

ATTACHMENT 5

Section 26.45: Overall DBE Three-Year Goal Methodology

Name of Recipient: Franklin County, owner of Preston Airport (U10)

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

DOT-assisted contract amount:	FY-2018	\$ _____
	FY-2019	\$ _____
	FY-2020	\$ <u>1,777,778.00</u>
	Total	\$ <u>1,777,778.00</u>

Overall Three-Year Goal: 0.67%, to be accomplished through 0% RC and 0.67% RN

Total dollar amount to be expended on DBE's: \$11,911.11

Describe the Number and Type of Contracts that the airport anticipates awarding:

Contracts Fiscal Year #1
1. No Projects - \$0

Contracts Fiscal Year #2
1. No Projects - \$0 (Possible Land Acquisition)

Contracts Fiscal Year #3
1. Runway Extension - \$1,777,778.00

Market Area: State of Idaho

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 as follows:

For each Contract and each fiscal year, for Franklin County Airport

NAICS	Type of Work	Total DBE's	Total All Firms
237310	Pavement Marking	1	17
237310	Asphalt Removal	0	6
237310	Asphalt Paving	0	119
237310	Asphalt Aggregate	0	119
238910	Excavation/Site Prep	6	951
541330	Engineering	1	36
238210	Electrical	1	218
Total		9	1,337

Divide the total number of DBE's by the total number of All Firms = base figure for each contract.

Base figure = 0.67% of all firms ready, willing and able.

The data source or demonstrable evidence used to derive the numerator was: State of Idaho DBE Directory August 2017.

<https://itd.dbesystem.com/>

The data source or demonstrable evidence used to derive the denominator was: Census Bureau Data August 2017 and Idaho Contractor Business License Directory August 2017.

<https://www.census.gov/eos/www/naics/>
<https://secure.ibol.idaho.gov/eIBOLPublic/LPRABrowser.aspx>

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.

An examination of the anticipated contracts for each fiscal year, the availability of the DBE firms by trade classification and the volume of work performed by DBE firms over previous years.

There were no adjustments to the base figure.

Fiscal Year #1

For FY-2018 we anticipate no awards (it will be a carryover year)

Fiscal Year #2

For FY-2019, we anticipate no awards (it will be a carryover year) (Possible Land Acquisition)

Fiscal Year #3

For FY-2020, we anticipate the award of the following:

<i>Contract Name</i>	<i>Trade Description</i>	<i>NAICS Description</i>	<i>NAICS</i>	<i>Trade (\$)</i>	<i>Census</i>	<i>Directory</i>	<i>DBE (%) (= G/F)</i>	<i>DBE (\$) (= E x H)</i>
<i>Contract #1 – Runway Extension</i>	<i>Highway Constr.</i>	<i>Pavement Marking</i>	<i>237310</i>	<i>\$100,000.00</i>	<i>17</i>	<i>1</i>	<i>0.9%</i>	<i>\$854.70</i>
	<i>Highway Constr.</i>	<i>Asphalt Removal</i>	<i>237310</i>	<i>\$20,000.00</i>	<i>6</i>	<i>0</i>	<i>0.0%</i>	<i>\$0.00</i>
		<i>Asphalt Paving</i>	<i>237310</i>	<i>\$700,000.00</i>	<i>119</i>	<i>0</i>	<i>0.0%</i>	<i>\$0.00</i>
	<i>Highway Constr.</i>	<i>Aggregate</i>	<i>237310</i>	<i>\$125,000.00</i>	<i>119</i>	<i>0</i>	<i>0.0%</i>	<i>\$0.00</i>
	<i>Excavation</i>	<i>Site Prep</i>	<i>238910</i>	<i>\$180,000.00</i>	<i>951</i>	<i>6</i>	<i>0.6%</i>	<i>\$1,080.00</i>
	<i>Civil Engineering</i>	<i>Engineering</i>	<i>541330</i>	<i>\$300,000.00</i>	<i>36</i>	<i>1</i>	<i>2.8%</i>	<i>\$8,400.00</i>
	<i>Electrical</i>	<i>Electrical</i>	<i>238210</i>	<i>\$352,778.00</i>	<i>218</i>	<i>1</i>	<i>0.01%</i>	<i>\$0.00</i>
<i>Total Contract FY-2020</i>				<i>\$1,777,778.00</i>	<i>1,337</i>	<i>9</i>	<i>0.67%</i>	<i>\$11,911.11 (0.67% of 1,777,778)</i>

Past History Participation

There was no past DBE participation in the last 5 years so there were no adjustments to the goal.

The proposed Overall DBE Goals are as follows:

- Fiscal Year #1 – 0.0%
- Fiscal Year #2 - 0.0%
- Fiscal Year #3 – .75% $(0.0075 + 0)/2 = 0.4\%$

Our proposed overall three year goal will be reflected as the original base figure noted above.

- **Year 1 Goal = 0.0%**
- **Year 2 Goal = 0.0%**
- **Year 3 Goal = 0.4%**

- **Average of the three years $0+0+.4= 0.4/3 = 0.13\%$**
- **Median of the three years of participation = 0.0%**
- **Weighted $\$11,911.11 / \$1,777,778 = 0.67\%$**

There is no historical DBE data to reference to make an adjustment to the Step 1 base figure; therefore, the Airport Authority is adopting its base figure (0.67%) as its overall goal for this three-year goal period.

Further, there are no applicable disparity studies for the local market area or recent legal case information available from the State of Idaho Department of Transportation (ITD) office to show any evidence of barriers to entry or competitiveness of DBEs in all Idaho counties.

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

Franklin County and the Preston Airport will meet the maximum feasible portion of its overall goal by using RN means of facilitating DBE participation

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 assistance in overcoming limitations such as inability to obtain bonding or financing;
3. Providing technical assistance and other services;
4. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
5. Implementing a supportive services program to develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBE's and other small businesses;
6. Providing services to help DBE's and other small businesses improve long-term development, increase opportunities to participate in a variety of kinds of work, handle increasingly significant projects, and achieve eventual self-sufficiency;
7. Establishing a program to assist new, start-up firms, particularly in fields in which DBE participation has historically been low;
8. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors;
9. Assist DBE's and other small businesses, to develop their capability to utilize emerging technology and conduct business through electronic media.

Franklin County estimates that in meeting its overall goal 0.67%, it will obtain 0.67% from RN participation and 0% through RC measures.

This breakout is based on Franklin County 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, we are applying the entire goal of 0.67% to race-neutral participation.

Franklin County 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, Franklin County provided for consultation and publication. This included 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 Franklin County's efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange (teleconference) with as many interested stakeholders as possible focused on obtaining information relevant to Franklin County's goal setting process, and it occurred before we were required to submit our goal methodology to the operating administration for review pursuant to paragraph (f) of this section.

Notwithstanding paragraph (f)(4) of this section, we will not implement our proposed goal until we have complied with this requirement.

Franklin County submits its overall DBE three-year goal to DOT on August 1 as required by the set schedule.

Before establishing the overall goal, Franklin County consulted with the State of Idaho Small Business Development, State of Idaho Contractors Association, and Idaho Bureau of Occupational Licenses Department (IBOL) without limiting consultation to these persons or groups, to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and Franklin County's efforts to establish a level playing field for the participation of DBEs. The consultations occurred on August 15, 2017.

Following the consultation, on September 6, 2017, we published a notice in the Preston Citizen local newspaper of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the airport administration building for 30 days following the date of the notice, and informing the public that Franklin County and DOT will accept comments on the goals for 30 days from the date of the notice. The goal methodology as well as the program have been posted on the Franklin County website franklincountyidaho.org as of 10/17/17.

No comments were received.

PUBLIC NOTICE

Franklin County hereby announces its fiscal years 2018 through 2020 goal of 0.67% for Disadvantaged Business Enterprise (DBE) airport construction Contracts. The proposed goals and rationale is available for inspection between 8:00 a.m. and 5:00 p.m., Monday through Friday at 39 West Oneida, Preston, ID 83263 for 30 days from the date of this publication, September 6, 2017. This information is also posted on the Franklin County website: franklincountyidaho.org.

Comments on the DBE goal will be accepted for 30 days from the date of this publication and can be sent to the following:

Shauna T. Geddes
County Clerk
Franklin County
39 West Oneida
Preston, ID 83263
208-852-1090
stgeddes@plmw.com

AND

Federal Aviation Administration
Office of Civil Rights Staff
Sonia Cruz
Compliance Specialist
Office of Civil Rights – ACR-4
FAA Los Angeles ADO
15000 Aviation Blvd
Lawndale, CA 90261

Contract Goals

Franklin County will use contract goals to meet any portion of the overall goal that Franklin County 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 Franklin County's overall goal that is not projected to be met through the use of RN means.

Franklin 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.