

**DBE GOAL METHODOLOGY**  
**49 CFR PART 26**  
**SANTEE COOPER REGIONAL AIRPORT**  
**MANNING, SOUTH CAROLINA**  
**FY 2021-2023**

**FY 2021**

A. UPDATE OF GOALS - To make the program as useful as possible to the public, Clarendon County, South Carolina, (Sponsor) will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required for approval: Amount of Overall goal section, Method used for establishing overall goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually, or as required, in the overall goal submission.

B. AMOUNT OF GOAL - Clarendon County, South Carolina's overall goal for FY 2021 is 9.45% of the Federal financial assistance we will expend in FAA-assisted contracts. We expect to let projects during this FY in the amount of \$930,277.00; this means that our DBE goal is set at \$87,911.00 for this Fiscal Year. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for the Santee Cooper Regional Airport the first step was to establish the availability of ready, willing, and able DBE businesses that were capable of participating in the type of contracts that were programmed during FY 2021. The project that is anticipated at the Santee Cooper Regional Airport includes Apron Rehabilitation, along with the professional effort associated with such a project. The monetary size of the project is expected to be \$930,277.00. An analysis of the project indicates that funds will be expended in the following areas:

<b>SANTEE COOPER REGIONAL AIRPORT PROJECT ANALYSIS FY 2021</b>			
TASK	NAICS	AMOUNT	PERCENTAGE
General Contractors	236220	\$86,534	9.30%
Street & Highway	237310	\$473,812	50.93%
Site Prep	238910	\$225,277	24.21%
Trucking	484220	\$71,304	7.67%
Engineering	541330	\$67,500	7.26%
Landscaping	561730	\$5,850	0.63%
TOTAL		\$930,277	100.00%

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$\frac{\text{Total DBE Firms in the Market Area by NAICS Code of Work to be Performed}}{\text{Total Firms in the Market Area by NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$

As there was not sufficient recent bidders list it was considered reasonable to use the airport’s county along with its surrounding counties to establish the market area. The counties to be included in the market area are as follows: Florence, Calhoun, Orangeburg, Berkeley, Clarendon, Williamsburg, and Sumter counties in the state of South Carolina. It was generally agreed that the most comprehensive directory for DBE firms in South Carolina is the UCP DBE Directory that has been established by the South Carolina Department of Transportation. The list was refined by identifying those firms that could participate in the project by matching the specific trade and description of construction/professional effort with their appropriate NAICS and County. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau’s County Business Pattern (CBCBP) and the identification of the NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{\text{Base}}{\text{Figure}} = \frac{.0930\left(\frac{\text{SCNAICS236220}}{\text{NAICS236220}}\right) + .5093\left(\frac{\text{SCNAICS237310}}{\text{NAICS237310}}\right) + .2421\left(\frac{\text{SCNAICS238910}}{\text{NAICS238910}}\right) + .0767\left(\frac{\text{SCNAICS484220}}{\text{NAICS484220}}\right) + .0726\left(\frac{\text{SCNAICS541330}}{\text{NAICS541330}}\right) + .0063\left(\frac{\text{SCNAICS561730}}{\text{NAICS561730}}\right)}{.0078 + .0340 + .0104 + .0038 + .0023 + .0007}$$

SCNAICS- South Carolina DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{\text{Base}}{\text{Figure}} = \frac{.0930\left(\frac{4}{48}\right) + .5093\left(\frac{1}{15}\right) + .2421\left(\frac{3}{70}\right) + .0767\left(\frac{2}{40}\right) + .0726\left(\frac{2}{62}\right) + .0063\left(\frac{15}{136}\right)}{.0078 + .0340 + .0104 + .0038 + .0023 + .0007}$$

$$\frac{\text{Base}}{\text{Figure}} = \frac{.0078 + .0340 + .0104 + .0038 + .0023 + .0007}{.0038 + .0023 + .0007}$$

$$\frac{\text{Base}}{\text{Figure}} = 5.90\%$$

STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions which have occurred at the Santee Cooper Regional Airport. Currently there are no known disparity studies completed in this area of the State of South Carolina. The Sponsor has considered the suggested options outlined in 49 CFR Part 26 and determined that past performance is the information that will be used to determine if an adjustment to our Base Figure is warranted. It was felt that a sampling of like type projects that have taken place in South Carolina would be appropriate for use in determining if an adjustment was required to the Base Figure. To this end, we investigated three airports with like type projects. Each of these

airports has received a FAA grant for projects of a similar magnitude and type anticipated at the Santee Cooper Regional Airport. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature and elements as the project that is being anticipated in the 2021 time frame at the Santee Cooper Regional Airport:

<b>YEAR</b>	<b>LOCATION</b>	<b>PROJECT TYPE</b>	<b>% OF DBE PARTICIPATION</b>
2013	Greenville	Rehabilitate Apron	3.50%
2009	Greenville	Rehabilitate Taxiway	13.40%
2008	Florence Regional	Construct Runway	13.00%*
* MEDIAN			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the projects was 13.00% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	13.00%
BASE FIGURE	+ <u>5.90%</u>
	18.90% ÷ 2 = 9.45%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 9.45%. It was felt that the Base Figure of 5.90% should be adjusted for this variance. The Average Percentage of 9.45% is established as the goal for DBE participation at the Santee Cooper Regional Airport for FY 2021.

D. PROCESS - The Sponsor submits its overall goal for FY 2021 to the FAA in June 2021, for their consideration and approval. Before establishing the overall goal each year, the Sponsor’s representative has consulted with the South Carolina Department of Transportation, and stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor’s efforts are to establish a level playing field for the participation of DBEs. Following this consultation, the Sponsor has published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Sponsor’s principal office for 30 days following the date of the notice, and informing the public that the Sponsor and FAA will accept comments on the goals for 30 days from the date of the notice. This information was posted on the sponsor’s website at <http://www.clarendoncountygov.org/> and made available to the Office of Minority Business Development in the State of South Carolina. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor’s addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor’s responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). The following people/agencies were invited to the

stakeholder consultation, Clarendon County, South Carolina, Santee Cooper Regional Airport, Holt Consulting, and Taffy Pippin Consulting. Consultation discussions were held with the following agencies on September 29, 2020 at approximately 1:30 pm CDT with questions regarding Uniform Reporting.

<b>SANTEE COOPER REGIONAL AIRPORT AGENCIES CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Tamika Malone, Procurement Director Clarendon County, South Carolina	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Thomas Harvin, Airport Manager Clarendon County, South Carolina	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Billy Timmons, Engineer Clarendon County, South Carolina	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Jack Mayfield, Senior Project Manager Holt Consulting	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Clayton Pippin, Planner Taffy Pippin Consulting, LLC	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Taffy Pippin, Consultant Taffy Pippin Consulting, LLC	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting

Public comments have been requested for the FY 2021 goal and the 30 day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS:** Each time Clarendon County, South Carolina submits an overall goal for review by the FAA, the Sponsor will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Sponsor’s overall goal. The Sponsor will establish contract goals to meet any portion of an overall goal when the Sponsor does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our goal of 9.45%, we will obtain 5.75% of the goal from race-conscious participation and 3.70% via race-neutral participation measures. This is an attainable goal based on the history of DBE participation in prior projects and the availability of current DBE contractors.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on the three projects considered in Step 2 (see page ) of the Previous FAA Projects. The Median is 3.70%, and is established as the race-neutral goal for FY 2021. The following is the data base upon which the level of variance was computed using the “Prior Projects Considered” information:

<b>PROJECT DBE GOAL VARIANCE</b> <b>SANTEE COOPER REGIONAL AIRPORT</b> <b>PREVIOUS FAA PROJECTS</b>				
YEAR	LOCATION	DBE GOAL	% OF DBE PARTICIPATION	VARIANCE
2013	Greenville	10.06%	3.50%	-6.56%
2009	Greenville	9.70%	13.40%	3.70%*
2008	Florence Regional	9.00%	13.00%*	4.00%
* MEDIAN VARIANCE				

**F. CONTRACT GOALS**

Clarendon County, South Carolina will use contract goals to meet any portion of the overall goal that the Sponsor 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.

**G. THREE YEAR GOAL**

Based on the methodologies and calculations for FY 2021 for the Santee Cooper Regional Airport the following average is submitted as a three year goal. As there are no DBE goals required for FY 2022, 0.00% will simply serve as placeholders.

FY 2021	9.45%
FY 2022	0.00%
FY 2023	+ <u>10.21%</u>
	19.66% ÷ 2 = 9.83%

**FY 2022**

The FY 2022 project did not reach the monetary threshold required for development of a DBE goal.

**FY 2023**

**A. UPDATE OF GOALS** - To make the program as useful as possible to the public, Clarendon County, South Carolina, (Sponsor) will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year, or as required for approval: Amount of Overall goal section, Method used for establishing overall goals, Process, the Race-Neutral/Race Conscious Breakout, and Contract Goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually, or as required, in the overall goal submission.

**B. AMOUNT OF GOAL** - Clarendon County, South Carolina's overall goal for FY 2023 is 10.21%, of the Federal financial assistance we will expend in FAA-assisted contracts. We expect to let projects during this FY in the amount of \$1,173,418.00; this means that our DBE goal is set

at \$119,806.00 for this Fiscal Year. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for the Santee Cooper Regional Airport the first step was to establish the availability of ready, willing and able DBE businesses that were capable of participating in the type of contracts that were programmed during FY 2023. The project that is anticipated at the Santee Cooper Regional Airport includes Taxiway Reconstruction, along with the professional effort associated with such a project. The monetary size of the project is expected to be \$1,173,418.00. An analysis of the project indicates that funds will be expended in the following areas:

<b>SANTEE COOPER REGIONAL AIRPORT PROJECT ANALYSIS FY 2023</b>			
TASK	NAICS	AMOUNT	PERCENTAGE
General Contractors	236220	\$410,431	34.98%
Street & Highway	237310	\$407,082	34.69%
Site Prep	238910	\$47,205	4.02%
Trucking	484220	\$76,500	6.52%
Engineering	541330	\$152,550	13.00%
Testing	541380	\$27,000	2.30%
Consulting	541611	\$3,150	0.27%
Landscaping	561730	\$49,500	4.22%
<b>TOTAL</b>		<b>\$1,173,418</b>	<b>100.00%</b>

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the Market Area by NAICS Code of Work to be Performed}}{\text{Total Firms in the Market Area by NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

As there was not sufficient recent bidders list it was considered reasonable to use the airport's county along with its surrounding counties to establish the market area. The counties to be included in the market area are as follows: Florence, Calhoun, Orangeburg, Berkeley, Clarendon, Williamsburg and Sumter counties in the state of South Carolina. It was generally agreed that the most comprehensive directory for DBE firms in South Carolina is the UCP DBE Directory that has been established by the South Carolina Department of Transportation. The list was refined by identifying those firms that could participate in the project by matching the specific trade and description of construction/professional effort with their appropriate NAICS and County. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau's County Business Pattern (CBCBP) and the identification of the NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{Base}{Figure} = .3498\left(\frac{SCNAICS236220}{NAICS236220}\right) + .3469\left(\frac{SCNAICS237310}{NAICS237310}\right) + .0402\left(\frac{SCNAICS238910}{NAICS238910}\right) + .0652\left(\frac{SCNAICS484220}{NAICS484220}\right) + .1300\left(\frac{SCNAICS541330}{NAICS541330}\right) + .0230\left(\frac{SCNAICS541380}{NAICS541380}\right) + .0027\left(\frac{SCNAICS541611}{NAICS541611}\right) + .0422\left(\frac{SCNAICS561730}{NAICS561730}\right)$$

SCNAICS- South Carolina DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{Base}{Figure} = .3498\left(\frac{4}{48}\right) + .3469\left(\frac{1}{15}\right) + .0402\left(\frac{3}{70}\right) + .0652\left(\frac{2}{40}\right) + .1300\left(\frac{2}{62}\right) + .0230\left(\frac{2}{6}\right) + .0027\left(\frac{7}{59}\right) + .0422\left(\frac{15}{136}\right)$$

$$.0292 + .0231 + .0017 +$$

$$\frac{Base}{Figure} = .0033 + .0042 + .0077 + .0003 + .0047$$

$$\frac{Base}{Figure} = 7.42\%$$

STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions which have occurred at the Santee Cooper Regional Airport. Currently there are no known disparity studies completed in this area of the State of South Carolina. The Sponsor has considered the suggested options outlined in 49 CFR Part 26 and determined that past performance is the information that will be used to determine if an adjustment to our Base Figure is warranted. It was felt that a sampling of like type projects that have taken place in South Carolina would be appropriate for use in determining if an adjustment was required to the Base Figure. To this end, we investigated three airports with like type projects. Each of these airports has received a FAA grant for projects of a similar magnitude and type anticipated at the Santee Cooper Regional Airport. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature and elements as the project that is being anticipated in the 2023 time frame at the Santee Cooper Regional Airport:

YEAR	LOCATION	PROJECT TYPE	% OF DBE PARTICIPATION
2013	Greenville	Rehabilitate Apron	3.50%
2009	Greenville	Rehabilitate Taxiway	13.40%
2008	Florence Regional	Construct Runway	13.00%*
* MEDIAN			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the projects was 13.00% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	13.00%
BASE FIGURE	+ <u>7.42%</u>
	20.42% ÷ 2 = 10.21%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 10.21%. It was felt that the Base Figure of 7.42% should be adjusted for this variance. The Average Percentage of 10.21% is established as the goal for DBE participation at the Santee Cooper Regional Airport for FY 2023.

D. PROCESS - The Sponsor submits its overall goal for FY 2023 to the FAA in June 2021, for their consideration and approval. Before establishing the overall goal each year, the Sponsor's representative has consulted with the South Carolina Department of Transportation, and stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor's efforts are to establish a level playing field for the participation of DBEs. Following this consultation, the Sponsor has published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Sponsor's principal office for 30 days following the date of the notice, and informing the public that the Sponsor and FAA will accept comments on the goals for 30 days from the date of the notice. This information was posted on the sponsor's website at <http://www.clarendoncountygov.org/> and made available to the Office of Minority Business Development in the State of South Carolina. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor's addresses to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor's responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). The following people/agencies were invited to the stakeholder consultation, Clarendon County, South Carolina, Santee Cooper Regional Airport, Holt Consulting, and Taffy Pippin Consulting. Consultation discussions were held with the following agencies on June 2 at approximately 10:00 am ET with a question regarding Policy Page signatory.

<b>SANTEE COOPER REGIONAL AIRPORT AGENCIES CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Vickie Williams, Director of Grants Clarendon County, South Carolina	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Tamika Malone, Procurement Director Clarendon County, South Carolina	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Thomas Harvin, Airport Manager Clarendon County, South Carolina	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Ryan Hounshell, P.E.   Operations Manager Holt Consulting	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Lori Hammond Bob Hammond Construction	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Clayton Pippin, Planner Taffy Pippin Consulting, LLC	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting
Taffy Pippin, Consultant Taffy Pippin Consulting, LLC	Availabilities of DBEs, Directories, small and DBE contracting opportunities, Goal setting

Public comments have been requested for the FY 2023 goal and the 30 day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS:** Each time Clarendon County, South Carolina submits an overall goal for review by the FAA, the Sponsor will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Sponsor's overall goal. The Sponsor will establish contract goals to meet any portion of an overall goal when the Sponsor does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our goal of 10.21%, we will obtain 6.51% of the goal from race-conscious participation and 3.70% via race-neutral participation measures. This is an attainable goal based on the history of DBE participation in prior projects and the availability of current DBE contractors.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on the three projects considered in Step 2 (see page 7) of the Previous FAA Projects. The Median is 3.70%, and is established as the race-neutral goal for FY 2023. The following is the data base upon which the level of variance was computed using the "Prior Projects Considered" information:

<b>PROJECT DBE GOAL VARIANCE</b> <b>SANTEE COOPER REGIONAL AIRPORT</b> <b>PREVIOUS FAA PROJECTS</b>				
YEAR	LOCATION	DBE GOAL	% OF DBE PARTICIPATION	VARIANCE
2013	Greenville	10.06%	3.50%	-6.56%
2009	Greenville	9.70%	13.40%	3.70%*
2008	Florence Regional	9.00%	13.00%*	4.00%
* MEDIAN VARIANCE				

**F. CONTRACT GOALS**

Clarendon County, South Carolina will use contract goals to meet any portion of the overall goal that the Sponsor 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.

**G. THREE YEAR GOAL**

Based on the methodologies and calculations for FY 2023 for the Santee Cooper Regional Airport the following average is submitted as a three year goal. As there are no DBE goals required for FY 2022, 0.00% will simply serve as placeholders.

FY 2021	9.45%
FY 2022	0.00%
FY 2023	+ <u>10.21%</u>
	19.66% ÷ 2 = 9.83%

*References:*  
 South Carolina UCP List of Certified DBE Firms, May 2021  
 2018 – U.S. Census Bureau/ May 2021