

ATTACHMENT 5

Overall DBE Three-Year Goal Methodology

Name of Recipient: St. George Regional Airport (SGU)

Goal Period: FY-2022-2023-2024 – October 1, 2021, through September 30, 2024

DOT-assisted contract amount:	FY-2022	\$ 2,720,000
	FY-2023	\$ 10,300,000
	FY-2024	<u>\$ 1,500,000</u>
	Total	\$ 14,520,000

Overall Three-Year Goal: 1.56%, to be accomplished through 0.00% RC and 1.56% RN

Total dollar amount to be expended on DBEs: \$226,512

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

Contracts Fiscal Year #1

1. Terminal apron expansion & reconstruct existing apron (design only) - \$1,000,000
2. South Connector Taxiway and Apron Construction- \$1,720,000

Contracts Fiscal Year #2

1. Terminal apron expansion & reconstruct existing apron - \$10,300,000

Contracts Fiscal Year #3

1. Pavement Preservation - \$700,000
2. Reconstruct and Rehabilitate Taxiway A (design only) – \$800,000

Market Area: The local market area in regard to airport construction activity at the St. George Regional Airport includes a multi-county area surrounding St. George City including Washington, Kane, and Iron counties. Historically, a substantial majority (80%) of our contractors are from this area and where we spend a substantial majority of our contracting dollars.

Step 1. Actual relative availability of DBEs

The base figure for the relative availability was calculated as follows:

Method: Use DBE Directories: [uucp dbe directory.pdf - Google Drive](#) and Census Bureau Data from [CBP Tables \(census.gov\)](#)

Unweighted Availability of DBE Firms:**FY22****Contract #1 Reconstruct and Rehabilitate Parallel Taxiway A (Design only)**

NAICS	Type of Work	Total ALL Firms	UUCP DBE Directory	DBE (%)
541330	Engineering Services	64	1	1.56%
541380	Geotechnical Testing	0	0	0.00%
541370	Surveying	7	0	0.00%
541620	Environmental Consulting	5	0	0.00%
<i>TOTAL PROJECT</i>		76	1	1.32%

Contract #2 South Connector Taxiway and Apron

NAICS	Type of Work	Total ALL Firms	UUCP DBE Directory	DBE (%)
237310	Airport Construction	11	2	18.18%
238210	Electrical Contractors	85	0	0.00%
238990	Concrete Contractors	0	1	0.00%
484220	Trucking	26	0	0.00%
541330	Engineering Services	64	1	1.56%
541370	Surveying	4	0	0.00%
541380	Geotechnical Testing	0	0	0.00%
541620	Environmental Consulting	5	0	0.00%
<i>TOTAL PROJECT</i>		195	4	2.05%
<i>TOTAL FY 22</i>		271	5	1.85%

FY23

Contract #1 Terminal apron expansion & reconstruct existing apron

NAICS	Type of Work	Total ALL Firms	UUCP DBE Directory	DBE (%)
237310	Airport Construction	11	2	18.18%
238210	Runway & Taxiway Lighting	85	0	0.00%
238990	Concrete	0	0	
484220	Dump Trucking	26	0	0.00%
541330	Engineering Services	64	1	1.56%
541370	Surveying	4	0	0.00%
541380	Geotechnical Testing	0	0	0.00%
<i>TOTAL FY2023</i>		190	3	1.58%

FY24

Contract #1 Pavement Preservation

NAICS	Type of Work	Total ALL Firms	UUCP DBE Directory	DBE (%)
237310	Airport Construction	11	2	18.18%
541330	Engineering Services	64	1	1.56%
541370	Surveying	4	0	0.00%
541620	Environmental Consulting	5	0	0.00%
<i>TOTAL PROJECT</i>		84	3	3.57%

Contract #2 Reconstruct and Rehabilitate Parallel Taxiway A (Design only)

NAICS	Type of Work	Total ALL Firms	UUCP DBE Directory	DBE (%)
541330	Engineering Services	64	1	1.56%
541380	Geotechnical Testing	0	0	0.00%
541370	Surveying	7	0	0.00%
541620	Environmental Consulting	5	0	0.00%
<i>TOTAL PROJECT</i>		76	1	1.32%

<i>TOTAL FY 24</i>		160	4	2.50%
--------------------	--	-----	---	-------

The data source or demonstrable evidence used to derive the numerator was: UUCP DBE Directory

The data source or demonstrable evidence used to derive the denominator was:
<https://data.census.gov/cedsci/>

Dividing the total number of DBEs by the total number of All Firms gives a base DBE availability figure for each contract. The availability figures for all contracts were then combined and averaged to provide the basis for the three-year overall goal.

The base goal projections are as follows:

- Fiscal Year #1 – 1.85%
- Fiscal Year #2 – 1.58%
- Fiscal Year #3 – 2.50%

Average of weighted availability: $(1.85\% + 1.58\% + 2.50\%)/3 = 1.98\%$

Base of DBE Goal: 1.02%

The data source or demonstrable evidence used to derive the numerator was: Utah Unified Certification Program (UUCP) DBE Directory dated November 26, 2021: [uucp dbe directory.pdf - Google Drive](#)

The data source or demonstrable evidence used to derive the denominator was: Census Bureau Data [CBP Tables \(census.gov\)](#)

Step 2: Adjustments to Step 1 base figure

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

Past History Participation

One piece of data used to determine the adjustment to the base figure was the median of historical DBE accomplishments, as follows:

FY	AIP#	Total Grant Amount	DBE Goals			Accomplishments			Type of work
			RC%	RN %	Total %	RC %	RN %	Total %	
16	26	\$817,832	0.0	1.92	1.92	0.0	98.8	98.8	Pavement Maintenance
17	27	\$1,182,168	0.0	1.92	1.92	0.0	0.0	0.0	
18	28	\$1,078,272	0.0	1.92	1.92	0.0	2.96	2.96	Painting
	29/30	\$23,439,472	0.0	1.92	1.92		1.14	1.14	Painting
	31	\$1,283,462	1.96	0.0	1.96	0.0	0.0	0.0	
Median DBE Achieved							4.16		

Arranging this historical data from low to high, (0.00%, 0.00%, 1.14%, 2.96%, 98.8%) the median is 1.14%.

Step 1 Base averaged with historical median: $(1.98\% + 1.14\%)/2 = 1.56\%$

To arrive at an overall goal, the Step 1 base figure was added to the Step 2 adjustment figure and the total was averaged, arriving at an overall goal of 1.56%. St. George Regional Airport believes this adjusted goal accurately reflects DBE participation that can be achieved for the type(s) of work being awarded during this three-year period.

Furthermore, there are no applicable disparity studies for the local market area or recent legal case information from the relevant jurisdictions to show evidence of barriers to entry or competitiveness of DBEs in the market area that is sufficient to warrant making an adjustment to the base goal.

Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation.

St. George Regional Airport will meet the maximum feasible portion of the overall goal by using RN means of facilitating DBE participation. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE, and other small businesses, participation.

1. Providing assistance in overcoming limitations such as inability to obtain bonding or financing.
2. Providing technical assistance and other services thru the SBDC, AGC, and PTAC.
3. Carrying out information and communications programs on contracting procedures and specific contract opportunities.
4. Implementing a supportive services program to develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs and other small businesses.
5. Providing services to help DBEs 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.

6. Establishing a program to assist new, start-up firms, particularly in fields in which DBE participation has historically been low.
7. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors; and
8. Assist DBEs and other small businesses, to develop their capability to utilize emerging technology and conduct business through electronic media.

St. George Regional Airport estimates that in meeting the established overall goal of 1.56%, it will obtain 1.65% from RN participation and 0.00% through RC measures.

This breakout is based on:

- a) In previous years, the St. George Regional Airport accomplishments exceeded the overall goal by an average of 4.56%, which may be construed as evidence of race-neutral participation. Therefore, the 1.56% goal is expected through race-neutral means.

St. George Regional Airport will adjust the estimated breakout of RN and RC DBE participation as needed to reflect actual DBE participation [see §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:

In establishing the overall goal St. George Regional Airport provided for consultation and publication. This process included consultation with minority, women, 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 St. George Regional Airport 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 on December 22, 2021, at 1:00 p.m.

Three individuals from St. George City participated and the following comments were received during the course of the consultation: No comments were received, but a good discussion with the participants reviewed the DBE process and ways to encourage Small Business and DBE participation and development.

A notice of the proposed goal was published on the St. George Regional Airport official website, www.sgcity.org before the methodology was submitted to FAA.

If the proposed goal changes following review by FAA, the revised goal will be posted on St. George Regional Airport official website www.sgcity.org.

Notwithstanding paragraph (f)(4) of §26.45, St. George Regional Airport proposed goals will not be implemented until this requirement has been met.

PUBLIC NOTICE

St. George Regional Airport hereby announces its proposed Disadvantaged Business Enterprise (DBE) participation goal of 1.56% for FAA-funded contracts/agreements. The proposed goal pertains to federal fiscal years 2022 through 2024. A Microsoft Teams teleconference will be held on December 21, 2021, at 1:00 p.m. for the purpose of consulting with stakeholders to obtain information relevant to the goal-setting process. Please call the following number to participate in the teleconference:

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Or call in (audio only)

[+1 937-240-2430,716306925#](tel:+19372402430716306925) United States, Dayton

Phone Conference ID: 716 306 925#

The proposed goal and its attendant methodology are available for inspection between 8:00 a.m. and 5:00 p.m., Monday through Friday at St. George Regional Airport offices, 4508 South Airport Parkway #1, St. George, UT 84790 from the date of this publication.

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

Mr. Richard Stehmeier
St. George Regional Airport Manager
4508 South Airport Parkway #1
St. George, UT 84790
(435) 627-4085
E-mail address: richstehmeier@sgcity.org

and

Federal Aviation Administration
Office of Civil Rights Staff, ASW-9
Attn: Sonia Cruz
PO Box 92007
Los Angeles, CA 90009
Sonia.cruz@faa.gov