

## Section 26.45: Overall Goal Calculation

**Name of Recipient:** *City of Redmond, Oregon – Redmond (Roberts Field) Municipal Airport*

**Goal Period:** FY-2024, 2025, & 2026 – October 1, 2023 through September 30, 2026

**DBE Goal:** 1.90% to be accomplished through 0.00% RC and 1.90 % RN

**Total dollar amount to be expended on DBE's: \$502,524**

### **Describe the Number and Type of Projects for this FY:**

The project for the next three years shall consist of

Projects Fiscal Year #1 (FY-24) - **\$13,507,200** (\$12,663,000 is Federal Share at 93.75/6.25)  
Project 1 - Terminal Construction

Projects Fiscal Year #2 (FY-25) – **\$7,352,335** (\$6,892,814 is Federal Share at 93.75/6.25)  
Project 1 – Terminal Construction (continued)

Projects Fiscal Year #3 (FY-26) – **\$7,352,335** (\$6,892,814 is Federal Share at 93.75/6.25)  
Project 1 – Terminal Construction (continued)

### **OVERALL GOAL SETTING METHODOLOGY**

The two-step goal setting process required by CFR 49 part 26 has been used to determine the overall goal for **FY 2024-2026**.

1. Establish a base figure for the relative availability of DBE's
2. Determine the figure adjustment.

The base figure is intended to be a measurement of the current ready, willing and able DBE's as a percentage of all businesses ready, willing and able to perform the recipients anticipated FAA-assisted contracts.

The base figure was established using the Redmond Municipal Airports Bidders List, DBE Directory and Census Data, and the Oregon Department of Aviation 2021 Disparity Study.

This methodology and the supporting evidence comply with the requirements of the federal regulations and federal guidance, as well as relevant court decisions, including *Western States Paving v. Washington State Dept. of Transportation*, 907 F.3d 963 (9th Cir. 2005).

### **STEP 1 ACTUAL RELATIVE DBE AVAILABILITY**

Step 1 of the overall goal determination is computed by determining the number of ready, willing, and able DBEs performing the types of work noted above using the most refined data possible. There are three methodologies used to determine DBE availability.

### **Method #1 DBE Bidders List**

The Redmond Municipal Airport maintains a bidders list from FAA funded project. When information was available from the bidders list for similar contracts, the current bidders list obtained from past procurement procedures was used to determine DBE availability. The bidder's list information was compiled by work type and the DBE status of the firms listed on the bidders list. The DBE availability was determined from the total number of firms for each work type compared to the DBE firms for each work type.

The geographical area for DBE's in the bidders list is not adjusted to a specific region. The bidders list reflects the DBE willing to bid on projects at Redmond Airport.

The table below shows the DBE availability based on the bidders list at the airport.

<b>REDMOND MUNICIPAL AIRPORT BIDDERS LIST</b>			
<b>Work Type</b>	<b>Total Number of Contractors</b>	<b>Number of DBE</b>	<b>DBE AVAILABILITY</b>
Aggregate Crushing	6	0	0%
Aggregate Placement	6	1	17%
Asphalt Paving	6	0	0%
Concrete Cutting	3	2	67%
Crack Seal	1	0	0%
Drilling and Blasting	1	0	0%
Electrical	2	0	0%
Engineering	4	0	0%
Excavation	7	1	14%
Fabric Supply	1	0	0%
Field Office	1	0	0%
Grooving	1	0	0%
Milling	6	0	0%
Pavement Marking	3	0	0%
Seal Coat	1	0	0%
Security	3	1	33%
Storm Drain	5	0	0%
Storm Drain Supply	1	0	0%
Survey	4	0	0%
Testing	1	0	0%
Trenching	2	0	0%
Trucking	6	0	0%

### **Method #2 DBE Directories and Census Data.**

When sufficient information from the bidders list was not available for the proposed contract, the step 1 goal is computed by determining the number of ready, willing, and able DBEs performing the types of work noted above as listed in the current DBE Directory prepared and maintained by the Oregon Department of Transportation against the number of ready, willing, and able businesses available in the same NAICS code. The total number of businesses was obtained from the Census Bureau's Business Pattern database, at <https://data.census.gov/cedsci/> The latest information currently available from this site is from 2021.

The geographical area used when DBE directories and census data are limited to the immediate geographical region where we would expect bidders to determine the most accurate

determination of DBE availability. The geographic region to determine the number of ready, willing, and able DBEs and total businesses included; Clackamas, Hood River, Wasco, Wheeler, Marion, Douglas, Sherman, Deschutes, Jefferson, Linn, Lane, Klamath, Lake, Harney and Crook Counties. This represents the area from which a substantial majority of the contractors and subcontractors come from and the area in which **the City** spends a majority of its contracting dollars.

The table below shows the applicable NAICS codes, DBE's, and total business in the market area.

<b>CENSUS DATA AND DBE DIRECTORY</b>				
<b>REDMOND MUNICIPAL AIRPORT (REDMOND, OREGON) - DBE BREAKDOWN</b>				
<b>Market Area: Clackamas County, Oregon; Crook County, Oregon; Deschutes County, Oregon; Harney County, Oregon; Hood River County, Oregon; Jefferson County, Oregon; Lake County, Oregon; Klamath County, Oregon; Lane County, Oregon; Linn County, Oregon; Wasco County, Oregon; Wheeler County, Oregon; Marion County, Oregon; Douglas County, Oregon; Sherman County, Oregon</b>				
<b>DESCRIPTION</b>	<b>NAICS CODE</b>	<b>TOTAL ESTABLISHMENTS</b>	<b>TOTAL DBE</b>	<b>% DBE</b>
Industrial Building Construction - Prime Contractor	236220	236	11	4.66%
Water and Sewer Line and Related Structures Construction	237110	83	10	12.05%
Power and Communication Line Related Construction	237130	41	2	4.88%
Highway, Street and Bridge Construction	237310	90	13	14.44%
Poured Concrete Foundation and Structure Contractors	238110	165	8	4.85%
Structural Steel and Precast Concrete Contractors	238120	28	2	7.14%
Framing Contractors- Interior	238130	139	2	1.44%
Masonry Contractors	238140	129	1	0.78%
Glass and Glazing Contractors	238150	40	0	0.00%
Roofing Contractors	238160	248	1	0.40%
Siding Contractors	238170	151	2	1.32%
Other Foundation, Structure, Exterior Contractors	238190	17	2	11.76%
Electrical Contractors and Other Wiring Installation Contractors	238210	494	2	0.40%
Plumbing Heating and Air Conditioning Contractors	238220	661	2	0.30%
Other Building Equipment Contractors – Elevator	238290	46	0	0.00%
Other Building Equipment Contractors – Passenger Boarding Bridge	238290	46	0	0.00%
Other Building Equipment Contractors Baggage Equipment	238290	46	0	0.00%
Drywall and Insulation Contractors	238310	181	1	0.55%
Painting and Wall Covering Contractors	238320	508	5	0.98%
Flooring Contractors	238330	216	4	1.85%
Finished Carpentry Contractors	238350	265	3	1.13%

CENSUS DATA AND DBE DIRECTORY				
REDMOND MUNICIPAL AIRPORT (REDMOND, OREGON) - DBE BREAKDOWN				
Market Area: Clackamas County, Oregon; Crook County, Oregon; Deschutes County, Oregon; Harney County, Oregon; Hood River County, Oregon; Jefferson County, Oregon; Lake County, Oregon; Klamath County, Oregon; Lane County, Oregon; Linn County, Oregon; Wasco County, Oregon; Wheeler County, Oregon; Marion County, Oregon; Douglas County, Oregon; Sherman County, Oregon				
DESCRIPTION	NAICS CODE	TOTAL ESTABLISHMENTS	TOTAL DBE	% DBE
Other Building Finish Contactors	238390	45	2	4.44%
Site Prep Contractors -Excavation	238910	413	18	4.36%
Other Specialty Trade Contractors - Fencing	238990	266	13	4.89%
Other Specialty Trade Contractors - Sidewalk and Curb	238990	266	12	4.51%

**Method #3 Disparity Study Data**

When projects are not well defined at the time of the DBE goal preparation, information on DBE availability 2021 Oregon Department of Aviation Disparity Study is used to establish the DBE availability for the respective project. An example of this type of project would be a building expansion project where the breakdown of the trades cannot be adequately defined until the project is more defined. The link to the disparity study is shown below. (<https://www.oregon.gov/aviation/plans-and-programs/Pages/StatewideDisparityStudy.aspx>) .

The information in the disparity study delineates the market regions as Portland/ Hood River region, Northwest Oregon, Southwest Oregon, Central Oregon, and Eastern Oregon. The Redmond Municipal Airport is east of the Cascades, therefore the market region used in the DBE availability calculation is Central Oregon. The DBE availability from the disparity study is shown below.

Weighted DBE Availability Benchmarks (Current DBE's) 2021 ODA Disparity Study Figure 9-4					
Type of Prime Contract	Portland/Hood River Region	Northwest Oregon	Southwest Oregon	Central Oregon	Eastern Oregon
<b>Construction</b>					
Airport Runway, Taxiway, Apron Paving	9.1%	8.6%	4.7%	4.9%	5.2%
Concrete Work	5.6%	5.1%	6.1%	5.9%	6.5%
Electrical Work	4.2%	4.1%	4.8%	4.3%	4.8%
Excavation, Site Prep, Grading, Drainage	6.8%	6.1%	5.0%	4.6%	5.3%
Installation of guardrails and Fencing	3.6%	3.2%	3.8%	3.7%	4.3%
Office and Public Building Construction	6.0%	5.6%	4.8%	4.5%	4.5%
Pavement Surface Treatment	1.1%	1.1%	1.4%	1.3%	1.3%
Wrecking and Demolition	9.7%	9.0%	5.1%	5.0%	5.4%
Other Construction Work	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Professional Services</b>					
Construction Management	8.2%	9.0%	8.2%	8.9%	9.8%
Design Engineering	8.8%	10.3%	7.9%	10.0%	8.6%

Weighted DBE Availability Benchmarks (Current DBE's) 2021 ODA Disparity Study Figure 9-4					
Type of Prime Contract	Portland/Hood River Region	Northwest Oregon	Southwest Oregon	Central Oregon	Eastern Oregon
Environmental Consulting	13.2%	14.5%	10.5%	14.5%	11.8%
Geotechnical	0.6%	0.6%	0.5%	0.6%	0.6%
Survey and Mapping	6.9%	6.9%	6.9%	6.4%	7.4%
Other professional services	10.0%	10.0%	10.0%	10.4%	10.5%
<b>Other Goods and Services</b>					
Other Services	3.2%	2.9%	3.4%	3.3%	0.0%

**Step 1 Goal Determination**

The Step 1 goal was determined for each project anticipated over \$250,000 for the **Redmond Municipal Airport**. A summary of the Step 1 goal determinations are summarized for each project below. The market area for the projects and the method for determining DBE availability is shown below in the calculation tables. The potential DBE participation for each project is weighted by trade group or work type.

The Redmond Municipal Airport will undertake a major terminal expansion project during the goal period. The project is expected to bid in spring of 2024 at which time the majority of the terminal expansion project will be contracted. Portions of the terminal project will be funded with Federal AIP and BIL (AIG) Funds. The total scope of the project is approximately \$150 million. The total federal funds committed to the project over the goal period is \$26,448,628. The remainder of the project will be funded with local funds and bonds.

The table below shows the total project breakdown with associated DBE availability. The DBE availability is determined from the work categories in the Disparity Study for Central Oregon, The total DBE dollars are then prorated based on the anticipated federal participation on the project.

FY 2024- 2026 CONTRACTS				
Contract #1 - Terminal Expansion - Construction				
Total Federal Share		\$26,448,628.00		
ANALYSIS METHOD: Disparity Study				
Work Description	Disparity Study Work Category	Trade (\$)	DBE% (Central Oregon)	DBE \$
Industrial Building Construction - Prime Contractor	Office and Public Building Construction	\$41,062,500	4.5%	\$1,847,813
Water and Sewer Line and Related Structures Construction	Excavation, Site Prep, Grading and Drainage	\$375,000	4.6%	\$17,250
Power and Communication Line Related Construction	Electrical Work	\$562,500	4.3%	\$24,188
Highway, Street and Bridge Construction	Airport Runway, Taxiway, Apron Paving	\$1,500,000	4.9%	\$73,500
Poured Concrete Foundation and Structure Contractors	Office and Public Building Construction	\$7,500,000	4.5%	\$337,500

Structural Steel and Precast Concrete Contractors	Office and Public Building Construction	\$15,000,000	4.5%	\$675,000
Framing Contractors- Interior	Office and Public Building Construction	\$2,250,000	4.5%	\$101,250
Masonry Contractors	Office and Public Building Construction	\$375,000	4.5%	\$16,875
Glass and Glazing Contractors	Office and Public Building Construction	\$4,500,000	4.5%	\$202,500
Roofing Contractors	Office and Public Building Construction	\$3,750,000	4.5%	\$168,750
Siding Contractors	Office and Public Building Construction	\$6,000,000	4.5%	\$270,000
Other Foundation, Structure, Exterior Contractors	Other Construction Work	\$750,000	0.0%	\$0
Electrical Contractors and Other Wiring Installation Contractors	Electrical Work	\$14,250,000	4.3%	\$612,750
Plumbing Heating and Air Conditioning Contractors	Office and Public Building Construction	\$14,250,000	4.5%	\$641,250
Other Building Equipment Contractors - Elevator	Other Construction Work	\$750,000	0.0%	\$0
Other Building Equipment Contractors - Passenger Boarding Bridge	Other Construction Work	\$6,750,000	0.0%	\$0
Other Building Equipment Contractors - Baggage Equipment	Other Construction Work	\$15,000,000	0.0%	\$0
Drywall and Insulation Contractors	Office and Public Building Construction	\$1,500,000	4.5%	\$67,500
Painting and Wall Covering Contractors	Office and Public Building Construction	\$1,500,000	4.5%	\$67,500
Flooring Contractors	Office and Public Building Construction	\$6,750,000	4.5%	\$303,750
Finished Carpentry Contractors	Office and Public Building Construction	\$2,250,000	4.5%	\$101,250
Other Building Finish Contractors	Office and Public Building Construction	\$1,125,000	4.5%	\$50,625
Site Prep Contractors -Excavation	Excavation, Site Prep, Grading and Drainage	\$1,500,000	4.6%	\$69,000
Other Specialty Trade Contractors - Fencing	Installation of Fencing and Guardrails	\$375,000	3.7%	\$13,875
Other Specialty Trade Contractors - Sidewalk and Curb	Concrete Work	\$375,000	5.9%	\$22,125
<b>TOTAL</b>		<b>\$150,000,000</b>		<b>\$5,684,250</b>
Federal Share %		17.6%		17.6%
Federal Share \$		\$26,448,628		\$1,002,271

The total step 1 goal is determined by taking the total Federal Share of the DBE dollars divided by the total federal share of the project dollars.

<b>Summary Step 1 Goal Determination</b>		
<b>Fiscal Year</b>	<b>\$ Total</b>	<b>\$ DBE</b>
FY 2024		
FY 2025		
FY 2026	<b>\$26,448,628</b>	<b>\$1,002,271</b>
<b>TOTAL</b>	<b>\$26,448,628</b>	<b>\$1,002,271</b>
<b>Step 1 Goal Determination (\$ DBE / \$ Total)</b>		<b>3.79%</b>

**Step 1 DBE Goal is 3.79%**

**Step 2 – Adjustments to the Step 1 Goal**

Oregon Department of Aviation (ODA) engaged a consultant to conduct a DBE Disparity Study, which focused on participation of minority- and women-owned firms in ODA and other airport contracts from October 2014 through September 2019. The Study was completed in March of 2021.

In Step 2 of the Goal Determination, the **City of Redmond** examined available evidence available in its jurisdiction, including the analysis performed by the ODA 2021 Disparity Study, to determine what adjustment, if any, is needed to the base figure to arrive at an overall DBE participation goal. The **City of Redmond** considered the following information in the potential step 2 adjustments.

- Past DBE Participation
- Information from the 2021 ODA Disparity Study in related to entry, advancement, and business ownership.
- Information from the 2021 ODA Disparity Study related to the ability of DBE’s to access bonding and insurance.
- Other relevant information from the 2021 ODA Disparity Study.

Past History DBE Participation

The **City of Redmond** has previously undertaken projects at the Redmond (Roberts Field) Airport requiring an overall goal under 49 CFR Part 26.

Past Participation History							
FY	Goal			Accomplishment			Primary Work Type
	Total	RN	RC	Total	RN	RC	
2016	2.79%	2.79%	0%	0.00%	0.00%	0.00%	Airfield Pavement Construction
2017	2.79%	2.79%	0%	0.00%	0.00%	0.00%	Airfield Pavement Construction
2018	2.79%	2.79%	0%	0.08%	0.08%	0.00%	Airfield Pavement Construction
2019	2.90%	2.90%	0%	0.02%	0.02%	0.00%	Building Construction, Airfield Pavement Construction
2020	2.90%	2.90%	0%	0.10%	0.10%	0.00%	Building Construction, Airfield Pavement Construction
2021	2.90%	2.90%	0%	0%	0%	0%	Airfield Pavement Construction
2022	2.71%	0.08%	2.63%	0%	0%	0%	Airfield Pavement Construction
2023	2.71%	0.08%	2.63%	7.65	5.02%	2.63%	Terminal Design – (Estimated)
<b>Median Achievement 2019-2023</b>				<b>0.02%</b>	<b>0.02%</b>	<b>0.00%</b>	

The median past participation from FY2019 to FY2023 and the step 1 goal are averaged to determine the potential step 2 adjustment based on past DBE participation.

$(0.02\% \text{ median} + 3.79\% \text{ step 1 goal}) / 2 = 1.90\%$

Below is a summary of the projects associated with the potential adjustment.

FY2019

Project #1 - Terminal Concrete Ramp Construction

Funding for the project was provided by one FAA grant . The Airport Improvement Program grant was AIP 3-41-0052-043-2018. A majority of the expenditures occurred during FY2019.

Project #2 – Snow Removal Equipment Building Construction

Funding for the project was provided by two FAA grants . The Airport Improvement Program grant was AIP 3-41-0052-045-2019 and AIP 3-41-0052-046-2020. A majority of the expenditures occurred during FY2019 / FY2020.



## FY2020

### Project #1– Snow Removal Equipment Building Construction (Continued)

Funding for the project was provided by two FAA grants . The Airport Improvement Program grant was AIP 3-41-0052-045-2019 and AIP 3-41-0052-046-2020. A majority of the expenditures occurred during FY2019 / FY2020.

## FY2021

### Project 1 – Taxiway ‘F’ Pavement and Airfield Lighting Rehabilitation.

Funding for the project was provided by one FAA grant . The Airport Improvement Program grant was AIP 3-41-0052-047-2021.

DBE participation was encouraged with the bid; however, no DBE participation was achieved with the bid.

The project was funded with an FY2021 grant but most of the funds were used in FY 2022.

## FY 2022

### Project 1 – Terminal Design Phase 1.

This project was funded in part by an FY 2022 FAA grant. The DBE goal for FY22 was 2.71% with 0.08% RN and 2.63% RC.

The project was awarded using qualification-based selection for the Architect Team. The DBE commitment was exceeded on the project with a total of 7.65% (2.63% RC, 5.02% RN).

Note, the grant was awarded late in FY2022 therefore most of the expenditures and DBE achievement occurred in FY 2023. The total achievement for the project is unknown at this time, but is expected to track the original contracted amount.

## FY2023

### Project 1 – Terminal Design Phase 2.

This project was funded in part by an FY 2023 FAA grant. The DBE goal for FY23 was 2.71% with 0.08% RN and 2.63% RC.

The project was awarded using qualification-based selection for the Architect Team. This project award is under negotiation at this time.

Note, the grant was awarded late in FY2023 therefore most of the expenditures and DBE achievement is planned to occur in FY 2024.

### Project 2 – Terminal Construction - Preconstruction Services

This project was funded in part with an FY2023 Grant. The DBE goal for FY23 was 2.71% with 0.08% RN and 2.63% RC.

The contractor was selected using a qualification base selection with price as a consideration. The contractor indicated a DBE commitment of 3.0%. Note, the grant was awarded late in FY2023 therefore most of the expenditures and DBE achievement is planned to occur in FY 2024.

### **Entry, Advancement, and Business Ownership.**

The 2021 ODA Disparity Study found that there are barriers that certain minority groups and women face related to entry and advancement in the Oregon construction and engineering industries. Such barriers may affect the availability of MBE/WBE to perform airport related contracts. The 2021 ODA Disparity Study estimated the availability of minority and women owned firms but for the effects of race and gender based discrimination there could be an upward adjustment of 46% increase in the base figure (*2021 ODA Disparity Study, Figure 9-8*). This would result in an upward adjustment of  $3.79\% \times 46\% = 1.7\%$ .

An adjustment to the base figure for barriers related to entry, advancement, and business ownership was not made in the determination of City of Redmond's DBE goal at the Redmond Municipal Airport for the following reasons.

- The 2021 ODA Disparity Study considered potential DBE's in as it related to this section, and not current DBE's. The step 1 methodology only considers current DBE's, therefore to be consistent with the step 1 methodology an adjustment was not made related entry, advancement, and business ownership.

### **Financing, Bonding, and Insurance**

The 2021 ODA Disparity Study found quantitative and qualitative evidence of the disadvantages for minorities, women, and minority/women owned firms related to access to financing and bonding. The 2021 ODA disparity study indicated that an upward adjustment could be made to address these barriers, however, the impact of those factors could not be quantified (*2021 ODA Disparity Study, Chapter 9, page 14*).

An adjustment to the base figure for barriers related to financing, bonding, and insurance, was not made in the determination of Redmond Airport's DBE goal for the following reasons.

- The disparity study indicated the impact of the barriers related to this category could not be quantified.

### **Other Factors**

The other factors examined in the 2021 ODA Disparity Study were related to success of minority- and women-owned firms relative to majority-owned businesses in the Oregon marketplace. The study noted quantitative evidence that minority- and women-owned firms are less successful than majority-owned firms and face greater barriers in the marketplace, even after considering neutral factors. There was also qualitative information that suggests discrimination on the basis of race, ethnicity and gender affects minority- and women-owned firms in the Oregon transportation contracting industry. Although the analysis indicates an upward adjustment could be made to address these barriers, the impact of those factors could not be quantified (*2021 ODA Disparity Study, Chapter 9, page 15*).

An adjustment to the base figure for barriers related to other factors was not made in the determination of Redmond Municipal Airport's DBE goal for the following reasons.

- The disparity study indicated the impact of the barriers related to this category could not be quantified.

#### Final Adjustments to the Step 1 Base Figure

After examining the available evidence and evaluating the step 2 adjustment options, the Redmond Municipal Airport will apply the step 1 adjustments based on past participation to the Step 1 base figure.

**The Step 2 Goal based on Final Adjustments 1.90%**

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

The **City of Redmond** will meet the maximum feasible portion of its overall goal by using RN means of facilitating DBE participation.

1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE, and other small businesses, participation;
2. Providing technical assistance and other services;
3. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
4. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.

The City estimates that in meeting its overall goal **1.90%**, it will obtain **1.90% from RN participation** and **0% through RC measures.**

To evaluate the portions of the goal to be met through race neutral and race conscious measures the City evaluated past race neutral DBE participation on similar projects.

The terminal expansion project has many more subcontracting opportunities than past projects at the airport that were primarily related to airfield pavement construction. The terminal project to date which included design service and preconstruction services has seen contract commitments greater than the race conscious goal that was in the procurement documents. The DBE commitment on the schematic design services was 7.65% which resulted in a race neutral DBE commitment of 5.02%.

Give the greater opportunity for subcontracting possibilities on the terminal expansion the City of Redmond expects to meet the DBE goal through Race Neutral efforts. During the bidding process, extensive outreach will be performed to increase the possibility of successful DBE's being awarded subcontracts on the project.

The City will adjust the estimated breakout of RN and RC DBE participation as needed to reflect actual DBE participation (see Section 26.51(f)) and track and report RN and RC participation separately. For reporting purposes, RN 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.

### **Disparity Study Findings**

**The City of Redmond will utilize the findings of the 2021 ODA Disparity Study to determine the existence of discrimination or its effects in the market.**

The 2021 Disparity Study is the last full disparity and availability study conducted. Provided is a link to the DBE program's Disparity & Availability Studies webpage.

<https://www.oregon.gov/aviation/plans-and-programs/Pages/StatewideDisparityStudy.aspx>

The 2021 ODA Disparity Study found that minority- and women-owned firms were underutilized based on their availability. The Study also noted both quantitative and qualitative information suggesting that there is not a level playing field for minority- and women-owned businesses in the Oregon airport related contracting industry. As a result, the Study indicated that race- and possibly gender-conscious means may need to be implemented for the portion of the overall goal that cannot be met solely through race/gender neutral measures.

### **Contract Goals**

The City will use contract goals to meet any portion of the overall goal that the recipient does not anticipate meeting through RN measures. Contract goals are established so that over the period that the goal applies, the cumulative result in meeting the overall goal that is not anticipated to be met through the use of RN means.

Contract goals will be established only on those DOT-assisted contracts that have subcontracting possibilities. A contract goal need not be established 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).

Contract goals will be expressed as a percentage of the total amount of a DOT-assisted contract OR the Federal share of a DOT-assisted contract.

## ***Public Participation***

**Consultation:** Section 26.45(g)(1).

***The City of Redmond*** submits its overall DBE three-year goal to DOT on August 1 as required by the set schedule.

Before establishing the overall goal, the ***City of Redmond*** checked the **Oregon Department of Transportation, DBE Office website** 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 ***City of Redmond*** efforts to establish a level playing field for the participation of DBEs.

In establishing the overall goal, the ***City of Redmond*** 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 ***City of Redmond*** efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange with as many interested stakeholders as possible focused on obtaining information relevant to the ***City of Redmond*** goal setting process, and it occurred before we were required to submit our goal and methodology to the operating administration for review. Details of the consultation are as follows:

An open meeting was held with as many interested stakeholders as possible focused on obtaining information relevant to the Disadvantaged Business Enterprise (DBE) goal setting methodology.

The consultation engaged in video conference meeting held on June 20, 2023 at 3:00 pm local time. To increase participation, stakeholders were invited to attend. Information regarding this meeting was posted on the City of Redmond website (<http://www.ci.redmond.or.us/business/city-hall-calendar/>) and the Redmond Municipal Airport website (<http://www.flyrdm.com/?Airport-Publications--Policies>), and emailed to all DBE's registered in the market area used.

The purpose of the meeting was to gather information on the availability of DBE's in the Market Area, determine if there were any effects of discrimination, and tried to gather any ideas for efforts to increase participation.

The following people attended the meeting:  
Fred LeLacheur – Redmond Airport Engineer  
Felila Sumanas Narotski, Redmond DBELO  
Cory Kesler – Project Manager – Morrison-Maierle, Inc

The following comments were received:

- None

A notice of the proposed goal was published on the **Redmond Municipal Airport** website <http://www.flyrdm.com/?Airport-Publications--Policies>, before the methodology was submitted to the FAA.

- No comments were received.

If the proposed goal changes following review by FAA, the revised goal will be posted on the **Redmond Municipal Airport** website.

Notwithstanding paragraph (f)(4) of §26.45, **City of Redmond** proposed goals will not be implemented until this requirement has been met.

## PUBLIC NOTICE

The **City of Redmond** hereby announces its fiscal years 2024 through 2026 goal of **1.90%** for Disadvantaged Business Enterprise (DBE) airport construction Contracts. The proposed goals and rationale is posted at <http://www.flyrdm.com/?Business-Advertising-Opportunities> for 30 days from the date of this publication.

Comments on the DBE goal will be accepted for 30 days from the date of this publication and can be sent to the following:

Felila Sumanas Narotski, Airport Business Coordinator, 2522 S.E. Jesse Butler Circle, # 17, Redmond, OR 97756, Phone: 541-504-3086, Email: [felila.narotski@flyrdm.com](mailto:felila.narotski@flyrdm.com)

AND

Federal Aviation Administration, Office of Civil Rights Staff, Sonia Cruz, DBE & ACDBE Compliance Specialist, Northwest Mountain Region, Federal Aviation Administration, Office of Civil Rights, P.O. Box 92007, Los Angeles, California 90009-2007, (310) 725-3940, [sonia.cruz@faa.gov](mailto:sonia.cruz@faa.gov)