



888 17th St. N.W., Ste. 1100
Washington, D.C. 20006
Ph: 202-775-8400
Fax: 202-857-0200
www.sebac.org

VIA EMAIL

Ms. Lora Morrow
Small Business Deputy
NAVFAC Southwest
1220 Pacific Highway
San Diego, CA 92132-5190

24 August 2016

Re: N6247316R8013 Sources Sought

Dear Ms. Morrow:

Thank you for taking the time to discuss the content of the subject Sources Sought announcement. SEBAC, the Small Environmental Business Action Coalition, would like to comment on the content of this announcement and how the content of the announcement may inhibit small business response to the sources sought.

The security clearance requirement is unclear. SEBAC membership includes multiple firms holding current and past EMAC contracts with experience on Navy bases throughout the country. In reviewing the scope of previous NAVFAC SW EMACs and our members' experience on these contracts, security requirements include United States Citizenship, obtaining base identification badges and vehicle passes, and providing security for work areas. The sources sought announcement requires that firms "State current ability to acquire all security clearance(s) requirements for access to military property/sites/installations." We are concerned that small businesses not familiar with this work may interpret that as Facility Secret Clearances (FCLs); therefore, they may not respond since FCLs are rarely required for environmental work. We encourage you to review the draft PWS to evaluate if a FCL is a basic requirement, and if not, consider rewording the sources sought announcement to align more closely with the expected security requirements.

The time period for firm experience should be expanded to the last 5 years versus the proposed 3-year window. NAVFAC SW's small business performance-based EMAC II expired in 2014, whereas the unrestricted EMAC II does not expire until 2017. Therefore, this requirement appears to give preference to the incumbent unrestricted firms because they will have more recent experience directly with NAVFAC SW on a similar contract. Using a 3-year experience window can also be perceived by industry as a policy to restrict new competitors who often times bring the best practices of industry given their commercial and government experience. Firms that have executed a relevant project will retain the knowledge and capability to be successful on such projects for at least 5 years. The benefit to the government of reducing that period to 3 years is minimal given the stability of the firms in the small business market. The government is better served by having strong competition than the minimal reduction in risk it gains by reducing the experience window by 2 years.

Thank you in advance for your consideration of these issues. SEBAC is committed to supporting the small business community and providing a conduit for communication with the government through a single voice.

Thanks,

John M. Dwyer
President
SEBAC