

**FY 2025 -2027**

**DISADVANTAGED BUSINESS ENTERPRISE PROGRAM METHODOLOGY  
for**



**BRUNSWICK GOLDEN ISLES AIRPORT**  
BRUNSWICK, GEORGIA

With Assistance From



Ken Weeden & Associates, Inc.

**September 2024**

**METHODOLOGY for Establishing the FY 2025 – FY 2027 Overall Disadvantaged Business Enterprise (DBE) Goal for:**

*Brunswick Golden Isles Airport  
Brunswick, GA*

In fulfillment of the requirements of 49 CFR Part 26, the Brunswick Golden Isles Airport (hereafter ‘the Airport’) has developed a proposed Overall Goal for FY 2025-2027 FAA-AIP projects for its Airports. The methodology used in establishing this goal is described herein.

**I. Detailed Methodology: Specific Steps**

**A. Amount of Goal**

The Airport’s overall goal for FY 2025-2027 is **13.1%** of the Federal financial assistance it will expend in USDOT-assisted contracts.

Given the amount of USDOT-assisted contracts that the Airport expects to let from FY 2025 -2027, which is approximately **\$11,957,922** this means that the Airport has set a goal of expending approximately **\$1,570,696** 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: Brunswick Golden Isles Airport Market Area**

<b>County</b>	<b>Bidders</b>	<b>Percent of bidders</b>	<b>Dollars</b>	<b>Percent of dollars</b>
Camden	2	9.1%	-	-
Chatham	2	9.1%	-	-
Fayette	1	4.5%	-	-
Fulton	2	9.1%	-	-
Glynn	2	9.1%	\$2,635,275	38.4%
Gwinnett	1	4.5%	\$192,958	2.8%
Tattnall	1	4.5%	\$2,684,992	39.2%
Troup	1	4.5%	-	-
Duval, FL	2	9.1%	-	-
<b>Market area total</b>	<b>14</b>	<b>63.6%</b>	<b>\$5,513,225</b>	<b>80.4%</b>
Other	8	36.4%	\$1,342,543	19.6%
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>\$6,855,768</b>	<b>100.0%</b>

**C. Determination of relevant NAICS codes**

Based on information provided by the consulting engineer concerning the proposed projects for this fiscal year, a list of NAICS codes corresponding to these projects was developed and is shown below:

**Table 2: Brunswick Golden Isles Airport  
FY 2025-FY 2027 Projects & Activities**

<b>FY 2025 projects</b>		
<b>PROJECT</b>	<b>ACTIVITY</b>	<b>NAICS</b>
Construct ARFF Facility Replacement	Building Construction	236220
	Land Subdivision	237210
	Concrete	238110
	Masonry Contractors	238140
	Other Foundation, Structure, and Building Exterior Contractors	238190
	Electrical Contractors	238210
	Plumbing, Heating, and Air-Conditioning Contractors	238220
	Drywall and Insulation Contractors	238310
	Landscaping	561730
Construct North Development Taxiway	Highway & Street	237310
	Site Prep	238910
	Engineering	541330
	Geotechnical Testing	541380
	Landscaping	561730
<b>FY 2026 projects</b>		
Relocate 3 Wind Cones (Design & Construction)	Highway & Street	237310
	Electrical Contractors	238210
	Engineering	541330
Perimeter Fencing Improvements (Design & Construction)	Fencing	238990
	Engineering	541330
<b>FY 2027 projects</b>		
Runway 7-25 & Taxiway Extension Justification Study	Engineering	541330
	Survey	541370
	Geotechnical Testing	541380
	Environmental Consulting Services	561730

SOURCE: Brunswick Golden Isles Airport

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

**Table 3a: DBES—Brunswick Golden Isles Airport  
by Relevant NAICS Codes—Construct ARFF Facility Replacement**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
236220	78	553	14%	\$1,811,773	\$253,648
237210	1	80	0%	\$391,735.00	\$0
238110	20	174	11%	\$89,773	\$9,875
238140	17	180	9%	\$126,498	\$11,385
238190	11	45	24%	\$395,815	\$94,996
238210	25	847	3%	\$371,332.00	\$11,140
238220	17	1095	2%	\$575,360	\$11,507
238310	11	231	5%	\$261,156	\$13,058
561730	38	1270	3%	\$28,564	\$857
<b>Total</b>				<b>\$4,052,006</b>	<b>\$406,466</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>10.0%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory, July 2024.

**Table 3b: DBES— Brunswick Golden Isles Airport  
by Relevant NAICS Codes—Construct North Development Taxiway**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
237310	14	86	16%	\$4,852,167.00	\$776,347
238910	38	216	18%	\$1,422,378	\$256,028
541330	72	1002	7%	\$748,620	\$52,403
541380	11	84	13%	\$388,173	\$50,462
561730	38	1270	3%	\$74,862	\$2,246
<b>Total</b>				<b>\$7,486,200</b>	<b>\$1,137,486</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>15.2%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory, July 2024.

**Table 3c: DBES— Brunswick Golden Isles Airport  
Relevant NAICS Codes— Relocate 3 Wind Cones (Design & Construction)**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
237310	14	86	16.0%	\$45,000	\$7,200
238210	25	847	3.0%	\$45,000	\$1,350
541330	72	1002	7.0%	\$18,000	\$1,260
<b>Total</b>				<b>\$108,000</b>	<b>\$9,810</b>
<b>WEIGHTED STEP 1 Goal =</b>				<b>9.1%%</b>	

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory, July 2024.

**Table 3d: DBES— Brunswick Golden Isles Airport  
by Relevant NAICS Codes—Perimeter Fencing Improvements (Design & Construction)**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
238990	17	400	4%	\$205,000	\$8,200
541330	72	1002	7%	\$36,200	\$2,534
<b>Total</b>				<b>\$241,200</b>	<b>\$10,734</b>
<b>WEIGHTED STEP 1 Goal =</b>				<b>4.5%</b>	

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory, July 2024.

**Table 3e: DBES— Brunswick Golden Isles Airport  
by Relevant NAICS Codes—Runway 7-25 Taxiway Extension Justification Study**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
541330	72	1002	7%	\$42,923	\$3,005
541370	10	90	11%	\$8,176	\$899
541380	11	84	13%	\$4,087	\$531
541620	22	134	16%	\$15,330	\$2,453
<b>Total</b>				<b>\$70,516</b>	<b>\$6,888</b>
<b>WEIGHTED STEP 1 Goal =</b>				<b>9.8%</b>	

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory, July 2024.

**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 directories 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 fiscal year was derived by multiplying the dollars for each activity by the percentage of relevant DBE firms to all relevant firms. The total DBE goal in dollars was divided by the total project costs to derive the step 1 goals.

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

Construct ARFF Facility Replacement	10.0%
Construct North Development Taxiway	15.2%
Relocate 3 Wind Cones (Design & Construction)	9.1%
Perimeter Fencing Improvements (Design & Construction)	4.5%
Runway 7-25 Taxiway Extension Justification Study	9.8%

**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 Airports in recent years were examined relative to the above consideration. Notice the annual DBE percent accomplishment indicated in Table 4 below:

**Table 4: Brunswick Golden Isles Airport  
DBE Accomplishment**

<b>Report Period</b>	<b>DBE Goal</b>	<b>Total DBE Percent Achieved</b>	<b>Achieved Over/Under</b>
<b>FY 2019</b>	7.3%	0.4%	-6.9%
<b>FY 2020</b>	10.7%	14.0%	3.3%
<b>FY 2022</b>	4.6%	17.5%	12.9%
<b>MEDIAN</b>		<b>14.0%</b>	<b>3.3%</b>

The median DBE accomplishment for the periods as shown above for the Airport is 14.0%. There has only been one year in the last three years with awarded projects.

**B. Consultations**

The Airport held a public meeting on August 15, 2024. The purpose of the meeting was to solicit information from interested stakeholders about the draft goal, as well as the availability of potential DBEs, the effects of discrimination on opportunities for DBEs, and the Airport’s effort to increase DBE participation. Please see Appendix B for the attendee list and consultation comments. The draft overall goal was posted on the Airport’s website on July 30, 2024.

**C. Adjustment to Step 1 DBE Base Figures: Brunswick Golden Isles Airport, FY 2025-FY 2027.**

With the adjustment factors considered to this point, the Airport will not adjust the Step 1 base figures as calculated above.

**Table 5: Brunswick Golden Isles Airport  
FY 2025 – FY 2027 Overall Goal**

<b>Fiscal Year</b>	<b>Project</b>	<b>Step1</b>	<b>Step 2 adjustment</b>	<b>Overall Goal</b>	<b>Total project costs</b>	<b>DBE Goal (dollars)</b>
2025	Construct ARFF Replacement	10.0%	N/A	10.0%	\$4,052,006	\$405,201
	Construct North Development Taxiway	15.2%	N/A	15.2%	\$7,486,200	\$1,137,902
<b>FY 2025 Total</b>				<b>13.4%</b>	<b>\$11,538,206</b>	<b>\$1,543,103</b>
2026	Relocate 3 Wind Cones (Design & Construction)	9.1%	N/A	9.1%	\$108,000	\$9,828
	Perimeter Fencing Improvements (Design & Construction)	4.5%	N/A	4.5%	\$241,200	\$10,854
<b>FY 2026 Total</b>				<b>5.9%</b>	<b>\$349,200.00</b>	<b>\$20,682</b>
2027	Runway 7-25 & Taxiway Extension Justification Study	9.8%	N/A	9.8%	\$70,516	\$6,911
<b>FY 2027 Total</b>				<b>9.8%</b>	<b>\$70,516</b>	<b>\$6,911</b>
<b>FY2025-FY2027 Overall Goal</b>				<b>13.1%</b>	<b>\$11,957,922</b>	<b>\$1,570,696</b>

The total DBE goal in dollars was divided by the total project costs to derive the overall DBE goal of **13.1%** for FY 2025-FY 2027.

### III. Process

The Airport will normally submit its overall goal to the FAA on August 1 of each year that a DBE goal is due.

Before establishing the overall goal this year, the Airport 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's efforts to establish a level playing field for the participation of DBEs.

Following this consultation, the Airport published a notice of the proposed overall goal on its website informing the public that the proposed goal and its rationale were available for review and comment during normal business hours at the Airport's administrative office for 30 days following the date of the notice. 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 2025 to FY 2027.



The Airport'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 will begin using the overall goal on October 1 of each year, unless the Airport 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 will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. The Airport 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 proposes a race-conscious goal of **9.8%** and a race-neutral goal of **3.3%**, for a total of **13.1%**. 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 3.3% (see **Table 4**).

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

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

**Resources: The Brunswick Golden Isles Airport FY 2025-2027 Disadvantaged Business Enterprise Program Methodology**

**A. Resource Documents:**

1. Georgia UCP DBE Directory, July 2024
2. Florida UCP DBE Directory, July 2024.
3. 2022 County Business Patterns, U.S. Census Bureau.
4. Uniform Report of DBE Commitments/Awards and Payments

## **Appendix A: Stakeholder Meeting**

Meeting held on August 15, 2024 at 2:00 PM in the Airport Commission Conference Room

**Summary of Meeting:** The Airport 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”.

The meeting invitation was emailed to 74 businesses and organizations. There were three registrations for the meeting, but there were no attendees other than staff at the meeting.

**GLYNN COUNTY AIRPORT COMMISSION**  
 DBE Program Three-Year goal Consultation Meeting  
 August 15, 2024

Name	Company	Phone	Email
Wilfred Nixon	Ken Weeden & Assoc.	910-762-6247	wilfred.nixon@kenweeden.com
Shawna Williams	Glynn Airport Commission	912-265-2070	swilliams@flygairports.com
Terra Winklett	Glynn County Airport Commission	912-270-2506	twinklett@flygairports.com
Robert Burr	"	813-523-6266	rburr@flygairports.com

**FY 2025 -2027**

**DISADVANTAGED BUSINESS ENTERPRISE PROGRAM METHODOLOGY**  
for



**St. Simons Island Airport**  
St. Simons Island, Georgia

With Assistance From



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**METHODOLOGY for Establishing the FY 2025 – FY 2027 Overall Disadvantaged Business Enterprise (DBE) Goal for:**

*St. Simons Island Airport  
St. Simons Island, GA*

In fulfillment of the requirements of 49 CFR Part 26, the St. Simons Island Airport (hereafter ‘the Airport’) has developed a proposed Overall Goal for FY 2025-2027 FAA-AIP projects for its Airports. The methodology used in establishing this goal is described herein.

**I. Detailed Methodology: Specific Steps**

**A. Amount of Goal**

The Airport’s overall goal for FY 2025-2027 is **14.6%** of the Federal financial assistance it will expend in USDOT-assisted contracts.

Given the amount of USDOT-assisted contracts that the Airport expects to let from FY 2025-2027, which is approximately **\$20,015,058** this means that the Airport has set a goal of expending approximately **\$2,929,683** 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: St. Simons Island Airport Market Area**

<b>County</b>	<b>Bidders</b>	<b>Percent of bidders</b>	<b>Dollars</b>	<b>Percent of dollars</b>
Camden	2	9.1%	-	-
Chatham	2	9.1%	-	-
Fayette	1	4.5%	-	-
Fulton	2	9.1%	-	-
Glynn	2	9.1%	\$2,635,275	38.4%
Gwinnett	1	4.5%	\$192,958	2.8%
Tattnall	1	4.5%	\$2,684,992	39.2%
Troup	1	4.5%		-
Duval, FL	2	9.1%		-
<b>Market area total</b>	<b>14</b>	<b>63.6%</b>	<b>\$5,513,225</b>	<b>80.4%</b>
Other	8	36.4%	\$1,342,543	19.6%
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>\$6,855,768</b>	<b>100.0%</b>

**C. Determination of relevant NAICS codes**

Based on information provided by the consulting engineer concerning the proposed projects for this fiscal year, a list of NAICS codes corresponding to these projects was developed and is shown below:

**Table 2: McKinnon St. Simons Airport  
FY 2025-FY 2027 Projects & Activities**

<b>FY 2025 projects</b>		
<b>PROJECT</b>	<b>ACTIVITY</b>	<b>NAICS</b>
Design Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements	Engineering	541330
	Survey	541370
	Geotechnical	541380
Construct Skylane Development Infrastructure Phase 2	Highway & Street	237310
	Site Prep	238910
	Engineering	541330
	Geotechnical Testing	541380
<b>FY 2026 projects</b>		
<b>PROJECT</b>	<b>ACTIVITY</b>	<b>NAICS</b>
Construct Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements Part 1: Rehab & Infrastructure	Highway & Street	237310
	Site Prep	238910
	Engineering	541330
	Geotechnical Testing	541380
	Landscaping	561730
Acquire 0.3 AC Parcel	Appraisal	531320
	Legal Services	541110
	Title Abstract & Settlement Offices	541191
	Engineering	541330
Design & Construct Perimeter Fencing Improvements	Surveying	541370
	Fencing	238990
	Engineering	541330
<b>FY 2027 projects</b>		
<b>PROJECT</b>	<b>ACTIVITY</b>	<b>NAICS</b>
Construct Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements Part 2: EMAS	Highway & Street	237310
	Electrical	238210
	Site Prep	238910
	Engineering	541330
	Geotechnical Testing	541380
	Landscaping	561730
Design Partial Realignment & Extension of Taxiway	Engineering	541330
	Survey	541370
	Geotechnical Testing	541380



	Environmental Consulting	541620
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SOURCE: St. Simons Island Airport

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

**Table 3a: DBES—St. Simons Island Airport  
by Relevant NAICS Codes—Design Runway 4-22 Rehabilitation, EMAS, & Drainage  
Improvements**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
541330	72	1002	7%	\$547,826	\$38,348
541370	10	90	11%	\$104,348	\$11,478
541380	11	84	13%	\$52,174	\$6,783
541620	22	134	16%	\$195,652	\$31,304
<b>Total</b>				<b>\$900,000</b>	<b>\$87,913</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>9.8%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory July 2024.

**Table 3b: DBES— St. Simons Island Airport  
by Relevant NAICS Codes—Construct Skylane Development Infrastructure Phase 2**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
237310	14	86	16%	\$2,565,330	\$410,453
238910	38	216	18%	\$752,008.00	\$135,361
541330	72	1002	7%	\$395,795	\$27,706
541380	11	84	13%	\$205,226	\$26,679
561730	38	1270	3%	\$39,579	\$1,187
<b>Total</b>				<b>\$3,957,938</b>	<b>\$601,386</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>15.2%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory July 2024.

**Table 3c: DBES— St. Simons Island Airport  
Relevant NAICS Codes— Construct Runway 4-22 Rehabilitation, EMAS, & Drainage  
Improvements Part 1: Rehab & Infrastructure**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
237310	14	86	16%	\$5,740,687	\$918,510
238910	38	216	18%	\$1,682,841.00	\$302,911
541330	72	1002	7%	\$885,706	\$61,999
541380	11	84	13%	\$459,255	\$59,703
561730	38	1270	3%	\$88,571	\$2,657
<b>Total</b>				<b>\$8,857,060</b>	<b>\$1,345,780</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>15.2%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory July 2024.

**Table 3d: DBES— St. Simons Island Airport  
by Relevant NAICS Codes—Acquire 0.3 AC Parcel (Recycle Center)**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
531320	0	258	0%	\$31,567	\$0
541110	15	3161	0%	\$26,306	\$0
541191	5	115	4%	\$11,838.00	\$474
541330	72	1002	7%	\$91,340	\$6,394
541370	10	90	11%	\$18,949	\$2,084
<b>Total</b>				<b>\$180,000</b>	<b>\$8,952</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>5.0%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory July 2024.

**Table 3e: DBES— St. Simons Island Airport  
by Relevant NAICS Codes—Design & Construct Perimeter Fencing**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
238990	17	400	4%	\$334,050	\$13,362
541330	72	1002	7%	\$58,950	\$4,127
<b>Total</b>				<b>\$393,000</b>	<b>\$17,489</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>4.5%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory July 2024.

**Table 3f: DBES— St. Simons Island Airport  
by Relevant NAICS Codes— Construct Runway 4-22 Rehabilitation, EMAS, & Drainage  
Improvements Part 2: EMAS**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
237310	14	86	16%	\$632,860	\$101,258
238210	25	847	3%	\$19,996.00	\$600
238910	38	216	18%	\$3,594,344.00	\$646,982
541330	72	1002	7%	\$958,246	\$67,077
541380	11	84	13%	\$114,265	\$14,854
561730	38	1270	3%	\$42,849	\$1,285
<b>Total</b>				<b>\$5,362,560</b>	<b>\$832,056</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>15.5%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory July 2024.

**Table 3f: DBES— St. Simons Island Airport  
by Relevant NAICS Codes— Design Partial Realignment & Extension of Taxiway A**

NAICS Codes	DBE Firms	All Firms	% of DBE Firms Available	NAICS Dollars	DBE Dollars
541330	72	1002	7%	\$221,870	\$15,531
541370	10	90	11%	\$42,261	\$4,649
541380	11	84	13%	\$21,130	\$2,747
541620	22	134	16%	\$79,239	\$12,678
<b>Total</b>				<b>\$364,500</b>	<b>\$35,605</b>
<b>WEIGHTED STEP 1 Goal =</b>					<b>9.8%</b>

SOURCES:

1. 2022 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, July 2024.
3. Florida UCP DBE Directory July 2024.

**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 directories 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 fiscal year was derived by multiplying the dollars for each activity by the percentage of relevant DBE firms to all relevant firms. The total DBE goal in dollars was divided by the total project costs to derive the step 1 goals.

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

Design Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements	9.8
Construct Skylane Development Infrastructure Phase 2	15.2%
Construct Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements Part 1: Rehab & Infrastructure	15.2%
Acquire 0.3 AC Parcel (Recycle Center)	5.0%
Design Taxiway "B" Rehabilitation	4.5%
Construct Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements Part 2: EMAS #1, #2	15.5%
Design Partial Re-alignment & Extension of Taxiway A	9.8%

**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 Airports in recent years were examined relative to the above consideration. Notice the annual DBE percent accomplishment indicated in Table 4 below:

**Table 4: Brunswick Golden Isles Airport  
DBE Accomplishment**

<b>Report Period</b>	<b>DBE Goal</b>	<b>Total DBE Percent Achieved</b>	<b>Achieved Over/Under</b>
FY 2016	9.1%	11.6%	2.5%
FY 2018	9.1%	10.6%	1.5%
FY 2020	7.3%	13.4%	6.1%
<b>MEDIAN</b>		<b>11.6%</b>	<b>2.5%</b>

The median DBE accomplishment for the periods as shown above for the Airport is 11.6%. There has been no federally awarded projects in the last three years.

**B. Consultations**

The Airport held a public meeting on August 15, 2024. The purpose of the meeting was to solicit information from interested stakeholders about the draft goal, as well as the availability of potential DBEs, the effects of discrimination on opportunities for DBEs, and the Airport’s effort to increase DBE participation. Please see Appendix B for the attendee list and consultation comments. The draft overall goal was posted on the Airport’s website on July 30, 2024.

**C. Adjustment to Step 1 DBE Base Figures: St. Simons Island Airport, FY 2025-FY 2027.**

With the adjustment factors considered to this point, the Airport will not adjust the Step 1 base figures as calculated above.

**Table 5: St. Simons Island Airport  
FY 2025 – FY 2027 Overall Goal**

<b>Fiscal Year</b>	<b>Project</b>	<b>Step1</b>	<b>Step 2 adjustment</b>	<b>Overall Goal</b>	<b>Total project costs</b>	<b>DBE Goal (dollars)</b>
2025	Design Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements	9.8%	N/A	9.8%	\$900,000	\$88,200
	Construct Skylane Development Infrastructure Phase 2	15.2%	N/A	15.2%	\$3,957,938	\$601,607
<b>FY 2025 Total</b>				<b>14.2%</b>	<b>\$4,857,938.00</b>	<b>\$689,807.00</b>
2026	Construct Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements Part 1: Rehab & Infrastructure	15.2%	N/A	15.2%	\$8,857,060	\$1,346,273
	Acquire 0.3 Parcel (Recycle Center)	5.0%	N/A	5.0%	\$180,000	\$9,000
	Design & Construct Perimeter Fencing Improvements	4.5%	N/A	4.5%	\$393,000	\$17,685
<b>FY 2026 Total</b>				<b>14.6%</b>	<b>\$9,430,060</b>	<b>\$1,372,958</b>
2027	Construct Runway 4-22 Rehabilitation, EMAS, & Drainage Improvements Part 2: EMAS # 1	15.5%	N/A	15.5%	\$5,362,560	\$831,197
	Design Partial Re-alignment & Extension of Taxiway A	9.8%	N/A	9.8%	\$364,500	\$35,721
<b>FY 2027 Total</b>				<b>15.1%</b>	<b>\$5,727,060</b>	<b>\$866,918</b>
<b>FY2025-FY2027 Overall Goal</b>				<b>14.6%</b>	<b>\$20,015,058</b>	<b>\$2,929,683</b>

The total DBE goal in dollars was divided by the total project costs to derive the overall DBE goal of **14.6%** for FY 2025-FY 2027.

### III. Process

The Airport will normally submit its overall goal to the FAA on August 1 of each year that a DBE goal is due.

Before establishing the overall goal this year, the Airport 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's efforts to establish a level playing field for the participation of DBEs.

Following this consultation, the Airport published a notice of the proposed overall goal on its website informing the public that the proposed goal and its rationale were available for review and comment during normal business hours at the Airport's administrative office for 30 days following the date of the notice. 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 2025 to FY 2027.

The Airport'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 will begin using the overall goal on October 1 of each year, unless the Airport 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 will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. The Airport 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 proposes a race-conscious goal of **12.1%** and a race-neutral goal of **2.5%**, for a total of **14.6%**. 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 **2.5%** (see **Table 4**).

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

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



**Resources: The St. Simons Island Airport FY 2025-2027 Disadvantaged Business Enterprise Program Methodology**

**A. Resource Documents:**

1. Georgia UCP DBE Directory, July 2024.
2. Florida UCP DBE Directory July 2024.
3. 2022 County Business Patterns, U.S. Census Bureau.
4. Uniform Report of DBE Commitments/Awards and Payments

## **Appendix A: Stakeholder Meeting**

Meeting held on August 15, 2024 at 2:00 PM in the Airport Commission Conference Room

**Summary of Meeting:** The Airport 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”.

The meeting invitation was emailed to 74 businesses and organizations. There were three registrations for the meeting, but there were no attendees other than staff at the meeting.

**GLYNN COUNTY AIRPORT COMMISSION**  
 DBE Program Three-Year goal Consultation Meeting  
 August 15, 2024

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