

**FFY 2021 – 2023  
DISADVANTAGED BUSINESS ENTERPRISE PROGRAM METHODOLOGY  
FOR**



**COBB COUNTY INTERNATIONAL AIRPORT - McCOLLUM FIELD**

**KENNESAW, GEORGIA**

July 2020

## FFY 2021-2023 Overall Disadvantaged Business Enterprise (DBE) Goal Methodology

Airport Sponsor: **Cobb County**

Airport: **Cobb County International Airport - McCollum Field**

**DBELO: Karl von Hagel, Airport Manager**

Cobb County International Airport

1723 McCollum Pkwy

Kennesaw, GA 30144

Phone (770) 528-1615

E-Mail: [Karl.VonHagel@cobbcounty.org](mailto:Karl.VonHagel@cobbcounty.org)

### I. Detailed Methodology: Specific Steps

#### A. Amount of Goal

Cobb County's FFY 2021-2023 overall DBE goal for the federal financial assistance it will expend in USDOT-assisted contracts is the following:

Overall Goal:	<b>11.17%</b>	<b>FFY 2021 Goal</b>	<b>10.21%</b>
Race-Neutral:	<b>0.00%</b>	<b>FFY 2022 Goal</b>	<b>9.75%</b>
Race-Conscious:	<b>11.17%</b>	<b>FFY 2023 Goal</b>	<b>14.71%</b>

Given the amount of USDOT-assisted contracts that the County expects to let during this fiscal three-year period, which is approximately **\$17,370,000**, this means that the County has set a goal of expending approximately **\$1,941,071** with DBEs during FFY 2021-2023.

#### B. Determination of the Market Area of the study

The normal market area is derived by determining where the substantial majority of contracting dollars for AIP-funded projects were spent, and from where the majority of bidders over a given period of time have come. The market area is shown below in Table 1, and is based on the counties from where bidders came who participated in projects at the airport in the past six years, as well as where the substantial majority of dollars were expended. Also, the market area for professional services is based on the location of the airport's engineering consultant (Gwinnett).

**Table 1: Counties in the Local Market Area for  
Cobb County International Airport - McCollum Field**

County	Dollars Expended	Percentage of Dollars Expended	Number of bidders	Percentage of bidders
<b>Cherokee</b>	\$5,588,888	40.6%	1	9.1%
<b>Cobb</b>	\$5,051,416	36.7%	6	54.5%
<b>Gordon</b>	\$2,779,164	20.2%	1	9.1%
<b>SUBTOTAL</b>	<b>\$13,419,468</b>	<b>97.4%</b>	<b>8</b>	<b>72.7%</b>
<b>Others</b>	\$354,564	2.6%	3	27.3%
<b>Total</b>	<b>\$13,774,032</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>

Source: Michael Baker International

**C. Determination of relevant NAICS codes**

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

**Table 2: Cobb County International Airport - McCollum Field—  
FFY 2021-2023 Projects & Activities**

FISCAL YEAR	PROJECTS	ACTIVITY	NAICS CODE
FFY 2021 <sup>1</sup>	Taxiway 'A' West Relocation (Phase 1 of 3)	Paving	237310
		Grading and drainage	238910
	North Terminal Area Development / Public Parking	Paving; marking	237310
		Drainage	238910
FFY 2022	Taxiway 'A' West Relocation (Phase 2 of 3)	Paving	237310
		Grading and drainage	238910
	Terminal Area Development for Tract AQ	Grading and drainage; clearing and grubbing; demolition	238910
		Runway 9/27 + Taxiway A/B + Apron Maintenance	Heavy construction
FFY 2023 <sup>2</sup>	Quarry Impacts/ Easement/Fee Simple	Environmental consulting	541620

SOURCE: Michael Baker International

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

**Table 3a: DBEs—Cobb County International Airport, by Relevant NAICS Codes — FFY 2021**

**TAXIWAY 'A' WEST RELOCATION (PHASE 1 OF 3)**

Activity	NAICS CODES	DBE Firms	All Firms	Percentage of DBE Firms Available	Grant Amount Breakdown	DBE Amount
Paving	237310	10	47	8.96%	\$4,500,000	\$403,200
Grading and drainage	238910	8	154			
<b>TOTAL =</b>		<b>18</b>	<b>201</b>	<b>STEP 1 DBE BASE FIGURE =</b>		<b>8.96%</b>

<sup>1</sup> S. Parallel Taxiway Relocation - Acquire Tract AQ (10 acres) project (land acquisition only) not included for the purpose of DBE goal setting

<sup>2</sup> Acquire Tract AR (10.84 acres) project (land acquisition only) not included for the purpose of DBE goal setting

**Table 3b: DBEs—Cobb County International Airport, by Relevant NAICS Codes — FFY 2021**

NORTH TERMINAL AREA DEVELOPMENT / PUBLIC PARKING						
Activity	NAICS CODES	DBE Firms	All Firms	Percentage of DBE Firms Available	Grant Amount Breakdown	DBE Amount
Paving, marking	237310	10	47	8.96%	\$900,000	\$80,640
Drainage	238910	8	154			
<b>TOTAL =</b>		<b>18</b>	<b>201</b>			
<b>STEP 1 DBE BASE FIGURE =</b>						<b>8.96%</b>

**Table 3c: DBEs—Cobb County International Airport, by Relevant NAICS Codes — FFY 2022**

TAXIWAY 'A' CENTER RELOCATION (PHASE 2 OF 3)						
Activity	NAICS CODES	DBE Firms	All Firms	Percentage of DBE Firms Available	Grant Amount Breakdown	DBE Amount
Paving	237310	10	47	8.96%	\$4,500,000	\$403,200
Grading and drainage	238910	8	154			
<b>TOTAL =</b>		<b>18</b>	<b>201</b>			
<b>STEP 1 DBE BASE FIGURE =</b>						<b>8.96%</b>

**Table 3d: DBEs—Cobb County International Airport, by Relevant NAICS Codes — FFY 2022**

TERMINAL AREA DEVELOPMENT FOR TRACT AQ						
Activity	NAICS CODES	DBE Firms	All Firms	Percentage of DBE Firms Available	Grant Amount Breakdown	DBE Amount
Grading and drainage; clearing and grubbing; demolition	238910	8	154	5.19%	\$2,700,000	\$140,130
<b>TOTAL =</b>		<b>8</b>	<b>154</b>			
<b>STEP 1 DBE BASE FIGURE =</b>						<b>5.19%</b>

**Table 3e: DBEs—Cobb County International Airport, by Relevant NAICS Codes — FFY 2022**

RUNWAY 9/27 + TAXIWAY A/B + APRON MAINTENANCE						
Activity	NAICS CODES	DBE Firms	All Firms	Percentage of DBE Firms Available	Grant Amount Breakdown	DBE Amount
Pavement rehabilitation; marking	237310	10	47	21.28%	\$270,000	\$57,456
<b>STEP 1 DBE BASE FIGURE =</b>						<b>21.28%</b>

**Table 3f: DBEs—Cobb County International Airport, by Relevant NAICS Codes —  
FFY 2023**

QUARRY IMPACTS /EASEMENT/FEE SIMPLE						
Activity	NAICS CODES	DBE Firms	All Firms	Percentage of DBE Firms Available	Grant Amount Breakdown	DBE Amount
Environmental consulting	541620	5	34	14.71%	\$4,500,000	\$661,950
<b>STEP 1 DBE BASE FIGURE =</b>						<b>14.71%</b>

**SOURCES:**

1. 2018 County Business Patterns, US Census Bureau, June 25, 2020.
2. Georgia DOT UCP Directory, July 2020.

**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 DBE Base Figure**

The Step 1 DBE Base Figure for each project was derived by dividing the number of relevant DBE firms by NAICS code into the number of all relevant firms by NAICS code, as indicated in Tables 3a-3f, above.

**FFY 2021**

Taxiway 'A' West Relocation (Phase 1 of 3) – **8.96%**  
 North Terminal Area Development / Public Parking – **8.96%**

**FFY 2022**

Taxiway 'A' West Relocation (Phase 2 of 3) – **9.91%**  
 Terminal Area Development for Tract AQ – **5.19%**  
 Runway 9/27 + Taxiway A/B + Apron Maintenance – **21.28%**

**FFY 2023**

Quarry Impacts/Easement/Fee Simple – **14.71%**

**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 overall DBE goal accomplishments at the Airport were examined relative to the above consideration. Notice the annual DBE percent accomplishment as indicated below):

**Table 4: Cobb County International Airport-McCollum Field DBE Accomplishments for FFY 2017-2019**

Report Period	Approved DBE Goal	Total DBE Percent achieved	Achieved over/under
<b>FFY 2017</b>	16.80%	47.15%	30.35%
<b>FFY 2018</b>	11.97%	11.45%	-0.52%
<b>FFY 2019</b>	11.69%	11.17%	-0.52%
<b>MEDIAN =</b>		<b>11.45%</b>	<b>-0.52%</b>

*Source: Michael Baker International*

49 CFR Part 26.45(d)(2) also states that the following must be considered for the purposes of considering an adjustment to the base figure:

*“(i) Statistical disparities in the ability of DBEs to get the financing, bonding and insurance required to participate in your program;*

*“(ii) Data on employment, self-employment, education, training and union apprenticeship programs, to the extent you can relate it to the opportunities for DBEs to perform in your program.”*

There are no local disparity studies or similar documents that can be utilized to adjust the Step 1 DBE base figure. Several agencies were contacted, including the Georgia Entrepreneur and Small Business Development office (ESBD), the Georgia DOT Equal Opportunity Division, and the Kennesaw State University’s Small Business Development Center office in Kennesaw GA.

A disparity study was conducted for the Georgia Department of Transportation (GDOT) and the findings were released in July 2016. The study demonstrated that there exists disparity between the availability of minority- and women-owned firms and DBEs to perform GDOT-funded work, and the utilization of said firms. Because the study does not focus on FAA contracts, the disparity study data will not be used to make an adjustment to the base figure.

None of the entities had any disparity studies or data available for the Cobb County area, and none had any data available noting disparities regarding DBEs’ access to bonding, capital, insurance, etc.

There are a number of programs available to DBEs and other small businesses. GDEcD (<http://www.georgia.org/small-business/>) has resources available for DBEs, including certification information, legislation involving small businesses, and contact information for small and minority business coordinators throughout the state of Georgia.

The Kennesaw State University's Small Business Development Center office in Kennesaw GA has consultants available to assist DBE firms in writing business plans; conforming to federal government regulations; bidding on federal, state and local contracts; find capital, etc. The agency does not conduct disparity studies, but it does provide resources to assist DBEs in obtaining a greater opportunity to participate in federal contracts.

**B. Adjustment to Step 1 DBE Base Figure: Cobb County International Airport - FFY 2021-2023**

With the adjustment factors considered to this point, the County will adjust the Step 1 base figures as calculated above by adding the median of the total percent achieved, derived in Table 4, above (11.45%) to the base figure for each fiscal year as noted, and averaging the total, for an adjusted overall DBE goal.

**Table 5: Overall Goal Calculation – Cobb County International Airport-McCollum Field**

Federal Fiscal Year	Project	Step 1	Step 2 adjustment	Overall Goal	Federal portion project costs	DBE Goal (dollars)
FFY 2021	Taxiway 'A' West Relocation (Phase 1 of 3)	8.96%	11.45%	10.21%	\$4,500,000	\$459,225
	North Terminal Area Development / Public Parking	8.96%	11.45%	10.21%	\$900,000	\$91,845
<b>FFY 2021 Total</b>				<b>10.21%</b>	<b>\$5,400,000</b>	<b>\$551,070</b>
FFY 2022	Taxiway 'A' Center Relocation (Phase 2 of 3)	8.96%	11.45%	10.21%	\$4,500,000	\$459,225
	Terminal Area Development for Tract AQ	5.19%	11.45%	8.32%	\$2,700,000	\$224,640
	Runway 9/27 + Taxiway A/B + Apron Maintenance	21.28%	11.45%	16.37%	\$270,000	\$44,186
<b>FFY 2022 Total</b>				<b>9.75%</b>	<b>\$7,470,000</b>	<b>\$728,051</b>
FFY 2023	Quarry Impacts/ Easement/Fee Simple	14.71%	n/a	14.71%	\$4,500,000	\$661,950
<b>FFY 2023 Total</b>				<b>14.71%</b>	<b>\$4,500,000</b>	<b>\$661,950</b>
<b>FFY 2021 - 2023 Overall DBE Goal</b>				<b>11.17%</b>	<b>\$17,370,000</b>	<b>\$1,941,071</b>

The total DBE goal in dollars was divided by the total federal portion of project costs to derive the overall DBE goal of **11.17%** for FFY 2021-2023.

**Resources: Cobb County International Airport - McCollum Field -  
Disadvantaged Business Enterprise Program Methodology (FFY 2021 -2023)**

**A. Resource Documents**

1. 2018 County Business Patterns, U.S. Census Bureau, June 25, 2020.
2. Georgia UCP Directory, July 2020.

## **APPENDIX A:**

### **PUBLIC COMMENTS**

The notice to the public was posted at <http://www.cobbcountyairport.org> (see Appendix B). No comments from the public have yet been received as of this submittal.

The DBE subconsultant to the Airport's engineering consultant hosted a web conference on \_\_\_\_\_ at 11:30 a.m. There were 96 invitations sent out, and there were 10 participants. The presentation covered the DBE program, recent changes to the federal regulations, and the DBE goal for federal fiscal years (FFY) 2021-2023. The session lasted about 30 minutes.

Comments and discussion are noted below:

**Q.**

**A.**

**APPENDIX B:**

NOTICE TO THE PUBLIC

Attachment 6

Breakout of Estimated  
Race-Neutral & Race-  
Conscious Participation

## **I. Breakout of Estimated Race-Conscious/Race-Neutral Participation**

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

*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);*

*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 County estimates that it will meet its overall goal of **11.17%** through race-conscious measures. The reason for this projection is that the historical information on DBE participation showed that the median amount by which annual DBE accomplishments on the AIP projects funded in FFY 2017-2019 were exceeded was -0.52% (see [Table 4](#)). Therefore, the goal is projected to be met via race-conscious measures for this fiscal three-year period.

The County 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.

## **II. Process**

The County will normally submit its overall goal to the FAA on August 1 of the required year of submission for general aviation airports in the FAA's Southern Region.

In establishing the overall goal, the County provided for consultation and publication. The consultation included minority-, women's and general contractor groups, and small business organizations that 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 County's efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange via a web conference with as many interested stakeholders as possible focused on obtaining information relevant to the County's goal setting process. The consultation web conference was held on [REDACTED], prior to the submission of the DBE goal methodology to the FAA for review pursuant to paragraph (f) of this section. The County documented in the goal submission the consultation process that was utilized (see Appendix A of Attachment 5).

Following this consultation, the County published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale were available for inspection during normal business hours at the office of the Airport Manager for 30 days from the date of the notice. The notice was posted on the airport's website ([REDACTED]).

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

### **III. Contract Goals**

The County will use contract goals to meet any portion of the overall goal that the County 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 its overall goal that is not projected to be met through the use of race-neutral means.

The County will establish contract goals only on those USDOT-assisted contracts that have subcontracting possibilities. The County does not need to 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 County will express its contract goals as a percentage of the total amount of a USDOT-assisted contract.