

ATTACHMENT 5

Section 26.45: Overall DBE Three-Year Goal Methodology

Name of Recipient: The City of So. St. Paul (So. St. Paul Municipal Airport)

Goal Period: FY 2026-2027-2028 – October 1, 2025 through September 30, 2028

| | | |
|--------------------------------------|--------------|----------------------|
| DOT-assisted contract amount: | FY-2026 | \$ 1,650,000. |
| | FY-2027 | \$ 0. |
| | FY-2028 | \$ 1,100,000. |
| | Total | \$ 1,750,000. |

Overall Three-Year Goal: 6.2%, to be accomplished through 6.2% RC and 0.0% RN

Total dollar amount to be expended on DBE's: \$119,660

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

Projects Fiscal Year #1

1. Fuel Farm Expansion – Design
2. Fuel Farm Expansion – Construction Administration
3. Fuel Farm Expansion – Construction
4. Land Acquisition - Design
5. Land Acquisition
6. Taxilane Crack Seal Project

Projects Fiscal Year #2

1. No Projects

Projects Fiscal Year #3

1. Runway and Taxiway Crack Seal Project
2. West Full Parallel Taxiway – Design
3. West Full Parallel Taxiway – Construction Administration
4. West Full Parallel Taxiway – Construction

Market Area: Due to the size of the project, the market area used is the Central Minnesota and the Twin Cities Area.

Step 1. 26.45(c) Actual relative availability of DBE's

Method: Use DBE Directory - <http://mnucp.metc.state.mn.us/Default.aspx>

and Census Bureau Data <http://www.census.gov/econ/cbp/index.html>

The data source or demonstrable evidence used to derive the numerator was:
<http://mnucp.metc.state.mn.us/Default.aspx>

The data source or demonstrable evidence used to derive the denominator was:
<http://www.census.gov/econ/cbp/index.html>

An examination of the anticipated projects for each fiscal year, the availability of the DBE firms by trade classification and the volume of work performed by DBE firms over previous years.

Fiscal Year #1

For FY-2026, we anticipate the award of the following:

| A | B | C | D | E | F | G | H | I |
|---|----------------------|----------------------|--------|------------|--------|-----------|-----------------|--------------------|
| Project Name | Trade Description | NAICS Description | NAICS | Trade (\$) | Census | Directory | DBE (%) (= G/F) | DBE (\$) (= E x H) |
| Fuel Farm Expansion - Design | Engineering Services | Engineering Services | 541330 | \$60,000 | 1687 | 42 | 2.5% | \$1,500 |
| Fuel Farm Expansion – Construction Administration | Engineering Services | Engineering Services | 541330 | \$60,000 | 1687 | 42 | 2.5% | \$1,500 |
| Fuel Farm Expansion - Construction | Specialty Contractor | Specialty Contractor | 238990 | \$680,000 | 1347 | 10 | 0.7% | \$4,760 |
| Land Acquisition – Design | Engineering Services | Engineering Services | 541330 | \$50,000 | 1687 | 42 | 2.5% | \$1,250 |
| Land Acquisition* | - | - | - | \$40,000 | - | - | 0% | \$0 |
| Airfield Crack Seal* | Engineering Services | Engineering Services | 541330 | \$25,000 | - | - | 0% | \$0 |
| Total FY-2026 | | | | \$915,000 | | | 0.68% | \$9,010 |

*Subcontracting and subconsulting not anticipated, DBE goal not required.

Fiscal Year #2

For FY-2027, we anticipate the award of the following:

| A | B | C | D | E | F | G | H | I |
|---------------|-------------------|-------------------|-------|------------|--------|-----------|-----------------|--------------------|
| Project Name | Trade Description | NAICS Description | NAICS | Trade (\$) | Census | Directory | DBE (%) (= G/F) | DBE (\$) (= E x H) |
| No Projects | - | - | - | \$0 | - | - | 0% | \$0 |
| Total FY-2027 | | | | \$0 | | | 0% | \$0 |

Fiscal Year #3

For FY-2028, we anticipate the award of the following:

| A | B | C | D | E | F | G | H | I |
|---|--------------------------------------|--------------------------------------|--------|-------------|--------|-----------|-----------------|--------------------|
| Project Name | Trade Description | NAICS Description | NAICS | Trade (\$) | Census | Directory | DBE (%) (= G/F) | DBE (\$) (= E x H) |
| Airfield Crack Seal – Runway and Taxiway* | Engineering Services | Engineering Services | 541330 | \$25,000 | - | - | 0% | \$0 |
| West Full Parallel Taxiway – Design | Engineering Services | Engineering Services | 541330 | \$125,000 | 1687 | 42 | 2.5% | \$3,125 |
| West Full Parallel Taxiway – Construction Admin | Engineering Services | Engineering Services | 541330 | \$175,000 | 1687 | 42 | 2.5% | \$4,375 |
| West Full Parallel Taxiway - Construction | Highway, Street, Bridge Construction | Highway, Street, Bridge Construction | 237310 | \$900,000 | 268 | 31 | 11.6% | \$104,400 |
| Total FY-2028 | | | | \$1,025,000 | | | 10.2% | \$111,900 |

*Subcontracting and subconsulting not anticipated

The proposed Overall DBE contract Goals are as follows:

- Fiscal Year #1 – 0.98% (\$9,010/\$915,000)

- Fiscal Year #2 – 0%
- Fiscal Year #3 – 10.9% (\$111,900/\$1,025,000)

The base goal projection after weighting is as follows:

- Total Weighted DBE Availability: \$120,910
- Total for All Trades: \$1,940,000

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: 6.2%

Step 2. 26.45(d) Adjustments to Step 1 base figure.

After calculating a base figure of the relative availability of DBEs, evidence was examined to determine what adjustment (if any) was needed to the base figure in order to arrive at the overall goal.

Past History Participation

Our proposed overall three year goal of 6.2% is based on total DBE dollars divided by total Federal dollars.

There is no historical DBE data from a similar project to reference to make an adjustment to the Step 1 base figure therefore, the City is adopting its Step 1 base figure as its overall goal for this three-year goal period.

Furthermore, 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.

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

26.51(b) (1-9)

The recipient will meet the maximum feasible portion of its 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. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
3. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.

The recipient estimates that in meeting its overall goal 6.2%, it will obtain 0.0% from RN participation and 6.2% through RC measures.

This breakout is based on:

- The City does not have enough history of DBE participation on these types of projects 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, we are applying the entire goal of 6.2% to race-conscious participation.

The City will adjust the estimated breakout of RN and RC DBE participation as needed to reflect actual DBE participation (see Section 26.51(f)) 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: Section 26.45(g)(1).

In establishing the overall goal, the City will provide for consultation and publication. This includes 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 will include a scheduled, direct, interactive exchange (e.g., a face-to-face meeting, video conference, teleconference) with as many interested stakeholders as possible focused on obtaining information relevant to the City's goal setting process, and it will occur before we are required to submit our goal methodology to the operating administration for review pursuant to paragraph (f) of this section. We will document in our goal submission the consultation process that we engaged in. Notwithstanding paragraph (f)(4) of this section, we will not implement our proposed goal until we have complied with this requirement.

The City submits its overall DBE three-year goal to DOT on August 1 as required by the set schedule.

Before establishing the overall goal, the City will consult with the So. St. Paul Chamber of Commerce, Minnesota Construction Association, Minnesota Minority Business Development Agency, without limiting consultation to these persons or groups, to obtain 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. Due to the location of the airport, face to face meetings are not always feasible. The City will consult with the Chamber of Commerce and will reach out to other organizations to gather input.

Following the consultation, a notice of the proposed goal will be published on the City's official website, informing the public that the proposed goal and its rationale are available for inspection

during normal business hours at the city administration building for 30 days following the date of the notice, and informing the public that the City and DOT will accept comments on the goals for 45 days from the date of the notice.

If the proposed goal changes following review by the FAA Office of Civil Rights, the revised goal will be posted on the City's official website.

Our overall goal submission to DOT will include a summary of information and comments received during this public participation process and our responses, if any.

No comments have been received.

Contract Goals

The City will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using RN 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 RN means.

The City 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 Federal share of a DOT-assisted contract.