

**DBE GOAL METHODOLOGY  
49 CFR PART 26  
GRIFFIN-SPALDING COUNTY AIRPORT  
FISCAL YEAR 2024 – FY 2026**

**FISCAL YEAR 2024**

A. Update of Goals - To make the program as useful as possible to the public, the Griffin-Spalding County Airport Authority will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required, for approval: Amount of Overall Goal Section, Method used for establishing Overall Goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually in the overall goal submission.

B. Amount of Goal -The Griffin-Spalding County Airport Authority's overall goal for FY 2024 is 7.30% of the Federal financial assistance that we will expend in FAA-assisted contracts. The Airport will receive FAA AIP grants in the amount of approximately \$2,544,700.00 in FY 2024. We expect to let FAA sponsored projects during this FY in the amount of \$2,544,700.00 this means that our DBE goal is set at \$185,767.00. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for the Griffin-Spalding County Airport the first step was to establish the availability of ready, willing, and able DBE businesses that are capable of participating in the type of contracts that are programmed during FY 2024. The project that is anticipated at the Griffin-Spalding County Airport involves Airfield Pavement Rehabilitation, Design of Parallel Taxiway, Design of Relocation of the Terminal Apron, Design of Replacement of the FBO Terminal Building, DBE Plan Update, and Perimeter Fencing Design and Installation, along with the associated professional efforts required for performance of the previously mentioned project. An analysis of the project indicates that funds will be expended in the following areas:

<b>GRIFFIN-SPALDING COUNTY AIRPORT PROJECT ANALYSIS FY 2024</b>			
<b>TASK</b>	<b>NAICS</b>	<b>AMOUNT</b>	<b>PERCENTAGE</b>
General Contractors	236220	\$1,894,500	74.45%
Fencing	238990	\$175,500	6.90%
Engineering	541330	\$274,500	10.79%
Survey	541370	\$67,500	2.65%
Testing	541380	\$54,000	2.12%
Consulting	541611	\$56,250	2.21%
Environmental Engineering	541620	\$22,500	0.88%
<b>TOTAL</b>		<b>\$2,544,750.00</b>	<b>100.00%</b>

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

Total DBE Firms in the County by NAICS Code of Work to be Performed X 100 = Base Figure  
Total Firms in the County by NAICS Code of Work to be Performed

After consideration of the size and scope of the projects over the FY 2024-FY 2026 goal period, and after conversation with airport professionals, it was determined to be reasonable to use the market area of the county where the airport is located, as well as the surrounding counties. The market area counties are as follows: Spalding, Butts, Lamar, Pike, Meriwether, Coweta, Fayette, Clayton, and Henry counties in Georgia. It was also determined that the most comprehensive directory for DBE firms in Georgia is the UCP DBE Directory that was established by the Georgia Department of Transportation. This directory contains DBE firms that are certified in accordance with 49 CFR Part 26. The list was refined by identifying firms that could participate in the project by their appropriate NAICS code. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau’s County Business Pattern (CBCBP) and the identification of the NAICS codes that were the same as those identified from the Directory. With these figures in hand, we compute our Base Figure using the following mathematics:

$$\frac{Base}{Figure} = \begin{aligned} &.7445\left(\frac{GNAICS236220}{NAICS236220}\right) + .0690\left(\frac{GNAICS238990}{NAICS238990}\right) + .1079\left(\frac{GNAICS541330}{NAICS541330}\right) + \\ &.0265\left(\frac{GNAICS541370}{NAICS541370}\right) + .0212\left(\frac{GNAICS541380}{NAICS541380}\right) + .0221\left(\frac{GNAICS541611}{NAICS541611}\right) + \\ &.0080\left(\frac{GNAICS541620}{NAICS541620}\right) \end{aligned}$$

GNAICS- GA/ DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{Base}{Figure} = \begin{aligned} &.7445\left(\frac{1}{24}\right) + .0690\left(\frac{11}{72}\right) + .1079\left(\frac{5}{96}\right) + \\ &.0265\left(\frac{0}{25}\right) + .0212\left(\frac{1}{9}\right) + .0221\left(\frac{22}{139}\right) + \\ &.0088\left(\frac{1}{9}\right) \end{aligned}$$

$$\frac{Base}{Figure} = \begin{aligned} &.0310 + .0105 + .0056 + \\ &.0000 + .0024 + .0035 + \\ &.0010 \end{aligned}$$

$$\frac{Base}{Figure} = 5.40\%$$

STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions that have occurred at the Griffin-Spalding County Airport. The Sponsor has considered the suggested options outlined in 49 CFR Part 26 and determined there are no applicable disparity studies, recent legal case information from the relevant jurisdictions, or evidence from related fields, that indicates evidence of barriers to entry or competitiveness of DBEs in the market area that is sufficient to warrant making any further adjustment. The Sponsor has considered the suggested options outlined in 49 CFR Part 26 and determined that past performance is the information that will be used to determine if an adjustment to our Base Figure is warranted. To this end, we investigated three airports with similar projects. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2024-time frame at Griffin Spalding Airport.

<b>PREVIOUS FAA PROJECTS</b>			
<b>YEAR</b>	<b>LOCATION</b>	<b>PROJECT TYPE</b>	<b>% OF DBE PARTICIPATION</b>
2021	Thomaston	Runway Rehabilitation	10.20%
2021	Americus	Apron Rehabilitation	7.60%
2021	Sylvester	Runway/Apron Rehabilitation	9.20%*
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	9.20%
BASE FIGURE	<u>+5.40%</u>
	14.60% ÷ 2 = 7.30%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 7.30%. It was felt that the Base Figure of 5.40% should be adjusted for this variance. The Average Percentage of 7.30% is established as the goal for DBE participation at the Griffin-Spalding Airport for FY 2024.

D. PROCESS - The Authority’s efforts are to establish a level playing field for the participation of DBEs. Following a stakeholder consultation, the Authority has published a public notice on the FAA website of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Authority’s Airport Project Manager for 30 days following the date of the notice, and informing the public that the Authority and FAA will accept comments on the goals for 30 days from the date of the notice. This information was made available to the Office of Minority Business Development at the State of Georgia. The notice will include the Authority’s and FAA’s addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Authority’s responses. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Authority’s responses. We

will begin using our overall goal on October 1 of each year, unless we have received other instructions from the DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). Public comments have been requested for the FY 2024 goal and the 30-day comment period is underway. Any comments received from the public advertisement, or the other coordination will be evaluated, and necessary changes will be made to the goal and included in the contract documents for the project. Consultation discussions were held with the following agencies and persons on July 10, 2023, at 9:00 AM EDT, with comments received regarding additional outreach efforts to DBEs in the future.

<b>GRIFFIN-SPALDING COUNTY AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Greg Teague, PE - CEO Croy	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Mr. Patrick Lenton, PE Croy	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Mr. Robert Mohl, Airport Director Griffin-Spalding County Airport	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Taffy Pippin Consulting, LLC Ms. Taffy Pippin, Consultant	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts

Any comments received from the public advertisement or other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project. Public comments have been requested and the 30-day comment period is underway.

**E. RACE-CONSCIOUS AND RACE-NEUTRAL GOALS** - The Authority will make every feasible effort to meet its goal through race-neutral means. Each time the Authority submits an overall goal for review by the FAA, the Authority will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Authority’s overall goal. The Authority will establish contract goals to meet any portion of an overall goal when the Authority does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 7.30%, we will obtain 7.20% of the goal from race-conscious participation and 0.10% via race-neutral participation measures.

This breakout was established by computing the variance of the level of DBE participation vs. DBE goal on the project considered in Step 2 (see page 3) of the Previous FAA Projects. The Median is 0.10% and is established as the race-neutral goal for FY 2024. The following is the data base upon which the level of variance was computed using the “Previous FAA Projects” information:

PROJECT DBE GOAL VARIANCE LIKE-TYPE FAA PROJECTS				
YEAR	LOCATION	DBE GOAL	DBE PARTICIPATION	VARIANCE
2021	Thomaston	9.90%	10.20%	0.30%
2021	Americus	9.50%	7.60%	-1.90%
2021	Sylvester	9.10%	9.20%	0.10%*
*Median				

**F. CONTRACT GOALS**

Contract goals will be used to meet any portion of the overall goal which the Authority 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.

We will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. We 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). The Authority will express the contract goals as a percentage of the Federal share of a DOT-assisted contract.

**G. THREE YEAR GOAL:** Based on the methodologies and calculations for FY 2024 – FY 2026, Griffin-Spalding County Airport submits the following average as a three-year goal.

FY 2024	7.30%
FY 2025	7.44%
FY 2026	+ <u>8.90%</u>
	23.64% ÷ 3 = 7.88%

**FISCAL YEAR 2025**

**A. Update of Goals -** To make the program as useful as possible to the public, the Griffin-Spalding County Airport Authority will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required, for approval: Amount of Overall Goal Section, Method used for establishing Overall Goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually in the overall goal submission.

**B. Amount of Goal -**The Griffin-Spalding County Airport Authority's overall goal for FY 2025 is 7.44% of the Federal financial assistance that we will expend in FAA-assisted contracts. The Airport will receive FAA AIP grants in the amount of approximately \$4,401,000.00 in FY 2025. We expect to let FAA sponsored projects during this FY in the amount of \$4,401,000.00 this means that our DBE goal is set at \$327,434.00. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for the Griffin-Spalding County Airport the first step was to establish the availability of ready, willing, and able DBE businesses that are capable of participating in the type of contracts that are programmed during FY 2025. The project that is anticipated at the Griffin-Spalding County Airport involves Master Plan and ALP Update, Relocation of the Parallel Taxiway and Terminal Apron, Replacement of FBO Terminal Building, Land Acquisition Services, and Runway 14/32 Improvements along with the associated professional efforts required for performance of the previously mentioned projects. An analysis of the project indicates that funds will be expended in the following areas:

<b>GRIFFIN-SPALDING COUNTY AIRPORT PROJECT ANALYSIS FY 2025</b>			
<b>TASK</b>	<b>NAICS</b>	<b>AMOUNT</b>	<b>PERCENTAGE</b>
General Contractors	236220	\$855,000	19.43%
Street & Highway	237310	\$2,493,000	56.65%
Electrical	238210	\$153,000	3.48%
Plumber	238220	\$27,000	0.61%
Painting	238320	\$54,000	1.23%
Site Prep	238910	\$180,000	4.09%
Flooring	442210	\$45,000	1.02%
Architectural Services	541310	\$45,000	1.02%
Engineering	541330	\$288,000	6.54%
Survey	541370	\$13,500	0.31%
Testing	541380	\$45,000	1.02%
Consulting	541611	\$31,500	0.72%
Environmental Engineering	541620	\$76,500	1.74%
Planning	541690	\$67,500	1.53%
Landscaping	561730	\$27,000	0.61%
<b>TOTAL</b>		<b>\$4,401,000.00</b>	<b>100.00%</b>

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by NAICS Code of Work to be Performed}}{\text{Total Firms in the State by NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

After consideration of the size and scope of the projects over the FY 2024-FY 2026 goal period, and after conversation with airport professionals, it was determined to be reasonable to use the market area of the county where the airport is located, as well as the surrounding counties. The market area counties are as follows: Spalding, Butts, Lamar, Pike, Meriwether, Coweta, Fayette, Clayton, and Henry counties in Georgia. It was also determined that the most comprehensive directory for DBE firms in Georgia is the UCP DBE Directory that was established by the Georgia Department of Transportation. This directory contains DBE firms that are certified in accordance with 49 CFR Part 26. The list was refined by identifying firms that could participate in the project by their appropriate NAICS code. The resulting number will be used as the numerator in determining the Base Figure.

$$\frac{Base}{Figure} = .1943 \left( \frac{GNAICS236220}{NAICS236220} \right) + .5665 \left( \frac{GNAICS237310}{NAICS237310} \right) + .0348 \left( \frac{GNAICS238210}{NAICS238210} \right) + .0061 \left( \frac{GNAICS238220}{NAICS238220} \right) + .0123 \left( \frac{GNAICS237320}{NAICS237320} \right) + .0409 \left( \frac{GNAICS238910}{NAICS238910} \right) + .0102 \left( \frac{GNAICS442210}{NAICS442210} \right) + .0102 \left( \frac{GNAICS541310}{NAICS541310} \right) + .0654 \left( \frac{GNAICS541330}{NAICS541330} \right) + .0031 \left( \frac{GNAICS541370}{NAICS541370} \right) + .0102 \left( \frac{GNAICS541380}{NAICS541380} \right) + .0072 \left( \frac{GNAICS541611}{NAICS541611} \right) + .0174 \left( \frac{GNAICS541620}{NAICS541620} \right) + .0153 \left( \frac{GNAICS541690}{NAICS541690} \right) + .0061 \left( \frac{GNAICS561730}{NAICS561730} \right)$$

GNAICS- GA/ DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{Base}{Figure} = .1943 \left( \frac{5}{76} \right) + .5665 \left( \frac{1}{24} \right) + .0348 \left( \frac{8}{178} \right) + .0061 \left( \frac{3}{257} \right) + .0123 \left( \frac{4}{28} \right) + .0409 \left( \frac{7}{94} \right) + .0102 \left( \frac{0}{21} \right) + .0102 \left( \frac{1}{13} \right) + .0654 \left( \frac{5}{96} \right) + .0031 \left( \frac{0}{25} \right) + .0102 \left( \frac{1}{9} \right) + .0072 \left( \frac{22}{139} \right) + .0174 \left( \frac{1}{9} \right) + .0153 \left( \frac{1}{36} \right) + .0061 \left( \frac{5}{238} \right)$$

$$\frac{Base}{Figure} = .0128 + .0236 + .0016 + .0001 + .0018 + .0031 + .0000 + .0008 + .0034 + .0000 + .0011 + .0011 + .0019 + .0004 + .0001$$

$$\frac{Base}{Figure} = 5.18\%$$

STEP 2: STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions that have occurred at the Griffin-Spalding County Airport. The Sponsor has considered the suggested options outlined in 49 CFR Part 26 and determined there are no applicable disparity studies, recent legal case information from the relevant jurisdictions, or evidence from related fields, that indicates evidence of barriers to entry or competitiveness of DBEs in the market area that is sufficient to warrant making any further adjustment. The Sponsor has considered the suggested options outlined in 49 CFR Part 26 and determined that past performance is the information that will be used to determine if an adjustment to our Base Figure is warranted. To this end, we investigated three airports with similar projects. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2025-time frame at Griffin Spalding Airport.

<b>PREVIOUS FAA PROJECTS</b>			
<b>YEAR</b>	<b>LOCATION</b>	<b>PROJECT TYPE</b>	<b>% OF DBE PARTICIPATION</b>
2020	Toccoa	Parallel Taxiway	9.50%
2020	Claxton	Parallel Taxiway, Apron	9.70%*
2020	Hazlehurst	Runway Rehabilitation	12.40%
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	9.70%
BASE FIGURE	+ 5.18%
	<u>14.88%</u> ÷ 2 = 7.44%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 7.44%. It was felt that the Base Figure of 5.18% should be adjusted for this variance. The Average Percentage of 7.44% is established as the goal for DBE participation at the Griffin-Spalding Airport for FY 2025.

D. PROCESS - The Authority’s efforts are to establish a level playing field for the participation of DBEs. Following a stakeholder consultation, the Authority has published a public notice on the FAA website of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Authority’s Airport Project Manager for 30 days following the date of the notice, and informing the public that the Authority and FAA will accept comments on the goals for 30 days from the date of the notice. This information was made available to the Office of Minority Business Development at the State of Georgia. The notice will include the Authority’s and FAA’s addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Authority’s responses. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Authority’s responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from the DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). Public comments have been requested for the FY 2025 goal and the 30-day comment period is underway. Any comments received from the public advertisement, or the other coordination will be evaluated, and necessary changes will be made to the goal and included in the contract documents for the project. Consultation discussions were held with the following agencies and persons on July 10, 2023, at 9:00 AM EDT, with comments received regarding additional outreach efforts to DBEs in the future.

<b>GRIFFIN-SPALDING COUNTY AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Greg Teague, PE - CEO Croy	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Mr. Patrick Lenton, PE Croy	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Mr. Robert Mohl, Airport Director Griffin-Spalding County Airport	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Taffy Pippin Consulting, LLC Ms. Taffy Pippin, Consultant	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts

Any comments received from the public advertisement or other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project. Public comments have been requested and the 30-day comment period is underway.

E. RACE-CONSCIOUS AND RACE-NEUTRAL GOALS - The Authority will make every feasible effort to meet its goal through race-neutral means. Each time the Authority submits an overall goal for review by the FAA, the Authority will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Authority’s overall goal. The Authority will establish contract goals to meet any portion of an overall goal when the Authority does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 7.44%, we will obtain 7.44% of the goal from race-conscious participation and 0.00% via race-neutral participation measures.

This breakout was established by computing the variance of the level of DBE participation vs. DBE goal on the project considered in Step 2 (see page 8) of the Previous FAA Projects. The Median is a negative number, therefore 0.00%, is established as the race-neutral goal for FY 2025. The following is the data base upon which the level of variance was computed using the “Previous FAA Projects” information:

<b>PROJECT DBE GOAL VARIANCE LIKE-TYPE FAA PROJECTS</b>				
YEAR	LOCATION	DBE GOAL	DBE PARTICIPATION	VARIANCE
2020	Toccoa	11.20%	9.50%	-1.70%
2020	Claxton	10.09%	9.70%	-0.39%*
2020	Hazlehurst	11.30%	12.40%	1.10%
*Median				

F. CONTRACT GOALS

Contract goals will be used to meet any portion of the overall goal which the Authority 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.

We will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. We 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). The Authority will express the contract goals as a percentage of the Federal share of a DOT-assisted contract.

G. THREE YEAR GOAL: Based on the methodologies and calculations for FY 2024 – FY 2026, Griffin-Spalding County Airport submits the following average as a three-year goal.

FY 2024	7.30%
FY 2025	7.44%
FY 2026	+ <u>8.90%</u>
	23.64% ÷ 3 = 7.88%

References:

*Georgia UCP List of Certified DBE Firms June 2023*  
*2021 – U.S. Census Bureau, June 2023*

**FISCAL YEAR 2026**

A. Update of Goals - To make the program as useful as possible to the public, the Griffin-Spalding County Airport Authority will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required, for approval: Amount of Overall Goal Section, Method used for establishing Overall Goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually in the overall goal submission.

B. Amount of Goal -The Griffin-Spalding County Airport Authority's overall goal for FY 2026 is 8.90% of the Federal financial assistance that we will expend in FAA-assisted contracts. The Airport will receive FAA AIP grants in the amount of approximately \$632,250.00 in FY 2026. We expect to let FAA sponsored projects during this FY in the amount of \$632,250.00; this means that our DBE goal is set at \$56,270.00. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for the Griffin-Spalding County Airport the first step was to establish the availability of ready, willing and able DBE businesses that are capable of participating in the type of contracts that are programmed during FY 2026. The project that is anticipated at the Griffin-Spalding County Airport involves Runway Lighting Replacement, Design of Segmented Circle and Visual “North-Compass Marker”, Land Acquisition Professional Services, Runway 14/32 Improvements, Installation of Wash Rack Water System, along with the associated professional efforts required for performance of the previously mentioned project. An analysis of the project indicates that funds will be expended in the following areas:

<b>GRIFFIN-SPALDING COUNTY AIRPORT PROJECT ANALYSIS FY 2026</b>			
<b>TASK</b>	<b>NAICS</b>	<b>AMOUNT</b>	<b>PERCENTAGE</b>
General Contractors	236220	\$306,000	48.39%
Street & Highway	237310	\$135,000	21.35%
Electrical	238210	\$13,500	2.14%
Plumber/HVAC	238220	\$13,500	2.14%
Engineering	541330	\$81,000	12.81%
Survey	541370	\$18,000	2.85%
Testing	541380	\$18,000	2.85%
Consulting	541611	\$26,550	4.20%
Environmental Engineering	541620	\$20,700	3.27%
<b>TOTAL</b>		<b>\$632,250.00</b>	<b>100.00%</b>

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by NAICS Code of Work to be Performed}}{\text{Total Firms in the State by NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

After consideration of the size and scope of the projects over the FY 2024-FY 2026 goal period, and after conversation with airport professionals, it was determined to be reasonable to use the market area of the county where the airport is located, as well as the surrounding counties. The market area counties are as follows: Spalding, Butts, Lamar, Pike, Meriwether, Coweta, Fayette, Clayton, and Henry counties in Georgia. It was also determined that the most comprehensive directory for DBE firms in Georgia is the UCP DBE Directory that was established by the Georgia Department of Transportation. This directory contains DBE firms that are certified in accordance with 49 CFR Part 26. The list was refined by identifying firms that could participate in the project by their appropriate NAICS code. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau’s County Business Pattern (CBCBP) and the identification of the NAICS codes that were the same as those identified from the Directory. With these figures in hand, we compute our Base Figure using the following mathematics:

$$\frac{Base}{Figure} = .4839 \left( \frac{GNAICS236220}{NAICS236220} \right) + .2135 \left( \frac{GNAICS237310}{NAICS237310} \right) + .0214 \left( \frac{GNAICS238210}{NAICS238210} \right) + .0214 \left( \frac{GNAICS238220}{NAICS238220} \right) + .1281 \left( \frac{GNAICS541330}{NAICS541330} \right) + .0285 \left( \frac{GNAICS541370}{NAICS541370} \right) + .0285 \left( \frac{GNAICS541380}{NAICS541380} \right) + .0420 \left( \frac{GNAICS541611}{NAICS541611} \right) + .0327 \left( \frac{GNAICS541620}{NAICS541620} \right)$$

GNAICS- GA/ DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{Base}{Figure} = .4839 \left( \frac{5}{76} \right) + .2135 \left( \frac{1}{24} \right) + .0214 \left( \frac{8}{178} \right) + .0214 \left( \frac{3}{257} \right) + .1281 \left( \frac{5}{96} \right) + .0285 \left( \frac{0}{25} \right) + .0285 \left( \frac{1}{9} \right) + .0420 \left( \frac{22}{139} \right) + .0327 \left( \frac{1}{9} \right)$$

$$\frac{Base}{Figure} = .0318 + .0089 + .0010 + .0002 + .0067 + .0000 + .0032 + .0066 + .0036$$

$$\frac{Base}{Figure} = 6.20\%$$

STEP 2: STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions that have occurred at the Griffin-Spalding County Airport. The Sponsor has considered the suggested options outlined in 49 CFR Part 26 and determined there are no applicable disparity studies, recent legal case information from the relevant jurisdictions, or evidence from related fields, that indicates evidence of barriers to entry or competitiveness of DBEs in the market area that is sufficient to warrant making any further adjustment. The Sponsor has determined that past performance is the information that will be used to determine if an adjustment to our Base Figure is warranted. To this end, we investigated three airports with

similar projects. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2026-time frame at Griffin Spalding Airport.

<b>PREVIOUS FAA PROJECTS</b>			
<b>YEAR</b>	<b>LOCATION</b>	<b>PROJECT TYPE</b>	<b>% OF DBE PARTICIPATION</b>
2020	Franklin County	Construct & Design Runway Rehab	11.60%*
2020	Cartersville	Runway Design and Improvements	8.90%
2018	LaGrange	Runway Lighting	30.40%
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	11.60%
BASE FIGURE	+ 6.20%
	<u>17.80% ÷ 2 = 8.90%</u>

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 8.90%. It was felt that the Base Figure of 6.20% should be adjusted for this variance. The Average Percentage of 8.90% is established as the goal for DBE participation at the Griffin Spalding Airport for FY 2026.

D. PROCESS - The Authority’s efforts are to establish a level playing field for the participation of DBEs. Following a stakeholder consultation, the Authority has published a public notice on the FAA website of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Authority’s Airport Project Manager for 30 days following the date of the notice, and informing the public that the Authority and FAA will accept comments on the goals for 30 days from the date of the notice. This information was made available to the Office of Minority Business Development at the State of Georgia. The notice will include the Authority’s and FAA’s addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Authority’s responses. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Authority’s responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from the DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). Public comments have been requested for the FY 2026 goal and the 30-day comment period is underway. Any comments received from the public advertisement, or the other coordination will be evaluated, and necessary changes will be made to the goal and included in the contract documents for the project. Consultation discussions were held with the following agencies and persons on July 10, 2023, at 9:00 AM EDT, with comments received regarding additional outreach efforts to DBEs in the future.

<b>GRIFFIN-SPALDING COUNTY AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
<b>Agency/Organization</b>	<b>Discussion/Information</b>
Greg Teague, PE - CEO Croy	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Mr. Patrick Lenton, PE Croy	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Mr. Robert Mohl, Airport Director Griffin-Spalding County Airport	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Taffy Pippin Consulting, LLC Ms. Taffy Pippin, Consultant	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories, small and DBE contracting, Good Faith Efforts

Any comments received from the public advertisement or other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project. Public comments have been requested and the 30-day comment period is underway.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS:** The Authority, will make every feasible effort to meet its goal through race-neutral means. Each time Griffin-Spalding County Airport Authority submits an overall goal for review by the FAA, the Authority will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Authority’s overall goal. The Authority will establish contract goals to meet any portion of an overall goal when The Authority does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 8.90%, we will obtain 8.90% of the goal from race-conscious participation and 0.00% via race-neutral participation measures.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on the three projects considered in Step 2 (see page 13) of the Previous FAA Projects. The Median is 0.00%, and is established as the race-neutral goal for FY 2026. The following is the data base upon which the level of variance was computed using the “Like Type FAA Projects” information:

<b>PROJECT DBE GOAL VARIANCE GRIFFIN-SPALDING COUNTY AIRPORT LIKE TYPE FAA PROJECTS</b>				
<b>YEAR</b>	<b>LOCATION</b>	<b>DBE GOAL</b>	<b>% OF DBE PARTICIPATION</b>	<b>VARIANCE</b>
2020	Franklin County	11.60%	11.60%	0.00%*
2020	Cartersville	10.30%	8.90%	-1.40%
2018	LaGrange	10.40%	30.40%	20.00%
<b>MEDIAN *</b>				

F. Contract Goals

Contract goals will be used to meet any portion of the overall goal which the Authority 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.

We will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. We 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).

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

G. THREE YEAR GOAL: Based on the methodologies and calculations for FY 2024 – FY 2026, Griffin-Spalding County Airport submits the following average as a three-year goal.

FY 2024	7.30%
FY 2025	7.44%
FY 2026	+ 8.90%
	<u>23.64%</u> ÷ 3 = 7.88%

References:

*Georgia UCP List of Certified DBE Firms June 2023*  
*2021 – U.S. Census Bureau, June 2023*