

Overall DBE Three-Year Goal Methodology (§26.45)

The Wyoming County Commission's overall goal for **FY 2017 - FY 2019** is **6.3%** of the Federal financial assistance that the Commission will expend in DOT-assisted contracts.

Method

1. Determining the market area.

We examined twenty-four (24) DOT-assisted contracts issued for Kee Field for the 2000-2015 period. We found that over 87% of the consultants and contractors that bid on these AIP projects were based in Kanawha, Raleigh, and Wyoming Counties. With nineteen (19) of these contracts issued to companies based in Kanawha County, we believe that these counties along with Mercer County form a contiguous market area for Kee Field. This is based upon the fact that the substantial majority (at least 75%) of bidders comes from these counties and the substantial majority of contracting dollars (greater than 75%) has been expended with firms from these counties.

2. Determining the relevant NAICS coded firms in the market area.

Table 1, below, lists the projects anticipated for Kee Field in accordance with the current ACIP. Due to the nature of the ACIP, and funding for general aviation airports in general, this list is subject to change, and in no way should it be viewed as a binding list of participation for the airport. Also included is a list of expected activities and their corresponding NAICS codes.

Table 1: Projected Projects for Plan Period (FY 2017 - 2019)

Fiscal Year	Project	Projected Cost	Activity	NAICS Code
2017	N/A			
2018	N/A			
2019	Rehabilitate Runway 8-26	\$3,650,000	Construction (General) Site Preparation Trucking Fuel Engineering Surveying Testing Landscaping (Site Restoration)	237310 238910 484220 424720 541330 541370 541380 561730

The U. S. Census Bureau website provides data for West Virginia companies specializing in "Construction" and "Professional, Scientific, and Technical Services", representing NAICS codes referenced in Table 1. We have selected these categories as being representative of the contracting activities that we are entertaining for the current plan period.

3. Determining the number of NAICS firms in the market area.

The U. S. Census Bureau website, particularly the County Business Patterns, provides the 2014 data for West Virginia companies specializing in the NAICS codes referenced in Table 1. Table 2 lists the available DBE's in the market area and all firms in the market area.

We make the assumption that those DBE firms that are “ready, willing and able” to compete for DOT-assisted contracting will have registered with the WVDOT in order to represent themselves as DBEs, and will, therefore, appear in the WVDOT directory of firms referenced in Attachment 2.

Table 2: Ready, Willing, and Able Firms for 2019 Project

NAICS Code	DBE Firms	Market Area - All Firms (as of 2014)
237310	6	15
238910	4	58
484220	0	55
424720	1	2
541330	4	72
541370	0	15
541380	2	13
561730	1	58
Total	18	288
DBE Base Figure = 18 / 288 = 6.3%		

We do not believe that sufficient information is presented in the directory to legitimately refine the data by weighting it in any way.

- Calculating the relative availability (base figure) of DBE’s to perform our work.

No DBE goal is required for FY 2017.

No DBE goal is required for FY 2018.

The DBE Base Figure (before adjustments) for FY 2019 is 6.3%.

- Adjusting the base figure.

To see if it is appropriate to adjust the base figure, the Commission examined the volume of work performed by DBE’s at Kee Field for the past five years, as reflected in bid documents. The DBE participation in federal contracts at Kee Field is as shown in Table 3.

Table 3: Past DBE Participation

Fiscal Year	DBE Participation
2015	N/A
2014	0.0%
2013	N/A
2012	N/A
2011	0.0%
Median participation	0.0%

The following should be noted in consideration of the DBE participation listed in Table 3:

- For FY 2015, FY 2013 and FY 2012 a grant was not issued; and
- For FY 2014 and FY 2011, the grant amounts were less than the \$250,000 goal establishment threshold.

Given the lack of past DBE participation recorded in Table 3, the Commission elects not to make any adjustments to the base figure.

The Commission's projected overall three-year goal for fiscal years 2017, 2018 and 2019 is 6.3%.

The Commission feels at this time that there are a reasonable number of DBE firms in the market area to achieve this goal.

6. Consultations and public participation

As indicated previously, a variety of resource agencies were consulted in developing the overall goal. These agencies include, but were not limited to, the United States Census Bureau Database, the West Virginia Department of Transportation DBE Database, the WVDOT EEO office and the DBE Program Manager for the State of West Virginia, the West Virginia Small Business Development Center, the WVU Council for Women's Concerns, the WVU Division of Diversity, Equity and Inclusion, the Herbert Henderson Office of Minority Affairs, the West Virginia Development Office, the Jefferson County, West Virginia NAACP Chapter and the West Virginia Chamber of Commerce.

The DBE Program Manager for the State of West Virginia was contacted to determine whether or not (1) any changes have been made to the Unified Certification Program that might, by reference, have an impact on the procedures employed in the Commission's DBE Program, and (2) if DBE firms or Contractors have concerns with DBE contracting and goals. In the first instance, the Program Manager did not indicate that the UCP, revised in 2014 by the Federal Highway Administration, would materially impact the procedures for administering the program established herein. Any future updates will be incorporated into the Commission's DBE Program. In the second instance, the Program Manager did not indicate that certified DBE firms feel that goals are too low or that there are not enough contracts for them to participate in nor that Contractors felt that there were not enough certified DBE firms in the state with specialties in which subcontracting opportunities might be available.

The WVDOT EEO office noted that no disparity studies have been conducted to date by their office and they are not aware of any other organization within the State that has conducted a disparity study. Most of the agencies that were contacted did not respond; of those agencies that did respond, no comments or suggestions were made relative to the goal-setting process.

A public consultation meeting was conducted on Wednesday, November 9, 2016 at 10:00 AM at the office of Chapman Technical Group in Buckhannon, West Virginia. Stakeholders, including the public at large as well as minority, women's and general contractor groups, community organizations, and other officials which could have been expected to have information concerning the availability of disadvantaged and non-disadvantaged business and the effects of discrimination on opportunities for DBEs as well as any other information relevant to our goal setting process were invited. The invitees, including the public at large, are listed below:

Drema L. Smith, EEO Division Director
West Virginia Department of Transportation
1900 Kanawha Boulevard, East
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Charleston, WV 25305-0430
Drema.l.smith@wv.gov

J. Keith Burdette, Executive Director
West Virginia Development Office
1900 Kanawha Boulevard, East
Building 6, Room 553
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J.Keith.Burdette@wv.gov

Amanda Pasdon, Director of Business Investment & Development
West Virginia Chamber of Commerce
1624 Kanawha Boulevard, East
Charleston, WV 25311
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Danae Bass, Senior Administrative Assistant
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Division of Diversity, Equity and Inclusion
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Jessica Ice, Chair
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Council for Women's Concerns
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Charleston, WV 25339
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Carol Stevens
CAS Structural Engineering, Inc.
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calalane@aol.com

The following individuals were present for the meeting:

Russell Kocher – Mid Atlantic Maintenance
Rich Clemens – Buckhannon Upshur Airport Authority
Brian Huffman – Chapman Technical Group
Melissa Defibaugh – Chapman Technical Group.

The discussion involved the Commission's goal setting process including the individual project goals and the overall three-year DBE goal, as well as a discussion on the availability of disadvantaged businesses. The stakeholder present for the meeting agreed with the market area determination methodology described on the first page of this goal calculation, but, posed a question for consideration relative to expanding the market area and what effect, if any, that would have on the goal setting process and the overall goal. In consideration of the fact that only 0.6% of the Contractors and Consultants in the state are certified DBE's, expanding the market area would not substantially increase the number of certified DBE firms available to perform project work, hence there would be no material change to the goals calculated.

The Commission will publish a notice on the county's website announcing our proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours for 30 days following the date of the notice. It will also inform the public that the Commission and the DOT will accept comments on the goals for 45 days from the date of the notice.

Comments Received To Date: **None.** [Any public comments received by the Commission will be forwarded upon receipt.]