FY 2024 - FY 2026

DISADVANTAGED BUSINESS ENTERPRISE PROGRAM METHODOLOGY FOR



Greenville-Spartanburg Airport District Greenville-Spartanburg International Airport Greenville, SC

With Assistance From



Ken Weeden & Associates, Inc.

JULY 2023

METHODOLOGY for Establishing the FY 2024 – FY 2026 Overall Disadvantaged Business Enterprise (DBE) Goal for:

Greenville-Spartanburg Airport District Greer, SC

In fulfillment of the requirements of 49 CFR Part 26, the Greenville-Spartanburg Airport District (hereafter 'Airport District') has developed a proposed Overall Goal for FY 2024 - 2026 FAA-AIP projects for the Greenville-Spartanburg International Airport. The methodology used in establishing this goal is described herein.

Airport Sponsor: Greenville-Spartanburg Airport District Airport: Greenville-Spartanburg International Airport

DBELO: Kelly Dawsey

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I. Detailed Methodology: Specific Steps

A. Amount of Goal

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

	<u>Overall</u>	<u>Race</u> <u>Neutral</u>	Race Conscious
Total Goal	10.0%	1.1%	8.9%
Year 1 Goal	8.5%	1.1%	7.4%
Year 2 Goal	12.8%	1.1%	11.7%
Year 3 Goal	8.8%	1.1%	7.7%

Given the amount of USDOT-assisted contracts that the Airport District expects to let from FY 2024-2026, which is approximately **\$20,247,260**, this means that the Airport District has set a goal of expending approximately **\$2,032,326** with DBEs during this period.

B. Determination of the Market Area of the study

The normal market area was based on discussions with the Airport staff and an assessment of bidders from similar recent projects. Specifically, the market area is based on where the substantial majority of bidders, both successful and

unsuccessful are located and where the substantial majority of funding was spent as illustrated in **Table 1** below:

Table 1: Greenville-Spartanburg Airport District Market Area

g, SC
IC
NC
g, NC

C. Determination of relevant NAICS codes

Based on information provided by the Airport District concerning the proposed projects, a list of NAICS codes corresponding to these projects was developed and is shown below:

Table 2: Greenville-Spartanburg Airport District FY 2024-FY 2026 Projects & Activities

FY 2024 Projects	Step 1 Goal	AIP Dollars
1. Correct RGL MOS (Construction Phase)	4.3%	\$1,260,000
2. Airfield Pavement Improvement Priority 3 - Design Phase (RW 4/22)	4.3%	\$855,000
3. GA Expansion Area Phase 2 Site Prep - Construction Phase	8.7%	\$2,135,000
Fiscal Year 2024 Total		\$4,250,000
FY 2025 Projects	Step 1 Goal	AIP Dollars
4. Airfield Pavement Improvement Priority 3 - Construction Phase (RW 4/22)	16.0%	\$4,250,000
5. Automated Shuttle Airport Project (ASAP) Infrastructure (use 4 years of AIG banked funds)	8.7%	\$2,197,808
Fiscal Year 2025 Total		\$6,447,808
FY 2026 Projects	Step 1 Goal	AIP Dollars
6. TW H Design Phase	4.3%	\$450,000
7. South Aviation Complex Taxilane - Site Prep Construction Phase	7.9%	\$3,800,000
8. ATP Funding Request - Terminal Phase 2 Project	4.7%	\$5,299,452
Fiscal Year 2026 Total		\$9,549,452

SOURCE: Greenville-Spartanburg Airport District – Capital Improvement Plan

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

Table 3a: Step 1 Base Figure Greenville-Spartanburg Airport District

1. I	1. FY 2024 - Correct RGL MOS (Construction Phase)								
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars			
Highway, Street, and Bridge Construction	237310	18	96	18.8%	\$141,957	\$26,617			
Electrical Contractors	238210	15	713	2.1%	\$1,027,062	\$21,607			
Site Prep Contractors	238910	30	380	7.9%	\$62,589	\$4,941			
Landscaping Services	561730	23	1229	1.9%	\$28,391	\$531			
Total \$1,260,000									
Weighted Base Figure									

Table 3b: Step 1 Base Figure Greenville-Spartanburg Airport District

2. FY 2024 - Airfield Pavement Improvement Priority 3 - Design Phase (RW 4/22)							
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars	
Engineering Services	541330	23	680	3.4%	\$684,000	\$23,135	
Land Surveying Services	541370	3	104	2.9%	\$57,000	\$1,644	
Geotechnical Testing Services	541380	6	57	10.5%	\$114,000	\$12,000	
Total \$855,000							
Weighted Base Figure							

Table 3c: Step 1 Base Figure Greenville-Spartanburg Airport District

3. FY 2024 - G	3. FY 2024 - GA Expansion Area Phase 2 Site Prep - Construction Phase							
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars		
Drainage	237110	9	94	9.6%	\$125,846	\$12,049		
Concrete	238110	20	189	10.6%	\$681,616	\$72,129		
Site Prep Contractors	238910	30	380	7.9%	\$1,286,742	\$101,585		
Landscaping Services	561730	23	1229	1.9%	\$40,796	\$763		
Total \$2,135,000								
Weighted Base Figure								

Table 3d: Step 1 Base Figure Greenville-Spartanburg Airport District

4. FY 2025 -Airfield Pavement Improvement Priority 3 - Construction Phase (RW 4/22)							
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars	
Highway, Street, and Bridge Construction	237310	18	96	18.8%	\$3,494,863	\$655,287	
Electrical Contractors	238210	15	713	2.1%	\$213,991	\$4,502	
Site Prep Contractors	238910	30	380	7.9%	\$127,209	\$10,043	
Engineering Services	541330	23	680	3.4%	\$254,418	\$8,605	
Land Surveying Services	541370	3	104	2.9%	\$63,604	\$1,835	
Landscaping Services	561730	23	1229	1.9%	\$95,915	\$1,795	
Total \$4,250,000							
Weighted Base Figure							

Table 3e: Step 1 Base Figure Greenville-Spartanburg Airport District

5. FY 2025 - Automated Shuttle Airport Project (ASAP) Infrastructure (use 4 years of AIG banked funds)						
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars
Water & Sewer Line Construction	237110	9	94	9.6%	\$576,852	\$55,231
Highway & Street	237310	18	96	18.8%	\$116,524	\$21,848
Concrete Contractors	238110	20	189	10.6%	\$576,852	\$61,043
Roofing	238160	7	221	3.2%	\$46,148	\$1,462
Electrical	238210	15	713	2.1%	\$116,524	\$2,451
Mechanical	238220	9	1036	0.9%	\$92,296	\$802
Carpentry	238350	3	298	1.0%	\$46,148	\$465
Other Building Finishing Contractors	238390	3	92	3.3%	\$46,148	\$1,505
Site Prep Contractors	238910	30	380	7.9%	\$576,852	\$45,541
Other Building Finishing Contractors	238990	19	469	4.1%	\$1,154	\$47
Engineering	541330	23	680	3.4%	\$1,154	\$39
Surveying	541370	3	104	2.9%	\$1,154	\$33
Total \$2,197,808						
	Weighte	d Base Fi	gure			8.7%

Table 3f: Step 1 Base Figure Greenville-Spartanburg Airport District

6. FY 2026 - TW H Design Phase								
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars		
Engineering Services	541330	23	680	3.4%	\$360,000	\$12,176		
Land Surveying Services	541370	3	104	2.9%	\$30,000	\$865		
Geotechnical Testing Services	541380	6	57	10.5%	\$60,000	\$6,316		
Total \$450,000						\$19,358		
Weighted Base Figure								

Table 3g: Step 1 Base Figure Greenville-Spartanburg Airport District

7. FY 2026- South Aviation Complex Taxilane - Site Prep Construction Phase							
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars	
Site Prep Contractors	238910	30	380	7.9%	\$3,800,000	\$300,000	
Total \$3,800,000							
Weighted Base Figure						7.9%	

Table 3h: Step 1 Base Figure Greenville-Spartanburg Airport District

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8. FY 2026 - ATP Funding Request - Terminal Phase 2 Project								
Trades	NAICS	# of DBE Firms	All Firms	%DBE Availability	NAICS Dollars	DBE Dollars		
Building Construction	236220	28	376	7.4%	\$2,369,543	\$176,455		
Land Subdivision	237210	3	70	4.3%	\$512,334	\$21,957		
Concrete	238110	20	189	10.6%	\$117,410	\$12,424		
Masonry Contractors	238140	8	159	5.0%	\$165,441	\$8,324		
Other Foundation, Structure, and Building Exterior Contractors	238190	1	71	1.4%	\$517,671	\$7,291		
Electrical Contractors	238210	15	713	2.1%	\$485,650	\$10,217		
Plumbing, Heating, and Air- Conditioning Contractors	238220	9	1036	0.9%	\$752,490	\$6,537		
Drywall and Insulation Contractors	238310	4	199	2.0%	\$341,556	\$6,865		
Landscaping	561730	23	1229	1.9%	\$37,358	\$699		
Total \$5,299,452								
	Weighte	d Base Fig	gure			4.7%		

NOTE: The County Business Patterns data were used as the source to determine the denominator, or the number of all firms in the market area. The DBE directory listed above were used to determine the numerator, or the number of DBE firms in the market area.

E. Determination of the "Weighted" DBE Base Figure

The Step 1 DBE Base Figure for each project was derived by using a weighting process by which the percentage of dollars spent on various activities (represented by NAICS codes) were multiplied by the percentage of relevant DBE firms to all relevant firms as indicated in Table 3 above.

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

FY 2024 Projects	Step 1 Goal
1. Correct RGL MOS (Construction Phase)	4.3%
2. Airfield Pavement Improvement Priority 3 - Design Phase (RW 4/22)	4.3%
3. GA Expansion Area Phase 2 Site Prep - Construction Phase	8.7%
FY 2025 Projects	Step 1 Goal
4. Airfield Pavement Improvement Priority 3 - Construction Phase (RW 4/22)	16.0%
5. Automated Shuttle Airport Project (ASAP) Infrastructure (use 4 years of AIG banked funds)	8.7%
FY 2026 Projects	Step 1 Goal
6. TW H Design Phase	4.3%
7. South Aviation Complex Taxilane - Site Prep Construction Phase	7.9%
8. ATP Funding Request - Terminal Phase 2 Project	4.7%

II. Adjustments to the DBE Base Figure

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

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

A. Adjustment Factors to Consider

The regulations further state that there are several types of evidence that must be considered when adjusting the base figure. These include:

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

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

Table 4: Greenville-Spartanburg Airport District DBE Accomplishment

Report Period	DBE Goal	DBE Percent Achieved	Achieved Over/Under
FY 2018	11.0%	12.1%	1.1%
FY 2019	11.0%	0.1%	-10.9%
FY 2020	13.8%	3.4%	-10.4%
FY 2021	7.7%	19.9%	12.2%
FY 2022	7.7%	17.9%	10.2%
Median	11.0%	12.1%	1.1%

Source: Uniform Report of DBE Commitments/Awards and Payments

The median DBE accomplishment for the periods as shown above for the Airport District is 12.1%.

B. Consultations

The Airport District held a public meeting on July 12, 2023. The purpose of the meeting was to solicit information from interested stakeholders about the draft goal, as well as the availability of potential, the effects of discrimination on opportunities for DBEs, and the Airport District's effort to increase DBE participation. Please see Attachment B for additional information details on the consultation process.

C. Adjustment to Step 1 DBE Base Figures: Greenville-Spartanburg Airport District, FY 2024-FY 2026

With the adjustment factors considered to this point, the Airport District will adjust the Step 1 base figures as calculated above by adding the annual accomplishment factor derived in Table 4 above (12.1%) to the base figure for each project as noted, and averaging the total, for an adjusted overall DBE goal.

FY 2024 - FY 2026 Overall Goal

Fiscal Year	Project	Step 1	Step 2 adjustment	Overall Goal	AIP Dollars	DBE Goal (dollars)
FY 2024	1. Correct RGL MOS (Construction Phase)	4.3%	12.1%	8.2%	\$1,260,000	\$103,320
	2. Airfield Pavement Improvement Priority 3 - Design Phase (RW 4/22)	4.3%	N/A	4.3%	\$855,000	\$36,765
	3. GA Expansion Area Phase 2 Site Prep - Construction Phase	8.7%	12.1%	10.4%	\$2,135,000	\$222,040
FY 2024 Total				8.5%	\$4,250,000	\$362,125
FY 2025	4. Airfield Pavement Improvement Priority 3 - Construction Phase (RW 4/22)	16.0%	12.1%	14.1%	\$4,250,000	\$597,125
	5. Automated Shuttle Airport Project (ASAP) Infrastructure (use 4 years of AIG banked funds)	8.7%	12.1%	10.4%	\$2,197,808	\$228,572
FY 2025 Total				12.8%	\$6,447,808	\$825,697
	6. TW H Design Phase	4.3%	N/A	4.3%	\$450,000	\$19,350
FY 2026	7. South Aviation Complex Taxilane - Site Prep Construction Phase	7.9%	12.1%	10.0%	\$3,800,000	\$380,000
	8. ATP Funding Request - Terminal Phase 2 Project	4.7%	12.1%	8.4%	\$5,299,452	\$445,154
FY 2026 Total				8.8%	\$9,549,452	\$844,504
FY 2024 - FY 2026 Overall Goal				10.0%	\$20,247,260	\$2,032,326

The total DBE goal in dollars was divided by the total federal portion of project costs to derive the overall DBE goal of 10.0% for FY 2024-FY 2026.

III. Process

The Airport District will normally submit its overall goal to the FAA on August 1 of each goal year.

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

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

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

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

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

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

- 1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate DBE, and other small businesses participation (e.g., unbundling large contracts to make them more accessible to small businesses, encouraging prime contractors to subcontract portions of work that they might otherwise perform with their own forces);
- 2. Disseminating information communications on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists for bidders, ensuring the dissemination to bidders on prime contracts of lists of potential subcontractors).

The Airport District proposes a race-conscious goal of **8.9%** and a race-neutral goal of **1.1%**, for a total of **10.0%**. The reason for this breakout is that the projects from the previous years show that the median amount by which the past DBE goals were over-achieved is **1.1%** (see **Table 4**).

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

reporting purposes, race-neutral DBE participation includes, but is not necessarily limited to, the following: DBE participation through a prime contract a DBE obtains through customary competitive procurement procedures; DBE participation through a subcontract on a prime contract that does not carry a DBE goal; DBE participation on a prime contract exceeding a contract goal; and DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.

VI. Contract Goals

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

We will express our contract goals as a percentage of the Federal share of a DOT-assisted contract.

Appendix A: Resource Listing

A. Resource Documents:

- 1. South Carolina UCP DBE Directory.
- 2. 2021 County Business Patterns, Census Bureau.
- 3. Uniform Report of DBE Commitments/Awards and Payments.
- 4. Greenville-Spartanburg Airport District Capital Improvements Plan.



Appendix B: Greenville-Spartanburg Airport District

FY 2024-2026 DBE Goal Methodology Public Meeting Wednesday July 12, 2023

Summary of Meeting: The Airport District scheduled a meeting to present the information below to its stakeholders.

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

Feedback Points Summarized Below:

- -Problem is the marketability and the fact that the DBE company has to do their own research. The SC DOT office is supposed to know who is bidding and they do not. Accountability of DOT that the list of DBE companies is accurate needs to be improved. A better job of lining things out needs to be done. Have to do better with communication.
- -GSP discussed the DBE outreach events having DOT explain the certification process, for new prospective DBE companies, and sharing that the airport website has a sign up for proactive communications on upcoming opportunities and projects.
- -A question was asked about clarification on DBE vs. MBE. This clarification was provided by Wilfred Nixon of Ken Weeden & Associates.
- -Suggestion was made to broaden the look from the UCP directory for DBE companies to add the ACS.
- -Challenge was given to participate in broadening the pool of DBE companies and to read the Disparity Study and to go out of the norm for participation in broadening the pool.
- -Point was raised that they thought the DBE Goal needed to be increased from what was developed and communicated.

- -Question was raised on why the market area in the methodology was only the upstate of South Carolina.
- -Question was asked if the airport has non-federally funded projects and if we have goals for those projects?
- -Suggestion was made to increase the sources of communication for DBE activities to include: Chamber of Commerce, Workforce Development groups, Churches, Colleges & Universities, SBDC office. Point was made to not just check the box but give earnest effort to use DBE companies.
- -Point was made that the invitation to the meeting was given through an airport employee and that they did not receive notice of the meeting. Increase communication of such meetings was recommended.
- -Discussion was raised about the company codes on the DBE certificate not aligning with the DBE company codes that were used in the goal methodology and how could we improve the disconnect in the industry on the NAIS codes and not recognizing the actual category. Suggestion was made to further subdivide projects into further NAIS codes.
- -GSP Airport personnel thanks the participants for attending and for providing their input. It was communicated that a Public Notice would be posted in the GSP website along with the methodology presentation that was reviewed in the meeting.
- -The meeting was adjourned.



Sign-in sheet

Meeting: GSP Airport FY2024-FY2026 Public DBE Goal Consultation Meeting

Date: July 12, 2023; 1:00pm-2:00pm

NAME	COMPANY	EMAIL
BRADEN BUSOLD	MESER CONSTRUCTION	bousold emesser. com
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Wathanel Abaker Jr	Upsello Parviara	NATA bichano Caroling Panurana.com
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Sign-in sheet

Meeting: GSP Airport FY2024-FY2026 Public DBE Goal Consultation Meeting

Date: July 12, 2023; 1:00pm-2:00pm

NAME	COMPANY	EMAIL
Eric Cook	MBA	aric. Cooke mase, y