FY 2024 - 2026 Disadvantaged Business Enterprise Goal Methodology



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St. Pete-Clearwater International Airport

CLEARWATER, FLORIDA

JUNE 2023

ST. PETE-CLEARWATER INTERNATIONAL AIRPORT THREE-YEAR OVERALL DISADVANTAGED BUSINESS ENTERPRISE GOAL Federal Fiscal Years 2024, 2025 and 2026

In fulfillment of the requirements of 49 CFR Part 26, St. Pete-Clearwater ("Airport") has developed a proposed Overall Goal for FY 2024 – FY 2026 FAA-AIP projects. The methodology used in establishing this goal is described herein.

Airport Sponsor: Pinellas County

Airport: St. Pete-Clearwater International Airport

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I. Detailed Methodology: Specific Steps

A. Amount of Goal

The Airport's FY 2024-2026 overall goal for the Federal financial assistance it will expend in USDOT-assisted contracts is the following:

	<u>Overall</u>	<u>Race</u> <u>Neutral</u>	Race Conscious
Total Goal	6.80%	0.67%	6.13%
Year 1 Goal	7.58%	0.67%	6.91%
Year 2 Goal	5.72%	0.67%	5.05%
Year 3 Goal	6.81%	0.67%	6.14%

Given the amount of USDOT-assisted contracts that the Airport expects to let from FY 2024-2026, which is approximately **\$34,260,000**, the Airport has set a goal of expending approximately **\$2,329,697** with DBEs during this period.

B. Determination of the Market Area of the Study

The Airport's Market Area was determined to be **Hillsborough**, **Manatee**, **Orange**, **Pasco**, **Pinellas and Sarasota counties**. Bidders on projects from the last five-years were reviewed to determine the market area. Specifically, the market area is based on where the substantial majority of bidders, both successful and unsuccessful, are located and where the substantial majority of funding was spent, as illustrated in **Table 1** below.

Table 1: Market Area for St. Pete-Clearwater International Airport

County	Bidders	Percent of bidders	Dollars	Percent of dollars
Hillsborough	6	50.0%	\$5,538,991	14.3%
Manatee	0	0.0%	\$0	0.0%
Orange	2	16.7%	\$0	0.0%
Pasco	0	0.0%	\$0	0.0%
Pinellas	2	16.7%	\$0	0.0%
Sarasota	2	16.7%	\$33,212,383	85.7%
Market Area	12	100.0%	\$38,751,374	100.0%
Other	0	0.0%	\$0	0.0%
Total	12	100.0%	\$38,751,374	100.0%

Source: St. Pete-Clearwater International Airport

C. Determination of relevant NAICS codes

Based on information provided by the Airport concerning the proposed projects for this fiscal year, a list of projects was developed and is shown below:

Table 2: St. Pete-Clearwater International Airport FY 2024-FY 2026 Projects

FY	PROJECT	ACTIVITY	NAICS	Dollars	
2024	Passenger Terminal Improvements (Design)	Engineering	541330	\$3,440,500	
	Replace Terminal	Flooring Contractors	238330	\$675,000	
	Carpeting	Engineering	541330	\$75,000	
2025	XA7 - 4 I 4	Finish Carpentry (Doors/Windows)	238350	\$925,000	
	Water Intrusion in Terminal	Roofing (Skylights)	238160	\$462,500	
	Terminar	Drywall and Insulation Contractors	238310	\$462,500	
		Building Construction	236220	\$12,235,799	
		Land Subdivision	237210	\$2,645,578	
		Concrete	238110	\$606,278	
		Masonry Contractors	238140	\$854,301	
2026	Passenger Terminal	Other Foundation, Structure, and Building Exterior Contractors	238190	\$2,673,136	
2020	Improvements	Electrical Contractors	238210	\$2,507,788	
		Plumbing, Heating, and Air- Conditioning Contractors		238220	\$3,885,693
		Drywall and Insulation Contractors	238310	\$1,763,719	
		Flooring Contractors	238330	\$854,300	
		Landscaping	561730	\$192,907	

Source: St. Pete-Clearwater International Airport

D. Determination of Relative Availability of DBEs in Market Area, Compared to all Firms

Table 3a: Firms in Market Area by Relevant NAICS Codes—FY 2024 Passenger Terminal Improvements (Design) – St. Pete-Clearwater International Airport

Activity	NAICS CODES	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
Engineering	541330	56	1,319	4.2%	\$3,440,500	\$146,071
Total \$3,440,500						\$146,071
Weighted Step 1 Goal =					4.25%	

SOURCES:

- 1. 2021 County Business Patterns, U.S. Census Bureau.
- 2. Florida UCP DBE Directory, May 2023.

Table 3b: Firms in Market Area by Relevant NAICS Codes—FY 2025

Replace Terminal Carpeting - St. Pete-Clearwater International Airport

Activity	NAICS CODES	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
Flooring Contractors	238330	3	481	0.6%	\$675,000	\$4,210
Engineering	541330	56	1,319	4.2%	\$75,000	\$3,184
	\$7,394					
Weighted Step 1 Goal =						0.99%

SOURCES:

- 1. 2021 County Business Patterns, U.S. Census Bureau.
- 2. Florida UCP DBE Directory, May 2023.

Table 3c: Firms in Market Area by Relevant NAICS Codes—FY 2025

Water Intrusion in Terminal - St. Pete-Clearwater International Airport

Activity	NAICS CODES	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
Roofing (Skylights)	238160	3	422	0.7%	\$462,500	\$3,288
Drywall and Insulation Contractors	238310	2	412	0.5%	\$462,500	\$2,245
Finish Carpentry (Doors/Windows)	238350	1	824	0.1%	\$925,000	\$1,123
Total \$1,850,000						\$6,656
Weighted Base Figure						0.36%

SOURCES:

- 1. 2021 County Business Patterns, U.S. Census Bureau.
- 2. Florida UCP DBE Directory, May 2023.

Table 3d: Firms in Market Area by Relevant NAICS Codes—FY 2026

Passenger Terminal Improvements - St. Pete-Clearwater International Airport

Activity	NAICS CODES	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars	
Building Construction	236220	37	735	5.0%	\$12,235,799	\$615,952	
Land Subdivision	237210	0	102	0.0%	\$2,645,578	\$0	
Concrete	238110	7	375	1.9%	\$606,278	\$11,317	
Masonry Contractors	238140	5	389	1.3%	\$854,301	\$10,981	
Other Foundation, Structure, and Building Exterior Contractors	238190	3	115	2.6%	\$2,673,136	\$69,734	
Electrical Contractors	238210	20	1,303	1.5%	\$2,507,788	\$38,493	
Plumbing, Heating, and Air-Conditioning Contractors	238220	2	2,074	0.1%	\$3,885,693	\$3,747	
Drywall and Insulation Contractors	238310	2	412	0.5%	\$1,763,719	\$8,562	
Flooring Contractors	238330	3	481	0.6%	\$854,300	\$5,328	
Landscaping	561730	13	2,385	0.5%	\$192,907	\$1,051	
Total \$28,219,500							
	Weighted Base Figure						

SOURCES:

- 1. 2021 County Business Patterns, U.S. Census Bureau.
- 2. Florida UCP DBE Directory, May 2023.

E. Determination of the "Weighted" DBE Base Figure

The Step 1 DBE Base Figure for each project was derived by multiplying the dollars for each trade by the percentage of relevant DBE firms to all relevant firms. The total DBE goal in dollars was divided by the total project costs to derive the step 1 goals.

The Step 1 DBE Base Figures for the Airport are as follows:

Fiscal Year	Project	Step 1
2024	Passenger Terminal Improvements (Design)	4.25%
2025	Replace Terminal Carpeting	0.99%
2025	Water Intrusion in Terminal	0.36%
2026	Passenger Terminal Improvements	2.71%

II. Adjustments to the DBE Base Figure

After the DBE Base Figure has been developed, the regulations (49 CFR Part 26) require that:

"...additional evidence in the sponsor's jurisdiction be considered to determine what adjustment, if any, is needed to the base figure in order to arrive at your overall goal" (26:45(d)).

A. Adjustment Factors to Consider

The regulations further state that there are several types of evidence that must be considered when adjusting the base figure, which includes:

"(i) The current capacity of DBEs to perform work in your USDOT-assisted contracting program, as measured by the volume of work DBEs have performed in recent years.

The historical overall DBE goals accomplished at the Airport in recent years were examined relative to the above consideration. The Airport's annual DBE percent accomplishment is indicated in Table 4 below:

Table 4: St. Pete-Clearwater International Airport
DBE Accomplishment

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Report Period	DBE Goal	DBE Percentage Achieved	Achieved Over/Under			
FY 2018	9.81%	7.67%	-2.14%			
FY 2019	9.80%	34.00%	24.20%			
FY 2021	9.80%	10.90%	1.10%			
Median	9.80%	10.90%	1.10%			

Source: Uniform Report of DBE Commitments/Awards and Payments

The median DBE accomplishment for the periods as shown above for the Airport is 10.90%.

B. Consultations

The Airport held a public meeting on June 23, 2023. The purpose of the meeting was to solicit information from interested stakeholders about the draft goal, as well as the availability of potential DBEs at the Airport, the effects of discrimination on opportunities for DBEs, and the Airport's effort to increase DBE participation. Please see Appendix A for the attendee list and consultation comments.

The meeting invitation was sent to stakeholders including DBEs and various organizations. Organizations invited included:

- Resource Center for Women, 1301 Seminole Blvd., Suite 137, Plaza Center, Largo, FL 33770, phone 727-586-1110;
- Pinellas County Urban League, 333 31st N., St. Petersburg, FL 33713, phone 727-327-2081;
- Tampa Bay Builders Association, 2918 West Kennedy Boulevard, Tampa, FL 33609, phone 813-873-1000; and
- Pinellas County's Office of Small Business and Supplier Diversity, 13805 58th
 Street North, Suite 1-200, Clearwater, FL 33756, phone 727-464-7332.

C. Adjustment to Step 1 DBE Base Figures: St. Pete-Clearwater International Airport, FY 2024-FY 2026

With the adjustment factors considered to this point, the Airport will adjust the Step 1 base figures as calculated above by adding the annual accomplishment factor derived in Table 4 above (10.90%) to the base figures, and averaging the total, for an adjusted overall DBE goal.

Table 5: St. Pete-Clearwater International Airport FY 2024 - FY 2026 Overall Goal

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Fiscal Year	Project	Step 1	Step 2 adjustment	Overall Goal	AIP Dollars	DBE Goal (dollars)
FY 2024	Passenger Terminal Improvements (Design)	4.25%	10.90%	7.58%	\$3,440,500	\$260,618
	FY 2024 Total			7.58%	\$3,440,500	\$260,618
<u> </u>						
FY 2025	Replace Terminal Carpeting	0.99%	10.90%	5.95%	\$750,000	\$44,588
11 2023	Water Intrusion in Terminal	0.36%	10.90%	5.63%	\$1,850,000	\$104,155
	FY 2025 Total			5.72%	\$2,600,000	\$148,743
FY 2026	Passenger Terminal Improvements	2.71%	10.90%	6.81%	\$28,219,500	\$1,920,337
FY 2026 Total			6.81%	\$28,219,500	\$1,920,337	
			·			
FY 2024 - FY 2026 Overall Goal				6.80%	\$34,260,000	\$2,329,697

The total DBE goal in dollars was divided by the total federal portion of project costs to derive the overall DBE goal of 6.80% for FY 2024-FY 2026.

III. Process

The Airport normally submits its overall goal to the FAA on or before August 1 of each goal period.

Before establishing the overall goal this year, the Airport consulted with minority, women's and general contractor groups, community organizations, and other officials or organizations to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Airport's efforts to establish a level playing field for the participation of DBEs.

Following this consultation, the Airport published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale were available for review and comment during normal business hours at the Airport's administrative office for 30 days following the date of the notice. The notice included addresses (including offices) to which comments could be sent and addresses where the proposal could be reviewed. This process was used to establish the goals for FY 2024 through FY 2026.

The Airport's overall goal submission to the FAA will include a summary of information and comments received during this public participation process and our responses.

The Airport will begin using the overall goal on October 1 of each year, unless the Airport has received other instructions from DOT/FAA (or, if the goal is established on a project basis) by the time of the first solicitation for a DOT/FAA-assisted contract for the projects.

IV. Breakout of Estimated Race-Conscious/Race-Neutral Participation

The Airport will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. The Airport will use a combination of the following race-neutral means to increase DBE participation:

- 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, encouraging prime contractors to subcontract portions of work that they might otherwise perform with their own forces);
- 2. Disseminating information communications 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).

The Airport proposes a race-conscious goal of **6.13%** and a race-neutral goal of **0.67%**, for a total of **6.80%**. The reason for this breakout is that the projects from

previous years show that the median amount by which the past DBE goals were overachieved is **0.67%** (see **Table 4**).

The Airport will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual DBE participation (26.51(f)) and it 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; 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.

V. Contract Goals

The Airport will use contract goals to meet any portion of the overall goal that it 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.

The Airport will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. The Airport 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, etc.

The Airport will express its contract goals as a percentage of the Federal share of a DOT-assisted contract.

Resources: St. Pete-Clearwater International Airport FY 2024 - FY 2026 Disadvantaged Business Enterprise Program Methodology

A. Resource Documents:

- 1. 2021 County Business Patterns, U.S. Census Bureau
- 2. Florida Unified Certification Program, DBE Directory.
- 3. Uniform Report of DBE Commitments/Awards and Payments

Appendix B: St. Pete-Clearwater International Airport – Web Conference June 23, 2023

Summary of Meeting: Wilfred Nixon, of Ken Weeden & Associates, gave a PowerPoint presentation that covered and explained the following:

- Background, purpose, and goal requirements of the FAA-DBE program.
- Overview of the DBE goal methodology and basic requirements, such as use of most refined data, identification of a normal market area, and employment of a two-step process in establishing the overall 3-year DBE goals.
- Calculation of the base-figure goal (step 1), and adjusted goal (step 2), through "weighting" and consideration of indicators of "capacity".

Aubri Shauger-Haley, of Pinellas County Economic Development, provided an overview of Pinellas County's Small Business Enterprise (SBE) Program.

Stakeholder Meeting Q&A

1. Will the airport hold networking events for DBEs to meet the prime contractors and consultants?

The airport does not have networking events scheduled at this time.

- 2. What is being done to simplify the DBE certification process?

 If your firm is located outside of Florida, you are required to be certified in your home state first. The USDOT DBE program now has an interstate certification. This process allows for a simpler certification process.
- 3. How are DBEs notified of opportunities?

 Opportunities are posted on OpenGov. DBEs should subscribe to OpenGov to receive notifications of upcoming opportunities.

 https://pinellas.gov/services/apply-as-a-pinellas-county-vendor/
- 4. How can we find out who are the prime contractors?

 The purchasing department has a list of prime contractors. This can be found on OpenGov. https://pinellas.gov/services/apply-as-a-pinellas-county-vendor/
- 5. For an MEP Engineering Design firm. Do firms get selected individually or are they selected as a team such as Architect, structural, civil etc.?

 This can be done either way depending on how the Airport's purchasing department/engineer packages the project.
- 6. Are all RFPs and RFQs provided at OpenGov? Yes.
- 7. Does each project have an independent goal? Or will the goal set for the 3 years be for all projects?

The goal developed will be the overall goal for all projects during the 3-year period. The airport has individual goals for individual projects. Those goals can be higher or lower depending on the availability of firms.

- 8. Are primes reporting monthly payments to subs? Yes.
- 9. Does Pinellas County Airport receive any grant dollars for operations? No. We receive federal money for capital projects only.
- 10. Who from the Airport assist DBEs with enforcement after bid opening?

 The DBELO, Purchasing Department, and Airport Engineer look at the specifics to make sure a good faith effort was put forward.
- 11. As an ACDBE why do I not see goals for tenants of the airport in the methodology? This is the DBE goal methodology for construction related projects for FY2024-2026. The airport also has an ACDBE program with ACDBE goals. The next ACDBE goal methodology is due October 1, 2024.
- 12. Why is race-conscious not included, as there have been several area agencies reporting past discrimination via disparity studies?

 Race-conscious is included in the goal methodology. The overall goal is 6.80% and the Race-conscious/Race-Neutral splits are 6.13% and 0.67%.
- 13. If our company is certified by the state, does this translate to Pinellas County or should we seek direct certification from individual municipalities?

 Yes, you will have to seek certification from individual municipalities. If you are certified by the Florida UCP, you are certified throughout the state for the DBE program.

Stakeholder Meeting Attendee List

First Name	Organization
Yvette Aehle	St. Pete-Clearwater International Airport
Tony Best	Tensus Technology
Maureen Blackford	Birkitt Environmental Services
Julin Burdine	J Burd Studio
John Charlton	Matson-Charlton Surety Group
Richard Coates	Gulf Atlantic Engineers
Renee Culmer	American Infrastructure Development, Inc.
Wanda Gilbert	WANDA'S INC
Amy Guisinger	TSFGeo
Villard Houston Jr.	V. H. Jr. & Associates, Inc
Milton Jones	APEX Digital Imaging, Inc.
Moise LaPointe	Aptitude Associates
Marchelle Lamaster	Lite Wing
LaTonya Leonard	Bold Holdings, LLC
Corey McCaster	Pinellas County Economic Development
Chris McKinney	St. Pete-Clearwater International Airport (PIE)
Jessica McRory	AREHNA Engineering, Inc.
Jose Olvera	Vinco engineering LLC
Angela Provencio	Busto Plumbing Services, Inc.
Michael Reeves	Reevesbuilding,Plumbing and Roofing
Albert Rodriguez	Ambient Technologies, Inc.
Catalina Rousseau	Tensus Technology
Nina Sennott	Contract Furniture, Inc.
Gwen Sevaaetasi	Hillsborough County MBE/SBE Programs
Aubri Shauger-Haley	Pinellas County
Jenee Skipper	Pinellas County Economic Development
	Florida State Minority Supplier Development
Tim Spearman	Council
Grady Terrell	Terrell Industries
Raychele Walls	Maximizing Grace
Sarah Zarate Torrivilla	Casale Design Source
Wilfred Nixon	Ken Weeden & Associates, Inc.
Nikki Jefferies	Ken Weeden & Associates, Inc.