

## ATTACHMENT 5

### Overall DBE Three-Year Goal Methodology

**Name of Recipient:** The Town of Montague Airport Commission (the Commission) owner of Turners Falls Municipal Airport.

Goal Period: FY-2024-2025-2026 (October 1, 2023 through September 30, 2026)

DOT-assisted contract amount:	FY-2024	\$	0.00
	FY-2025	\$	362,500.00
	FY-2026	\$	1,410,000.00
	Total	\$	1,772,500.00

**Overall Adjusted Three-Year Goal: 2.88%, to be accomplished through 2.88% Race Neutral and 0% Race Conscious. Total dollar amount to be expended on DBEs: \$50,974.02**

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

FFY-2024 Projects

- No project

FFY-2025 Projects

- 1) Apron and Taxiway Design/Permit/Bid – \$362,500.00

FFY-2026 Projects

- 2) Apron and Taxiway Realignment /Construction – \$1,410,000.00

Detailed goal calculations for each project have been provided in the spreadsheets at the end of this section.

Market Area: The Commission defines its market area as the County of Franklin, Massachusetts and neighboring Counties in Massachusetts, New Hampshire, and Vermont.

Step 1. Relative Availability of DBEs

Pursuant to 49CFR 26.45, the Commission has used the following methodology to determine the baseline figure for its 2024-2026 DBE goal. The Commission has used the most recent (2021) US Census data and the Supplier Diversity Office Directory of Certified Businesses to determine the number of ready, willing, and able DBEs in the market area.

Census Bureau Data: <https://data.census.gov/cedsci/>

Supplier Diversity Office Link:

<https://www.diversitycertification.mass.gov/BusinessDirectory/BusinessDirectorySearch.aspx>

For each area of work, the total number of DBEs within the market area (with adjustments for specific work categories) found in the SDO DBE Directory is divided by the total number of all firms found through analysis of the (2021) US Census data for the market area to arrive at the percentage of DBE firms that are ready, willing, and able to perform contract work.

In order to determine the expected DBE participation in dollars, the estimated contracting dollars for each area of work is multiplied by the percentage of firms that are ready, willing, and able to perform contract work. To establish the DBE project goal, the overall projected DBE participation (in dollars) is divided by the estimated total project costs. This is the base goal for each project.

To determine the overall base figure for more than one project, the sum of all the dollars expected to be spent on DBE participation is divided by the estimated total of all project costs. This number is the overall base goal for the Airport. A breakdown of all mathematical calculations is provided in the tables that follow this page.

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**STEP 1: CALCULATION OF GOAL**

**YEAR 1 GOAL CALCULATION (2024)**

2024 Project Name: No Project

Eligible Project Costs
\$0.00

DBE Participation	
in dollars	in percentage
\$0.00	0.00%

PROJECT DBE PARTICIPATION GOAL

<b>YEAR 1 TOTAL PROJECTS (2024)</b>
<b>\$0.00</b>

YEAR 1 GOAL (2024)	
in dollars	in percentage
\$0.00	0.00%

**YEAR 2 GOAL CALCULATION (2025)**

2025 Project Name: Apron and Taxiway Design/Permit/Bid

Eligible Project Costs
\$362,500.00

DBE Participation	
in dollars	in percentage
\$12,802.25	3.53%

PROJECT DBE PARTICIPATION GOAL

<b>YEAR 2 TOTAL PROJECTS (2025)</b>
<b>\$362,500.00</b>

YEAR 2 GOAL (2025)	
in dollars	in percentage
\$12,802.25	3.53%

**YEAR 3 GOAL CALCULATION (2026)**

2026 Project Name: Apron and Taxiway Realignment /Construction

Eligible Project Costs
\$1,410,000.00

DBE Participation	
in dollars	in percentage
\$89,145.79	6.32%

PROJECT DBE PARTICIPATION GOAL

<b>YEAR 3 TOTAL PROJECTS (2026)</b>
<b>\$1,410,000.00</b>

YEAR 3 GOAL (2026)	
in dollars	in percentage
\$89,145.79	6.32%

**STEP 2: GOAL ADJUSTMENT CALCULATION**

Goal Adjustment	
Year	DBE Achievement
2014	1.3%
2015	6.4%
2016	0%
2017	0%
2018	0%
2019	0%
2020	Not Required
2021	0%
2022	0%
2023	Not Required
Median	0.00%

**TOTAL FOR ALL TURNERS FALLS MUNICIPAL AIRPORT PROJECTS**

Overall Project Costs
\$1,772,500.00

DBE Participation	
in dollars	in percentage
\$101,948.04	5.75%
0.00%	0.00%
\$101,948.04	2.88%

STEP 1: Calculation of Goal

STEP 2: Goal Adjustment

\$50,974.02	2.88%	<b>FINAL OVERALL AIRPORT DBE PARTICIPATION GOAL</b>
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2025 Project Name: Apron and Taxiway Design/Permit/Bid

Overall Project Cost: \$362,500.00  
Eligible Project Costs: \$362,500.00

STEP 1: Calculation of Goal

Description of Services		NAICS Code	Available Businesses*	Available DBEs**	% of Available DBEs	Project Costs	DBE Participation in Dollars
<b>Professional/Consultant Contract</b>							
X	Engineering and Management Services	541330	230	9	3.91%	\$275,000.00	\$10,760.87
X	Geotechnical	541330	230	9	3.91%	\$30,000.00	\$1,173.91
X	Survey (Land) Subconsultant	541370	29	0	0.00%	\$47,000.00	\$0.00
X	Environmental Engineering, Compliance and Permitting Subconsultant	541620	64	7	10.94%	\$6,500.00	\$710.94
	Electrical Design Consultant	238210	518	4	0.77%		
						<b>Subtotal</b>	<b>\$358,500.00</b>
						<b>% DBE Participation</b>	<b>3.53%</b>
<b>Independent Fee Estimate Contract</b>							
X	Engineering/Specialty Subconsultant - IFE	541330	230	9	3.9%	\$4,000.00	\$156.52
						<b>Subtotal</b>	<b>\$4,000.00</b>
						<b>% DBE Participation</b>	<b>3.91%</b>
<b>Overall Total</b>						<b>\$362,500.00</b>	<b>\$12,802.25</b>
						<b>% Overall DBE Participation</b>	<b>3.53%</b>

STEP 2: Goal Adjustment

% Goal Adjustment 0%

**FINAL PROJECT DBE PARTICIPATION GOAL 3.53%**

2026 Project Name: Apron and Taxiway Realignment /Construction

Overall Project Cost: \$1,410,000.00  
Eligible Project Costs: \$1,410,000.00

STEP 1: Calculation of Goal

Description of Services	NAICS Code	Available Businesses*	Available DBEs**	% of Available DBEs	Project Costs	DBE Participation in Dollars	
<b>Professional/Consultant Contract</b>							
X Engineering Construction Phase Services	541330	230	9	3.91%	\$250,000.00	\$9,782.61	
X Materials Testing (Soils Investigation) Subconsultant	541380	230	9	3.91%	\$25,000.00	\$978.26	
X Survey (Land) Subconsultant	541370	29	0	0.00%	\$20,000.00	\$0.00	
					Subtotal	\$295,000.00	
					% DBE Participation		3.65%

<b>Independent Fee Estimate Contract</b>							
X Engineering/Specialty Subconsultant - IFE	541330	230	9	3.91%	\$5,000.00	\$195.65	
					Subtotal	\$5,000.00	
					% DBE Participation		3.91%

Description of Services	NAICS Code	Available Businesses*	Available DBEs**	% of Available DBEs	Project Costs	DBE Participation in Dollars	
<b>Construction</b>							
X Asphalt Paving	237310	36	6	16.67%	\$195,000.00	\$32,500.00	
X Drainage Subconsultant	237310	36	10	27.78%	\$70,000.00	\$19,444.44	
X Electrical Contractors (Electrical Installation)	238210	518	4	0.77%	\$135,000.00	\$1,042.47	
X Hydroseeding/Seeding	561730	919	8	0.87%	\$50,000.00	\$435.26	
X Pavement and Pavement Markings (Painting) Subconsultant	237310	36	9	25.00%	\$20,000.00	\$5,000.00	
X Sedimentation and Erosion Control (Landscaping)	561730	919	8	0.87%	\$50,000.00	\$435.26	
X SWPPP Preparation	237310	36	10	27.78%	\$25,000.00	\$6,944.44	
X Unclassified Excavation	238910	333	15	4.50%	\$275,000.00	\$12,387.39	
<b>Construction Material Providers:</b>							
X * Asphalt	324121	13	0	0.00%	\$285,000.00	\$0.00	
					Subtotal	\$1,105,000.00	
					% DBE Participation		7.08%

<b>Non - Contributive Expenses</b>							
X Sponsor Admin Fee	N/A	N/A	N/A	0.0%	\$5,000.00	\$0.00	
					Subtotal	\$5,000.00	
					% DBE Participation		0.0%

<b>Overall Total</b>	\$1,410,000.00	\$89,145.79
<b>% Overall DBE Participation</b>	6.32%	

STEP 2: Goal Adjustment

% Goal Adjustment 0%

<b>FINAL PROJECT DBE PARTICIPATION GOAL</b>	<b>6.32%</b>
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Step 2. 26.45(d): Adjustments to Step 1 base figure.

A review of past DBE achievements revealed that historic DBE participation at the Airport was significantly lower than the base 1 figure for FY-2024-2026. Below are the Airport's historic DBE achievements:

<b>Year</b>	<b>DBE Achievement</b>
2014	1.3%
2015	6.4%
2016	0%
2017	0%
2018	0%
2019	0%
2020	Not Required
2021	0%
2022	0%
2023	Not Required
<b>Median</b>	<b>0%</b>

Arranging this historical data from low to high (0%, 0%, 0%, 0%, 0%, 0%, 1.3%, 6.4%) the median is 0%

Step 1 Base averaged with historical median:  $(5.75\% + 0\%)/2 = 2.88\%$

To arrive at an overall goal, the Step 1 base figure was added to the Step 2 adjustment figure and the total was averaged, arriving at an overall goal of 2.88%. The Commission believes this adjusted goal accurately reflects DBE participation that can be achieved for the type(s) of work being awarded during this three-year period.

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

The Commission will meet the maximum feasible portion of its overall goal by using Race Neutral means of facilitating DBE participation., including but not limited to the following:

- Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE, and other small businesses, participation;
- Relaying information regarding contracting procedures and specific contract opportunities;
- Providing services to help DBEs and other small businesses improve long-term development, increase opportunities to participate in a variety of kinds of work, handle increasingly significant projects, and achieve eventual self-sufficiency;
- Ensuring distribution of DBE directory, through electronic means, to the widest feasible universe of potential prime contractors;

The Commission will meet the maximum feasible portion of its overall goal by using Race Neutral means of facilitating DBE participation.

The Commission estimates that in meeting its overall goal of 2.88%. It will obtain 2.88% from Race Neutral participation and 0% through Race Conscious measures.

The Commission will adjust the estimated breakout of Race Neutral and Race Conscious DBE participation as needed to reflect actual DBE participation (see Section 26.51(f)) and 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 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:

In establishing the overall goal, the Commission provided for consultation and publication. This included 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 Town's efforts to establish a level playing field for the participation of DBEs. The consultation included outreach seeking to schedule, direct, interactive exchange with as many interested stakeholders as possible focused on obtaining information relevant to the Town's goal setting process, and it occurred before its goal methodology was submitted to the operating administration for review pursuant. Details of the consultation are as follows:

Before finalizing the overall goal, the Commission reached out to the Greater New England Minority Supplier Development Council, Women's Business Enterprise National Council, Center for Women & Enterprise, and the Franklin Chamber of Commerce 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 Commission's efforts to establish a level playing field for the participation of DBEs.

A virtual meeting focused on obtaining information relevant to the goal setting process will be held on October 31, 2024, from 10:00 AM to 10:30 AM. Any comments received as a result of consultation will be provided in this section.

Notwithstanding paragraph (f)(4) of this section, the Commission will not implement its proposed goal until it has complied with this requirement.

A notice of the proposed goal was published on the Airport's official internet website before the methodology was submitted to the FAA. If the proposed goal changes following review by the FAA,

the revised goal will be posted on the official internet website. The notice can also be viewed using the link below:

<https://montague-ma.gov/p/31/Turners-Falls-Airport>

The language used for the public notice is provided below:

The Commission hereby announces its goal of 2.88% for Disadvantaged Business Enterprise (DBE) participation on Airport Improvement Program (AIP) contracts at the Turners Falls Municipal Airport for federal fiscal years 2024 through 2026. A copy of the Airport's DBE Plan, goal, and rationale can be viewed by clicking the following links: 0B5 2024-2026 DBE Program, 0B5 2024-2026 DBE Goal Calculation. A virtual meeting to discuss the Airport's DBE goal and rationale will be held on October 31, 2024, from 10:00 AM to 10:30 AM. Parties interested in participating in the virtual meeting must contact Jacklyn Marks of Gale Associates, via email at [jcm@gainc.com](mailto:jcm@gainc.com) or phone at 603-471-1887 so that a meeting link can be provided. This meeting is open to the public.

#### CONTRACT GOALS

The Commission will use contract goals to meet any portion of the overall goal that it 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 the Commission's overall goal that is not projected to be met through the use of Race Neutral means.

The Commission 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 DBEs to perform the particular type of work).

The Commission will express its contract goals as a percentage of the total amount of a DOT-assisted contract.