

City of St. Louis- St. Louis Lambert International Airport®

Three Year Overall DBE Goal Methodology 2026-2028

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DISADVANTAGED BUSINESS ENTERPRISE GOAL METHODOLOGY FISCAL YEARS 2026-2028

I. SUMMARY

The City of St. Louis-St. Louis Lambert International Airport has prepared this document to describe the methodology used to establish its' overall Disadvantaged Business Enterprise (DBE) goal for Federal Aviation Administration (FAA) assisted contracts. The DBE overall goal setting methodology is a requirement set forth in the United States Department of Transportation (USDOT) DBE regulations-49 CFR Part 26.

II. PROPOSED OVERALL GOAL FOR FFY 2026-2028

Based on the requirements set forth in 49 CFR Part 26, the City of St. Louis-St. Louis Lambert International Airport is submitting a goal for 2026-2028. The recommended overall DBE goal for the period of 2026-2028 is 20 percent (20%).

III. OVERALL DBE GOAL SETTING METHODOLOGY

In preparation for the 2026-2028 overall DBE goal, the Disadvantaged Business Enterprise Liaison Officer (DBELO) obtained the Airport's planned program of projects and the budget for those projects from STL Airport Engineering, Planning & Development. FAA assisted contracting for FFY 2026-2028 is expected to consist of projects outlined in ***Table 1-Anticipated Program of Projects for 2026-2028***. Additional projects may be undertaken if revenue becomes available and the overall DBE goal will be adjusted, if necessary.

TABLE 1. Anticipated Program of Projects for 2026-2028

Anticipated Program of Projects for 2026-2028	
Federal Fiscal Year 2026	
Design of the Reconstruction of Runway 12L-30R from Sierra to Lima	
Construction Management of Runway 12L-30R from Sierra to Lima	
Construction of Runway 12L-30R from Sierra to Lima	
Federal Fiscal Year 2027	
Design of Runway 6-24-North Project	
Construction Management of Runway 6-24-North Project	
Construction of Runway 6-24-North Project	
Pavement Management Plan (PMP)	
Construction Management of West Deicing Pad	
Construction of West Deicing Pad	
Federal Fiscal Year 2028	
Design of Runway 6-24-South Project	
Construction Management of Runway 6-24-South Project	
Construction of Runway 6-24-South Project	

Projects listed in Table 1 are evaluated for contracting opportunities. The City of St. Louis Lambert International Airport examined work categories by utilizing the North American Industry Classification System (NAICS) codes involved on projects listed in Table 1. NAICS along with their NAICS description are listed in **Table 2**. In order to determine the weight of each NAICS involved we must estimate and assign a dollar amount for each NAICS which is listed in the Amount of DOT Funds column. Once the amount has been determined we divide the total amount to be expended in each NAICS by the Total DOT-Assisted Contract Funds amount to assign weight to each NAICS as shown in the percentage of total DOT funds (weight) column (**Table 2**).

TABLE 2. North American Industry Code System (NAICS)/Work Categories

NAICS Code	NAICS Description	Amount of DOT funds	% of total DOT funds (weight)
237310	Highway, Street & Bridge Construction	\$ 35,000,000	0.2175

237990	Other Heavy & Civil Engineering Construction	\$ 17,326,101	0.1077
238110	Poured Concrete Foundation and Structure Contractors	\$ 15,000,000	0.0932
238210	Electrical Contractors and Other Wiring Installation Contractors	\$ 10,000,000	0.0621
238910	Site Preparation Contractors	\$ 20,000,000	0.1243
238990	All Other Specialty Trade Contractors	\$ 5,000,000	0.0311
541330	Engineering Services	\$ 15,188,150	0.0944
541310	Architectural Services	\$ 15,188,150	0.0944
327320	Ready-Mix Concrete Manufacturing	\$ 5,690,000	0.0354
484220	Specialized Freight Trucking, Local	\$ 5,000,000	0.0311
238120	Structural Steel and Precast Concrete Contractors	\$ 10,000,000	0.0621
237130	Power and Communication Line & Related Construction	\$ 5,550,000	0.0345
561730	Landscaping Services	\$ 2,000,000	0.0124
Total DOT-Assisted Contract Funds		\$ 160,942,401	1.0000

IV. STEP 1. BASE FIGURE CALCULATION

The initial phase of the Step 1 analysis requires that the Airport calculate the base figure for the relative availability of ready, willing and able DBEs within their market area to participate on Airport projects. Before calculating the base figure, the City of St. Louis-St. Louis Lambert International Airport must determine its market area. Review of census tract data indicates that the St. Louis-Illinois Metropolitan Statistical Area is the Airport market area. has been determined to be the market area based on the area where the majority of the contractors and subcontractors who seek to do business with the Airport are located as well as the area in which the Airport spends the majority of its contracting dollars. The St. Louis Metropolitan Statistical includes counties in Missouri and Illinois as listed in *Table 3*. Once the market area has been established the City of St. Louis-St. Louis Lambert International Airport must examine DBE availability.

Table 3. St. Louis Metropolitan Statistical Area-Missouri and Illinois Counties

Missouri Counties	Illinois Counties
1. City of St. Louis	9. Bond
2. City of Sullivan	10. Calhoun
3. Franklin County	11. Clinton
4. St. Charles County	12. Jersey
5. St. Louis County	13. Macoupin
6. Jefferson County	14. Madison
7. Lincoln County	15. Monroe
8. Warren County	16. St. Clair

In order to determine the relative availability of DBEs in the market area the STL must examine the number of ready, willing and able DBE firms and total number of establishments within the market area and across all NAICS involved on projects at the Airport.

STL examined additional lists of DBEs within the Illinois Department of Transportation DBE Directory, the State of Missouri Office of Administration-Office of Equal Opportunity MBE/WBE Directory, Illinois Central Management Systems Directory of MBE/WBE, the City of St. Louis's MBE/WBE directory and MBEs/WBEs from other sources to ensure the number of ready, willing and able DBEs and potential DBEs is accurate.

The number of ready, willing and able DBE firms to participate on projects at the Airport within the market area for all NAICS totaled 363 (*see Number of DBEs available to perform this work column Table 4*). Additionally, STL examined the total number of establishments, including DBEs, available to perform within the market area and NAICS involved on STL projects. STL examined the United States Census Bureau County Business Patterns database to determine the total number of establishments within the market area and NAICS involved. Based off data reviewed in the County Business Patterns database the total number of all establishments for all NAICS totaled 3,704 (*see Table 4*). USDOT tips requires the calculation of the relative base figure by dividing the total number of available, willing and able DBEs in the market area by the total number of all establishments multiplied by 100. The Step 1 base figure estimate of DBE availability equals 10 percent with rounding (10%) as shown in *Table 4*.

Table 4. DBE Availability Analysis

NAICS Code	NAICS Description	Number of DBEs available to perform this work	Number of all firms available (including DBEs)	Relative Availability
237310	Highway, Street & Bridge Construction	20	79	0.2532
237990	Other Heavy & Civil Engineering Construction	9	20	0.4500
238110	Poured Concrete Foundation and Structure Contractors	30	212	0.1415
238210	Electrical Contractors and Other Wiring Installation Contractors	25	511	0.0489
238910	Site Preparation Contractors	35	311	0.1125
238990	All Other Specialty Trade Contractors	45	439	0.1025
541330	Engineering Services	91	468	0.1944
541310	Architectural Services	18	170	0.1059
327320	Ready-Mix Concrete Manufacturing	7	64	0.1094
484220	Specialized Freight Trucking, Local	40	267	0.1498
238120	Structural Steel and Precast Concrete Contractors	3	12	0.2500
237130	Power and Communication Line & Related Construction	10	59	0.1695
561730	Landscaping Services	30	1092	0.0275
Combined Totals		363	3704	0.0980 <i>Overall availability of DBEs</i>

Weighted Base Figure

In accordance with FAA recommendations from the “Tips for Goal Setting in the Disadvantaged Business Enterprise (DBE) Program” the relative availability was weighted based on the dollar projected to be spent on each NAICS code.

Weighted Base Figure = Weight x Relative Availability

Dividing the weighted DBE totals by the total estimate for all NAICS involved on the anticipated planned program of projects provides the base DBE availability. This figure is expressed as a percentage and serves as the basis for the three-year overall goal. The weight for each NAICS was calculated based off weight multiplied by the relative availability. STL weighted the availability of based on the dollar spend in each NAICS which resulted in a weighted step-one base figure of 20 percent (20%) as outlined in **Table 5**.

Table 5. DBE Goal Analysis

NAICS Description	Weight	x	Availability	Weighted Base Figure
Highway, Street & Bridge Construction	0.21747	x	0.25316	0.0551
Other Heavy & Civil Engineering Construction	0.10765	x	0.45000	0.0484
Poured Concrete Foundation and Structure Contractors	0.09320	x	0.14151	0.0132
Electrical Contractors and Other Wiring Installation Contractors	0.06213	x	0.04892	0.0030
Site Preparation Contractors	0.12427	x	0.11254	0.0140
All Other Specialty Trade Contractors	0.03107	x	0.10251	0.0032
Engineering Services	0.09437	x	0.19444	0.0183
Architectural Services	0.09437	x	0.10588	0.0100
Ready-Mix Concrete Manufacturing	0.03535	x	0.10938	0.0039
Specialized Freight Trucking, Local	0.03107	x	0.14981	0.0047
Structural Steel and Precast Concrete Contractors	0.06213	x	0.25000	0.0155
Power and Communication Line & Related Construction	0.03448	x	0.16949	0.0058
Landscaping Services	0.01243	x	0.02747	0.0003
			Total	0.1955

			Expressed as a % (*100)	19.55%
			Rounded, Weighted Base Figure:	20%

V. STEP 2. CONSIDERATION OF ADJUSTMENT TO THE BASE FIGURE

STL examined all evidence in its jurisdiction to determine what adjustment, if any, is needed to the base figure to arrive at the overall goal. Included among the types of evidence that must be considered is the current capacity of DBEs to perform work on the STL's federally assisted contracts, as measured by the volume of work DBEs have performed on in recent years and input from interested parties. STL examined the past five years of DBE participation in order to make a determination and 2024 City of St. Louis and St. Louis County Joint Disparity Study-City of St. Louis Contract Disparity Study Report and St. Louis County Contract Disparity Study Report.

The methodology includes past participation in 2020, 2021, 2022, 2023 and 2024 (*Table 6*). The median number from 2020-2024 was determined to be 19.5 percent (19.5%). Review of past participation and review of specific projects indicates that an adjustment to the Step-One base figure is not warranted at this time. Therefore, the overall three-year DBE goal will be 20 percent (20%).

Table 6. Past Participation/Adjustment to Base Figure

FFY	Contract Awards/Commitments	DBE Awards/Commitments	DBE Percentage
2020	\$14,115,496	\$2,263,357	16.0%
2021	\$11,889,516	\$1,770,432	14.9%
2022	\$55,159,859	\$15,105,542	28.3%
2023	\$2,260,793	\$169,337	38.5%
2024	\$20,792,290	\$3,496,877	18.3%

VI. PROJECTION OF RACE NEUTRAL (RN) METHODS AND DBE CONTRACT GOALS

The final requirement of the goal setting process is to determine the portion of the overall goal that will be achieved by race neutral means. As outlined in 49 CFR Part 26.51, the maximum feasible portion of the overall DBE goal should be achieved using race neutral means. RN participation is participation obtained when a DBE is awarded a prime contract through customary competitive procurement procedures and/or is awarded a subcontract on a prime contract that does not have an established DBE contract goal. STL examined the achievement of its goals for 2020-2024 since contracting opportunities are similar. The race neutral and DBE participation components were determined by analyzing DBE achievements against the actual goals set forth for federally-funded projects. Race-neutral means includes, but are not limited to, the following:

- (1) Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by DBEs and other small businesses and by making contracts more accessible to small businesses, by means such as those provided under § 26.39.
- (2) Providing assistance in overcoming limitations such as inability to obtain bonding or financing (e.g., by such means as simplifying the bonding process, reducing bonding requirements, eliminating the impact of surety costs from bids, and providing services to help DBEs, and other small businesses, obtain bonding and financing);
- (3) Providing technical assistance and other services;
- (4) Carrying out information and communications programs 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; provision of information in languages other than English, where appropriate);
- (5) Implementing a 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;
- (6) 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;
- (7) Establishing a program to assist new, start-up firms, particularly in fields in which DBE participation has historically been low;

(8) Ensuring distribution of your DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors; and

(9) Assisting DBEs, and other small businesses, to develop their capability to utilize emerging technology and conduct business through electronic media.

Based off the upcoming program of projects STL estimates that in meeting the established overall goal of 20%, STL determined that the race neutral and DBE participation split would utilize the weighted base figure. STL estimates that approximately \$50,000,000.00 worth of its contracting opportunities can be bid to small business enterprises. Examining larger opportunities, STL considered if prime bidders would solicit and afford viable opportunities to DBE firms, as well as, small businesses to perform on larger opportunities. STL estimates that approximately \$3,110,992 worth of DBE participation exists within the remaining opportunities. STL calculated the total to be approximately \$53,110,992 of contracts awarded to firms through race neutral means which equates to approximately 9.4 percent (9.4%). STL subtracted the race neutral percentage from the overall goal of 20% and determined the DBE participation portion of the overall goal to be 10.4 percent (10.4%). Therefore, STL will obtain 9.4% from race-neutral (RN) participation and 10.4% DBE participation.

STL will adjust the estimated breakout of RN and DBE participation as needed to reflect actual DBE and SBE participation (see Section 26.51(f)) and track and report RN and DBE 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.

VII. CONTRACT GOALS

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. STL will establish contract goals only on those FAA-assisted contracts that have subcontracting possibilities. STL 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). STL will express our contract goals as a percentage of the total amount of DOT-assisted contracts.

VIII. PUBLIC NOTICE

In establishing an overall goal, recipients must provide for consultation and publication. This includes: 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 STL's efforts to establish a level playing field for the participation of DBEs.

The consultation must include a scheduled, direct, interactive exchange (e.g., a face-to-face meeting, video conference, and tele-conference) with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process.

Attached is the Public Notice posted to the STL's website at [Office of Business Opportunities - St. Louis Lambert International Airport](#) on 8/12/2025 and sent to regional and community stakeholders, DBEs, SBEs and additional contracting advocacy groups.

STL will host a virtual meeting on Friday, August 22, 2022 from 10:00 a.m.-11:45 a.m.

**AMENDED PUBLIC NOTICE
ST. LOUIS LAMBERT INTERNATIONAL AIRPORT**

**PROPOSED DISADVANTAGED BUSINESS ENTERPRISE (DBE) GOAL
FEDERAL FISCAL YEAR (FFY) 2026-2028
8/13/2025**

In accordance with 49 CFR Part 26, St. Louis Lambert International Airport (STL) has established an overall three-year goal for the participation of DBEs on federally assisted projects during FFY 2026-2028.

The proposed goal is 20% of which 9.4% is expected through race-neutral (RN) methods and 10.4% through DBE participation.

The proposed goal and rationale is available for review at [Office of Business Opportunities - St. Louis Lambert International Airport](#) for 30 days from the date of this publication and can be viewed during normal business hours (8:30 a.m.-5:00 p.m.) Monday through Friday at the Airport Office Building (AOB)-2ND Floor, Office of Business Opportunities (OBO), 11495 Navaid Road, Bridgeton, Missouri 63044.

The OBO will hold a DBE Goal Setting Stakeholder Meeting open to the public virtually over Zoom on **Friday, August 22, 2025 from 10:00 a.m.-11:45 a.m. See information Zoom information below.** in order to provide relevant information regarding the goal setting process

One tap US: [+16465588656,,86204959190#](tel:+1646558865686204959190) or [+16469313860,,86204959190#](tel:+1646931386086204959190)
mobile:

Meeting <https://flystl.zoom.us/j/86204959190?pwd=Oge4WJD2jmM1HAKZCYf3tayaNkobyT.1>
URL:

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+1 669 900 9128 US (San Jose)
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+1 719 359 4580 US
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+1 253 215 8782 US (Tacoma)

Meeting ID: 862 0495 9190

Comments will be accepted for 30 days from the date of this publication and can be sent to Francois Lyles-Wiggins, DBELO, Assistant Airport Director, OBO, St. Louis Lambert International Airport, PO Box 10212, St. Louis, Missouri 63145 or by email to ofcbusinessop@flystl.com.