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13 September 2017

Mr. Aaron Parra
U.S. Small Business Administration
Procurement Center Representative
Office of Government Contracting
330 North Brand Blvd., Suite 1200
Glendale, CA 91203

Re: Procurement Strategy, Naval Facilities Engineering Command (NAVFAC) Southwest Multiple Award Remedial Action Contract (MARAC), Solicitation No. N6247316R2418

Dear Mr. Parra:

The members of the Small Environmental Business Action Coalition (SEBAC) wish to express our concerns regarding the above referenced procurement. Representing many of the environmental businesses that make up the pool of eligible firms under the NAICS code 562910, SEBAC offers a combined industry voice of at least six small businesses fully capable of meeting the Navy's requirements for this procurement. The Navy's announcement made on Industry Day to procure two small business contracts and one unrestricted contract reflects a strategy that appears to contradict the SBA Rule of Two. SEBAC requests that the SBA instruct the Navy to re-evaluate this procurement strategy, as this contract is ideally suited for a total Small Business Set-Aside under the SBA Rule of Two. Furthermore, a comprehensive review of the Federal Procurement Data System (FPDS) NextGen of all cost-type contracts awarded by DoD and EPA over the past 10 years adequately demonstrates a deep bench of small business prime contract awards.

To further support this contention, NAVFAC Pacific currently has a \$95M cost-type small business Remedial Action Contract, and recently awarded a \$235M worldwide cost-type, total small business set-aside contract for environmental and munitions response services. NAVFAC Atlantic also has a small business Remedial Action Contract, and is currently in source selection for a follow-on total small business MARAC for \$240M. If these higher Echelon NAVFAC commands can develop and attain approval by NAVFAC HQ of an Acquisition Plan for total Small Business cost-type contracts (identical in scope to what Southwest has envisioned for the MARAC), it would seem NAVFAC Southwest should seek the same approvals from NAVFAC HQ and the SBA.

Thank you for your consideration to make the MARAC a total Small Business Set Aside.

Sincerely,

A handwritten signature in black ink that reads "Susan Brock".

Susan Brock, Secretary
on behalf of SEBAC Members

cc: Ed Chevalier, Director Environmental Acquisitions
Claudia Ramirez, Contracting Officer
Melanie Kito, Remedial Technology Manager
Lora Marrow, SB Deputy
Jennifer Devera, Contracting Specialist