

# NORTH BIG HORN COUNTY AIRPORT DBE OVERALL GOAL METHODOLOGY FFY 2018-2020

## Section 26.45: Overall Goal Calculation

**Name of Sponsor:** Big Horn County, Wyoming – Owner of the North Big Horn County Airport

**Goal Period:** FY-2018-2019-2020 – October 1, 2017 through September 30, 2020

<b>DOT-assisted contract amount:</b>	FY-2018	\$0.00
	FY-2019	\$0.00
	<b>FY-2020</b>	<b>\$750,000.00</b>
	<b>Total</b>	<b>\$750,000.00</b>

**Overall Three-Year Goal:** 0.97%

**Total dollar amount to be expended on DBEs:** \$26,024.08

### **Describe the Number and Type of Contracts that the Sponsor anticipates awarding:**

Contracts Fiscal Year #1 2018 – No Planned Projects

Contracts Fiscal Year #2 2019 – Seal Coat and Mark Airside Pavements

**Contracts Fiscal Year #3 2020 – Construct Wildlife Fence**

**Market Area:** The local market area incorporates the states of Idaho, Colorado, Montana, Utah and Wyoming. This area is where a substantial majority of the contractors and subcontractors capable of and interested in these types and sizes of projects are located.

### Step 1. 26.45(c) Actual relative availability of DBEs

The base figure for the relative availability was calculated by dividing the total number of DBEs by the total number of All Firms. The product is the base percentage of all firms ready, willing and able.

NAICS	Type of Work	WY DBEs	Total All Firms	DBE %
236220	Industrial and Commercial Buildings	1	1,782	0.06%
237110	Water and Sewer Line	3	701	0.43%
237310	Airport Runway Construction (Paving and Painting)	8	549	1.46%
238210	Lighting	1	3,772	0.03%
238910	Site Prep (Demolition and Minor Grading)	7	2,305	0.30%
238990	Specialty Trade (Fencing, Painting, Traffic Control/Signage)	7	1,966	0.36%
541330	Civil Engineering Services	2	3,966	0.05%
561730	Seeding	5	4,483	0.11%
<b>STEP ONE GOAL</b>		<b>34</b>	<b>19,524</b>	<b>2.79%</b>

The total number of DBEs registered in the State of Wyoming was divided by the total number of All Firms in our Local Market Area to determine the base figure. **The total base figure = 2.79% of all firms ready, willing and able.**

The data source or demonstrable evidence used to derive the numerator was the WYDOT DBE Directory. The data source or demonstrable evidence used to derive the denominator was Census Bureau Data.

The percent of total work in each work type was considered and the base figure goal weighted by multiplying the base figure for each NAICS code by the percentage of total work. **The result was a weighted goal of .27%.**

NAICS	NAICS Description				
236220	Industrial and Commercial Buildings	1	1,782	0.00%	0.00%
237310	Airport Runway Construction	8	549	0.00%	0.00%
237110	Water and Sewer Line	3	701	0.00%	0.00%
238210	Lighting	1	3,772	0.00%	0.00%
238910	Site Prep (Demo, Minor Grading)	7	2,305	0.33%	0.00%
238990	Specialty Trade (Fencing)	7	1,966	70.25%	0.25%
561730	Seeding	5	4,483	0.00%	0.00%
541330	Civil Engineering Services	2	3,966	29.42%	0.01%
<b>STEP ONE WEIGHTED GOAL</b>					<b>0.27%</b>

**Step 2. 26.45(d):** Adjustments to Step 1 base figure.

After calculating a base figure of the relative availability of DBEs, historical DBE participation in the market area\* for similar projects completed in the most recent three-year period was examined to determine what adjustment (if any) was needed to the base figure in order to arrive at the overall goal. We felt that the Step One Weighted Goal does not represent the probable DBE achievement, based on evaluation of past participation. A Step Two Adjustment was made by determining the average of the Step One Weighted Goal of .27% and the median of the most recent three years similar projects' achievement percentage of 1.66%. The result is a **Step Two Adjusted Goal of 0.97%.**

\*Due to the lack of federally funded projects at this airport and in order to compile enough data to form statistically significant conclusion we included historical DBE participation for airport projects in the surrounding area. The specific data used to evaluate whether a Step Two adjustment to the base figure was warranted was the median of historical DBE accomplishments as follows. The historic DBE utilization type of work may or may not represent the DBE work type that will be achieved in the FFY18-20 projects.

FY	Airport	Total Federal Dollars	DBE Goals			Accomplishments			DBE utilization work type
			RC	RN	Total	RC	RN	Total	
2014	VEL Vernal, UT	\$641,160	1.67%	0.00%	1.67%	1.54%	0.00%	1.54%	238990, 238910
2015	U68 Cowley, WY	\$780,913	1.9%	0.00%	1.9%	1.66%	0.00%	1.66%	238990
2016	GEY Greybull, WY Main Apron Reconstr Phase II	\$2,035,000	.87%	.80%	.95%	1.85%	0.00%	1.85%	237310

Historical Data Summary	Dollar Value	%	Over/Under		Notes
			%	Dollar Value	
Total RC Projected	\$43,249	0.33%	-0.02%	-\$2,708	<i>When goals are set with RC means, the goal is typically achieved and even exceeded, with more \$\$ to DBEs</i>
Total Achieved with RC	\$40,542	0.31%			
Total RN Projected	\$16,280	0.19%	0.04%	\$3,663	<i>When goals are set with RN means, the goal is typically not met, and shows a considerable loss to DBEs. The RN achieved here is a result of exceeding a RC project goal.</i>
Total Achieved with RN	\$19,943	0.24%			

Our data above is not representative of the normal achievement. Race Conscious goals are typically achieved and, when over-achieved, the exceeded portion becomes Race Neutral. Historic data for our market area shows that when a goal is set with solely Race Neutral efforts, the goal is not met. The above accomplishments represent approximately \$60,485 of the total Federal dollars, or approximately 1.75% of Federal contracting dollars.

There are no applicable disparity studies for the State of Wyoming or recent legal case information to show any evidence of barriers to entry or competitiveness of DBEs.

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

Due to the limited number of DBE firms in the market area qualified to perform airport work, the Sponsor will meet the its overall goal by using Race Conscious means of facilitating DBE participation.

The Sponsor 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 Requirement to Establish Overall Goal**

As per **49 CFR Part 26.45(g)**, a DBE goal-setting consultation and publication occurred:

In establishing its overall goal, the North Big Horn County Airport provided for consultation and publication. The Monday, June 12, 2017 consultation teleconference was held to obtain input on goal setting from 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 North Big Horn County’s efforts to establish equal opportunities for the participation of DBEs. The consultation included scheduled, direct, interactive exchange (e.g., a face-to-face meeting, video conference, teleconference) with as many interested stakeholders as possible focused on obtaining information relevant to North Big Horn County Airport’s goal setting process. The teleconference was advertised in advance on the GDA web site and advertised in the Casper Star Tribune (the State of Wyoming’s major newspaper) on May 26 and June 2.

North Big Horn County Airport will submit its updated DBE Plan overall 3-year goal to DOT on or before August 1, as required by the FAA schedule. Participating in the consultation were the following individuals, without limiting consultation to any persons or groups, to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and efforts to establish a level playing field for the participation of DBEs:

Carl Meyer, North Big Horn County Airport Manager and DBELO. Meyer expressed that there are a limited number of DBEs in the area and that the specialized work involved in airport projects presents additional challenges in finding qualified DBEs. Meyer asked how the goal was established and whether this process follows what is recommended by the FAA. Meyer also asked about the DBE achieved reporting. Representing GDA Engineers was Shaunna Romero, the DBE consultant for Big Horn County Airports. Romero confirmed that the goals are set and reporting submitted as per 49 CFR 26 guidelines. Also participating in the consultation call from GDA was Amelia Pays, DBE consultant for other airports served by GDA. No DBE firms or other prime contractors or subcontractors participated in the consultation.

Following the consultation, a notice was posted on the GDA web site and Big Horn County web site, notifying the public that the proposed goal and its rationale are available for inspection during normal business hours on the GDA web site for 30 days following the date of the notice, and informing the public that comments will be accepted on the goals for 30 days from the date of the notice.

### **Public Notice**

#### **COMMENTS ON DBE GOAL AND RATIONALE**

June 13, 2017

The proposed Overall Disadvantaged Business Enterprise (DBE) Goal for Federal fiscal years 2018-2020 for **North Big Horn County Airport, Cowley, Wyoming, is .97%**, to be reached through race and gender conscious (RC) means.

The proposed goal and its rationale are available for inspection for 30 days following the date of this notice, or until July 13, 2017, at the office of GDA Engineers, 502 33<sup>rd</sup> Street, Cody, Wyoming, or by going to <http://www.gdaengineers.com/customer/DBE/>. Comments on this proposed DBE Goal will be accepted in writing (via US Mail or email) for 30 days following the date of this notice. Please send comments by US MAIL to: GDA Engineers, ATTN: Shaunna Romero, 502 33<sup>rd</sup> Street, Cody, WY 82414 or by EMAIL to [sromero@gdaengineers.com](mailto:sromero@gdaengineers.com)

**Comments will be accepted until July 13, 2017.**

### **Section 26.51(d-g) Contract Goals**

Over the FFY 18-20 period, North Big Horn County Airport will evaluate the DBE participation and will use contract goals to meet any portion of the overall goal that is not met. Contract goals are established so that, over the period to which the overall goal applies, they will cumulatively result in meeting any portion of our overall goal that is not projected to be met through the use of race-neutral means.

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

We will express our contract goals as a percentage of the Federal share of a DOT-assisted contract.