

Goal Setting Methodology

For FY 2021, the Airport used the following method to calculate its annual percentage goal:

Step 1: Determine a Base Figure for the Overall Goal – The Airport calculated a base figure using the criteria suggested in 49 CFR Part 26.45. The determination was based on a level of DBE participation relative to all businesses ready, willing and able to participate on federally assisted contracts, and reflected a level the Administration would expect in the absence of discrimination.

Step 1a: The Airport has identified the type of work items for all projects, based on the Scope of Work, and the North American Industrial Code System (NAICS) classifications in the construction, professional services and material/supplier categories. www.naics.com

237110 – Utility Construction
237310 – Prime Contractors
238110 – Misc. Concrete Specialty Works
238210 – Electrical
238910 – Site Preparation and Earthwork
238990 – Other Specialty Contractors
423320 – Asphalt and Concrete Supply
423510 – Pipe Supply
423610 – Electrical Supply
484220 – Trucking/Hauling
541330 – Engineering Services
541370 – Surveying and Mapping
541380 – Testing Laboratories
561730 – Seeding and Erosion Control
561790 – Sweeping
561990 – Traffic Control

Using these codes, the DBE businesses within the Market area were compiled from WSDOT Certified Firms Directory (<https://omwbe.diversitycompliance.com/>). This resulted in 405 DBE firms in Snohomish County Airport's Market Area.

Step 1b: Using the Census Bureau's 2017 County Business Pattern (<https://www.census.gov/data/tables/2017/econ/cbp/2017-cbp-tables.html>), the Airport determined 6706 non-DBE and DBE businesses corresponding to the selected work areas that were in the airport's market area. A base figure for the overall goal was determined by weighting. A weighted percentage was calculated by multiplying the approximate total percentage of the contract dollars for the upcoming future projects allocated for each work area classification by the divided the number of DBE firms over the total number of

reasonable firms that can perform the work. The base figure, calculated by adding the individual weighted percentages, is 6.46%. This data is shown in Table 2 below.

TABLE 2					
FY 2021 Determination of Base Figure					
NAICS Classification	NAICS Code	Number of DBE Firms in Airport Market Area	Number of All Firms in Airport Market Area	Approximate Percentage of Contract Dollars	Weighted Percentage
Utility Construction	237110	31	139	4%	0.89%
Prime Contractors	237310	3	124	32.5%	0.79%
Misc. Concrete Specialty Works	238110	22	377	5%	0.29%
Electrical	238210	25	1101	5%	0.11%
Site Preparation and Earthwork	238910	42	543	5%	0.39%
Other Specialty Contractors	238990	43	399	2%	0.22%
Asphalt and Concrete Supply	423320	6	56	5%	0.54%
Pipe Supply	423510	2	140	1%	0.01%
Electrical Supply	423610	12	218	0.5%	0.03%
Trucking/Hauling	484220	53	279	3%	0.57%
Engineering Services	541330	67	1114	30%	1.80%
Surveying and Mapping	541370	14	84	3%	0.50%
Testing Laboratories	541380	5	122	1%	0.04%
Seeding and Erosion Control	561730	33	1652	1%	0.02%
Sweeping	561790	22	171	1%	0.13%
Traffic Control	561990	25	187	1%	0.13%
Total		405	6706	100%	6.46%

Step 2: Adjust Base Figure

In determining if an adjustment to the base figure was needed, the airport reviewed past participation levels and sought out disparity studies.

Step 2a. Review Past Participation. The Airport reviewed its DBE past participation levels to determine if an adjustment to the base figure was required. A summary of past participation levels is shown in Table 3. The average DBE achievement for FAA funded projects was 2.26%. To adjust the goal for past participation, the base figure (6.46%) was averaged with the median past DBE achievement $[(6.46+2.26)/2 = 4.36\%]$. **The adjusted goal for past participation is 4.36%.**

TABLE 3						
DBE Past Participation						
Year	Brief Description	Overall Goal	Race Neutral Goal	Race Conscious Goal	Actual DBE Achievement	Actual Race Neutral
2014	Pavement Rehabilitation	6.73	6.73	0	0.92	0.92
2015	16R-34L & Taxiway Alpha Electrical Improvements (Pavement Rehabilitation)	4.87	4.87	0	1.53	1.53
2016	Rehabilitation of Taxiway Hotspots 1 & 2 Improvements	4.87	4.87	0	0	0
2017	Rehabilitation of Taxiway Hotspot 1 & 2 Improvements	4.87	4.87	0	2.88	2.88
2017	Taxiway Bravo and North Ramp Reconstruction Project (AIP 057)	4.87	4.87	0	8.25	8.25
2018	Runway 16R-34L Fog Seal Project (AIP 058)	4.87	4.87	0	0	0

Step 2b. Identify Disparity Studies. The Washington State Department of Transportation (WSDOT) completed a disparity study in 2019 titled Washington State Airports Disparity Study, Colette Holt & Associates.

<https://wsdot.wa.gov/sites/default/files/2016/05/09/OEO-Washington-State-Airports-Disparity-Study-2019.pdf>

While the disparity study found that the airport DBE programs in WSDOT are in compliance, more could be done to level the playing field for DBE business. The study states the following:

“There are disparities of various magnitudes in opportunities for FAA funded contracts and subcontracts. Outside the industries with high concentrations of DBEs, minority and women entrepreneurs still face challenges in contracting opportunities. That a few firms have overcome systemic barriers to achieve contracts from the Airports does not mean that the playing field is level for all firms.”

Some recommendations to help level the playing field include: increased access to contracting information and outreach to DBEs; partnering with other organizations to provide outreach and networking opportunities for DBES, prime contractors and Airport staff; focus on leveling the playing field for prime contract participation, including through reducing contract size; providing annual forecast of projected contracts; and providing training to DBEs on how to perform on FAA-assisted work and Airport staff about the DBE program. As the disparity study did not provide recommendations for adjusting contract goals, no adjustment has been made based on the disparity study.

Step 2c. Consult Minority Professional Associations. In establishing our overall goal, we consulted with WSDOT and their DBE Program manager to obtain information concerning availability of DBE and non-DBE businesses and the effects of discrimination on opportunities for DBEs.

Breakout of Estimated Race-Neutral and Race-Conscious Participation (See 26.51)

The Administration will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation on Airport DOT/FAA-assisted projects. Snohomish County has adopted a Snohomish County Federally Funded Transportation Program/Title VI Plan, updated April 30, 2019 that will be used for applicable portions of this CFR 49 Part 26 DBE Program. In addition, the following race-neutral measures may be used to increase DBE participation:

- Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by DBEs and other small businesses and by making contracts more accessible to small businesses, by means such as those provided under §26.39 of this part.
- Providing technical assistance and other services;
- 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.
- Provide information on the County website with contact information for the DBE directory.

As Washington and Snohomish County Airport is located in the 9th Circuit Court of Appeals decision in the Western States Paving Company vs. Washington State Transportation which affects the breakout of the race-neutral/race-conscious portions of the goal and in accordance with the recommendations of the disparity study available.

Per federal regulations, the entire goal of 4.36% will be race-neutral.

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

We will maintain data separately on DBE achievements in those contracts with and without contract goals, respectively.

PUBLIC PARTICIPATION

Consultation: Section 26.45(g)(1).

Before establishing the overall goal, the Administration consulted with the Snohomish County Department of Finance Purchasing Division. The Snohomish County Department of Finance Purchasing Division is very active in the small business community and conducts numerous outreach efforts through the year to involve minority and woman's organizations and contractor groups. These efforts include:

- In-person meetings with small business subcontractors to discuss opportunities, barriers, and provide information on where to obtain resources needed
- Attended outreach events involving minority and woman's organizations
- Quarterly email distribution of project opportunities to small, minority, and woman businesses
- Conducts DBE training seminars

Additionally, the Snohomish County Department of Finance Purchasing Division works closely with the Snohomish County Procurement Technical Assistance Center (PTAC). PTAC offers webinars, one-on-one counseling, workshops, and other support for local based businesses. PTAC and the County co-sponsor several outreach events each year. In June 2017, PTAC and the County co-sponsored a roundtable event. This event allowed suppliers to meet directly with buyers in either a small group or one-on-one. The Snohomish County Department of Finance Purchasing Division is in the process of scheduling another roundtable event for Feb 2018 with PTAC.

The Snohomish County Department of Finance Purchasing Division also works closely with the Snohomish County Economic Alliance. The Alliance holds several meetings a month to promote local business and provide network opportunities. The County attends at least one event each quarter.

The following comments were received by the Snohomish County Department of Finance Purchasing Division during these outreach events and consultations:

1. DBE, minority, and woman organizations face difficulty and discrimination in contracting. Often, they are not aware of project opportunities. Additionally, they are not aware of certain resources available to them. The purchasing division works to help provide assistance in preparing bids and provides information on where to obtain bonding and insurance.
2. Another factor in contracting with DBEs and contractors in general, is the large number of ongoing projects in area. Community Transit (bus) and Sound Transit (light rail) have both recently passed tax increases. The County and the Airport competes with these agencies and others for the local DBE/MBE contractors. Although studies may show there are contractors in the area, the studies do not provide data on capacity/availability.

PUBLIC NOTICE

The Administration published a notice of the proposed overall goal on the County website, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the airport for 30 days following the date of the notice. This notice will also inform the public that the Snohomish County Airport and the DOT/FAA will accept comments on the goals for 45 days from the date of the notice.

Snohomish County Airport/Paine Field Administration has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation, 49 CFR Part 26. For Fiscal Year 2021, the Airport has established an overall goal of 4.36% of the Federal financial assistance it will receive for improvements to the airport. The Airport estimates it will meet this goal through 4.36% race neutral means. The proposed DBE goal and its rationale will be available for review between 8:00 a.m. and 5:00 p.m. at Snohomish County Airport, 3220 100th Street SW, Everett, WA 98204.

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

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9191 Jamaica Street
Englewood, CO 80112
Direct (720) 286-1070
Nicolette.Lind@Jacobs.com

No comments were received.

CONTRACT GOALS

The Airport will use contract goals to meet any portion of the overall goal that the recipient 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 the recipient's 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. It need not establish a contract goal on every such contract, and the size of the contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work and availability of DBE's to perform the particular type of work).

We will express our contract goals as a percentage of the total amount of a DOT-assisted contract.

Please contact Nicolette Lind, Project Engineer at Jacobs Engineering, with any questions or comments regarding this methodology:

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