

ATTACHMENT 5ASection 26.45: Overall DBE Three-Year Goal Methodology**Name of Recipient:** Pierce County – Thun Field**Goal Period:** FY-2021 – FY2023: (Oct. 1, 2020 – Sept. 30, 2023)

DOT-assisted contract amount:	FY-2019	\$	<u>450,000</u>
	FY-2020	\$	<u>0</u>
	FY-2021	\$	<u>500,000</u>
	Total	\$	<u>950,000</u>

Overall Three-Year DBE Goal:

- FY2021: 15.30% (RN 0.0% RC 100%)
- FY2022: N/A - No project
- FY2023: 6.88% (RN 0.0% RC 100%)
- Total for FY 2021-2023: 10.87%, to be accomplished through 0% RN and 100% RC.

Total dollar amount to be expended on DBE's:

- FY2021: \$68,850 = \$450,000 x 15.30%
- FY2022: N/A – No Project
- FY2023: \$34,400 = 500,000 x 6.88%
- Total for FY 2021-2023: \$103,250

Number and Type of Contracts that the airport anticipates awarding:

Contracts FY21 (FY-2021)

1. Environmental Review of Planned Projects- \$450,000

Contracts FY22 (FY-2022)

No Project

Contracts FY23 (FY-2023)

2. Remove Obstructions (trees) – Design and Construction - \$500,000

Market Area:

The State of Washington has been determined as the market area for this DBE goal methodology.

Determination of Market Area:

The market area has been established as where a majority of the grant and contract funds have been spent, as previously established in the previous DBE Goal submissions.

Step 1. 26.45(c) Actual relative availability of DBE's

Determine the base figure for the relative availability of DBEs. The base figure for the relative availability was calculated and investigated by two different methods. The first compares the OMWBE Directory findings with that of the corresponding Census data, and the second method utilizes the information found in the 2019 Washington State Airport Disparity Study.

1. The data source or demonstrable evidence used to derive the numerator was: OMWBE Washington DBE Directory; <https://omwbe.diversitycompliance.com/>; and the data source or demonstrable evidence used to derive the denominator was: US Census Bureau Business Pattern for Washington; <https://data.census.gov/cedsci/>
2. The Washington State Airport Disparity Study recommends utilizing the census information found within the study, specifically the study's census information with regard to the DBE availability for an "apples to apples" comparison. <https://wsdot.wa.gov/sites/default/files/2016/05/09/OEO-Washington-State-Airports-Disparity-Study-2019.pdf> Appendix E contains the state wide information utilized in the market area.

DBE firm Availability

OMWBE vs. the Census Data

FY-2021: Environmental Review of Planned Projects

NAICS	Type of Work	DBEs	All Firms	DBEs as a % of All Firms
Construction				
N/A	N/A	0	0	0%
Construction Subtotal		0	0	0%
Professional Services				
541330	Engineering Services	18	1,673	
541620	Environmental Services	54	353	
Professional Services Subtotal		72	2,026	3.554%
Total		72	2,026	3.554%

Fiscal Year 2019 Base Figure:

(Sum of DBEs) / (Sum of All Firms) = 72 / 2,026 = 3.554% (rounded to 3.55%)

FY-2022: No New Project or FAA Grant Expected

FY-2023: Remove Obstructions (trees) – Design and Construction

NAICS	Type of Work	DBEs	All Firms	DBEs as a % of All Firms
Construction				
238910	Site Preparation Contractors	4	1,393	
561730	Landscaping Services – Tree Removal	43	2,917	
Construction Subtotal		47	4,310	1.090%
Professional Services				
541330	Engineering Services	18	1,673	
541620	Environmental Services	54	353	
Professional Services Subtotal		72	2,026	3.554%
Total		119	6,336	1.878%

Fiscal Year 2020 Base Figure:

(Sum of DBEs) / (Sum of All Firms) = 119 / 6,336 = 1.878% (rounded to 1.88%)

Disparity Study Findings:

1. Disparity Study findings for DBE availability is found in the column titles “Percent Qualified DBE’s Per Disparity Study” and provides a verified source of DBE data found for the considered NAICS categories that will be utilized over the three year planning period. This is compared to the OMWBE/Census data, which is shown in the column titled “Percent Qualified DBEs Per Base Figure”, to determine if a disparity is evident and need to be considered in the base figure.

NAICS	Type of Work	Percent Qualified DBEs Per Base Figures	Percent Qualified DBE’s Per Disparity Study	Difference
541620	Airport Environmental Services	15.297%	19.1%	-3.803%
541330	Airport Engineering	1.076%	7.7%	-6.624%
561730	Landscaping Services - Tree Removal	1.474%	5.7%	-4.226%
238910	Site Preparation	0.287%	6.4%	-6.113%

The average of the DBE base figures that are available for projects are computed as follows:

Three-Year Base DBE Goal:

To compare the information found we first investigated the OMWBE/Census data and then investigated the Disparity Study Data.

1. OMWBE/Census base figure = Divide the sum of the Base Figures for FY21 & FY23 by the number of Base Figures:

$$\frac{3.55\% + 1.88\%}{2} = \frac{5.43\%}{2} = 2.715\% \text{ (rounded to 2.72\%)}$$

2. Disparity Study Base Figure = Average of the DBE availability per NAICS Category

$$\frac{19.1\% + 7.7\% + 5.7\% + 6.4\%}{4} = 9.725\% = \text{(rounded to 9.73\%)}$$

Per the recommendation of the Disparity Study, and the large variance found between the OMWBE/Census data and the Disparity Study data, calculations will be derived from the Disparity Study data to ensure the DBE goal calculations in this planning period are as accurate as possible.

Base figure = 9.73% of all firms ready, willing, and able.

Weighted Availability of DBE Firms:

An examination of the anticipated contracts for each fiscal year, the availability of the DBE firms by aviation trade classification (<https://wsdot.wa.gov/sites/default/files/2016/05/09/OEO-Washington-State-Airports-Disparity-Study-2019.pdf> Appendix E) and the volume of work performed by DBE firms over previous years with consideration to the Washington State Airports Disparity Study.

Consideration to the findings of the disparity study are weighted against the anticipated Dollars spent for each contract below:

**For FY-2021, we anticipate the award of the following:
Environmental Review of Planned Projects**

A	B	C	D	E	F	I
Contract Name	NAICS Description	NAICS	Trade (\$)	Disparity Study Findings of Capable DBEs	DBE (\$) = D X E	Adj % = F / D
Construction						
<i>Environmental Review of Master Plan Projects</i>	N/A	NA	\$0	0%	\$0	
Construction Subtotal			\$0	0%	\$0	0%
Professional Services						
<i>Environmental Review of Master Plan Projects</i>	Engineering Services	541330	\$150,000	7.7%	\$11,550	
	Environmental Services	541620	\$300,000	19.1%	\$57,300	
Professional Services Subtotal			\$450,000		\$68,850	15.300%
Total FY-2021			\$450,000		\$68,850	15.300%

Weighted Goal for 2021 with consideration to the Disparity Study:

We divided the sum of the DBE (\$) by the sum of the Trade (\$):

$$\frac{\$68,850}{\$450,000} = 15.300\% \quad (\text{rounded to } 15.30\%)$$

**For FY-2022, we anticipate the award of the following:
No Project is planned or anticipated**

**For FY-2023, we anticipate the award of the following:
Remove Obstructions (trees) – Design and Construction**

Weighted Goal for 2023:

We divide the sum of the DBE (\$) by the sum of the Trade (\$):

A	B	C	D	E	F	I
Contract Name	NAICS Description	NAICS	Trade (\$)	Disparity Study Findings of Capable DBEs	DBE (\$) = D X E	Adj % = F / D
Construction						
<i>Remove Obstructions (Trees and Wet Land Mitigation) – Design and Construction</i>	Site Preparation Contractors	238910	\$150,000	6.4%	\$9,600	
	Landscaping Services – Tree Removal	561730	\$250,000	5.7%	\$14,250	
Construction Subtotal			\$400,000		\$23,850	5.963%
Professional Services						
<i>Remove Obstructions (Trees and Wet Land Mitigation) – Design and Construction</i>	Engineering Services	541330	\$75,000	7.7%	\$5,775	
	Environmental Services	541620	\$25,000	19.1%	\$4,775	
Professional Services Subtotal			\$100,000		\$10,550	10.550%
Total FY-2023			\$500,000		\$34,400	6.880

$$\frac{\$34,400}{\$500,000} = 6.880\% \quad (\text{rounded to } 6.88\%)$$

The Weighted Base Goals projections for the airport for each year are as follows:

- FY 2021 – 15.30%
- FY 2022 – N/A
- FY 2023 – 6.88%

Dividing the Incorporated disparity weighted DBE totals by the total estimate for all trades gives an adjusted DBE availability figure for the projects anticipated during the goal-setting period. This figure is expressed as a percentage and serves as the basis for the three-year overall goal.

Three-Year Weighted Base DBE Goal:

$$\frac{\text{Sum of weighted DBE Goals}}{\text{\# of Weighted Goals}} = \frac{15.30\% + 6.88\%}{2} = 11.090\% \quad (\text{rounded to } 11.09\%)$$

The airport anticipates spending \$950,000 over the three-year period on projects that have DOT and FAA funding participation. The individual BDE goal year percentages of 15.30% (FY21) and

6.88% (FY23) determines that the airport expects to spend \$103,250 through DBE firms in the project years of FY21 and FY23.

$$\begin{aligned}
 \text{FY21 DBE \$} &= \$450,000 \times 15.30\% = \$68,850 \\
 \text{FY23 DBE \$} &= \$500,000 \times 6.88\% = \$34,400 \\
 \hline
 \text{Total DBE \$} &= \$103,250
 \end{aligned}$$

The three-year goal for FY2021-2023 is a product of the total adjusted DBE dollars anticipated to be spent divided by the total DOT assisted project dollars. The calculation below finds that the FY 2021-2023 DBE overall goal is 10.87%.

$$\text{FY 2021-23 DBE Overall Goal} = \frac{\text{Total DBE \$}}{\text{Total DOT Assisted \$}} = \frac{\$103,250}{\$950,000} = 10.868\% \text{ (rounded to 10.87\%)}$$

Step 2. 26.45(d): Adjustments to Step 1 Base Figure.

After calculating a base figure of the relative availability of DBEs, evidence was examined to determine what adjustment (if any) was needed to the base figure in order to arrive at the overall goal.

Past history participation examines local and regional participation through (1) Historical Data and (2) Disparity Studies:

1. Past Participation

- a. After calculating a base figure of the relative availability of DBEs, historical data was examined to determine what, if any, adjustment to the base figure was needed in order to arrive at the overall goal. Historical data for the airport is as follows:

FY	Total Grant \$ Amount	DBE Goals			Accomplishments			Type of work
		RC	RN	Total	RC	RN	Total	
FY 14	\$43,167	0%	0%	0%	0%	0%	0%	Wild Life Hazard Assessment
FY 15	\$431,566	0%	3.6%	3.6%	0%	0%	0%	Installation of Runway Guidance System, Runway, Taxiway and Apron Rehab.
FY 16		0%	0%	0%	0%	0%	0%	No Project
FY 17	\$407,874	0%	3.6%	3.6%	0%	0%	0%	Rehabilitate Pavement
FY18		0%	0%	0%	0%	0%	0%	No Project
FY19		0%	0%	0%	0%	0%	0%	No Project

Historical DBE Goals and Accomplishments

- FY 2014 Accomplishment: N/A, no project requiring a DBE goal
- FY 2015 Accomplishment: 0.0%
- FY 2016 Accomplishment: N/A, no project
- FY 2017 Accomplishment: 0.0%
- FY 2018 Accomplishment: N/A, no project
- FY 2019 Accomplishment: N/A, no project

We examined the previous 5 years of data for the airport and found that there has only been one project completed that would require a DBE goal. No adjustment to the goal was made due to the limited number of historical projects that achieved DBE accomplishments. Future adjustments in future DBE goals will be analyzed when appropriate.

1. Market area research concerning disparity studies for the State of Washington was completed with the following findings:
 - a. A Washington State Airports Disparity Study was completed in 2019.

Based on the Washington State Disparity Study, Chapter V & IV and the Appendix E: Unweighted Availability by Region for NAICS Codes in the Washington State Airports' Final Contract Data File, and per the historical findings the disparity study found that the disparity was greater than the base figure presented. The project areas in consideration of this DBE Goal proposal were adjusted to provide incorporation of the disparity study findings in Step 1, therefore no further adjustment was found to be necessary.

Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation. 26.51(b) (1-9)

The recipient will meet the maximum feasible portion of its overall goal by using race neutral (RN) means of facilitating DBE participation through:

1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE, and other small businesses, participation;
2. Providing technical assistance and other services;
3. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
4. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.

The recipient estimates that in meeting its overall goal 10.87%, it will obtain 0% from RN participation and 100% through RC measures.

This breakout is based on:

1. The Recipient does not have a history of DBE participation or over-achievement of goals to reference and expects to obtain its DBE participation through the use of DBE contract goals or a conscious effort to obtain DBE participation. Therefore, the entire goal of 10.87% is to be obtained through race-conscious participation.

The Airport will adjust the estimated breakout of RN and RC DBE participation as needed to reflect actual DBE participation (see Section 26.51(f)) and track and report RN and RC participation separately. For reporting purposes, RN DBE participation includes, but is not necessarily limited to, the following: DBE participation through a prime contract obtained through customary competitive procurement procedures; DBE participation through a subcontract on a prime contract that does not carry a DBE goal, DBE participation on a prime contract exceeding a contract goal and DBE participation through a subcontract from a prime contractor that did not consider a firm’s DBE status in making the award.

Public Participation

Consultation: Section 26.45(g)(1).

In establishing the overall goal, the Sponsor provided for consultation and publication. This process included opportunities for consultation with minority, women's, and general contractor groups, community organizations, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Sponsor's efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process and was conducted before the goal methodology was submitted to the operating administration for review. Details of the consultation are as follows.

The consultation engaged in was a teleconference which was held at 9:00 AM on September 30th, 2020 (PST).

The following comments were received during the course of the consultation:
No one called into the teleconference, and no comments were received.

A notice of the proposed goal was published on the airport's webpage and at the airport terminal before the methodology was submitted to DOT/FAA.

If the proposed goal changes following review by the DOT/FAA, the revised goal will be posted on the Sponsor's official website.

Notwithstanding paragraph (f)(4) of §26.45, the Sponsor proposed goals will not be implemented until this requirement has been met.

Update: The Goals were updated after the public participation meeting. The changes that occurred were to change the goals from Race Neutral to Race Conscious and to carry out the percentages to the hundredths. The updated DBE Goals have been posted to the County Website in accordance with regulation and policy. The original public notice can be found on the following page.

PUBLIC NOTICE

Request for Public Comment on the Proposed Three-Year DBE Goal for Thun Field – Pierce County Airport.

Goal Period: FY2021, FY2022, FY2023

Pierce County hereby announces its proposed Disadvantaged Business Enterprise (DBE) participation goal amendment for Thun Field for FY 2021, FY2022, FY2023. Future projects are as follows:

FY2021: 15.3% DBE Goal: Environmental Review of Projects Identified in the Master Plan

FY2022: No Project Anticipated

FY2023: 6.9% DBE Goal: Removal of Obstructions (Trees) – Design and Construction

Overall Three-Year DBE Goal FY21-23: 10.9%

The Airport's DBE goal methodology resulting in a goal of 10.9% for the three-year goal setting period, is based on the anticipated projects.

A teleconference will be held on September 30th, 2020 for the purpose of consulting with stakeholders to obtain information relevant to the goal-setting process.

The proposed goal and its attainment methodology are available for inspection on the Pierce County official website (www.co.pierce.wa.us) for 30 days from the date of this publication.

Interested stakeholders that would like to obtain information relevant to the Thun Field goal setting process are encouraged to call in to a scheduled teleconference held by the Airport as follows:

Date: **Wednesday, September 30, 2020**

Time: **9:00am – 9:30am (PST)**

To Join the Call: Dial (405) 267-1571 and when prompted dial access code 804 501 471#

Comments on the amended three-year DBE goal will be accepted for 30 days from the date of this publication and can be sent to the following: Justin@theaviationplanninggroup.com or by calling (931) 212-7174, or by calling into the teleconference on September 30th, 2020.

Market Area: The State of Washington.

Potential NAICS Code Work Items Include:

238910, 541330, 541620, 561730

Contract Goals

Pierce County will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using RN means. Contract goals are established so that, over the period to which the overall goal applies, they will cumulatively result in meeting any portion of the recipient's overall goal that is not projected to be met through the use of RN means.

Pierce County will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. It need not establish a contract goal on every such contract, and the size of the contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work and availability of DBE's to perform the particular type of work).

We will express our contract goals as a percentage of the total amount of a DOT-assisted contract.