Description of document: Department of the Interior (DOI) Real Property Asset Management Plan FY 2020 - FY 2024, 2019

Requested date: 28-November-2020

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Posted date: 06-December-2021

Source of document: Freedom of Information Act Request
Office of the Secretary (OS)
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FOIA submission during COVID-19 pandemic:
FOIAonline

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

IN REPLY REFER TO:
1212.1-DOI-OS-2021-000931

xxxxx xx, 2021

Via email

The Office of the Secretary FOIA office received your Freedom of Information Act (FOIA) request, dated November 28, 2020, on November 30, 2020 and assigned it control number **DOI-OS-2021-000931**. Please cite this number in any future communications with our office regarding your request.

> A copy of the most recent Interior Department Real Property "Asset Management Plan", which is provided annually to OMB and GSA by the Senior Real Property Officer at the Department of the Interior under Executive Order 13327.

In addition, you stated your willingness to pay up to $30.00 in processing fees for this request.

On December 8, 2020, we acknowledged your request, classified you as an "other-use" requester, informed you of your fee entitlements, informed you of the format to receive responsive records, and placed your request into the normal processing track.

On January 13, 2021, we reminded you of your processing track – normal and the ability to narrow the scope of your request for quicker processing and requested a 10-workday extension to search for records.

Response

Accordingly, we are writing today to respond to your request on behalf of the Office of the Secretary. We have enclosed **one (1) file** consisting of **22 pages**, which is being released to you in its entirety.

Fees

We did not respond timely to your request, therefore there is no billable fee for the processing of this request. *See 43 C.F.R. § 2.37(f)(1).*

Appeals

You may appeal this decision to the Department's FOIA/Privacy Act Appeals Officer. If you choose to appeal, the FOIA/Privacy Act Appeals Officer must receive your FOIA appeal **no later than 90 workdays** from the date of this final response. Appeals arriving or delivered after 5 p.m. Eastern Time, Monday through Friday, will be deemed received on the next workday.

Your appeal must be made in writing. You may submit your appeal and accompanying materials to the FOIA/Privacy Act Appeals Officer by mail, courier service, fax, or email. All communications concerning your appeal should be clearly marked with the words: "FREEDOM OF INFORMATION APPEAL." You must include an explanation of why you believe this response is in error. You must also include with your appeal copies of all correspondence between you and the Office of the Secretary concerning your FOIA request, including your original FOIA request and this response. Failure to include with your appeal all correspondence between you and the Office of the Secretary will result in the Department's rejection of your appeal, unless the FOIA/Privacy Act Appeals Officer determines (in the FOIA/Privacy Act Appeals Officer's sole discretion) that good cause exists to accept the defective appeal.

Please include your name and daytime telephone number (or the name and telephone number of an appropriate contact), email address and fax number (if available) in case the FOIA/Privacy Act Appeals Officer needs additional information or clarification of your appeal.

DOI FOIA/Privacy Act Appeals Office Contact Information

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Conclusion

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. *See* 5 U.S.C. § 552(c). This response is limited to records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

The 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

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8601 Adelphi Road - OGIS
College Park, MD 20740-6001

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Telephone: 202-741-5770
Fax: 202-741-5769
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Please note that using OGIS services does not affect the timing of filing an appeal with the Department's FOIA & Privacy Act Appeals Officer. If you have any questions about our response to your request, you may contact Milicent White by phone at 202-513-0765, by fax at 202-219-2374, by email at os_foia@ios.doi.gov, or by mail at U.S. Department of the Interior, 1849 C Street, NW, MS-7328, Washington, D.C. 20240.

Additionally, contact information for the Department's FOIA Requester Centers and FOIA Public Liaison is available at *https://www.doi.gov/foia/foiacenters*.

Sincerely,

MILICENT WHITE

Digitally signed by MILICENT WHITE
Date: 2021.03.04 07:29:51 -05'00'

Milicent White
Office of the Secretary
FOIA Office

Electronic Enclosure

Department of the Interior

Real Property Efficiency Plan
Reduce the Footprint Policy Implementation

FY 2020 - FY 2024
September 2019

Susan Combs
Assistant Secretary
Policy, Management and Budget

September 4, 2019
Date

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Contents

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INTRODUCTION

The Department of the Interior (Interior, DOI) is actively implementing the Office of Management and Budget's (OMB) Reduce the Footprint (RtF) directive issued through Management Procedures Memorandum No. 2015-01. The RtF directive seeks to improve the utilization and ongoing efficient use of agency real property through targeted space reductions and disposal of unneeded real property. This Real Property Efficiency Plan describes the strategies, actions, and targets planned by DOI to implement the RtF initiative while continuing to deliver critical services to the American people. This plan also serves as the real property management plan required by Public Law 114-318, the Federal Property Management Reform Act of 2016.

The DOI conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people, provides scientific and other information about natural resources and natural hazards to address societal challenges and create opportunities for the American people, and honors the Nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities to help them prosper. This mission affects the lives of all Americans.

Interior's bureaus and offices manage more than 480 million surface acres, 700 million subsurface acres, 760 million acres of submerged land in five marine national monuments, and 1.7 billion acres of the Outer Continental Shelf. Interior oversees responsible development of 19 percent of U.S. energy supplies, is the largest supplier and manager of water in the 17 Western States, maintains relationships with 573 federally-recognized Tribes, and provides services to more than two million American Indian and Alaska Native peoples. Interior operates and manages 418 national park units, 567 national wildlife refuges, and 70 national fish hatcheries. DOI programs operate from 2,400 locations with about 70,000 employees and 370,000 volunteers. Annually, Interior hosts an estimated 485 million recreation visitors, supporting more than 350,000 jobs nationwide.[1]

Investment in and management of real property is inherent to successful implementation of Interior's mission. DOI's real property inventory includes approximately 43,000 buildings and 78,000 structures. It consists of owned building space as well as space provided through the General Services Administration (GSA), direct leases, and cooperative agreements with State agencies and universities. DOI manages the life-cycle requirements of nearly every type of constructed asset found in a typical town and city, including visitor centers, dams, schools, power generating facilities, housing, hotels, campgrounds, roads, water and wastewater treatment plants, offices, and more. Each of the assets supports a unique function at a local level that combines with additional asset functions across the entire Department to create a robust portfolio for mission delivery and support.

Nearly all DOI-owned constructed assets are intentionally situated on public lands (including national parks, national wildlife refuges, public lands and other protected resources) or lands held in trust, in order to be closely connected to the public or resources they serve. This makes mission delivery more efficient, but poses specific challenges when implementing initiatives involving real property consolidation, as the lands must be retained. Interior must balance

[1] *U.S. Department of the Interior Budget Justification, March 2019.*

directives to reduce space and operations costs and improve overall real property portfolio sustainability with public demands to provide greater wildlife habitat, resource protection, recreation, and other services. DOI also maintains many historic properties and sites that have cultural significance with specialized needs. In fact, DOI estimates that between one half and two-thirds of buildings in its portfolio that are predominantly used for office space are designated as historic. These unique assets facilitate the support of DOI's mission and also represent a critical element of our core mission.

DOI bureaus have mission-specific statutory authorities and management tools available to enhance and optimize their management of real property. Examples include out-leasing of historic properties by the National Park Service (NPS), where rents are redirected to additional preservation activities; Bureau of Reclamation (Reclamation) transferred works, where operation and maintenance (O&M) is carried out by a non-Federal entity; collection of entrance and user fees for appropriate maintenance of service-related facilities, and leveraging partnerships, commercial uses, and concessions to achieve mission objectives. Such authorities afford the bureaus flexibility and innovative solutions to manage their real property portfolio to provide the best value to the Government and the public. Where they are available, these authorities help DOI transfer some or all of the financial liability associated with managing the real property from the Government to the operating entity, making Federal resources available for use elsewhere.

DOI will update this Real Property Efficiency Plan annually to reflect changes in Administration priorities, Departmental strategies, and to refine out-year targets.

ROLES AND RESPONSIBILITIES OF SENIOR OFFICIALS

Departmental leadership for implementing the RtF program is provided by:

- The Deputy Secretary, who provides senior leadership, strategic direction, and accountability for the Administration's priority initiatives;
- The Assistant Secretary - Policy, Management, and Budget who also serves as the DOI Chief Financial Officer (CFO);
- The Principal Deputy Assistant Secretary for Policy, Management and Budget;
- The Deputy Assistant Secretary - Budget, Finance, Grants and Acquisition, who also serves as the Department's Senior Real Property Officer (SRPO); and
- The Office of Acquisition and Property Management, which provides staff and technical support to the SRPO for the implementation and coordination of the RtF program across bureaus/offices.

Each bureau/office Senior Asset Management Officer (SAMO) and CFO serve as accountable executives responsible for implementation of RtF. The SAMOs are members of the DOI Asset Management Council (AMC) Executive Steering Committee (ESC), which serves as an executive council for asset management issues. The Department's SRPO chairs the Asset Management Team (AMT). The AMC provides the forum where the Department shapes its asset management policies and processes. In addition to these senior leaders, the active involvement and commitment of individuals throughout the organization is essential to the success of the RtF initiative.

DOI issued an RtF policy memo to bureaus/offices requiring actions and controls similar to those required of agencies by OMB. The policy requires integration of bureau/office 5 Year Space Management Plans with the DOI Real Property Efficiency Plan, with structured components which will be used to identify and promote strategies within the bureau/office, evaluate compliance and provide a framework for dialog between the DOI SRPO, the bureau SAMOs and bureau/office CFOs.

BUDGET ASSUMPTIONS AND IMPACT TO REDUCTION TARGETS

Interior's Real Property Efficiency Plan for FY 2020-2024 is based upon budget levels in the FY 2019 appropriations and FY 2020 President's Budget for all Line Item Construction and Deferred Maintenance programs and Interior's Office Consolidation Fund. Changes to funding levels in FY 2020-2024 will affect the targets for projected space reductions and building disposals. Significant budget reductions may also reduce the number of employees on staff, which in turn directly affects the need for mission support space. Interior's plan is also based upon funding approved to date by GSA through the GSA Space Consolidation Fund for Interior high priority projects such as Building 40 in the Denver Federal Center. Successful implementation of these partnership projects with GSA is critical to achieving significant space consolidations and reducing commercial leases in the respective metropolitan areas.

PORTFOLIO STATUS

Overall Agency Building Portfolio

In total, there are roughly 43,000 buildings representing nearly 115 million square feet in owned, leased, and GSA-provided space. Each of these spaces contributes a specific operational function in support or delivery of the mission. The portfolio size remained relatively static over the past 5-10 years, in part because individual space actions have little effect on the very large inventory of real property holdings. However, the renewed national emphasis on office and warehouse space efficiency and consolidation starting in FY 2012 is changing that trend. The summary of the entire portfolio of building space (all use types) in Table 1 illustrates the changes from FY 2012 to FY 2018 for direct leases, owned space, and GSA-provided space. Table 1a further details the inventory across specific use types related to the RtF initiative.

Table 1. Building Portfolio Summary (All Uses)

	Direct Lease Space (RSF)	Owned Space (GSF)	GSA OA Space (RSF)	Total (SF)
FY 2012 SF	3,806,349	101,720,155	14,723,928*	120,250,432
FY 2018 SF	2,910,431	98,316,233	13,205,830*	114,432,494

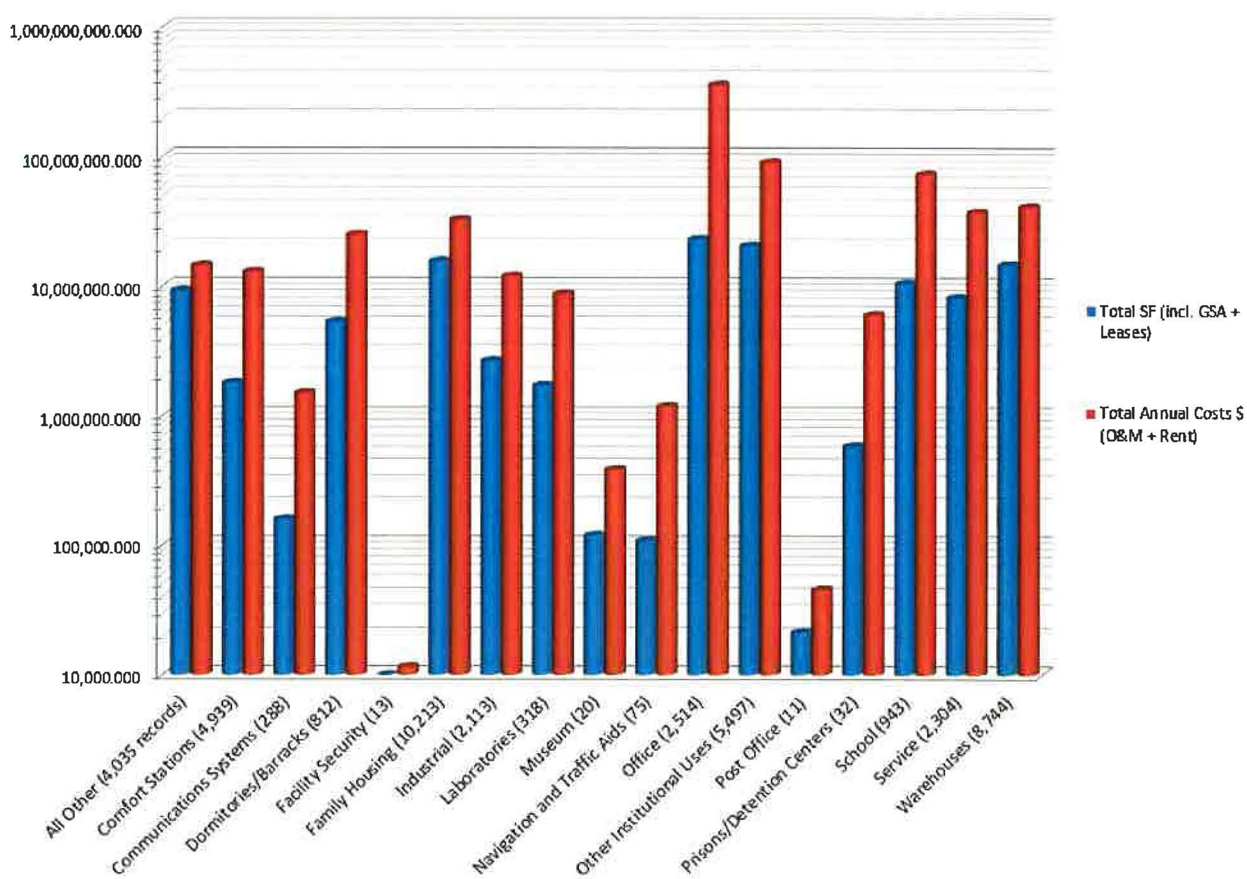
SF- Square Feet; RSF- Rentable Square Feet; GSF- Gross Square Feet
* Includes only Office and Warehouse Space.

Table 1a. FY 2018 Portfolio Summary
(All property, including the RTF Baseline properties)

	Direct Lease Space (RSF)	Owned Space (GSF)	GSA OA Space (RSF)	Total (SF)
Office	2,415,950	10,346,950	11,828,775	24,591,675
Warehouse	62,536	13,098,335	1,377,055	14,537,926
All Other	431,945	74,870,948	-	75,302,893

DOI supports the RtF initiative's primary focus to reduce office and warehouse space, both of which provide *mission support* functions. These two predominant uses are the most appropriate building type targets for promoting higher levels of efficiency and cost savings through consolidations and/or collocations. In contrast, identifying efficiencies at facilities that provide specific *mission delivery* functions such as visitor centers, schools, museums, laboratories, etc., can be more complex and must consider program needs, stakeholders, management plans, mission scope, and, in some cases Tribal consultation. In FY 2018, office and warehouse space represented approximately 35 percent of the total DOI building portfolio's square footage and 55 percent of the total reported annual operating and rental costs for buildings. Management controls placed on these two predominant use types will result in program improvements for a large proportion of the portfolio and spending. The relative distribution of square footage and annual costs by building type is illustrated in the chart below.

DOI Total Square Footage and Annual Costs By Building Type



Expanded mission scope and actions directed through legislation impact DOI's real property portfolio. As such changes occur, bureaus must consider the current and future need for new real property holdings in order to effectively support increased workload and financial commitments. The two examples below illustrate the potential effects that mission changes have on the real property community.

* The NPS real property footprint can increase due to the addition of new park units. New park units are placed under NPS management through congressional action or through Presidential proclamations under the Antiquities Act. In the past five years, 20 new park units have been added to the NPS portfolio. The additional real property needs associated with these new park units create new funding requirements and may impact compliance with the RtF policy. Newly created park units require staff to manage the resources and interact with the public, thereby creating a potential need for office space or other buildings.

* DOI has realigned regional boundaries across most bureaus to more effectively provide shared services and manage the landscapes and resources for which it is responsible. Such realignment and reorganization may shift the needs for office space from current areas of concentration to the locations deemed most appropriate for regional offices.

Status Relative to FY 2012 Freeze the Footprint Baseline

Prior to the RtF initiative, DOI implemented the Freeze the Footprint (FtF) effort. Similar in scope, the FtF effort established a baseline of office and warehouse space which agencies must not exceed. OMB established the FY 2012 FtF square footage baseline for DOI in March 2013, using DOI data reported to the Federal Real Property Profile (FRPP) database, as well as data contained in the Occupancy Agreements (OA) held by GSA. Table 2 details the components of the baseline. Square footage from the FRPP for owned and direct leased buildings is measured in Square Feet (SF), while for GSA OAs, square footage is reported in Rentable Square Feet (RSF).

Table 2. FY 2012 DOI Office and Warehouse Space Baseline

Space Type	Space	Unit of Measure
Owned and Leased Space (FRPP)	30,460,001	SF
Occupancy Agreements (OAs) with GSA	14,723,928	RSF
Freeze the Footprint Baseline Totals	**45,183,929**	**SF**

By the end of FY 2018, DOI achieved a reduction of 5.7 million SF in total office and warehouse space compared to the FY2012 baseline. This represents a 13 percent reduction in space in six years. Compared to the FY 2015 RtF baseline, this is a 2.8 percent reduction in square footage and a net annual cost avoidance of nearly $10 million in total rent redirected to mission delivery. However, despite these space reductions, DOI projects that costs associated with leases and GSA-provided space will continue to increase over time. DOI must continue aggressive actions to reduce the space in these categories in order to minimize the impact of rent cost increases on mission delivery. The annual funding available to operate and maintain DOI's owned office space portfolio continues to lag behind the industry average for similar uses, resulting in increased maintenance backlogs at DOI facilities.

Maintenance of the Reduce the Footprint Baseline

The Department of the Interior will continue to hold component bureaus/offices accountable for maintaining the RtF Baseline as established at the end of FY 2015. DOI sub-allocates the agency square footage baseline for office and warehouse space to each bureau/office based on FRPP data and OA assignments. Bureaus/offices must provide an accounting of offsets for any proposed expansions. The following sections discuss additional details on programmatic approaches.

Acquisitions

DOI and its bureaus/offices closely scrutinize the acquisition of any new facility or space. This scrutiny extends beyond office and warehouse space subject to this initiative. With multiple priorities competing for limited budgets, DOI emphasizes maintaining, repairing, or, when appropriate, replacing assets in kind. For owned facilities, DOI manages this through a Capital Planning and Investment Control process that aligns with the annual budget formulation cycle. It includes development, review and approval of five-year capital investment plans for each bureau/office that specifically identify and prioritize projects in accordance with DOI policy. The policy establishes Department-wide criteria for project selection and reporting requirements. Beginning with the FY 2012 program, this policy has continued a moratorium on construction of new facilities without specific SRPO approval. This moratorium is intended to limit unmanaged portfolio growth and the increase in associated financial liabilities, such as operations and maintenance needs.

DOI continues to leverage this moratorium in support of the RtF initiative. The policy also requires that any replacement projects include the appropriate disposal of the existing asset in the scope and budget of the project. This offset requirement ensures that bureaus are not retaining the replaced facility, which otherwise would increase O&M liability. Beginning with the FY 2015 program, project selection criteria also included an assessment of the project's impact on O&M costs, with priority given to projects that demonstrate major and measurable net savings.

Management of Direct Leases and GSA-Provided Space

DOI uses a Five-year Space Management Plan as the primary tool for overseeing and managing space through direct leases or GSA OAs. Requirements for new space are compared to the Departmental space utilization rate standard and to Departmental and Administration mandates. DOI monitors all existing direct leases through Quarterly Lease Reports, and monitors and justifies both direct leases and GSA-provided space through annual updates to the OMB Circular A-11 Exhibit 54, "Rental Payments for Space and Land." These management tools document the location, cost, and size of the leased/GSA-provided space inventory for the current year, and budgetary projections for the budget year and two out-years. DOI will use these tools to validate the bureau/office RtF targets and accomplishments to ensure compliance with the RtF initiative.

During the development of these reports, plans, and exhibits, DOI encourages bureaus/offices to look first at solutions for moving to federally-owned space, thereby reducing the square footage and cost of the leased space or eliminating the space altogether and optimizing the use of owned space.

In addition to the general management controls placed on all direct leases and OAs, additional controls apply to new direct leases/OAs equal to or greater than 50,000 rentable square feet. For such actions, bureaus/offices must certify to DOI on a transactional basis that corresponding offsets will keep them compliant with the RtF policy. Additionally, for proposed space actions with annual costs greater than the prospectus level (defined annually by GSA) bureaus/offices must submit each transaction to the DOI SRPO for review prior to requesting OMB approval.

DOI continues to look for opportunities to improve utilization in partnership with GSA as current direct leases held by DOI which are greater than 20,000 square feet are converted to GSA OAs. With each conversion, DOI reviews space programming needs, evaluates costs, and considers moving into federally-owned space when available.

Through the implementation of these management approaches, DOI intends to shift any cost savings achieved in reducing direct leased/GSA-provided space to the appropriate maintenance and repair of owned facilities. DOI continues to investigate methods by which such resource shifts could be identified and retained as an incentive for managers to embrace RtF.

Collocation and Consolidation

DOI actively promotes efficient space utilization, with increasing focus on cost savings opportunities. Prior to the RtF initiative, DOI transitioned from simply freezing the footprint to the strategy of freeze, measure, reduce. In August 2011, DOI established a new utilization goal for office space of 180 USF per person, at a bureau/office level. DOI also requires bureaus/offices to incorporate this policy into any proposed construction, renovation or relocation and reevaluate all direct leases and GSA-provided space as opportunities arise.

This policy encourages space utilization studies to facilitate reduction of leased space through collocation and consolidation in owned facilities. However, the remote nature of DOI's small facilities and the significant upfront costs required to retrofit or renovate owned space and move offices present ongoing challenges in consolidating into owned space. Funding necessary for such activities is scarce due to competing priorities in maintenance and repairs of other mission-critical facilities. Large scale consolidations of office space are most appropriate for GSA-provided space in urban environments. Funding associated with these consolidations would typically originate within the GSA budget request process.

In response to these funding challenges, DOI continues to look for innovative approaches to incentivize and achieve consolidations. DOI is investigating available authorities and funding mechanisms to achieve consolidations that result in cost savings or cost avoidance. DOI is also coordinating with GSA to identify appropriate consolidations that result in cost savings with manageable upfront investment. Examples of this are the partnership between DOI and GSA in optimizing the Stewart Lee Udall Main Interior Building in Washington, D.C., during modernization projects, the joint DOI-GSA working group established in the Denver, CO, metropolitan area to evaluate similar opportunities at the Denver Federal Center (DFC), and the vacating and return of the South Interior Building, also in Washington, DC. Further, the U.S. Geological Survey (USGS), DOI's largest occupant of GSA-provided space, continues to identify real property cost savings projects at the John Wesley Powell Building in Reston, VA, and other locations as priorities in its annual facilities budget requests.

DOI bureaus actively seek to collocate both internal and external functions whenever possible and appropriate, including opportunities to share space across DOI bureaus/offices, other Federal entities (e.g., USDA Forest Service, Department of Defense) and other educational and nonprofit organizations (e.g., universities and the National Park Foundation). DOI bureaus and offices also leverage Service First authorities to collocate with other agencies and to streamline organizations in order to reduce costs.

REDUCTION TARGETS

Reduction Targets for Office and Warehouse Space

DOI evaluated accomplishments under FtF and projected a five-year goal for further office and warehouse space reductions under the RtF initiative. DOI achieved a 3 percent space reduction in FY 2013 and FY 2014 under the FtF initiative. Many of the high yield, low cost consolidation projects have been initiated or completed. DOI must identify and execute more complex opportunities to achieve similar levels of reduction in the future. Given costs and timelines involved in typical space consolidations, DOI aims to achieve an additional three (3) percent reduction from the FY 2015 baseline through the end of FY 2020. Establishing a five- year strategic goal affords DOI and its bureaus/offices the opportunity to plan in advance for actions that will help attain the goal. Annual targets are difficult to establish without a collective vision for the future. As part of the planning process, DOI reviewed the goal with the bureaus to test its feasibility and then distributed it for their use in developing real property efficiency plans and annual reduction targets. It is important to note that accomplishment of this goal depends on appropriations and priorities established by Congress in the coming years. Annual targets in support of this goal are projected in Table 3.

Table 3. Domestic Office and Warehouse SF Reduction Targets FY 2020 – FY 2024

Reductions from RtF Baseline (FY 2015)	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	Total FY 2020-2024
Office Target* (Net SF Reduction)	158,000	60,500	94,500	148,000	49,000	**510,000**
Warehouse Target* (Net SF Reduction)	110,000	32,000	86,500	6,000	230,000	**464,500**

*Reductions are reported as a positive value.

The GSA Real Property Management Tool provides valuable insights for identifying areas of opportunity as DOI begins developing tactical actions to achieve these goals. DOI continues to focus consolidation efforts in geographic locations with highest employee concentrations and highest rental costs, such as the Denver, CO, and Washington, DC, metropolitan areas. The GSA Real Property Management Tool reinforces this focus and provides data to support future actions. DOI also uses the real property cost and utilization benchmarking metrics of "Rent per Square Foot" and "Square Feet per Person" when reviewing opportunities in a specific Metropolitan Statistical Area.

The primary constraining factor affecting DOI reductions is the fact that DOI-owned offices are typically small, remote facilities that consist of a mix of uses, including visitor contact areas, laboratories, and museum exhibits. While the predominant use of these buildings may be office space, the building functions are well beyond an office space that can be reduced through consolidation with other buildings.

Specific mission delivery models also affect whether reductions are feasible. For example, approximately two-thirds of Reclamation's facilities are operated and maintained by water districts or recreation entities (operating entities), yet the Federal government retains title to these facilities, referred to as *transferred works*. These transferred works facilities pose challenges for reducing space because operating entities independently determine needs and fund all of the resources in support of these facilities, which can include construction and replacement buildings. Buildings that are constructed in support of these operations, although funded and maintained by the operators, become Reclamation-owned property and are included in Reclamation's baseline. In general, the transfer of operations and maintenance (O&M) responsibility to non-Federal entities is a good management practice for avoiding such costs.

For leased and GSA-provided space, the primary constraining factors are the extended time needed to terminate leases, or turn back GSA space, and the upfront funding necessary to modernize, consolidate and move occupants into new space. Often the business case clearly supports consolidations or collocations, yet the upfront funding necessary to achieve the business case is not available. DOI continues to partner with OMB and GSA to support modernization and consolidation funding through the annual appropriations process.

As mentioned in the section on challenges, the DOI mission can, at times, conflict with the goals of RtF. For example, NPS may acquire new buildings through donations, exchanges, or Congressional direction (e.g., new park units) and is required to manage certain properties for the benefit of future generations. Such mission requirements can limit NPS' ability to significantly reduce the real property portfolio. Further, when other agencies terminate operations at sites, the NPS, U.S. Fish and Wildlife Service, and the Bureau of Land Management (BLM) are frequent recipients of the land and constructed assets. These transfers can often diminish the benefits of reductions planned or achieved elsewhere in the portfolio.

Disposal Targets for Owned Buildings

DOI recognizes the importance of disposing of unneeded assets and the challenges associated with prioritizing these activities among other needs in the real property portfolio. Many excess facilities within the DOI portfolio were originally acquired with stewardship land purchases, transfers, or creation of new national parks, refuges, or monuments through Presidential or Congressional action. Existing facilities on the land at the time of acquisition are often in poor condition and can present challenges to the stewardship mission for which the land was acquired. It is important to note that these assets are often not maintained to high condition standards because limited maintenance funding is more appropriately used on active, mission delivery assets. Bureaus continue to dispose of unneeded assets in order to further their stewardship mission or reduce potential hazardous conditions; however, there will be limited cost avoidance associated with these dispositions. When DOI is required to conduct environmental assessments or historic evaluations prior to disposal, this can result in additional costs rather than savings. Nevertheless, DOI continues to make disposal of excess buildings a priority, especially when cost avoidance is possible, in alignment with appropriate asset management policies.

DOI evaluated the portfolio of assets across the bureaus/offices in order to establish meaningful reduction targets for disposition of owned buildings. Much like the reduction targets for office and warehouse space, DOI established a five-year goal from which the bureaus/offices develop annual targets. The five year disposition goal is derived from the number of assets reported under the following status categories in the FRPP: Determination to Dispose, Report of Excess Submitted, Report of Excess Accepted, and Active/Unutilized. Targets also take into account the potentially lengthy administrative process and limited return on investment for disposing of such buildings on public lands and FY 2019 funding levels. DOI recognizes the positive stewardship effects of dispositions and requires the bureaus to program no less than 3 percent of construction budgets for disposition activities, with priority given to those activities that result in actual cost savings. Annual targets in support of this goal are projected in Table 4. Details on potential dispositions are shown in the attached spreadsheet. However such actions are subject to limitations on appropriations and delays due to unforeseen conditions and administrative or regulatory processes. It is important to note that the targets shown below represent gross measurements in accordance with the GSA implementation guidance. DOI does not expect a net reduction of space across the portfolio equivalent to the disposition targets.

Table 4. Disposal Targets for Owned Buildings FY 2020 – FY 2024

	FY 2020	**FY 2021**	**FY 2022**	**FY 2023**	**FY 2024**	**Total FY 2020 - 2024**
Disposal Target* (Gross SF Reduction)	246,000	407,000	173,000	379,000	20,500	**1,225,500**
Disposal Target* (# Buildings)	135	109	60	137	16	**457**

*Reductions are reported as a positive value.

Use of Performance Benchmarks to Identify Reduction Opportunities

DOI utilizes multiple metrics to identify and prioritize consolidation and disposal projects. For space consolidation, emphasis is placed on locations with high rental unit costs (Rent/SF), high overall costs, and areas where there is a significant DOI presence to enable meaningful consolidations. As requirements for these priority areas are developed, the utilization rates (SF/Person) are evaluated for alignment with DOI design standards.

For disposition of owned assets, DOI prioritizes based on mission benefits and condition, as well as eliminating risk and cost avoidance. The following table of benchmark metrics were provided by GSA for incorporation in the DOI plan. While some of these metrics demonstrate reductions in unit costs (e.g. GSA OAs for Office), others illustrate that DOI is challenged with prioritizing funding for operations and maintenance of the owned portfolio, when compared to industry benchmarks.

Benchmark Metric Summary for Department of the Interior (Source: GSA)

Rent and O&M Benchmark Metrics

Agency	Metric	Units	FY2013	FY2018	% Change ((FY13 - FY18)/FY18)	Government-wide Average
Department of the Interior	O&M/SF Owned Office	$/SqFt	$ 5.87	$ 6.58	12.22	$ 6.14
Department of the Interior	O&M/SF Owned Warehouse	$/SqFt	$ 2.43	$ 1.83	-24.75	$ 2.68
Department of the Interior	Rent per SF Direct Lease Office	$/SqFt	$ 18.33	$ 19.81	8.07	$ 30.36
Department of the Interior	Rent per SF Direct Lease Warehouse	$/SqFt	$ 5.48	$ 8.46	54.5	$ 8.79
Department of the Interior	Rent per SF GSA OA Office	$/SqFt	$ 26.16	$ 20.86	-20.28	$ 27.37
Department of the Interior	Rent per SF GSA OA Warehouse	$/SqFt	$ 6.50	$ 11.52	77.28	$ 10.87

Personnel Benchmark Metrics

Agency	Metric	Units	FY2015	FY2018	% Change ((FY15 - FY18)/FY18)	Government-wide Average
Department of the Interior	SF per person GSA OA Office	SqFt/Persc	416.1	303.74	-27	252.73
Department of the Interior	SF per person Owned Office	SqFt/Persc	428.92	406.67	-5.19	331.71
Department of the Interior	SF per person Direct Lease Office	SqFt/Persc	364.63	395.03	8.34	297.63

Condition Index Benchmark Metric

Agency	Metric	Units	FY2017	FY2018	% Change ((FY17 - FY18)/FY18)	Government-wide Average
Department of the Interior	% of Owned Square Footage with Condition Index >= 85	%	78.57	78.49	-0.1	74.02
Department of the Interior	% of Owned Buildings with Condition Index >= 85	%	78.78	78.65	-0.16	70.94

Tenant Satisfaction Metrics

Agency	Metric	Units	FY2018	Government-wide Average
Department of the Interior	TSS Overall Sat Score for Owned Assets	%	53.26	50.24
Department of the Interior	TSS Overall Sat Score for Occupany Agreements	%	61.2	60.78
Department of the Interior	TSS Overall Sat Score for Leased Assets	%	51.57	53.76

Space Design Standard and Utilization Rates

DOI reduced its space utilization standard by 10 percent to a 180 USF/person maximum based on the recognition that space costs continue to increase and erode mission execution capacity. The current space utilization standard is the basis for a space design standard and additional guidance as required by the RtF policy. The design standard, issued in 2015, addresses the different methods of obtaining space (GSA-provided, direct leased and owned), using a conversion factor to equate usable square feet to other standard measurements (i.e., rentable and gross). Guidance identifies space classified by usage to clarify which space is included or excluded in the office utilization calculation. These standards apply to all new space acquisitions and any space that is significantly modified. Bureaus/offices will need to provide specific justification in order to deviate from the Department's space utilization standard.

Department of the Interior Utilization Rates

Headquarters/Bureaus	Administrative Office UR
All HQ and Bureaus	180 USF/Person

Administrative office space is measured in usable square feet (USF) and consists of assignable space that is comparable to commercial office space (including open workstations, private offices, meeting rooms, file and storage rooms, coat closets, and reception areas). It does not include special space, such as data centers, laboratories, high density file rooms, and public waiting areas. Headcount is determined by the total number of Federal personnel and resident contractors assigned to a building.

CONSOLIDATION EFFORTS

In support of the aspirational goals and targets discussed above, DOI continues to identify programmatic opportunities to further intelligent space management efforts within the RtF initiative. Opportunities are developed internally or through interagency working groups and related strategic space plans and, when applicable, socialized with the assistance of GSA's account executives in the Regions and at Central Office. As requirements are identified and developed, funding sources such as the GSA Consolidation Fund, are identified and evaluated. The following programs and projects, which are currently planned or underway in FY 2019 and beyond, directly support DOI's goals.

Bureau of Land Management Headquarters Realignment.
The Bureau of Land Management (BLM) is realigning its Washington, DC headquarters and staff members to the western United States, relocating approximately 222 positions to existing BLM and DOI facilities. A majority of the employees will be relocated to various State Offices in BLM and 60 will relocate to the Main Interior Building. The moves will result in the release of more than 100,000 square feet in Washington, DC back to GSA by December, 2020.

Geological Survey Headquarters Relocation.
The U.S. Geological Survey (USGS) plans to establish a headquarters presence in western United States to improve mission support, engagement and collaboration with stakeholders and partners whose activities are concentrated in the West. The USGS expects to move selected leaders and associated staff from Reston, VA to Lakewood, CO, strengthening capabilities to manage and deliver research and scientific products. The relocation, for which planning is underway, will create opportunities for reduced leasing costs and additional consolidations.

Geological Survey Menlo Park Campus Consolidation into NASA Moffett Field – Mountain View, CA.

In FY 2018, USGS began full implementation of a plan to relocate from the Menlo Park Campus, operated by GSA, to the NASA Ames Research Center and Moffett Field in Mountain View, CA. This 6-year long endeavor is in partnership with both GSA and NASA and will ultimately result in an estimated $14M annual facility savings, and an approximate reduction of 40% of the current footprint. Phase 1 is nearing completion, which includes renovating the existing NASA Building 19, and relocating 200+ USGS employee's in the summer of 2019. Phase 2 includes moving laboratories, the remaining offices and other mission related functions to the NASA campus. Design work to renovate NASA Building 239A for laboratory space will begin in the 3rd Quarter FY 2019, with construction expected to start in FY 2021. Completion is expected in FY 2023.

GSA CONSOLIDATION FUND

GSA Consolidation Program Funding Request FY 2020–FY 2024

Consolidation Project Building Name and Number	FY Submission (e.g., FY 2020, 2021, 2022, 2023 or 2024)	Consolidation Type (e.g., Leased to Owned, Owned Contraction, or Owned to Owned Consolidation)	Consolidation Impact (Net SF Reduction)	Total Consolidation Funds Requested
TBD*				

*As of the date of submission, DOI did not have any new GSA Consolidation Fund proposals that met the criteria established.

Current GSA Consolidation Fund Project Examples

Office of Surface Mining Reclamation and Enforcement (OSMRE) Denver Federal Center (DFC) Consolidation into Building 41 - Denver, CO.

The OSMRE Western Regional Office and Finance Office in Building 41 on the DFC will be moving from more costly leased space in downtown Denver and another building on the DFC where, combined, they currently occupy 37,401 USF. The project will consolidate activities into 21,020 USF of space in Building 41. GSA expects to award the contract no later than the end of Summer, 2019, at which time full design will begin.

Bureau of Land Management Colorado State Office Consolidation into Building 40 - Denver, CO.

The BLM Colorado State Office (COSO) consolidation project in Building 40 on the DFC will convert a vacant two-story Federal office building into a cost effective, long-term housing solution for BLM that aligns with its strategic asset plan for the Denver Metro area. The BLM COSO currently resides in costly delegated commercial leased space within five miles of the DFC campus. This delegated lease will expire in December 2019, at which point BLM is committed to move its 151 employees to Building 40 on the DFC. The BLM COSO currently occupies 48,500 USF of commerical leased space. The consolidation project will reduce the COSO utilization rate to 180 square feet per full-time employee, in line with DOI policy, and place the COSO into approximately 30,279 USF in Building 40. This represents a 38% reduction in BLM's footprint. GSA is leveraging $10 million in consolidation funding, is in the process of updating the Program of Requirements (POR), and awaiting funds from the COSO office.

Completed GSA Consolidation Fund Project Examples

Reclamation Denver Federal Center Consolidation into Building 67 - Denver, CO.

Reclamation occupied more than 453,636 USF on the DFC. The majority of their office space is housed in Building 56 (B56) and Building 67 (B67). B67 is primarily general use, where B56 is a combination of both general use and warehouse. This project consolidated all of Reclamation's office space in B67 alone. This consolidation project frees up over 87,000 USF in B56 and B67, and helps Reclamation achieve an all-in Utilization Rate of 165 SF per person - a 40% reduction - exceeding DOI's 180 SF per person office space design standard. In addition, the annual cost avoidance without tenant improvements is approximately $2.1 million. The project was phased and utilized swing space for Reclamation's occupancy in each phase. This project was approved for $15 million of 2016 GSA Consolidation Funding and was completed in FY 2019.

National Park Service Federal Office Building Project - Seattle, WA.

This project executed a space consolidation for the NPS in the Federal Office Building (FOB), Seattle, WA. The target for this reduction was the DOI office space design standard of 180 USF per person, with allowance for the historic FOB's inefficient floor design. The project resulted in 8,800 USF of contiguous space being vacated.

The required GSA-provided spreadsheet attached to this report identifies potential agency office and warehouse acquisitions, consolidations, co-locations, disposals, and construction projects anticipated over the five-year planning period. The second tab also lists project examples of planned reductions to office and warehouse space through consolidation, collocations, and disposals that can be updated and tracked publicly on performance.gov. It is important to note that the total net portfolio reduction shown in the GSA spreadsheet will vary slightly from the targets discussed in this narrative. The targets account for many of the planned actions but also include projection of additional space reductions in order to achieve the five-year goal discussed above.

OPERATIONAL EFFICIENCIES

All consolidation efforts consider and incorporate operational efficiencies when they make business sense and can reasonably be implemented within available resources and policy constraints. DOI also supports the President's Management Agenda priority goals driving shared services across the Federal sector. Some of the activities included in these shared services can result in space reductions over time.

DOI also recently initiated a significant effort at the headquarters level to achieve operational efficiency through a space leasing Center of Excellence Team (COET). The COET is a centralized group of subject matter experts in direct/delegated leasing across bureaus/offices that will matrix across the bureaus to provide technical support, execution, and oversight of the leasing program. Given the tremendously limited resources available to bureaus to hire and retain warranted leasing officers and experts, the COET leverages the resources across the department in order to meet the business need.

Additional operational efficiencies will be considered as the agency reform plan matures. These may include additional shared service opportunities, virtual employees, hoteling, Service-First arrangements, or other flexibilities.

INTERNAL CONTROLS

DOI has developed policies and procedures to provide controls over certain critical RtF components and activities. DOI also leverages the Financial and Business Management System (FBMS) and OMB real property benchmarking metrics to report, evaluate, and track compliance. DOI requires each bureau to identify, implement, and incorporate strategies, policies, and procedures for RtF into bureau-level Real Property Efficiency Plans. The DOI Senior Real Property Officer and the Associate Director, Asset Management, evaluate bureau plans and targets and engage SAMOs to improve overall outcomes.

DOI currently leverages multiple processes to ensure appropriate reviews and approvals are required for real property acquisitions, expansions, growth, and associated offsets. These processes include requirements for Departmental review and approval of bureau Five-Year Construction Plans (owned assets) as well as Five-Year Space Management Plans (Direct Leases/GSA-provided space).

In addition to Departmental approval processes, DOI requires approval by the bureau Chief Financial Officer (CFO) or SAMO for new direct leases, acquisitions, expansions and additions (or increases) to office and warehouse space before they can be implemented. Requests for expansions must also identify the specific offsets that will be incorporated into the project scope to ensure the bureau/office baseline is not exceeded.

DOI applies additional requirements prior to acquisition for owned assets equal to or greater than 100,000 SF and for direct leased or GSA-provided space equal to or greater than 50,000 RSF.

For these properties, bureaus/offices must certify to the Department, on a transactional basis, that they have identified a corresponding offset to keep the bureau compliant with the FtF/RtF policy. The DOI SRPO will review these requests before they are implemented. DOI, in coordination with GSA, will ensure proper accounting for these acquisitions and offsets. Bureaus/offices will also include current and anticipated offsets for these properties in their real property strategic plans.

When an asset no longer supports the DOI mission, the Department requires bureaus/offices to follow applicable laws, and procedures found in Federal Management Regulation (FMR), 41 CFR 102-75, to dispose of the asset. Disposition includes the transfer of excess real property to other Federal agencies and surplus assets to state and local governments, eligible nonprofit organizations and the general public, as well as sale, demolition, deconstruction, off-site removal or termination of commercial lease agreements.

DOI identified a need for management controls associated with internal transfers of real property. GSA disposal procedures stipulate that when a bureau identifies administrative real property (not public domain land) no longer needed for mission execution, the bureau must screen such property against the needs of other Agency bureaus/offices before it can be reported as excess for appropriate disposal. The Department is sensitive to these internal real property transfers because such actions equate to new acquisitions by the receiving bureau/office. In response, DOI has instituted requirements for bureau SAMO and DOI SRPO review and approval of the business case justifying any such proposed acquisitions prior to executing the internal transfer. These management controls strengthen the oversight of internal transfers and align the approval process with that of other capital investment strategies.

DATA QUALITY IMPROVEMENT

Real property data quality is a critical component of the overall asset management program at DOI. Management decisions and resource allocation at all levels of the organization depend on complete and accurate financial and real property data. DOI continues to take significant steps to improve the quality of real property data in FBMS, Interior's real property system of record, which supplies the data to complete the FRPP and is also interfaced with bureau/office maintenance management systems. The completeness and accuracy of real property data is critical to ensure the effectiveness of these systems in supporting management and investment decisions. DOI continues to improve upon data quality through the following efforts:

- Data Verification and Validation- DOI employs multiple strategies to verify the accuracy of property data throughout the year. For example, the DOI space management office requires bureaus to review Quarterly Lease Reports from FBMS to ensure all information is current and accurate. DOI also issues annual supplemental real property reporting guidance to bureaus to further interpret the data dictionary provided by GSA and emphasize additional DOI data requirements. DOI uses quality checks in FBMS and the anomaly checks in FRPP to further refine the data when it is uploaded into FRPP. Prior to final submission, DOI conducts data quality and anomaly checks at the local, bureau and departmental level. Finally, bureau SAMOs are required to sign a certification verifying the data is as accurate as possible.

- Evaluations- DOI implemented statistical sampling efforts in previous years using independent third-party contractors to sample real property data and evaluate for accuracy and improvement over prior year data sets. This sampling effort compared real property data in FBMS to available supporting documentation at local levels to identify exceptions and areas of concern. DOI continues to leverage the annual financial audit process to evaluate certain real property data elements that affect basic financial information. The annual evaluation provides the Department with an independent assessment of the accuracy and completeness of real property data in FBMS. Following the assessment, DOI identifies recommendations for changes in policy and practices to improve the quality of data in coming years.

In addition to the standard reviews and evaluations of anomalies discussed above, DOI required all bureaus with owned and leased real property to develop and implement data quality corrective action plans. These plans include specific actions bureaus must take to improve data quality through revisions to policies and practices, sampling, and engagement of senior management. DOI also includes data quality as a component of the agency's OMB Circular A-123 internal control review program. This effort will result in a consistently applied assessment of the bureaus controls over certain key processes affecting property and financial data.

Due to the large and diverse portfolio of assets held by DOI, these improvements require multiple years to implement and positively affect the data set. However, with continued emphasis on the importance of real property data to the management of the portfolio, DOI anticipates that these efforts will generate meaningful results in a short timeframe.

CHALLENGES AND IMPROVEMENT OPPORTUNITIES

There are aspects of Interior's ongoing mission, strategic initiatives, and day-to-day operations that may complicate the Department's ability to achieve the goals established in this plan for consolidation and asset disposal efforts. Examples of these challenges include the following:

- As noted earlier, between half and two-thirds of the Department's portfolio of owned office buildings are considered historic. At the time these buildings were constructed, space utilization efficiencies were not always the primary consideration. Wide corridors, private offices, and other historic design elements can make consolidation more challenging, especially when the historic features within the building are to be preserved. These buildings must be evaluated on a case-by-case basis.
- Interior's budget for maintenance and repair is currently about one-half of the 2 to 4 percent of Current Replacement Value recommended by industry standards for proper sustainment of assets. This deficit in maintenance and repair funding results in the increase of deferred maintenance. To remedy this imbalance, DOI supports and is evaluating approaches to redirect any rent reductions achieved through RtF to improve asset funding/management at critical owned facilities.

DOI recognizes that space consolidation and reductions require long term planning, strategic investments, and leadership support to be successful. Sustained focus on implementing the RtF initiative will result in continuous program improvements in these areas over the coming years. The following actions are examples of how DOI continues to support the RtF initiative in order to achieve such improvements:

- DOI requested more than $20 million total through the FY 2015-FY 2018 budgets for space consolidation activities in Washington, DC, and other metropolitan areas. Congress appropriated $1.2 million in each year. The funding was used to renovate underutilized space within the Main Interior Building to increase occupancy.
- DOI partnered with the GSA Region 8 to develop a DFC strategic plan and has established a local working group to evaluate future consolidation and cost savings opportunities on the DFC and in the greater Denver area.
- DOI continues to emphasize improving data quality and cost accounting associated with real property. With all bureaus and offices now utilizing FBMS as the system of record for real property and financial management, DOI has increased the availability and integration of corporate management and reporting tools.

DOI is committed to improving the utilization and efficient use of real property across the agency through implementation of this Real Property Efficiency Plan. The strategies, actions, and targets identified will lead to meaningful space reductions and disposals over the coming years. Additional actions will be informed by the Agency Reform Plan as it is finalized and implemented. Lastly, in partnership with OMB and GSA, DOI will also identify additional best practices from across the Federal government for inclusion in future plan submissions.