

**CONTRA COSTA COUNTY AIRPORTS  
DISADVANTAGED BUSINESS ENTERPRISE (DBE)  
OVERALL DBE GOAL AND METHODOLOGY  
FOR  
FEDERAL FISCAL YEARS (FFY) 2019-2021  
(Covering the period of October 1, 2018 to September 30, 2021)**

**I. INTRODUCTION**

The Contra Costa County Airports (the County) is required to develop and submit a Disadvantaged Business Enterprise (DBE) Overall Goal for DBE participation as a condition of receiving federal assistance, pursuant Moving Ahead for Progress in the 21<sup>st</sup> Century; 49 CFR Part 26 “Participation by Disadvantaged Business Enterprises in U.S. Department of Transportation Programs” and the Federal Aviation Administration (FAA) Master Funding Agreement.

**II. BACKGROUND**

Effective March 3, 2010, the United States Department of Transportation (“DOT”) issued a final rule affecting the implementation and management of the Department’s Disadvantaged Business Enterprise (“DBE”) program. The final rule, required submission of a goal-setting methodology on a three-year cycle. Pursuant to this final rule, the County is still required to conduct an annual review to account for changes that may warrant an adjustment to the overall goal or make an adjustment based on changed circumstances (i.e. significant change in the legal standards governing the DBE program, new contracting opportunities presented by the availability of new or different grant opportunities, etc.) to ensure the goal and program as a whole are narrowly tailored throughout the goal period. Under the three-year schedule, the County’s DBE goal and methodology submission is due to FAA on August 1, 2018 for proposed FAA funded contracting activities for Federal Fiscal Years (FFY) 2019/21.

**The County herein presents its Proposed Overall DBE Goal Methodology for FFY 2019/21 goal period, which resulted in a 7% Overall DBE Goal.**

**III. DOT-ASSISTED CONTRACTING PROGRAM FOR FFY 2019-2021**

*Table 1* represents the Contra Costa County Airports’ (the County) U.S. DOT-assisted (FAA) contracting program, which includes projects considered in preparing its ***Proposed Overall DBE Goal-Setting Methodology***. The projects have viable subcontracting possibilities and corresponding availability of DBEs, a required criterion for Overall Goal consideration, and are anticipated to be awarded within the respective goal period.

**Table 1**

<b>PROJECT</b>	<b>Total Estimated Cost (Federal Share)</b>
Buchanan - Design New ARFF Equipment Storage Bay	\$237,500
Buchanan Construction - Overlay/Reconstruction of RWY 14L/32R	\$3,990,000
Buchanan - Construction of new ARFF Equipment Storage Bay	\$2,850,000
Buchanan - Design Engineering and Enviro Analysis for Reconstruct/Overlay of Txwy Golf and Runway 01L Run-up	\$190,000
Buchanan - Construction of Asphalt Pavement Reconstruct/Overlay Txwy Golf and Runway 01L Run-up	\$1,140,000
<b>TOTAL</b>	<b>\$8,407,500</b>

**Table 2** provides a summary of work grouped into one (3) primary categories: Construction, Professional Services and Materials and Supplies, utilizing the North American Industry Classification System (NAICS) work categories and comparable 2016 Census Business Patterns NAICS Work Codes. **Table 2** also serves to identify the estimated Federal Dollar Share and the Percent of Federal funding, as follows:

**Table 2**

<b>CONTRACT CATEGORY</b>	<b>NAICS CUCP DATABASE</b>	<b>ESTIMATED FEDERAL DOLLAR SHARE</b>	<b>% OF FEDERAL FUNDING</b>
<b>Construction</b>	237110, 237310, 238110, 238120, 238130, 238160, 238170, 238210, 238220, 238310, 238320, 238910, 238990, 484110, 484220	\$6,074,775.00	72.25%
<b>Professional Services</b>	541310, 541330, 541350, 541370, 541380, 541512, 541611, 541620, 541990	\$1,645,875.00	19.58%
<b>Materials &amp; Supplies</b>	423320, 423390	\$686,850.00	8.17%
<b>TOTAL</b>		<b>\$8,407,500</b>	<b>100%</b>

#### **IV. GOAL METHODOLOGY**

##### ***Step 1: Determination of a Base Figure (26.45)<sup>1</sup>***

To establish Contra Costa County Airports' (County) Base Figure of the relative availability of DBEs to all comparable firms (DBE and Non-DBEs) available to propose on the County's FFYs 2019-2021 DOT-assisted contracting opportunities projected to be solicited during the respective goal period; the County followed one of the five prescribed federal goal-setting methodologies in accordance with 49 CFR Part 26 regulations. This was accomplished by accessing the ***California Unified Certification Program (CUCP) Directory of Certified DBE Firms*** and the ***2016 U.S. Census Bureau County Business Patterns (CBP) Database***. Comparisons were made within the County's market area (defined as Alameda County, Contra Costa County, Marin County, Napa County, Sacramento County, San Francisco County, San Joaquin County, San Mateo County, Santa Clara County, Solano County, Sonoma County, and Stanislaus County) and by specified industries and types of businesses identified in Table 2. The County local market area represents where the substantial majority of the County of Contra Costa Airports' contracting dollars are expended and/or where the substantial majority of contractors and subcontractors bids or quotes are received.

The County of Contra Costa Airports made a concerted effort to ensure that the scope of businesses included in the numerator was as close as possible to the scope included in the denominator. For corresponding detail of all work category classifications grouped, refer to *Table 4*.

- ⇒ ***For the numerator: California UCP DBE Database of Certified Firms***
- ⇒ ***For the denominator: 2016 U.S. Census Bureau's Business Pattern Database (CBP)***

To determine the relative availability of DBEs, the County divided the numerator<sup>2</sup> representing the ratio of ready, willing and able DBE firms, by the denominator<sup>3</sup> representing all firms (DBE and Non-DBEs) available in each work category, see below:

$$\frac{\text{Number of Ready, Willing and Able DBEs}}{\text{Number of All Available Firms (Including DBEs and Non-DBEs)}} = \text{DBE Availability \%}$$

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<sup>1</sup> §26.45 represents Title 49 CFR Part 26 regulatory referenced section.

<sup>1</sup> 26.45 represents Title 49 CFR Part 26 regulatory goal setting methodology reference.

<sup>2</sup> Numerator represents all DBE firms established within the County's market area.

<sup>3</sup> Denominator represents all comparable available established firms within the County's market area.

To determine the appropriate weighting percent by NAICS, the estimated dollar value by NAICS was divided by the total estimated federal dollars for FFY 2019/21. The weighting percent by NAICS was then multiplied by the DBE Availability % to determine the Base Figure % by NAICS, see below:

$$\text{Weighting} \quad \times \quad \text{DBE Availability \%} \quad = \quad \text{Base Figure \% by NAICS}$$

To determine the Step 1 Base Figure, the County added together all Base Figure % by NAICS in Table 3 below, resulting in a 24.69% that was multiplied by 70%, (to account for 30% Prime performance required on most of the County’s contracts) to produce a Step 1 Base Figure of 17%.

**Table 3**

CATEGORY OF WORK	NAICS CODES	Weighting*	DBE Availability %	Base Figure % by NAICS
Water and Sewer Line and Related Structures Construction	237110	1.22%	42.99%	0.52%
Highway, Street and Bridge Construction	237310	4.95%	91.86%	4.55%
Poured Concrete Foundation and Structure Contractors	238110	9.49%	21.81%	2.07%
Structural Steel and Precast Concrete Contractors	238120	1.69%	67.03%	1.14%
Framing Carpentry Contractors	238130	6.78%	14.45%	0.98%
Roofing Contractors	238160	0.85%	2.33%	0.02%
Siding Contractors	238170	0.51%	7.04%	0.04%
Electrical Contractors	238210	5.76%	5.23%	0.30%
Plumbing, Heating, and Air-Conditioning Contractors	238220	3.39%	1.53%	0.05%
Drywall and Insulation Contractors	238310	0.51%	3.88%	0.02%
Painting and Wall Covering Contractors	238320	0.51%	2.68%	0.01%
Site Preparation Contractors	238910	14.68%	23.04%	3.38%
All Other Specialty Trade Contractors	238990	13.90%	20.19%	2.81%
Brick, stone and related construction Material Merchant Wholesalers	423320	6.10%	39.47%	2.41%
Other Construction Material Merchant Wholesaler (stripes/markings)	423390	2.07%	37.04%	0.77%
General Freight Trucking, Local	484110	6.19%	15.05%	0.93%
Specialized Freight Trucking, Local	484220	1.83%	37.16%	0.68%
Architectural Services	541310	1.78%	8.15%	0.15%
Engineering Services	541330	5.51%	13.74%	0.76%
Building Inspection Services	541350	0.34%	47.31%	0.16%
Surveying and Mapping (except Geophysical) Services	541370	0.05%	63.16%	0.03%
Testing Laboratories	541380	1.66%	22.83%	0.38%
Computer System Design Services (CADD)	541512	0.25%	8.93%	0.02%
Administrative Management and General Management Consulting Services	541611	7.37%	21.73%	1.60%
Environmental Consulting Services	541620	0.95%	60.37%	0.57%
All Other Professional, Scientific, and Technical Services (Surveying)	541990	1.66%	21.10%	0.35%
<b>Total:</b>		<b>100%</b>		<b>24.69%</b>
Base Figure 24.69% *70% (30% Prime to Perform Factor) = 17.29%				
17% (Rounded to the nearest whole number)				

**Step 2: Adjusting the Base Figure**

Upon establishing the Base Figure, Contra Costa County Airports (County) reviewed and assessed other known evidence potentially impacting the relative availability of DBEs within the County’s market area, in accordance with prescribed narrow tailoring provisions set forth under 49 CFR Part 26.45 Step 2; DBE Goal Adjustment guidelines.

Evidence considered in making an adjustment to the Base Figure included the County’s *Past DBE Goal Attainments, Disparity Studies, and Other Evidence*, as follows:

**A. Past DBE Goal Attainments**

The following table below reflects the demonstrated capacity of DBEs (measured by historical DBE participation) on FTA-assisted contracts awarded by the County within the last three (3) Federal Fiscal Years:

**Table 4**

	Year	Attainment
Byron	FFY 2015*	21%
Buchanan		0%
Byron	FFY 2016	0%
Buchanan		4%
Byron	FFY 2017	0%
Buchanan		28%
		Median of Past Awards = 0%, 0%, <del>0%</del> , <del>4%</del> , 21%, 28% = Average of two middle numbers: $0+4=4/2= 2\%$ <b>Median Past Participation = 2%</b>

*\*FFY 2018 still in progress as of the date of methodology preparation, so FFY 2015 was used in lieu of FFY 2018*

The County considered an adjustment to the Base Figure based on the median DBE participation on DOT-assisted contracts completed within the past three FFYs (2015/17). The median established for the past three years is below the Base Figure derived from Step 1; therefore, an adjustment to the Base Figure based on the County’s past DBE goal participation has been made. As three years of DBE Participation data was reviewed and the years reviewed included projects with a similar variety in scope to the scopes projected for the 2019/21 period, the County can reasonably assume that the rates of DBE participation reflected are an accurate reflection of DBE capacity to perform in the 2019/21 overall goal period. The adjustment is calculated in accordance with FTA guidance by averaging the Base Figure with the Median DBE Past participation, as shown below.

The formula resulted in a downward adjustment to Base Figure based from 17% to 10%.

***B. Evidence from Disparity Studies***

The County Contra Costa Airports (County) did not find it feasible to conduct its own independent availability/disparity study; however, the County identified three (3) disparity studies in the assessment of whether a Race-Conscious DBE Program should be adopted by the County. This was done in conformance with FAA's recommendation for recipients to utilize relevant State or local disparity studies as a basis for developing race-conscious goals, to assist recipients with meeting the requirements pertaining to the Western Paving Ruling. The three identified Disparity Studies were the Caltrans Disparity Study, The Los Angeles County Metropolitan Transportation Authority (Metro) Disparity Study and the Reno-Tahoe Airport Authority Disparity Study.

The first Disparity Study considered was that of the California Department of Transportation (Caltrans), completed in 2016 due to the timeliness of the contracts reviewed. The Caltrans Disparity Study reviewed Construction and Engineering contracts state-wide between the years January 1, 2011 to December 31, 2014. Overall, certified DBEs received 6.4 percent of the relevant contracting dollars that Caltrans and subrecipient local agencies awarded during the study period. As the Caltrans' Disparity Study included thousands of contracts from areas outside of the County's market area as well as projects that had no relation to the scopes included in this methodology the County opted to not utilize this Disparity Study to apply an adjustment to their base figure or their current race-neutral DBE application measures.

The second Disparity Study taken into consideration was the 2015 Reno-Tahoe Airport Authority Disparity Study which was anticipated to be complete in 2016 but at the time this goal methodology was developed information was still not published. As this study and the accompanying analysis is not yet available the County did not utilize this Disparity Study to make an adjustment to the base figure.

The third Disparity Study taken into consideration was the Burbank-Glendale-Pasadena Airport Authority (BGPAA) Disparity Study, completed in 2012 due to the similarity of contract types reviewed. Disparity analysis results indicated that most racial/ethnic and gender groups showed disparities on contracts where race- and gender-conscious measures were not in place during the study period. Since August 2006, BGPAA has solely used neutral means and has fallen considerably short of its annual goals for DBE participation. — BBC identified substantial disparities between the utilization of minority-owned firms in BGPAA contracts and what might be expected based upon the availability analysis (substantial disparities for each racial and ethnic group in the Federal DBE Program). Minority-owned firms were underutilized in BGPAA contracts even when the DBE contract goals program was in place. As a result, the Disparity Study recommended the use of contract DBE goals.

As the Disparity Study satisfies the legal standards established by the Ninth Circuit Court of Appeals in *Western States Paving Co., Inc. v. Washington State Department of Transportation*, and guidance from the U.S. Department of Transportation/Federal Transit Administration (FTA) concerning the implementation of race-conscious application, the County has elected to utilize this study as a basis for implementation of a race-conscious component of their Overall DBE goal. The County will ensure that the use of race-conscious goals is narrowly tailored and consistent with other relevant legal standards.

The County will continue to review applicable Disparity Studies as they become available and apply the appropriate adjustments to their Race-neutral/Race-Conscious DBE goal application.

#### ***D. Other Evidence***

The Federal DBE Program suggests that federal aid recipients also examine “other factors” when determining whether to make any step-2 adjustments to their base figures.

To ensure the County of Contra Costa Airports (County) DBE goal was tailored and best represents the DBEs available to perform within the County’s market area and within the scopes identified, the County considered three like Agency DBE goals whose methodology utilized similar projects descriptions.

The County first considered Norman Y. Mineta San Jose International Airport’s (SJC) Overall DBE Goal for FFY 2017/2019 due to its market area (defined as Santa Clara and Alameda counties) and the scopes (5 of the 8 NAICS identified by SJC are included in the County’s methodology) included within its Overall DBE Goal-Setting Methodology. SJC’s methodology included a base figure of 11.13% that was adjusted in consideration of the FFY 2015 Past DBE Attainments (1.48%) to 6.30%.

The County considered The Port of Oakland’s (OAK) Overall DBE Goal for FFY 2017/2019 due to its market area (defined as Contra Costa and Alameda counties) and the scopes (pavement and taxiway projects represented 94.8% of the projected dollars) included within its Overall DBE Goal-Setting Methodology. OAK’s methodology included a base figure of 11.22% that was adjusted in consideration of the average of past DBE Attainments achieved (4.8%) to 8.01%.

The County considered San Francisco International Airport’s (SFO) Overall DBE Goal for FFY 2017/2019 due to its market area (defined as Contra Costa, Alameda, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma counties) and the scopes (pavement and taxiway projects represented 52% of the projected dollars) included within its Overall DBE Goal-Setting Methodology. SFO’s methodology included a base figure of 9.25% that was adjusted in consideration of the average of past DBE Attainments achieved (11.57%) to 10.41%.

The County has found it reasonable to conclude the Median Past DBE Attainments of SJC, OAK and SFO which include nearby market areas and similar project scopes could be utilized to project the types of DBE attainments that the County may be able to achieve. In consideration of this, the County has made an adjustment to the base figure as depicted below:

*Table 5*

Recipient	Median Past Participation
Norman Y. Mineta San Jose International Airport (SJC)	1.48%
The Port of Oakland	4.8%
San Francisco International Airport's (SFO)	11.57%
Median of % Past Attainments = $1.48 + 4.8 + 11.57 = 17.85$	<b>4.8%</b>

Median of % Past Attainments = 4.8%

Median of % Past Attainments + Adjusted Base Figure = 4.8% + 10% = 14.8%

Base Figure Adjusted =  $\frac{14.8\%}{2} = 7.4\%$

Adjusted Base Figure = 7% (rounded)

Given the above, the adjusted goal for FY 2019-2021 is 7%.

**OVERALL DBE GOAL AND PROJECTION OF RACE-NEUTRAL AND RACE-CONSCIOUS PARTICIPATION:**

**The Overall DBE Goal for FFY 2019-2021 for the County Contra Costa Airports' FAA-assisted contracts is 7%.** The Overall Goal is expressed as a percentage of all DOT-assisted funds that County of Contra Costa Airports will expend in applicable DOT-assisted contracts in the given federal fiscal years.

The goal further serves to identify the relative availability of DBE's based on evidence of ready willing, and able DBE's to all comparable firms, which are known to be available to compete for and perform on the County of Contra Costa Airports' DOT-assisted contracts.

**V. RACE-NEUTRAL/RACE-CONSCIOUS BREAKOUT ANALYSIS**

The County of Contra Costa Airports (County) will implement race conscious measures, coupled with race-neutral measures based on the results received from the County's analysis of its past utilization data and an examination of similar market area Disparity Studies.



**A. Consideration of the Amount by which the County has Exceeded Goals in the Past**

DOT has identified the amount a recipient has exceeded their overall goals in the past years as a useful tool in projecting the race/gender-neutral participation one can expect in future Federal Fiscal Years.

The following table reflects the demonstrated capacity of DBEs on FTA-assisted contracts completed by the County within the last three (3) Federal Fiscal Years:

**Table 6**

	Overall DBE Goal by Period	RN/RC Application Period	Federal Fiscal Year	DBE Attainment	% Goal Exceeded
Byron	12.79%	RN	FFY 2015*	21%	8%
Buchanan	5.64%	RC		0%	-6%
Byron	3.13%	RN	FFY 2016	0%	-3%
Buchanan	12.28%	RC		4%	-8%
Byron**			FFY 2017		
Buchanan	12%	RN		28%	16%
% Goals Exceeded in numerical Order: -3%, -8%, <b>-6%</b> , 8%, 16% <b>-6% Median Amount Goals have been Exceeded</b>					

\*FFY 2018 still in progress as of the date of methodology preparation, so FFY 2015 was used in lieu of FFY 2018

\*\*Excluded from analysis as goal information was not available

The County’s Historical Past race-neutral participation above the DBE goal produced a median of 0% DBE Participation (as illustrated in the table above). As the County’s historical DBE Participation does not exceed the projected DBE goal valid during the attainment periods, it is reasonable to conclude that the FFY 2019/21 goal cannot be met race-neutrally based on this factor.

**B. Past Participation by DBE Prime Contractors**

DOT has identified that the amount of past participation obtained through the use of DBE primes should be considered achieved race/gender-neutrally and that those attainments can be used as a basis for estimating a similar level of race/gender-neutral participation in the next overall goal period.

Therefore, the County considered the amount of past DBE participation (based on awards) obtained through the use of DBE primes in FFYs 2015, 2016 and 2017 below:

**Table 7**

	FFY	Total Dollar Value Awarded to DBE Prime	Total Dollar Value of Awarded Contracts
Byron	2017	\$ 0	\$ 0

Buchanan		\$ 0	\$ 527,129
Byron	2016	\$ 0	\$ 0
Buchanan		\$ 0	\$ 1,583,965
Byron	2015	\$ 0	\$ 834,506
Buchanan		\$ 0	\$0
Totals:		\$0	\$2,945,600.00
% DBE Prime Participation			0%

The County found that 0% of the DBE participation during FFYs 2015 through 2017 was produced by the utilization of DBE primes. This value was developed by dividing the total dollars awarded to DBE Primes (\$0) by the total dollars awarded on all Primes contracts (\$2,945,600) within FFYs 2015 through 2017, as displayed in the table above. The County confirmed that the projects completed during FFYs 2015 through 2017 were similar to the types of projects being procured in the upcoming overall goal period, a required criterion for consideration in utilizing DBE prime participation to validate race-neutral application. As 0% DBE participation was achieved on like-projects during the attainment period reviewed the County concluded that this rate of DBE participation would be an accurate reflection of DBE prime capacity in the primary types of work projected to be performed in the coming overall goal period.

### C. Consider Past Participation by DBE Subcontractors on Contracts without Goals

DOT has identified that the amount of past participation obtained through the use of DBE subcontractors on contracts without DBE goals should be considered achieved race/gender-neutrally and that those attainments can be used as a basis for estimating a similar level of race/gender-neutral participation in the next overall goal period. Therefore, the County considered the amount of past DBE subcontractor participation on contracts without DBE goals in FFYs 2015, 2016 and 2017 below:

*Table 8*

	FFY	Total Dollar Value Awarded to DBE Subs on RN Contracts	Total Dollar Value of Awarded Contracts without Goals
Byron	2017	\$ 0	\$ 0
Buchanan		\$ 94,380	\$ 372,186
Byron	2016	\$ 0	\$ 0
Buchanan**			
Byron	2015	\$ 162,000	\$ 752,606
Buchanan**			
Totals:		\$256,380	\$1,124,792
% DBE Prime Participation			22.79% = 23%*

\*Rounded to the nearest whole number

\*\*Excluded from analysis as participation was achieved with race-conscious measures

A DBE participation value of 23% was derived by the utilization of DBE firms in the Race-Neutral (RN) periods above. Although the County reviewed a three-year period to provide a sufficient sampling of performance on past projects, closer examination uncovered that the 2015 FFY included RC participation,

so this participation was excluded from the analysis. The County confirmed that the projects completed during FFYs 2015 through 2017 were similar to the types of projects being procured in the upcoming overall goal period, a required criterion for consideration in utilizing race-neutral DBE subcontractor participation to validate race-neutral application. As 23% DBE participation was achieved on like-projects during the attainment period reviewed the County concluded that this rate of DBE participation would be an accurate reflection of DBE subcontractor’s capacity to perform race-neutrally in the 2019/21 overall goal period.

**D. Consider MBE/WBE/DBE Participation Pursuant to Race/Gender-Neutral State or Local Programs.**

The County monitors DBE participation but does not currently track MBE/WBE/DBE participation on Race/Gender-Neutral or Local Programs. The County will consider methods of tracking this information in the future for use in considering the proper race/gender-neutral application.

**E. Past History of Inability to Achieve Goals**

DOT has identified that a recipient’s past inability to meet their goals in the past years as a powerful indicator that the recipient may be justified in applying race-/gender-conscious measures to achieve their goals in future Federal Fiscal Years. The following table below reflects the demonstrated capacity of DBEs (measured by historical DBE participation) on FTA-assisted contracts awarded by the County within the last three (3) Federal Fiscal Years:

**Table 9**

	Overall DBE Goal by Period	RN/RC Application Period	Federal Fiscal Year	DBE Attainment	% Beneath Goal
Byron	12.79%	RN	FFY 2015*	21%	8.21%
Buchanan	5.64%	RC		0%	-5.64%
Byron	3.13%	RN	FFY 2016	0%	-3.13%
Buchanan	12.28%	RC		4%	-8.28%
Byron**			FFY 2017		
Buchanan	12%	RN		28%	16%
% Goals Exceeded in numerical Order: -8.28%, -5.64%, <b>-3.13%</b> , 8.21%, 16% <b>-3% Median Past History of Inability to Achieve Goals</b>					

\*FFY 2018 still in progress as of the date of methodology preparation, so FFY 2015 was used in lieu of FFY 2018

\*\*Excluded from analysis as participation was achieved with race-conscious measures

The County’s historical DBE participation produced a shortfall in their ability to meet goals in Federal Fiscal Years 2015 through 2017.

As three years of DBE Participation data was reviewed for projects with similar scopes and values to the projects in the upcoming goal period, the County can reasonably assume that the rates of DBE participation reflected are an accurate reflection of DBE capacity to perform race-neutrally in the 2019/21 overall goal period. The County has applied this to the proposed DBE Goal to project the necessary race-conscious/race-neutral breakout, as illustrated below:

Consistent with the FAA guidance provided and the reasons delineated above the County has found it advisable to implement the race-neutral/race-conscious breakout illustrated above to meet the proposed Overall DBE Goal in accordance with 49 CFR Part 26.51.

**F. Monitor DBE Participation to Determine Whether an Adjustment to the Use of Race/Gender-Conscious Measures is Necessary**

The County will continue to monitor its DBE participation during the overall goal period to determine whether the application of race-neutral/race-conscious measures to meet the proposed Overall DBE Goal remains on target. The County will adjust the application of race/gender-neutral and race/gender-conscious measures, as necessary to ensure they meet the maximum feasible portion the overall goal by using race/gender-neutral means of facilitating DBE participation.

**VI. PUBLIC PARTICIPATION AND FACILITATION**

In accordance with Public Participation Regulatory Requirements of Title 49 CFR Part 26, minority, women, local business chambers, and community organizations within the County's market area were consulted and provided an opportunity to review the goal analysis and provide input. The County prepared Outreach Consultation Letters advising the aforementioned business community of the proposed DBE goal analysis and its availability for review and comment on the County's website.

The County issued a Public Notice publishing the County's Overall Goal for the FFY 2019/21 FAA-assisted contracts on their website. The Notice informed the public that the proposed goal and rationale were available for inspection on the County's website and that the County would accept comments on the goal analysis for 30 days from the date of the Public Notice. Additionally, the Public Notice requested participation from the public in a forum to discuss and share their valuable experience and input pertaining to effects of discrimination on opportunities for DBE's in the County's market area. The public was informed that the County would give full consideration to all

comments and input received as a part of the consultation process and would assess its impact on the Proposed Overall DBE Goal. The final Overall Goal submitted to FAA for approval will remain on the County's website through the life of the goal period.

As a follow-up, the County invited the public as well as identified minority, women and general contractor groups and organizations within the County's market area to attend a public forum (December 20, 2018) from 9:00am to 11:00 am), in order to provide testimony and any additional information regarding effects of discrimination on opportunities for DBE's in the County's market area. The County identified 109 of these groups and organizations for direct solicitation to participate in the public forum, review the proposed goal and share their valuable experience and input.

Additionally, the County consults and will continue to consult with minority groups and organizations year-round via event attendance and facilitation to directly solicit the public in-person regarding input they have on DBE opportunities.

Comment review produced xxxxxxxx, therefore an adjustment to the goal was not necessary.