

**DBE GOAL METHODOLOGY**  
**49 CFR PART 26**  
**CY NUNNALLY MEMORIAL AIRPORT**  
**FY 2021-FY 2023**  
**FISCAL YEAR 2021**

**A. UPDATE OF GOALS** – To make the program as useful as possible to the public, the City of Monroe, Georgia (Sponsor) will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required, for approval: Amount of Overall Goal Section, Method Used for Establishing Overall Goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually in the overall goal submission.

**B. AMOUNT OF GOAL** – The City of Monroe, Georgia's overall goal for FY 2021 is 9.62% of the Federal financial assistance that we will expend in FAA-assisted contracts. We expect to let projects during this FY in the amount of \$1,230,938.00; this means that our DBE goal is set at \$118,416.00 for this Fiscal Year. This overall goal is intended for the information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

**C. METHOD STEP 1** – In the development of the DBE goal for the Cy Nunnally Memorial Airport the first step was to establish the availability of ready, willing and able DBE businesses that are capable of participating in the type of contracts that are programmed during FY 2021. The project that is anticipated at the Cy Nunnally Memorial Airport involves the following: Runway 3-21 Rehabilitation and DBE Plan and Goals, along with the engineering/professional services associated with such a project. The monetary size of the grant is expected to be \$1,230,938.00. An analysis of the project indicates that funds will be expended in the following areas:

<b>CY NUNNALLY MEMORIAL AIRPORT PROJECT ANALYSIS FY 2021</b>			
<b>TASK</b>	<b>NAICS</b>	<b>AMOUNT</b>	<b>PERCENTAGE</b>
General Contractors	236220	\$132,750	10.78%
Street/Highway	237310	\$762,000	61.91%
Hauling	484220	\$90,000	7.31%
Engineering	541330	\$246,188	20.00%
<b>TOTAL</b>		<b>\$1,230,938.00</b>	<b>100.00%</b>

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by NAICS Code of Work to be Performed}}{\text{Total Firms in the State by NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

Due to a lack of recent bidders/projects, it was considered reasonable to include in the market area the county the airport is located in as well as the surrounding counties. The following counties located in Georgia are established as the market area: Barrow, Dekalb, Gwinnett, Morgan, Newton, Oconee, Rockdale and Walton.

A search was initiated with a series of DBE agencies within Georgia for an appropriate DBE Directory. It was agreed that the most comprehensive directory for DBE firms in Georgia was the UCP DBE Directory that was established by the Georgia Department of Transportation. This directory contains DBE firms that are certified in accordance with 49 CFR Part 26. The DBE Directory dated August, 2020 was utilized to determine the universe of DBEs. These numbers were refined by using the Georgia Directory and searching out DBEs within each appropriate NAICS. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau's County Business Pattern (CBCBP) and the identification of the County and NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{\text{Base}}{\text{Figure}} = \frac{.1078 \left( \frac{\text{GNAICS236220}}{\text{NAICS236220}} \right) + .6191 \left( \frac{\text{GNAICS237310}}{\text{NAICS237310}} \right) + .0731 \left( \frac{\text{GNAICS484220}}{\text{NAICS484220}} \right) + .2000 \left( \frac{\text{GNAICS541330}}{\text{NAICS541330}} \right)}$$

GNAICS- Georgia DBE Directory NAICS

NAICS – Census Bureau's County Business Pattern (CBCBP) Data Base

$$\frac{\text{Base}}{\text{Figure}} = \frac{.1078 \left( \frac{2}{272} \right) + .6191 \left( \frac{4}{42} \right) + .0731 \left( \frac{55}{150} \right) + .2000 \left( \frac{18}{425} \right)}$$

$$\frac{\text{Base}}{\text{Figure}} = .0008 + .0590 + .0268 + .0085$$

$$\frac{\text{Base}}{\text{Figure}} = 9.51\%$$

METHOD STEP 2 – With the Base Figure established our next step was to more finely tailor this figure to reflect conditions that have occurred at the Cy Nunnally Memorial Airport. The City has considered the suggested options outlined in 49 CFR Part 26 and determined that past performance will be utilized to determine if an adjustment to our Base Figure is warranted. To

this end, we investigated three airports with similar projects. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2021 time frame at the Cy Nunnally Memorial Airport:

<b>PREVIOUS FAA PROJECTS</b>			
<b>YEAR</b>	<b>LOCATION</b>	<b>PROJECT TYPE</b>	<b>% OF DBE PARTICIPATION</b>
2018	Bacon	Runway Rehabilitation	6.70%
2018	Louisville	Taxi Lane Rehabilitation	11.20%
2010	Millen	Extend Runway	9.73% *
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the three projects was 9.73% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	9.73%
BASE FIGURE	+ <u>9.51%</u>
	19.24% ÷ 2 = 9.62%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 9.62%. It was felt that the Base Figure of 9.51% should be adjusted for this variance. The Average Percentage of 9.62% is established as the goal for DBE participation at the Cy Nunnally Memorial Airport for FY 2021.

**D. PROCESS** – The Sponsor submits its overall goal for FY 2021 to the FAA in September 2020, for their consideration and approval. Before establishing the overall goal each year, the Sponsor has consulted with stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor's efforts are to establish a level playing field for the participation of DBEs. Following a stakeholder consultation, the Sponsor has published a notice 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 Sponsor's principal office for 30 days following the date of the notice, and informing the public that the Sponsor and FAA will accept comments on the goals for 30 days from the date of the notice. This information was published on the City website and made available to the Office of Minority Business Development at the State of Georgia. The notice will be available for 30 days for comments. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor's and FAA's addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor's responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). A teleconference stakeholder consultation was held with the following agencies and

persons September 9, 2020 at 1:30 pm EDT with a comment regarding change in scope of the project and Uniform Report submittal.

<b>CY NUNNALLY MEMORIAL AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
<b>Agency/Organization</b>	<b>Discussion/Information</b>
Chris Bailey, Assistant City Administrator City of Monroe, Georgia	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Lynn Thompson, Aviation Project Manager GMC	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Taffy Pippin Consulting, LLC Ms. Taffy Pippin	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts

Public comments have been requested for the FY 2021 goal and the 30-day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS** – The City of Monroe, Georgia will make every feasible effort to meet its goal through race-neutral means. Each time the City submits an overall goal for review by the FAA, the City will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the City’s overall goal. The City will establish contract goals to meet any portion of an overall goal when the City does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 9.62%, we will obtain 9.62% of the goal from race-conscious participation and 0.00% via race-neutral participation measures.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on three projects considered in Step 2 (see page 3) of the Previous FAA Projects. The Median is a negative number therefore 0.00% is established as the race-neutral goal for FY 2021. The following is the data base upon which the level of variance was computed using the “Like Type Project” information:

<b>PROJECT DBE GOAL VARIANCE CY NUNNALLY MEMORIAL AIRPORT LIKE TYPE FAA PROJECTS</b>				
<b>YEAR</b>	<b>LOCATION</b>	<b>DBE GOAL</b>	<b>% OF DBE PARTICIPATION</b>	<b>VARIANCE</b>
2018	Bacon	9.33%	6.70%	-2.63%
2018	Louisville	11.32%	11.20%	-0.12%*
2010	Millen	9.73%	9.73%	0.00%
<b>MEDIAN *</b>				

**F. CONTRACT GOALS** – Contract goals will be used to meet any portion of the overall goal which the City does not project being able to meet using race-neutral 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 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). The City will express the contract goals as a percentage of the Federal share of a DOT- assisted contract.

### **G. THREE-YEAR GOAL**

The three-year goal is as follows:

FY 2021	9.62%
FY 2022	7.34%
FY 2023	+ <u>10.29%</u>
	27.25% ÷ 3 = 9.08%

References:

*Georgia UCP List of Certified DBE Firms, August 2020*  
*2018 – U.S. Census Bureau, August 2020*

## **FISCAL YEAR 2022**

**A. Update of Goals** – To make the program as useful as possible to the public, the City of Monroe, Georgia (Sponsor) will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required, for approval: Amount of Overall Goal Section, Method Used for Establishing Overall Goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually in the overall goal submission.

**B. Amount of Goal** – The City of Monroe, Georgia's overall goal for FY 2022 is 7.34% of the Federal financial assistance that we will expend in FAA-assisted contracts. We expect to let projects during this FY in the amount of \$478,750.00; this means that our DBE goal is set at \$35,140.00 for this Fiscal Year. This overall goal is intended for the information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

**C. METHOD STEP 1** – In the development of the DBE goal for the Cy Nunnally Memorial Airport the first step was to establish the availability of ready, willing and able DBE businesses that are capable of participating in the type of contracts that are programmed during FY 2022. The project that is anticipated at the Cy Nunnally Memorial Airport involves the following: Ditch Grading, along with the engineering/professional services associated with such a project.

The monetary size of the grant is expected to be \$478,750.00. An analysis of the project indicates that funds will be expended in the following areas:

CY NUNNALLY MEMORIAL AIRPORT PROJECT ANALYSIS FY 2022			
TASK	NAICS	AMOUNT	PERCENTAGE
General Contractors	236220	\$81,000	16.92%
Site Preparation	238910	\$200,000	41.78%
Hauling	484220	\$25,000	5.22%
Engineering	541330	\$95,750	20.00%
Landscaping	561730	\$77,000	16.08%
TOTAL		\$478,750.00	100.00%

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by NAICS Code of Work to be Performed}}{\text{Total Firms in the State by NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

Due to a lack of recent bidders/projects, it was considered reasonable to include in the market area the county the airport is located in as well as the surrounding counties. The following counties located in Georgia are established as the market area: Barrow, Dekalb, Gwinnett, Morgan, Newton, Oconee, Rockdale and Walton.

A search was initiated with a series of DBE agencies within Georgia for an appropriate DBE Directory. It was agreed that the most comprehensive directory for DBE firms in Georgia was the UCP DBE Directory that was established by the Georgia Department of Transportation. This directory contains DBE firms that are certified in accordance with 49 CFR Part 26. The DBE Directory dated August, 2020 was utilized to determine the universe of DBEs. These numbers were refined by using the Georgia Directory and searching out DBEs within each appropriate NAICS. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau's County Business Pattern (CBCBP) and the identification of the County and NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{\text{Base}}{\text{Figure}} = .1692 \left( \frac{GNAICS236220}{NAICS236220} \right) + .4178 \left( \frac{GNAICS238910}{NAICS238910} \right) + .0522 \left( \frac{GNAICS484220}{NAICS484220} \right) + .2000 \left( \frac{GNAICS541330}{NAICS541330} \right) + .1608 \left( \frac{GNAICS561730}{NAICS561730} \right)$$

GNAICS- Georgia DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{\text{Base}}{\text{Figure}} = \frac{.1692\left(\frac{2}{272}\right) + .4178\left(\frac{9}{138}\right) + .0522\left(\frac{55}{150}\right) + .2000\left(\frac{18}{425}\right) + .1608\left(\frac{13}{660}\right)}{.0012 + .0272 + .0191 + .0085 + .0032}$$

$$\frac{\text{Base}}{\text{Figure}} = 5.92\%$$

$$\frac{\text{Base}}{\text{Figure}} = 5.92\%$$

STEP 2 – With the Base Figure established our next step was to more finely tailor this figure to reflect conditions that have occurred at the Cy Nunnally Memorial Airport. The City has considered the suggested options outlined in 49 CFR Part 26 and determined that past performance will be utilized to determine if an adjustment to our Base Figure is warranted. To this end, we investigated three airports with similar projects. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2022 time frame at the Cy Nunnally Memorial Airport:

PREVIOUS FAA PROJECTS			
YEAR	LOCATION	PROJECT TYPE	% OF DBE PARTICIPATION
2018	Laurens County	Fuel Farm	13.76%
2016	Thomaston	Taxiway Grading	8.76% *
2006	Savannah	Site Prep	5.99%
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the three projects was 8.76% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	8.76%
BASE FIGURE	+ 5.92%
	14.68% ÷ 2 = 7.34%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a

final percentage. The result of this was 7.34%. It was felt that the Base Figure of 5.92% should be adjusted for this variance. The Average Percentage of 7.34% is established as the goal for DBE participation at the Cy Nunnally Memorial Airport for FY 2022.

**D. PROCESS** – The Sponsor submits its overall goal for FY 2022 to the FAA in September 2020, for their consideration and approval. Before establishing the overall goal each year, the Sponsor has consulted with stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor's efforts are to establish a level playing field for the participation of DBEs. Following a stakeholder consultation, the Sponsor has published a notice 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 Sponsor's principal office for 30 days following the date of the notice, and informing the public that the Sponsor and FAA will accept comments on the goals for 30 days from the date of the notice. This information was published on the City website and made available to the Office of Minority Business Development at the State of Georgia. The notice will be available for 30 days for comments. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor's and FAA's addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor's responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). A teleconference stakeholder consultation was held with the following agencies and persons September 9, 2020 at 1:30 pm EDT with a comment regarding change in scope of the project and Uniform Report submittal.

<b>CY NUNNALLY MEMORIAL AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Chris Bailey, Assistant City Administrator City of Monroe, Georgia	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Lynn Thompson, Aviation Project Manager GMC	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Taffy Pippin Consulting, LLC Ms. Taffy Pippin	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts

Public comments have been requested for the FY 2022 goal and the 30-day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS:** The City of Monroe, Georgia will make every feasible effort to meet its goal through race-neutral means. Each time the City submits an overall goal for review by the FAA, the City will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of



the City's overall goal. The City will establish contract goals to meet any portion of an overall goal when the City does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 7.34%, we will obtain 7.34% of the goal from race-conscious participation and 0.00% via race-neutral participation measures.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on three projects considered in Step 2 (see page 8) of the Previous FAA Projects. The Median is a negative number therefore 0.00% is established as the race-neutral goal for FY 2022. The following is the data base upon which the level of variance was computed using the "Like Type Project" information:

<b>PROJECT DBE GOAL VARIANCE CY NUNNALLY MEMORIAL AIRPORT LIKE TYPE FAA PROJECTS</b>				
YEAR	LOCATION	DBE GOAL	% OF DBE PARTICIPATION	VARIANCE
2018	Lawrence County	10.20%	13.76%	3.56%
2016	Thomaston	9.57%	8.76%	-0.81%*
2006	Savannah	9.00%	5.99%	-3.01%
MEDIAN *				

**F. Contract Goals** – Contract goals will be used to meet any portion of the overall goal which the City does not project being able to meet using race-neutral 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 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). The City will express the contract goals as a percentage of the Federal share of a DOT- assisted contract.

### **G. THREE-YEAR GOAL**

The three-year goal is as follows:

FY 2021	9.62%
FY 2022	7.34%
FY 2023	+ <u>10.29%</u>
	27.25% ÷ 3 = 9.08%

## References:

*Georgia UCP List of Certified DBE Firms, August 2020*  
*2018 – U.S. Census Bureau, August 2020*

**FISCAL YEAR 2023**

**A. Update of Goals** – To make the program as useful as possible to the public, the City of Monroe, Georgia (Sponsor) will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required, for approval: Amount of Overall Goal Section, Method Used for Establishing Overall Goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually in the overall goal submission.

**B. Amount of Goal** – The City of Monroe, Georgia's overall goal for FY 2023 is 10.29% of the Federal financial assistance that we will expend in FAA-assisted contracts. We expect to let projects during this FY in the amount of \$250,763.00; this means that our DBE goal is set at \$25,804.00 for this Fiscal Year. This overall goal is intended for the information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

**C. METHOD STEP 1** – In the development of the DBE goal for the Cy Nunnally Memorial Airport the first step was to establish the availability of ready, willing and able DBE businesses that are capable of participating in the type of contracts that are programmed during FY 2023. The project that is anticipated at the Cy Nunnally Memorial Airport involves the following: Taxiway Rehabilitation, along with the engineering/professional services associated with such a project. The monetary size of the grant is expected to be \$250,763.00. An analysis of the project indicates that funds will be expended in the following areas:

<b>CY NUNNALLY MEMORIAL AIRPORT PROJECT ANALYSIS FY 2023</b>			
<b>TASK</b>	<b>NAICS</b>	<b>AMOUNT</b>	<b>PERCENTAGE</b>
Street & Highway	237310	\$182,500	72.78%
Hauling	484220	\$20,000	7.97%
Engineering	541330	\$48,263	19.25%
<b>TOTAL</b>		<b>\$250,763.00</b>	<b>100.00%</b>

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by NAICS Code of Work to be Performed}}{\text{Total Firms in the State by NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

Due to a lack of recent bidders/projects, it was considered reasonable to include in the market area the county the airport is located in as well as the surrounding counties. The following

counties located in Georgia are established as the market area: Barrow, Dekalb, Gwinnett, Morgan, Newton, Oconee, Rockdale and Walton.

A search was initiated with a series of DBE agencies within Georgia for an appropriate DBE Directory. It was agreed that the most comprehensive directory for DBE firms in Georgia was the UCP DBE Directory that was established by the Georgia Department of Transportation. This directory contains DBE firms that are certified in accordance with 49 CFR Part 26. The DBE Directory dated August, 2020 was utilized to determine the universe of DBEs. These numbers were refined by using the Georgia Directory and searching out DBEs within each appropriate NAICS. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau's County Business Pattern (CBCBP) and the identification of the County and NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{\text{Base}}{\text{Figure}} = .7278 \left( \frac{\text{GNAICS237310}}{\text{NAICS237310}} \right) + .0797 \left( \frac{\text{GNAICS484220}}{\text{NAICS484220}} \right) + .1925 \left( \frac{\text{GNAICS541330}}{\text{NAICS541330}} \right)$$

GNAICS- Georgia DBE Directory NAICS

NAICS – Census Bureau's County Business Pattern (CBCBP) Data Base

$$\frac{\text{Base}}{\text{Figure}} = .7278 \left( \frac{4}{42} \right) + .0797 \left( \frac{55}{150} \right) + .1925 \left( \frac{18}{425} \right)$$

$$\frac{\text{Base}}{\text{Figure}} = .0693 + .0292 + .0082$$

$$\frac{\text{Base}}{\text{Figure}} = 10.84\%$$

STEP 2 – With the Base Figure established our next step was to more finely tailor this figure to reflect conditions that have occurred at the Cy Nunnally Memorial Airport. The City has considered the suggested options outlined in 49 CFR Part 26 and determined that past performance will be utilized to determine if an adjustment to our Base Figure is warranted. To this end, we investigated three airports with similar projects. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2023 time frame at the Cy Nunnally Memorial Airport:

PREVIOUS FAA PROJECTS			
YEAR	LOCATION	PROJECT TYPE	% OF DBE PARTICIPATION

2018	Bacon	Runway Rehabilitation	6.70%
2018	Louisville	Taxi Lane Rehabilitation	11.20%
2010	Millen	Extend Runway	9.73% *
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the three projects was 9.73% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	9.73%
BASE FIGURE	+10.84%
	$20.57\% \div 2 = 10.29\%$

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 10.29%. It was felt that the Base Figure of 9.73% should be adjusted for this variance. The Average Percentage of 10.29% is established as the goal for DBE participation at the Cy Nunnally Memorial Airport for FY 2023.

**D. PROCESS** – The Sponsor submits its overall goal for FY 2023 to the FAA in September 2020, for their consideration and approval. Before establishing the overall goal each year, the Sponsor has consulted with stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor's efforts are to establish a level playing field for the participation of DBEs. Following a stakeholder consultation, the Sponsor has published a notice 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 Sponsor's principal office for 30 days following the date of the notice, and informing the public that the Sponsor and FAA will accept comments on the goals for 30 days from the date of the notice. This information was published on the City website and made available to the Office of Minority Business Development at the State of Georgia. The notice will be available for 30 days for comments. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor's addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor's responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). A teleconference stakeholder consultation was held with the following agencies and persons September 9, 2020 at 1:30 pm EDT with a comment regarding change in scope of the project and Uniform Report submittal.

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Agency/Organization	Discussion/Information
Chris Bailey, Assistant City Administrator City of Monroe, Georgia	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Lynn Thompson, Aviation Project Manager GMC	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Taffy Pippin Consulting, LLC Ms. Taffy Pippin	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories and DBE promotion, Goal Setting, Good Faith Efforts

Public comments have been requested for the FY 2023 goal and the 30-day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS:** The City of Monroe, Georgia will make every feasible effort to meet its goal through race-neutral means. Each time the City submits an overall goal for review by the FAA, the City will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the City's overall goal. The City will establish contract goals to meet any portion of an overall goal when the City does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 10.29%, we will obtain 10.29% of the goal from race-conscious participation and 0.00% via race-neutral participation measures.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on three projects considered in Step 2 (see page 12) of the Previous FAA Projects. The Median is a negative number therefore 0.00% is established as the race-neutral goal for FY 2023. The following is the data base upon which the level of variance was computed using the "Like Type Project" information:

<b>PROJECT DBE GOAL VARIANCE CY NUNNALLY MEMORIAL AIRPORT LIKE TYPE FAA PROJECTS</b>				
YEAR	LOCATION	DBE GOAL	% OF DBE PARTICIPATION	VARIANCE
2018	Bacon	9.33%	6.70%	-2.63%
2018	Louisville	11.32%	11.20%	-0.12%*
2010	Millen	9.73%	9.73%	0.00%
MEDIAN *				

**F. Contract Goals** – Contract goals will be used to meet any portion of the overall goal which the City does not project being able to meet using race-neutral 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 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). The City will express the contract goals as a percentage of the Federal share of a DOT- assisted contract.

### G. THREE-YEAR GOAL

The three-year goal is as follows:

FY 2021	9.62%
FY 2022	7.34%
FY 2023	+ <u>10.29%</u>
	27.25% ÷ 3 = 9.08%

### References:

*Georgia UCP List of Certified DBE Firms, August 2020*  
*2018 – U.S. Census Bureau, August 2020*