



FAA AIRPORT IMPROVEMENT PROGRAM (AIP)
DISADVANTAGED BUSINESS ENTERPRISE (DBE)
IN ACCORDANCE WITH 49 CFR PART 29

GOAL

For

CAPE COD GATEWAY AIRPORT
HYANNIS, MASSACHUSETTS

FFY2025-2027

Attachment

Section 26.45: Overall DBE Three-Year Goal Methodology

Name of Recipient: Cape Cod Gateway Airport

Goal Period: FY-2025-2026-2027 – (October 1, 2024, through September 30, 2027)

DOT-assisted contract amount:

Fiscal Year	Project	FAA \$ Amount	Year Total
2025	Upgrade Tower HVAC Systems (BIL Act Funds FY2022 and FY2023)	\$1,874,160	
			\$1,874,160
2026	Design, Construct, Relocate and Extend Taxiway B. FFY2026/Airport FY2027	\$7,920,000	
	Design & Construct Terminal Upgrades - Phase I - TSA hold room expansion. BIL	\$5,850,000	
			\$13,770,000
2027	Design & Acquire Easements/Acquisition Phase I for Future Construction/Runway extension - acquisition will be implemented on a phased approach as properties become available or easements acquired.	\$6,075,000*	
	Design & Construct Reconstruction and Re-Alignment of Taxiways Delta and Echo at Runway 15 (includes Run-Up Pit).	\$10,980,000	
			\$17,055,000

Overall Three-Year Goal: 3.74%, to be accomplished through 3.00% RC and 0.74% RN (weighted percentage)

Total dollar amount to be expended on DBE's: \$1,018,464

*In 2027 there is a project for "Design and Acquire Easements". Of the \$6,075,000 allocated for this project, it is estimated that \$5,467,500 will be used for actual purchases of property and therefore is not included in calculations for DBE participation.

Market Area:

Determination of Market Area:

The Airport determined that an approximate 50-mile radius of the Airport was a realistic market area based on past contracts. Massachusetts counties that fell within 50 miles of the Airport were used as the Market Area. The substantial majority of the Airport's contractors and subcontractors and the substantial majority of contracting dollars spent by the Airport are within this Market Area.

The Airport determined that a large share of project dollars (75.6%) was being spent on contractors in the immediate area (Barnstable County). Following that, the counties just north of Barnstable County, in particular Norfolk and Plymouth, also contributed to approximately another 5% of dollars spent. When evaluating the location of contractors to determine a logical market area from which contractors would travel to the project, the numbers were similar. Approximately 57% of contractors that worked on airport projects or bid on them were from the same local area, approximately within 50 miles. Another thirty five percent (35 %) of contractors and approximately seven percent (7%) of dollars spent are from the Boston Area (Suffolk County) and Middlesex County (just outside of Boston).

Based on these results we determined the market area to be the counties in closest proximity to the airport (Barnstable, Plymouth, Bristol and Norfolk counties) as well as Suffolk and Middlesex counties. This represents most of Eastern Massachusetts.

We did not include Duke County or Nantucket County. Duke County is the island of Martha's Vineyard and Nantucket County consists of the island of Nantucket. It is not reasonable to assume that a contractor or crew would be able to travel by boat or flight, back and forth to a site in Hyannis and to date,

there has been no interest from contractors on the islands for Cape Cod Gateway Airport Projects.

The Airport used the following counties in its analysis:

- Barnstable
- Bristol MA
- Middlesex MA
- Norfolk MA
- Plymouth MA
- Suffolk MA

Step 1. 26.45(c) Actual Relative Availability of DBE's

The base figure for the relative availability was calculated as follows:

To determine eligible DBE companies by county, we used the Massachusetts' Unified Certification Program's website (<https://www.diversitycertification.mass.gov/BusinessDirectory/BusinessDirectoryDBESearch.aspx>) to download the "Directory of Certified DBE Businesses" by NAICS Code.

"All Established Firms" in the same market area were determined using data from the U.S. Census Bureau, County Business Patterns 2021 ([CB2100CBP: All Sectors: County ... - Census Bureau Table](#)). We divided the total number of "DBE's" by the total number of "All Established Firms" for each NAICS code that would be involved in projects. This percentage was used to determine available potential DBE participation by NAICS.

Upcoming projects on the Airport's CIP were evaluated to determine the types of businesses / services that would be used on the project. Services were then grouped by NAICS code. A percentage of project costs/expenditure for each NAICS code was determined based on past projects analysis. The projected costs / expenditures per NAICS code, per project, per year were determined. The total projected expenditure per NAICS code was multiplied by the DBE percentage for each NAICS code. This produced the potential DBE cost / expenditure over the next three years for each NAICS code. The total DBE portion of NAICS cost / expenditure was divided by the total overall expenditure by NAICS code to determine our weighted **DBE Goal of 3.74%**.

Total of all DBE Dollar amounts were divided by Total of all Project Dollars to determine DBE Goal for Fiscal 2025-2027.

(Total: Three Year DBE Portion of Expenditures / Costs)

_____ = **Weighted DBE Goal**

(Total: Three Year Expenditures / Costs)

Method: Used MA Unified Certification Program DBE Directories: and Census Bureau Data (*Source: U.S. Census Bureau-All Sectors: County Business Patterns, including ZIP Code Business Patterns, by Legal Form of Organization and Employment Size Class for the U.S., States, and Selected Geographies: 2021*) see above links.

Step 2: Adjustments to Step 1 Base Figure

The Airport determined that there was no need to adjust base figure for goal based on past participation and the lack of any disparity studies.

PUBLIC PARTICIPATION

Consultation: Section 26.45(g)(1).

In establishing the overall goal, the Cape Cod Gateway Airport provided for consultation and publication. This process 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 Airport's 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 goal setting process and was conducted before the goal methodology was submitted to the operating administration (FAA) for review. Details of the consultation are as follows.

The consultation engaged was a virtual meeting on Teams, which was held on July 19, 2024 at 1:00pm. Invitees included:

- SBA MA (Small Business Administration MA)
- Small Business Resource MassDOT
- MA Office of Diversity & Civil Rights (ODCR)
- MassDOT Aeronautics
- APEX Accelerator (formerly known as MA PTAC)

- WTS (Women in Transportation)
- Mass UCP/DBE Certification Office
- Mass DOT - Office of Civil Rights & Diversity
- BECMA (Black Economic Council MA)
- GNEMSDC (Greater New England Minority Supplier Development Council)
- Mass DOT DBE Supportive Services
- NMSDC (National Minority Supplier Development Council)
- WBENC (Woman Business Enterprise National Council)

The following comments were received during the course of the consultation:
[If no comments were received, so state]

A notice of the proposed goal was published on the Cape Cod Gateway's Airport official website before the methodology was submitted to the FAA.

In addition, the Airport will solicit public participation to understand actual DBE interest in projects using the following methods: Advertising on the Airport's website page dedicated to DBE and ACDBE (<https://flyhya.com/airport-info/dbe/>) MASSDOT and the Cape Cod Gateway Airport Commission. The Cape Cod Gateway Airport's Commission Meeting on July 16, 2024 at 4:00pm is a public meeting and will discuss the Airport's upcoming program and goals in this meeting. Public comment will be welcomed. The agenda for the meeting is published on the Town of Barnstable's website (<https://tobweb.town.barnstable.ma.us/boardscommittees/AirportCommission/default.asp?brd=Airport+Commission&brdid=1&year=2019>) along with details on how to attend the meeting. The Airport also used social media (Facebook, Instagram) to notify the public. The Airport will allow a 30-day comment period. If comments come in after August 1, 2024, the Airport will revise, if necessary, the DBE Program and Goal and will re-submit to the FAA.

Breakout of Estimated Race Neutral (RN) and Race Conscious (RC) Participation. 26.51(b)(1-9).

The Airport will meet the maximum feasible portion of its overall goal by using RN means of facilitating DBE participation such as:

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. Posting DBE information on the Airport's website, including links to get certified

3. Distributing flyers with DBE and ACDBE information at Airport
4. Through the Airport partnering with the *MassDOT DBE Supportive Services* department (<https://www.mass.gov/info-details/dbe-supportive-services-dbess>), the Airport can assist in the following:
 - a. Providing assistance in overcoming limitations such as inability to obtain bonding or financing
 - b. Providing technical assistance and other services;
 - c. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
 - d. Partnering with the Mass DOT DBE supportive services program to develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs and other small businesses;
 - e. 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;
 - f. Establishing a program to assist new, start-up firms, particularly in fields in which DBE participation has historically been low, (this service exists through a contract with CEI and the MA DOT)
 - g. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors;
 - h. Assist DBEs and other small businesses, to develop their capability to utilize emerging technology and conduct business through electronic media

The Airport estimates that in meeting its overall goal of 3.74%, it will obtain 0.74% from RN participation and 3.0% through RC measures. The breakdown of RC vs RN was determined by looking at overall projects and determining the percentage of projected dollars expected for construction projects (81%) versus non-construction projects (19%). These percentages were applied to the overall goal to determine the RN versus RC breakdown of goal.

The Airport's past projects have been successful in meeting DBE Goals when using a DBE Goal in the bid process for construction projects (RC). Larger construction projects have more opportunities for DBE participation. The Airport will continue to try to achieve as much as possible through RN means and will continue to use methods to encourage RN participation.

The Airport does not have a history of over-achievement of goals in DBE participation to reference and expects to obtain its DBE participation through the use of DBE contract goals or a conscious effort to obtain DBE

participation. Therefore, the Overall DBE goal of 3.74% is to be obtained mostly through race-conscious (RC) participation.

The Airport 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.

Contract Goals

The Airport will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using RN 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 Airport's overall goal that is not projected to be met through the use of RN means.

The Airport 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 DBE's to perform the particular type of work).