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September 28, 2021

Ms. Ericka Collins, ericka.t.collins@usace.army.mil
Mr. Tyler Hegge, tyler.hegge@usace.army.mil
Omaha District Small Business Office - cenwo-sb@usace.army.mil

Subject: RFP Number W9128F21R0037. Title: 8(a) Indefinite Delivery/Indefinite Quantity (ID/IQ) Single Award Task Order Contract (SATOC) with capacity of \$47M for Environmental Remediation Services w/ Military Munitions Response Program (MMRP) in support of the U.S. Army Corps of Engineers, Northwest Division (NWD) and existing and future customers

Dear Ms. Collins and Mr. Hegge,

Thank you in advance for review of this letter. I am writing to you on behalf of the members of the Small Environmental Business Action Coalition, Inc. (SEBAC), www.sebac.org. SEBAC serves as a voice for the small business community providing environmental engineering, remediation and related support to the U.S. Department of Defense (DOD) and other Federal agencies throughout the country. A key part of our mission is to support and promote opportunities for small businesses by monitoring the federal government's goals, policies, and regulations regarding small business participation.

Regarding the subject RFP, Volume 1, Factor 1 – Summary of Previous Experience. The RFP's previous experience requirements are limiting of competition based on the following solicitation requirements:

- Projects must have been completed within the last seven (7) years from the initial proposal due date.
- The Offeror shall submit five (5) examples of completed projects which demonstrate relatable ERS experience as described in Section C of this solicitation.
- Project #1 and #2 Non-MMRP Defense Environmental Restoration Program (DERP) Projects shall each have a minimum contract value equal to or greater than \$4,000,000 executed by the Offeror with successful outcomes. The projects shall demonstrate the successful performance of a Non-MMRP DERP project executed under CERCLA or RCRA authorities.
- Project #3 MMRP Project shall each have a minimum contract value equal to or greater than \$2,000,000 executed by the Offeror with successful outcomes. The projects shall demonstrate the successful performance of an MMRP project executed under CERCLA or RCRA authorities. Activities associates with small arms and skeet work are not considered MMRP for the purposes of this solicitation. The MMRP project must have remedial services for Munitions and Explosives of Concern (MEC).

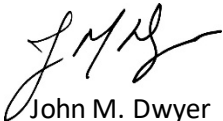
- Projects #4 and 5 – ERS (i.e., Section C, paragraphs 2.1 - 2.3) Projects. Projects #4 and #5 should demonstrate the Offeror's capability to successfully perform projects of the type described in the Description of Work and Scope of Work in Section C of this solicitation as a potential project under this contract and project was executed under CERCLA or RCRA authorities. Projects #4 and 5 shall have a minimum contract value equal to or greater than \$1,000,000.
- All of the projects submitted shall be for the Federal Government.

This RFP is well suited for Small Businesses under 562910, but for 8(a) companies not in joint ventures the criteria are misaligned with the SBA's 8(a) Business Development program, such that the current 8(a) sole source maximum is only \$4M. To have two completed projects equal to or greater than \$4M is the amount of two entire IDIQ sole source contracts for an 8(a) company.

We respectfully ask that the experience requirements criteria be revisited and aligned with 8(a) firm capabilities. Specifically, the \$4M value on past experience should be revised to not more than \$2M.

I would kindly ask that you provide an acknowledgement of this letter. Please do not hesitate to contact the undersigned if I can be of any further service or provide additional information in support of our position on this matter: I can be reached at jdwyer@sebac.org. We look forward to engaging you in a dialogue, and we thank you for your consideration.

Respectfully,



John M. Dwyer
President, SEBAC