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12 December 2019

Mr. Aaron Parra  
Procurement Center Representative  
U.S. Small Business Administration  
Office of Government Contracting  
330 North Brand Blvd., Suite 1200  
Glendale, CA 91203  
Email: [aaron.parra@sba.gov](mailto:aaron.parra@sba.gov)

Ms. Michelle Morales  
Small Business Deputy  
USACE Sacramento District  
1325 J Street  
Sacramento, CA 95814  
Email: [Michelle.d.stratton@usace.army.mil](mailto:Michelle.d.stratton@usace.army.mil)

**Subject: US Army Corps of Engineers, Sacramento District, MEGA ERS – Unrestricted  
Beta.SAM.gov Notice ID – W91238-20-S-2078**

Dear Mr. Parra and Ms. Morales:

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](http://www.sebac.org). SEBAC serves as a voice for the small businesses 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 protect small businesses by monitoring the federal government's goals, policies, and regulations regarding small business participation.

The purpose of this letter is to briefly introduce SEBAC and request that USACE Sacramento and SBA reevaluate the need for designating the planned Sacramento \$50M ERS contract as an unrestricted solicitation. Under the Rule of Two, this solicitation should first be subject to a sources sought determination to identify any small businesses that meet the requirements for the proposed ERS contract. Following that and knowing the small business firms in the environmental remediation sector (NAICS Code 562910), SEBAC is confident that this procurement can be set aside for small business award.

We believe the right course of action is a single Small Business ERS Multiple Award Task Order Contract (MATOC).

- The Sacramento District has a number of small businesses under the 562910 NAICs code that have clearly shown the capability to manage a contract of this size and complexity.
- The small environment business community has also demonstrated capabilities and expertise on a number of current MEGA contracts providing further substantiation that this procurement should be a small business set aside

**Specific concerns**

Additionally, a number of the awardees for unrestricted contract awards under the MEGA strategy are actually small business firms. Furthermore, with the advent of the SBA's All Small Mentor-Protégé program, the small business community supporting the Department of Defense is undergirded by many of the large businesses in the unrestricted pool of MEGA contract awards.

SEBAC believes, given the number of awards, capability of small businesses and past track record of success, there are ample facts surrounding this recommendation.

We look forward to engaging you in a dialogue.

Respectfully,



Small Environmental Business Action Coalition  
Susan Brock  
Secretary

Cc: Mallory Sharpe, Branch Chief Environmental, Sacramento District  
Lara Beasley, Chief Environmental Division, Headquarters