Overall DBE Three-Year Goal Methodology

Name of Recipient: City of Brewster – Anderson Field (S97)

Goal Period: FY-2021-2023 – October 1, 2020 through September 30, 2023

DOT-assisted contract amount:

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY-2021</td>
<td>Access Agreement, Env. Review, TW A (Design)</td>
<td>$150,000</td>
</tr>
<tr>
<td>FY-2022</td>
<td>No Project</td>
<td></td>
</tr>
<tr>
<td>FY-2023</td>
<td>TW A (Const.)</td>
<td>$425,600</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>$575,600</td>
</tr>
</tbody>
</table>

Overall Three-Year Goal: 4.9%, to be accomplished through 4.9% RC and 0% RN

Total dollar amount to be expended on DBEs: $20,952

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

Contracts Fiscal Year #1 FY2021

1. Access Agreement, Environmental Review, Design Phase of TW A (Phase 1 of 3) < $250,000 FAA funding

Contracts Fiscal Year #1 FY2022

Contracts Fiscal Year #3 FY2023

1. Construction of TW A (Phase 1 of 3) $425,600

Market Area:
Washington: Okanogan County, Chelan County, Grant County, Lincoln County, Douglas County, Spokane County

This represents the area in which the sponsor spends a majority of its contract dollars.

Step 1. Actual relative availability of DBEs

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


Weighted Availability of DBE firms:

Fiscal Year #3 - For FY-2023, award of the following is anticipated (Construction of TW (Ph 1 of 3)):

<table>
<thead>
<tr>
<th>Trade Description</th>
<th>NAICS Description</th>
<th>NAICS</th>
<th>Trade ($)</th>
<th>Census</th>
<th>Directory</th>
<th>DBE (%)</th>
<th>DBE ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Storm Drainage</td>
<td>Water and Sewer Line</td>
<td>237110</td>
<td>$63,840</td>
<td>64</td>
<td>2</td>
<td>3.1%</td>
<td>$1,995</td>
</tr>
<tr>
<td>Asphalt Paving/Marking</td>
<td>Hwy, Street, Bridge Const.</td>
<td>237310</td>
<td>$106,400</td>
<td>25</td>
<td>2</td>
<td>8.0%</td>
<td>$8,512</td>
</tr>
<tr>
<td>Excavation/Backfill</td>
<td>Site Prep. Contractors</td>
<td>238910</td>
<td>$42,560</td>
<td>172</td>
<td>3</td>
<td>1.7%</td>
<td>$742</td>
</tr>
</tbody>
</table>
The base goal projection after weighting is as follows:

- Total Weighted DBE Availability: $20,952
- Total for All Trades: $425,600

Dividing the weighted DBE totals by the total estimate for all trades gives a base DBE availability figure for the projects anticipated during the goal-setting period. This figure is expressed as a percentage and serves as the basis for the three-year overall goal.

**Base of DBE Goal: 4.9%**

**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. Two pieces of evidence were used: Past-History Participation and Disparity Studies.

**Past-History Participation**

One piece of data used to determine if adjustment to the base figure is warranted is the historical DBE accomplishments, as follows:

<table>
<thead>
<tr>
<th>FY</th>
<th>Total Grant $ Amount</th>
<th>DBE Goals</th>
<th>Accomplishments</th>
<th>Type of work</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY 15</td>
<td>No Project</td>
<td>0.0%</td>
<td>0.0%</td>
<td>N/A</td>
</tr>
<tr>
<td>FY 16</td>
<td>$150,000</td>
<td>0.0%</td>
<td>0.0%</td>
<td>Rehab RW (Design)</td>
</tr>
<tr>
<td>FY 17</td>
<td>$356,163</td>
<td>0.0%</td>
<td>3.08%</td>
<td>Update Master Plan</td>
</tr>
<tr>
<td>FY 17</td>
<td>$467,758</td>
<td>0.0%</td>
<td>3.08%</td>
<td>Rehab RW (Const.)</td>
</tr>
<tr>
<td>FY 18</td>
<td>No Project</td>
<td>0.0%</td>
<td>0.0%</td>
<td>N/A</td>
</tr>
<tr>
<td>FY 19</td>
<td>No Project</td>
<td>0.0%</td>
<td>0.0%</td>
<td>N/A</td>
</tr>
</tbody>
</table>

FY16 and FY17 were the only years in the last 5 years where the FAA Grants were issued. There was no DBE participation in these projects. Hence, not enough historical data on DBE participation is available to reference to make an adjustment to the Step 1 base figure.

**Disparity Studies**

Another piece of data evaluated to determine if adjustment to the Step 1 base figure was warranted was a 2019 Washington State Airports Disparity Study conducted by Washington Department of Transportation (WSDOT) (2019 Disparity Study). To be considered relevant, the disparity studies need to be conducted in the Airport’s Market Area. The market area considered for the 2019 Disparity Study included the entire State of Washington and did not make differentiations between the Western (more populous) and Eastern (more rural) sections of the State. Furthermore, the 2019 Disparity Study indicated that there are few DBE firms outside of the Puget Sound market area, so overall availability is low.
The 2019 Disparity Study, therefore, will not be used as a basis for adjustment to the Step 1 base figure.

Therefore, the City of Brewster is adopting the Step 1 base figure as the overall goal for this three-year goal period.

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

The City of Brewster will meet the maximum feasible portion of the 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. Contracts will be unbundled to include pricing for separate items thus encouraging DBE participation;
3. Notice of Invitation for Bids will be sent to the local newspaper and emailed to DBE firms in the Market Area that were included in calculations of these goals to make minority, women, and/or small businesses aware of the project;
4. Plans and specifications will be available on an ftp site so the DBEs may view the plans.
5. A Plan Holders List will also be available on an ftp site and kept current during bidding so the DBEs may identify potential Prime Contractors to contact for potential partnering opportunities.
6. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.

The City of Brewster estimates that in meeting the established overall goal of 4.9%, it will obtain 0.0% from RN participation and 4.9% through RC measures.

This breakout is based on:

The City of Brewster 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, the entire goal of 4.9% is to be obtained through race-conscious participation.

The City of Brewster will adjust the estimated breakout of RN and RC DBE participation as needed to reflect actual DBE participation 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, the City of Brewster 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’s 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 teleconference, which was held at 10:00 am PDT on Sept. 14, 2020 to allow businesses in the Market Area to provide input on the draft DBE goals. Notice of this meeting was advertised on the City of Brewster’s website. DBE businesses identified in the Market Area and included in the Step 1 calculations were also contacted by email inviting them to join the teleconference.

The following comments were received during the course of the consultation: No comments were received.

A notice of the proposed goal was published on the City of Brewster’s official website (cityofbrewsterwashington.org) before the methodology was submitted to FAA.

If the proposed goal changes following review by FAA, the revised goal will be posted on City of Brewster’s official website.

Notwithstanding paragraph (f)(4) of §26.45, City of Brewster’s proposed goals will not be implemented until this requirement has been met.

PUBLIC NOTICE

The City of Brewster hereby announces its proposed Disadvantaged Business Enterprise (DBE) participation goal of 4.9% for FAA-funded contracts/agreements. The proposed goal pertains to federal fiscal years 2021 through 2023. A teleconference will be held at 10:00 am PDT on Sept. 14, 2020 for the purpose of consulting with stakeholders to obtain information relevant to the goal-setting process. The telephone number for this teleconference is 1-800-377-8846 and the participant code is 62197970#.

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

City of Brewster
Attn: Misty Ruiz, Finance Director/City Clerk
105 S. 3rd Street
Brewster, WA 98812

or

Federal Aviation Administration
Civil Rights Staff, ASW-9
PO Box 92007
Los Angeles CA 90009