Section 26.45: Overall DBE Goal Methodology

Name: Hobby Field Airport (77S) owned by the City of Creswell, Oregon

Goal Period: City of Creswell (City’s) project goal for the Federal Fiscal Years (FFY) 2019-2020

DOT Assisted Contract Amount:

<table>
<thead>
<tr>
<th>Year</th>
<th>Grant Amount</th>
<th>Match Amount</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY 2019</td>
<td>$690,000</td>
<td>$76,667</td>
<td>$766,667</td>
</tr>
<tr>
<td>FY 2020</td>
<td>$20,000</td>
<td>$0</td>
<td>$20,000</td>
</tr>
<tr>
<td>Total</td>
<td>$710,000</td>
<td>$76,167</td>
<td>$786,667</td>
</tr>
</tbody>
</table>

Overall Three Year Goal:
Based on the above calculation the overall goal for the City for fiscal years 2019-2020 is 5.50%. The City estimates that in meeting its overall goal of 5.50%, it will obtain 5.50% from Race-Neutral participation and 0.0% through Race-Conscious measures.

Total Dollar Expended on DBE:
The City anticipates contracting $41,620 to DBE firms during FFY 2019.

Types of Contract:
- During FFY 2019, The City expects to receive $690,000 in FAA - DOT assisted contracts. The project is the construction of the taxi lane improvements design in 2019.
- During FFY 2020, The City expects to receive $20,000 in FAA - DOT assisted contracts, making it exempt from meeting a DBE goal. The funding covers a match to the State Pavement Maintenance Program (PMP). A match by the City is not required for the federal portion since the match is recognized by FAA as coming from the State PMP funding portion for the work. The PMP portion funds 90% of the work thereby exceeding the federal grant match requirements.

Market Area:
Hobby Field is located in the City of Creswell approximately 8 miles south of Eugene, OR along Interstate-5 and resides in Linn County.

A substantial majority of the airport’s contractors and subcontractors come from the following counties:
- Linn,
- Lane,
- Benton, and
- Douglas
Step 1: Actual relative availability of DBE’s

In arriving at this goal, the City has researched the U.S. Census Bureau, City Business Patterns Section, to obtain the total number of businesses in the designated market area surrounding the airport specific project site that fall within the appropriate North American Industry Classification Systems (NAICS) Code, which match the prevalent work to be accomplished under federal grant. The City also consulted the state Business Oregon Certification Office for Business Inclusion and Diversity (COBID) for DBE and Oregon Office of Minorities, Women, and Emerging Small Businesses (OMWESB) Certified Directory maintained by the State of Oregon to find the number of certified businesses in the job classifications for project work for the fiscal year. Individual DBE goals will be calculated for each Airport Improvement Program (AIP) and General Aviation Entitlement grant issued to the City in FFY 2019. The individual calculations include both a percentage goal and a dollar goal. The City added each DBE goal and averaged that goal to calculate an overall DBE fiscal goal.

2019 - (Creswell Municipal Airport - Hobby Field) Taxi lanes Improvements - Construction

Work for this project includes Construction activities along with Engineering Inspection Services. This project will be awarded under one contract.

The City consulted the U.S. Census Bureau, City Business Patterns Section for these counties to obtain the total number of businesses in NAICS Codes. The City then consulted the DBE and Oregon COBID Certified Directory for the stated counties. Results are listed below for the unweighted availability of DBE firms:

<table>
<thead>
<tr>
<th>NAICS Code #</th>
<th>Certification Type</th>
<th>Benton All</th>
<th>Douglas DBE All</th>
<th>Lane DBE All</th>
<th>Linn DBE All</th>
<th>Total DBE All</th>
</tr>
</thead>
<tbody>
<tr>
<td>237110</td>
<td>Water and Sewer Lines (Storm sewer construction)</td>
<td>0</td>
<td>4</td>
<td>0</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>237110</td>
<td>Highway, Street, and Bridge Construction (AC, PCC, rock, paint) - Flagging</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>237310</td>
<td>Highway, Street, and Bridge Construction (AC, PCC, rock, paint)</td>
<td>0</td>
<td>25</td>
<td>0</td>
<td>10</td>
<td>1</td>
</tr>
<tr>
<td>238210</td>
<td>Electrical Contractors</td>
<td>0</td>
<td>12</td>
<td>1</td>
<td>28</td>
<td>0</td>
</tr>
<tr>
<td>233990</td>
<td>Specialty Trade (incl. sealing, fencing, etc.)</td>
<td>0</td>
<td>11</td>
<td>1</td>
<td>12</td>
<td>2</td>
</tr>
<tr>
<td>541330</td>
<td>Engineering Services</td>
<td>1</td>
<td>46</td>
<td>0</td>
<td>13</td>
<td>4</td>
</tr>
<tr>
<td>541370</td>
<td>Geophysical Surveying and Mapping Services</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>8</td>
<td>1</td>
</tr>
<tr>
<td>541380</td>
<td>Testing Laboratories</td>
<td>1</td>
<td>6</td>
<td>0</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>18</td>
</tr>
</tbody>
</table>

Base figure = Ready, willing, and able DBE’s
All firms ready, willing and able

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

Oregon OMWESB DBE database: [https://oregon4biz.diversitysoftware.com/](https://oregon4biz.diversitysoftware.com/)
The data source or demonstrable evidence used to derive the denominator was:


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 2019 and 2020 were not computed as the grant funding level was below $250,000 as noted earlier. The base goal projection for 2019 is:

- 2019 – 18/467) = 3.85%

The average weighted availability is 3.85%. This is the Base of the DBE Goal.

The costs shown were estimated from the best available information. The DBE goal for this 2019 project may be revised to reflect updated cost information.

<table>
<thead>
<tr>
<th>Proposed Project</th>
<th>NAICS Description</th>
<th>NAICS</th>
<th>* Trade ($)</th>
<th>Census</th>
<th>Directory</th>
<th>DBE (%)</th>
<th>DBE ($)</th>
<th>Weighted DBE (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct Taxiway Phase 2 Construction</td>
<td>Water and Sewer Lines (Storm sewer construction)</td>
<td>237110</td>
<td>$ 50,000</td>
<td>17</td>
<td>1</td>
<td>5.88%</td>
<td>$ 2,941</td>
<td>0.39%</td>
</tr>
<tr>
<td></td>
<td>Highway, Street, and Bridge Construction (AC, PCC, rock, paint) - Flagging</td>
<td>237110</td>
<td>$ 10,000</td>
<td>1</td>
<td>1</td>
<td>100.00%</td>
<td>$ 10,000</td>
<td>1.32%</td>
</tr>
<tr>
<td></td>
<td>Highway, Street, and Bridge Construction (AC, PCC, rock, paint)</td>
<td>237310</td>
<td>$ 531,666</td>
<td>55</td>
<td>2</td>
<td>3.64%</td>
<td>$ 19,333</td>
<td>2.56%</td>
</tr>
<tr>
<td>Electrical Contractors</td>
<td>238210</td>
<td>$ 15,000</td>
<td>148</td>
<td>1</td>
<td>0.68%</td>
<td>$ 101</td>
<td>0.01%</td>
<td></td>
</tr>
<tr>
<td>Specialty Trade (incl. sealing, fencing, etc.)</td>
<td>238990</td>
<td>$ 20,000</td>
<td>79</td>
<td>4</td>
<td>5.06%</td>
<td>$ 1,013</td>
<td>0.13%</td>
<td></td>
</tr>
<tr>
<td>Engineering Services</td>
<td>541330</td>
<td>$ 70,000</td>
<td>127</td>
<td>6</td>
<td>4.72%</td>
<td>$ 3,307</td>
<td>0.44%</td>
<td></td>
</tr>
<tr>
<td>Geophysical Surveying and Mapping Services</td>
<td>541370</td>
<td>$ 45,000</td>
<td>22</td>
<td>2</td>
<td>9.09%</td>
<td>$ 4,091</td>
<td>0.54%</td>
<td></td>
</tr>
<tr>
<td>Testing Laboratories</td>
<td>541380</td>
<td>$ 15,000</td>
<td>18</td>
<td>1</td>
<td>5.56%</td>
<td>$ 833</td>
<td>0.11%</td>
<td></td>
</tr>
</tbody>
</table>

| 2019 Program Totals | $ 756,666 | 467 | 18 | 3.85% | $ 41,620 | 5.50% |

No step 2 adjustment was made for this goal.

The City estimates a 5.50% ($41,620) race neutral goal for the 2019 Taxi lanes Improvements – Construction, which will receive $690,000 in federal funds.

The base goal projection after weighting is as follows:

- Total weighted DBE Availability: 5.50%
- Total for all Trades: 5.50%
- Base of DBE Goal: 5.50%
Basis for no Step 2 adjustment in the above projects

a. Past participation – There have been no recent projects of similar character at the airports that have had DBE participation. Based on past participation, there is no data to support an adjustment to the base figure. Therefore, no adjustment to the base figure was made based on past participation.

b. Disparity study – A disparity study was conducted in 1996 for the region. This study is too old to be considered current. There are no newer disparity studies available for review. A disparity study is being initiated by the Oregon Department of Aviation and FAA in 2019 that should have data available for the 2021-2023 goal period. The City will continue to contact FAA, Oregon COBID and others for records of any recently completed disparity studies. Therefore, no adjustment will be made based on disparity studies.

c. Other factors, information about barriers to entry to past competitiveness of DBEs on projects:
   - The City has not found disparity in contracting for airport construction.

BREAKOUT OF ESTIMATED “RACE AND GENDER NEUTRAL AND RACE-CONSCIOUS PARTICIPATION

The City will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. The City’s projects will achieve increased DBE participation through race-neutral means by;

1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate DBE, and other small businesses, participation (e.g., unbundling large contracts to make them more accessible to small businesses, requiring or encouraging prime contractors to subcontract portions of work that they might otherwise perform with their own forces);

2. Carrying out information and communications programs on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists for bidders; ensuring the dissemination to bidders on prime contracts of lists of potential subcontractors; provision of information in languages other than English, where appropriate);

3. Ensuring distribution of the State DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.

The City estimates that in meeting the established overall goal of 5.50%. Based on the 9th Circuit Court Decision in Western States Paving Company v. Oregon State Department of Transportation, the City has determined that it is appropriate to use a race/gender neutral goal. The City encourages all bidders to take active race/gender neutral steps to include DBE’s in this and other airport contracts. Race/gender neutral steps include unbundling large contracts, subcontract work the prime contractor may self-perform, provide bonding or financing assistance,
provide technical assistance, etc. This contract can be awarded without the lowest responsive bidder meeting the goal or demonstrating good faith effort to meet the goal.

The City will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual DBE participation and will track and report race-neutral and race-conscious participation separately. For reporting purposes, race neutral DBE participation includes, but is not necessarily limited to, the following:

- DBE participation through a prime contract a DBE obtains through customary competitive procurement procedures;
- DBE participation through a subcontract on a prime contract that does not carry a DBE goal;
- a DBE participation on a prime contract exceeding a contract goal; and
- DBE participation through a subcontract from a prime contract that did not consider a firm’s DBE status in making the award.

PUBLIC PARTICIPATION

Public Notice

In establishing the overall goal, the City of Creswell provided for consultation and publication. This process 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 the City 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 City’s goal setting process, and it occurred before we were required to submit our goal methodology to the operating administration for review pursuant to the 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.

The consultation engaged in a teleconference / public meeting at City Hall, City of Creswell, on April 19, 2019 at 10:00 am to comply with this requirement. The meeting was publicly announced prior to being held and advertised on the City’s official internet web site. The notice included the date, time, and location of the meeting as well as a description of the meeting’s purpose.

- No comments were received via call-in. In addition, no one showed up at City Hall to attend the meeting and provide comment.

Comments on the DBE goal will be accepted for 30 days from the date of this publication and can be sent to the following:
Attn: Shelley Humble, Airport Manager
13 South 1st St
P.O. Box 276
Creswell, OR 97426
P: (541) 895-2913
shumble@creswell-or.us

or

Federal Aviation Administration
Office of Civil Rights – ACR-4 (Attn: Sonia Cruz)
777 S. Aviation Blvd, Suite #150
El Segundo, CA 90245