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June 19, 2024

Tyler Hegge, US Army Corps of Engineers, Omaha District tyler.hegge@usace.army.mil

Jennifer Gilbreath, US Army Corps of Engineers, Omaha District jennifer.c.gilbreath@usace.army.mil

Subject: Sources Sought Announcement No. W9128F24SS003

Dear Mr. Hegge and Ms. Gilbreath,

The Small Environmental Business Action Coalition (SEBAC) includes over 60 member companies that represent all facets of small business (SB) socio-economic classifications performing various aspects of environmental work: investigations, consulting, design, engineering, remediation, operations and maintenance, and ordnance and explosives work for federal agencies. One of SEBAC's primary objectives is to represent and advocate for SBs when either DOD and/or federal civilian agencies are soliciting SB input into acquisitions covering work under environmental NAICS including 562910.

SEBAC, on behalf of its members, seeks to provide comments on the referenced sources sought released to industry on June 5th. While the scope of the requirements is consistent with what SBs in NAICS 562910 typically offer, the requirements outlined under the paragraph titled "Types of Contracts" are not. Specifically, under item (6), the COE requests that responders "demonstrate capability and capacity to perform services on at least (5) different, large (>\$25M) task order awards concurrently". This is an extremely high requirement threshold, and one that even large businesses would have difficulty meeting. While a few of our member companies maintain a staffing level of close to the 1,000-employee limit (as per requirements under 562910) and may have a \$25M project or two, the vast majority of our members do not. A more equitable approach would be to modify this requirement to more accurately reflect industry experience and provide an avenue for small business participation.

To ensure that SBs in our community are afforded appropriate opportunity to compete for this and other Omaha District environmental opportunities, we would greatly appreciate any accommodation to reduce this threshold to be more in line with the norms of our industry. By doing so, the government will not only be maximizing competitive opportunities for SBs, rather than favoring large businesses, but will also ensure that taxpayer dollars are more fairly and equitably distributed. Thank you for considering our request.

Respectfully,

A handwritten signature in black ink, appearing to read 'J M Dwyer', is written over a light blue horizontal line.

John M. Dwyer jdwyer@sebac.org (404) 229-3807

President
SEBAC

CC: Daniel Curado, Procurement Center Representative, US Small Business Administration,
Office of Government Contracting, Area IV daniel.curado-fuentes@sba.gov