*. The Century/DAYCENT models, which will be used for the foreseeable future to estimate soil carbon and nitrous oxide flux from soils, were developed by a team at Colorado State University that includes Dr. Parton and Dr. Del Grosso. Members of the CSU team have recently used these models to generate soil carbon and soil nitrous oxide estimates for the *1990-2008 US Inventory of Greenhouse Gas Emissions and Sinks* currently undergoing a review by experts. Dr. Ogle has been working for over nine years to develop the methodology and associated documentation for the soil carbon estimates and for four years on the soil nitrous oxide estimates used in the US Greenhouse Gas Inventory. Dr. Ogle was

a Lead Author on nine chapters of the recently completed *2006 IPCC Guidelines*, including the sections on soil carbon methods, Tier 3 approaches and uncertainty, in addition to other IPCC publications that are used as the methodological basis for developing the greenhouse gas estimates in national greenhouse gas inventories, including the United States. Dr. Paustian was the Convening Lead Author for the Agriculture, Forestry and Other Land Uses Volume of the *2006 IPCC Guidelines*. Additionally, the CSU team has overseen the development of a multi-agency effort to combine data sets on US land use types to provide a complete representation of the US land base over the 18 year time period for the current US Greenhouse Gas Inventory in compliance with the IPCC Guidelines; a task that has not been undertaken by any other research group.

The focus of the greenhouse gas capacity building work will be the further development of the Agriculture and Land Use (ALU) Tool and training of inventory experts in developing countries on the use of the ALU tool in producing greenhouse gas inventory estimates for the Agriculture, Forestry and Other Land Use (AFOLU) sector. Dr. Ogle was the lead researcher in a EPA/USAID sponsored project in Central America from 2003 to 2007. It was during this project that Dr. Ogle developed the original concept for the ALU tool and oversaw the design of the tool to its current level of development through the team of software designers that he manages. The ALU tool is recognized both in the US and internationally as a ground-breaking effort for assisting developing countries in improving their greenhouse gas inventories. Dr. Ogle has since traveled throughout the world to provide trainings on the ALU tool in addition to working on further refinements. As part of EPA's expansion of the greenhouse gas inventory capacity building work in developing countries under the IA with USAID, EPA will be working in several new regions where the focus will again be on training experts on the use of the ALU tool. Dr. Ogle and his team are uniquely qualified to perform these trainings given his role as the lead developer of the ALU tool, knowledge of the IPCC methodologies and extensive past experience in training inventory experts in developing countries on the use of the tool.

For these reasons, the proposed team is exceptionally and uniquely qualified to undertake these tasks and presents the best value to the US Government. In particular, the model utilized by the team generates tier 3 level data which is critical to EPA's annual reporting objective. Thus Colorado State is the only organization that has tier 3 capabilities and this fact makes them the only ones who can do this work.

In accordance with FAR 6.303-2(a)(11) the EPA will make every effort to ensure that barriers to competition are evaluated before any subsequent acquisition for supplies or services are required. This will include staying abreast of current literature, attending conferences and networking with other professionals to ensure that EPA is aware of other potential contractors that may be able to provide expertise/services as it relates to the work covered under this SOW.

In summary, this action is intended to expand the funding ceiling for contract EP-W-08-013 with CSU by \$982,656 in order to allow for additional work that would not currently be possible with the existing funding ceiling. This action will include additional work under Tasks 1 and 3. Under Task 1 this will include further developing the approach for using data from the National Resources Inventory for the national greenhouse gas reporting for soil N₂O utilizing the DAYCENT model, integrating the soil carbon assessment into this analysis; and refining the national land representation analysis based on recommendations from the Second Land Use

Representation Workshop that was held during Option Period 1 of the contract. Under Task 3 this work will include further development of the ALU greenhouse gas inventory tool and inventory capacity building through additional trainings in developing countries on the use of the ALU tool. The additional work under Task 3 is the result of a recently signed IA between EPA and USAID to improve the capacity of developing countries to produce high quality greenhouse gas inventories in the AFOLU sector.

PART III – PROGRAM OFFICE DIVISION DIRECTOR CERTIFICATION

I, Dina Kruger, certify that the supporting data which forms the basis for this JOFOC is complete and accurate.


Dina Kruger,
Director, Climate Change Division

6/3/10
Date

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
EP-W-08-013
“NATIONAL AGRICULTURE GREENHOUSE GAS INVENTORY REPORTING OF
SOIL ORGANIC CARBON AND NITROUS OXIDE EMISSIONS”

PART V – APPROVALS

RECOMMENDATION:



Margaret Kline
Contracting Officer



Date

CONCUR:



Debra A. Miller
Administrative Contract Service Center/
Team Leader



Date

CONCUR:



Mi Suk Cox
Administrative Contract Service Center
And Manager



Date

CONCUR:

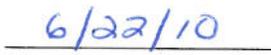
Kenneth Pakula
Office of General Counsel

Date

APPROVE:



Susan Moroni
Competition Advocate



Date

PART IV – CO'S DETERMINATION

1. **A description of efforts made to ensure that offers are solicited from as many potential sources as is practicable, including whether a notice was or will be publicized as required by Subpart 5.2.** Notice to increase CSU's ceiling was publicized on FedBizopps on December 7, 2009. No responses or comments were received. Acquisition planning efforts to continue this work after the contract expires are underway but presently no sources have been identified that can do this particular work.
2. **A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.** From the determination that the expanded services were vital to fulfillment of EPA responsibilities, CSU's cost proposal was reviewed. The cost proposal was in line with the Independent Government Cost Estimate (IGCE) and reflected existing negotiated compensation rates for each option year. The cost proposal was accepted as fair and reasonable. An increase in the level of effort was warranted and was appropriate for the proposed work.
3. **A description of the market research conducted and the results or a statement of the reason market research was not conducted.**

The expanded work was publicized on FedBizopps with a NAICs code of 541620 and no responses were received. The COR continues to keep communication channels open via networking and continues to monitor the market to find others who might have models that can generate the data that CSU's team has successfully done.

Market research efforts to identify potential firms that can produce the tiered data required by EPA remain unrealized.

4. **A listing of sources, if any, that expressed, in writing, an interest in the acquisition.** No responses were received from the December 2009 posting.

This Justification is accurate, complete, and in the best interests of the government, to the best of my knowledge and belief.