

**Buckeye Municipal Airport
Triennial Goal Calculations
Federal Fiscal Year: 2021 - 2023
Goals and Methodology Report**



BUCKEYE MUNICIPAL AIRPORT DISADVANTAGED BUSINESS ENTERPRISE PROGRAM POLICY STATEMENT

Objectives/Policy Statement - Section 26.1, 26.23

The City of Buckeye (City) as the sponsor for the Buckeye Municipal Airport, has established a Disadvantaged Business Enterprise (DBE) Program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 26. The City has received Federal Aviation Administration (FAA) financial assistance from the DOT, and as a condition of receipt of funding, the City has signed an assurance that it will comply with 49 CFR Part 26.

It is the City's policy to ensure that DBEs as defined in 49 CFR Part 26 have an equal opportunity to receive and participate in U.S. DOT-assisted contracts. The City's policy also includes the following:

- To ensure nondiscrimination in the award and administration of DOT-assisted contracts;
- To create a level playing field on which DBEs can compete fairly for DOT-assisted contracts;
- To ensure that the DBE Program is narrowly tailored in accordance with applicable law;
- To ensure that only firms that fully meet 49 CFR Part 26 eligibility standards are permitted to participate as DBEs;
- To help remove barriers to the participation of DBEs in DOT-assisted contracts;
- To promote the use of DBEs in all types of federally assisted contracts and procurement activities;
- To assist the development of firms that can compete successfully in the marketplace outside the DBE Program; and
- To provide appropriate flexibility to recipients of Federal financial assistance in establishing and providing opportunities for DBEs.

Mr. Christopher Williams, Manager of Construction and Contracting Division, City of Buckeye, has been delegated as the DBE Liaison Officer (DBELO). In that capacity, the DBELO is responsible for implementing all aspects of the DBE Program. Implementation of the DBE Program is accorded the same priority as compliance with all other legal obligations incurred by the City in its financial assistance agreements with the DOT.

The City has disseminated this policy statement to all the appropriate Departments and Division of the organization. This policy statement is made available to DBE and non-DBE companies that perform work on U.S. DOT-assisted contracts. Distribution channels include trade associations, online publications, and electronic notification via stakeholder distribution lists and the City website.

Roger Klingler, City Manager

Date

Section 26.45 - Overall DBE Three-Year Goal Calculation

SUMMARY OF FINDINGS - AIRPORT IMPROVEMENTS FFY 2020-22 OVERALL GOALS (\$26.45)

The City's overall goal for the period of Federal Fiscal Years (FFYs) 2020-2022 (October 1, 2020 to September 30, 2022) is **10.33%** of the financial assistance the Buckeye Municipal Airport (Airport) will expend on DOT/FAA assisted contracts with DBE contractors.

DOT/FAA -assisted contract amount:

FFY 2021	\$ 1,231,131
FFY 2022	\$ 2,731,800
<u>FFY 2023</u>	<u>\$2,230,970</u>
Total	\$ 6,193,901

Overall Three-Year Goal:

To be accomplished through 0% Race/Gender Conscious (RC) and **10.33%** Race/Gender Neutral (RN).

Total dollar amount to be expended on DBEs:

Given the dollar amount of DOT/FAA-assisted contracts, the City, expects to let during the next three fiscal years, they have set a goal of expending **\$639,829** with DBEs during those years. However, the actual dollar amount spent may be +/- depending on the successful bid(s) submitted and the actual DBE goal achieved at project closeout.

Number and Type of Projects that the City anticipates:

Projects FFY 2021

1. South Apron & Taxiway J Reconstruction - Phase 2 - \$1,231,131

Projects FFY 2022

1. Airport Maintenance Building - \$910,600
2. Land Acquisition - \$1,821,200

Projects FFY 2023

1. Update Master Plan & ALP with AGIS - \$455,300
2. North Apron Reconstruction - \$1,456,960
3. AWOS Upgrade - \$318,710

Methodology Used to Calculate Overall Goal

Step 1 – Determination of Base Figure

This section describes the calculation of the overall DBE participation goal in DOT/FAA assisted airport projects that are to be undertaken by the City during the FFYs 2021-2023. According to 49 CFR Part 26, there are two steps to determine a DBE participation goal. Step one is the determination of a base figure of participation. Step two is the further adjustment of the base figure in order to determine a reasonable and realistic goal given the geographic availability of DBE firms and the workload capacity. These two steps are outlined below.

1.0 Base Figure

The base figure for the City's goal for the Buckeye Municipal Airport DBE goal attainment considers several factors, such as the number of available DBE firms in the market, the total number of firms in the market, the anticipated DOT/FAA assisted project values, and types of professional services that will be required with those projects.

1.1 Anticipated FFY 2021- 2023 Federal Aviation Administration (FAA) Projects

A review of the Buckeye Municipal Airport's Capital Improvement Program (ACIP):

FFY 2021, the City has one listed Federally assisted project at the Airport, for the South Apron and Taxiway "J" Reconstruction. Total estimated costs for FFY 2021 are \$ 1,231,131

FFY 2022, the City anticipates two FAA grants for a new Equipment Maintenance Building estimated at \$910,600, and Land Acquisition estimated at \$1,821,200. Total estimated project costs for 2022 are \$2,731,800.

FFY 2023, the City anticipates three FAA grants including a grant for an updated Airport Master Plan with AGIS estimated at \$455,300, design and construction for the North Apron Reconstruction estimated at \$1,456,960, and an upgrade to the AWOS estimated at \$318,710. Projects in 2023 are estimated to total \$ 2,230,970.

These projects and their estimated budgets are summarized in **Table 1**.

Table 1			
FY 2021 – 2023 Anticipated Federal Projects			
Fiscal Year	Project Name	Project Type	Estimated Budget
2021	South Apron & Taxiway J Reconstruction - Phase 2	Construction	\$1,231,131
2022	Airport Maintenance Building	Construction	\$910,600
2022	Land Acquisition	Planning	\$1,821,200
2023	Update Master Plan & ALP with AGIS	Planning	\$455,300
2023	North Apron Reconstruction	Design & Construction	\$1,456,960
2023	AWOS Upgrade	Design & Construction	\$318,710

Source: Arizona Department of Transportation 2021-2026 Final Airport Capital Improvement Program and The City of Buckeye Airports Grant Applications

1.2 Market Area and Local Availability of DBE Firms

The Buckeye Municipal Airport is in South Central Arizona in the City of Buckeye. After careful research of the historical bidding practices and locality of respondents in the competitive bidding environment, it has determined that their market area is made up of all counties in Arizona. Therefore, a statewide market area was considered in the calculation of the operating location.

In order to set the overall goal, the City first considered the contract opportunities anticipated for projects under consideration for FFY 2021-2023. These include:

- Excavation Hauling
- Clearing and Grubbing
- Drainage and Utilities Relocation
- Paving and Pavement Marking
- Airfield Electrical
- Surveying
- Trucking
- Design/Engineering
- Aviation Planning
- Concrete Placement
- Construction Materials
- Fencing Suppliers

Additionally, based on familiarity with construction and professional services procurement and practices within the operating jurisdiction, information contained in bidders/proposers' lists, and pre-bid conference

attendance history, the City determined that the contractors, both DBE and non-DBE, qualified to perform the services required for FFY 2021-2023 have traditionally come from within the State of Arizona. For the projects being offered, the City found no reason to research business patterns beyond the state of Arizona for the purpose of setting the overall goals. Therefore, the City established its market area as *the state of Arizona*.

It should be noted that while the state of Arizona has been deemed the market area in the goal setting process, DBEs from outside the area will be given the same bid opportunities provided they are appropriately certified by the state of Arizona Unified Certification Program and they appear on the data base available on the internet at the Arizona Unified Transportation Registration and Certification System (AZ UTRACS).

1.3 Anticipated Industries by NAICS Code

Using the US Census Bureau’s North American Industry Classification System (NAICS) updated 2018, the shares of various industry components of the anticipated upcoming projects were estimated. The codes used reflect anticipated industries that generally participate in airport construction and design projects, as well as historical project bids for similar projects. The following codes identified in **Table 2** were used in the project estimates.

Table 2	
NAICS CODES	
NAICS Code	Description
23899	Specialty Contractors (Fencing)
21231	Other crushed and broken stone mining and quarrying
21232	Construction Sand and Gravel Mining
23711	Water and sewer line and related structures construction
23731	Highway, Street and Bridge Construction
23799	Other Heavy and Civil Engineering Construction
238110	Asphalt and Concrete Construction
23821	Electrical Contractors
23891	Site Preparation Contractors
48422	Specialized Freight (Except Used Goods) Trucking

54133	Engineering Services
54137	Surveying and Mapping Services
54138	Testing Laboratories
54162	Environmental Consulting Services

Source: North American Industry Classification System (2018)

The above NAICS codes were further organized into work categories based on general categories of work associated with the projects in the Airport ACIP. **Table 3** lists the categories and estimated percentages of work by NAICS code:

Table 3		
WORK CATEGORIES		
Description	NAICS Codes	Percentage
Construction Services	21231, 21232, 23711, 23731, 23799, 23821, 23890, 23891, 48422, 23811	60%
Engineering, Planning, and Technical Services	54133, 54137, 54138, 54162	40%
Total		100%

Sources: North American Industry Classification System (2019), The Genesis Consulting Group, LLC analysis

1.4 Number of DBE Firms

The City researched the AZ UTRACS DBE and Small Business Concern (SBC) Databases and chose to use these databases as the data source for the goal calculation, which represents the number of ready, willing and able DBE/SBC firms within the market area. The AZ UTRACS database includes DBE firms that are certified by the Arizona Department of Transportation (ADOT), the City of Phoenix, and the City of Tucson. In addition, data from the US Census Bureau's County Business Patterns Database (CBP) was selected to determine the total number of firms within the same NAICS codes and the statewide market area. Table 4 lists the total number of Arizona firms and the specific number of DBE/SBC firms by service type.

Table 4		
STATEWIDE ARIZONA DBE FIRMS AVAILABILITY		
Description	Total Statewide Firms	Statewide DBE Firms
Construction Services	4766	362
Engineering, Planning & Technical Services	1669	237
Total	6435	599

Source: Arizona Department of Transportation DBE Directory and US Census Bureau's County Business Patterns Database (CBP), accessed 11/25/2019

The following methodology was utilized to calculate the base figure:

For each work category, the number of DBE firms was divided by the total number of statewide firms and multiplied by the percentage of work ratio. For each work category, the resulting values were summed, and the result multiplied by 100 to obtain a whole number percentage.

$$(0.600 \times 362/4766) + (0.400 \times 237/1669) = 0.1033$$

$$.1033 \times 100 = 10.33\% \text{ Base Figure for DBE participation}$$

Based upon the calculations above, the step 1 base figure for FFY 2021-2023 is **10.33%**. This became the base figure of Step 1 utilized in proceeding to Step 2.

Step 2 – Determination of Base Figure

2.0 Step 2: Adjustments to Step 1 Base Figure

After calculating a base figure representing the relative availability of DBEs, evidence was examined to determine what adjustment to the base figure should be made to reflect, as accurately as possible, the DBE participation one would expect in the absence of discrimination. The factors considered by the City included disparity studies and past DBE historical participation.

2.1 Disparity Studies

The Arizona Department of Transportation (ADOT) conducted a Disparity Study that began in FFY2015, and when completed covered FFY2017, FFY2018, and FFY2019. Results of that study indicated that an overall DBE Goal of 4.87% (FAA) was appropriate at that time, and was so indicated in ADOT's DBE Program, Goals and Methodology Report for FFY2017 through FFY2019.

Every three years, ADOT updates and analyzes the availability of DBEs and other firms to perform its contracts, and a new study is currently underway. This DBE Disparity Study will provide information for ADOT to adopt new overall DBE goals in 2020.

2.2 Past DBE Historical Participation

Adjustments to the base figures are often predicated on finding the average past DBE participation percentage from previous FFY data. However, in this case insufficient historical data exists to make a credible judgement for such adjustment at this time. Additionally, the base figure of 8.59% appears consistent with other regional norms, so adjustment to the base number is not warranted at this time.

Disparity Ratio

A disparity ratio calculation speaks to the historical under/over-utilization of DBEs. Based on the disparity ratio methodology developed and utilized in disparity studies, past discrimination and/or historical underutilization can be used to adjust the Step 1 Base Figure. The use of a disparity ratio to adjust current DBE and non-DBE availability represents a “but for” adjustment that addresses the lasting effects of past discrimination and historical under-utilization. This calculation can also address the anecdotal evidence presented by business owners related to continuing difficulties in obtaining capital and bonding in the local market.

Unfortunately, here again it appears that insufficient historical data exists to make a credible judgement or calculation for application of a disparity ratio. Therefore, no additional basis for adjustment to the base figure exists at this time.

2.3 Resultant Goal Adjustment and Conclusion

Therefore, to arrive at an overall goal, the base goal calculated in the Step 1 base figure (10.33%) would normally be averaged with the outcome of historical DBE participation averages and the outcome of disparity studies and related calculations. However, since the historical information was limited to a single year (2019), with insufficient information to determine a credible adjustment factor, it is recommended that the base figure **NOT** be adjusted at this time and remain at the calculated 8.59% shown in Step 1.

The City feels this goal figure accurately reflects DBE participation that can be achieved for the type of project work anticipated to be awarded during this three-year period. These calculations are also supported and within the range of the current goals established by the Sky Harbor International Airport, Tucson International Airport, Yuma International Airport, Prescott Regional Airport, and several other Arizona airports recently approved overall goals.

3.0 Breakout of Estimated Race/Gender Neutral & Race/Gender Conscious Participation

The City will meet the maximum feasibility portion of its overall goal by using race neutral means of facilitating DBE participation. The City will use the following race neutral means to increase DBE and other small business participation:

- Arrange solicitations or requests for proposals, time for presenting bids or proposals, quantities, specifications, and delivery schedules in an effort to facilitate DBE and small business participation
- Make available information and communications on contracting procedures and specific contracting opportunities by means of providing lists to bidders and dissemination of potential subcontractor information to bidders on prime contracts

- Maintain a file of successful bid documents from past procurements and permit DBEs and other small businesses to review and evaluate these documents
- Hold pre-bid/pre-proposal conferences to provide firms with an opportunity to inquire about the DBE requirements

These procedures shall be applied to DOT/FAA-assisted contracts such as those including professional, technical, consultant, or managerial services; construction; and the procurement of materials, supplies, personnel, facilities, and equipment, depending on the Airports' Capital Improvement Plans. In all instances, efforts will be made to facilitate DBE and small business participation in prime and subcontract opportunities.

The City estimates that in meeting their overall DBE goal of 10.33% that they will obtain 10.33% from Race/Gender Neutral (RN) participation and 0% from Race/Gender Conscious (RC) measures.

3.1 Calculation of Race Neutral and Race Conscious Goals

Traditionally the City has administered a race and gender-neutral DBE Program for all DOT/FAA-assisted construction-related contracts. The City's administration of the Federal DBE Program with race and gender-neutral measures should provide the factual information and foundation that DBE firms continue to be competitive in the local marketplace and justify the continuation of no race or gender conscious goal-based measures.

The City will also utilize available information regarding the degree to which prime contractors proposed and utilized DBE firms on projects where no DBE goals were established or required. The review of race and gender-neutral attainment included DBE prime contractor participation as well as DBE subcontractor participation that occurred on the projects.

In *Western States Paving*, the Ninth Circuit Court noted "while Washington DOT was not required to produce a separate factual predicate for a DBE program, it was still required to produce a factual predicate to justify race-conscious elements in the local implementation of its DBE program." In an update to the 2009 Arizona Department of Transportation (ADOT) Disadvantaged Business Enterprise Disparity Study, their current 2015 Disparity Study determined there was a compelling interest to justify a race and gender conscious (RC) DBE program for ADOT.

The consultant, Keen Independent Research, found that minority, women, and disadvantaged business enterprises (M/W/DBEs) were substantially underutilized as prime contractors in construction and construction-related professional services. While all groups were under-utilized in Architecture and Engineering, Hispanic American, Native American, and woman-owned firms were not under-utilized as construction subcontractors. (See Keen Independent Research 2015 ADOT Disparity Study, Chapter 6.)

The City is unable to rely on the results of the ADOT 2015 Disparity Study in determining the race and gender conscious split due to two main factors:

- Relevant Market Area: ADOT's study which reviewed FAA projects was limited to the state-owned Grand Canyon National Park Airport, with no other airports evaluated.
- Scopes of Work/Trade Areas: The majority of ADOT's projects are heavy civil and highway work, while contracting opportunities at the City of Buckeye Airport are primarily taxiway, runway,

and rehabilitation, apron reconstruction, pavement rehabilitation, building construction, planning and land acquisition.

Without more factual information to justify the application of race and gender conscious goals and since DBE historical participation information is insufficient to support any adjustment conclusions, the City is proposing that the 10.33% three-year overall DBE goal be achieved through race and gender-neutral measures.

3.2 Contract Goals

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

The city will establish contract goals only on those DOT/FAA assisted contracts that have subcontracting possibilities. The City 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 contract (e.g., type and location of work and availability of DBE's to perform the particular type of work).

The City will establish contract goals as a percentage of the Federal share of a DOT/FAA assisted contract.

4.0 Public Participation

In an effort to determine the availability of disadvantaged and non-disadvantaged businesses, to consider the effects of discrimination in opportunities for DBEs, and to further its efforts to establish a level playing field for participation of the same, the City, with the assistance of an outside consultant, took the measures to garner public participation in its goal setting process

4.1 Availability

Before establishing the overall goal, the City consulted with the following organizations, 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 Airports' efforts to establish a level playing field for the participation of DBEs.

- **Arizona Department of Transportation (ADOT)**

Consultation was made with ADOT DBE Supportive Services to confirm the number of ready, willing and able DBEs that have been certified by the Department as it relates to the Airport contracting opportunities and to ensure that the information contained in the AZ UCP Database (Arizona Unified Transportation Registration and Certification System - AZ UTRACS) is current. Additionally, ADOT was asked about any statistical and/or anecdotal information concerning the DBE Program.

Result: ADOT confirmed that the number of ready, willing, and able DBEs as utilized above is accurate and that the AZ UTRACS Database information was current. They also indicated that ADOT has created and added a Small Business Concern (SBC) Program for statewide small businesses interested in doing work with ADOT and is available for all interested parties. In addition, they stated ADOT is currently working on a program to combine the AZ UTRACS database with the Small Business Enterprise (SBE) Certificated Businesses of the Cities of Phoenix and Tucson through the ADOT Small Business Concerns (SBC) Program. ADOT stated that they are

increasing their outreach to create awareness of the program and ADOT - Business Engagement and Compliance (BECO) reviews any and all issues raised on a regular basis.

- Associated General Contractors, Arizona Chapter (AZAGC)

Consultation was made with the AZAGC DBE Division to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses and available outreach programs. Additionally, AZAGC was asked about any statistical and/or anecdotal information concerning the DBE Program.

Result: AZAGC staff confirmed that they extensively use AZ UTRACS for assistance in locating new small businesses, however, many members have developed their own historical lists of sub-contractors. AZAGC has started a new program to invite a limited number of certified DBE firms to their monthly meetings. These firms are then given time to present a short summary about their capabilities and experience. AZAGC is actively involved with ADOT, the cities of Phoenix and Tucson, DBE, and small business outreach programs. AZAGC sponsors and participates in many DBE/SBC events. Anecdotal information concerning current small businesses issues included: 1) over commitment of time and resources issues resulting in time delays and penalties, 2) personnel competence and resulting poor product quality issues and 3) availability of various specialty/professional licensed firms (e.g. geotechnical and survey).

- Northern Arizona Council of Governments (NACOG)

Consultation was made with the NACOG Economic Workforce/Development Division to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses and available outreach programs. Additionally, they were asked about any statistical and/or anecdotal information concerning the DBE Program.

Result: NACOG Staff confirmed that they occasionally referred clients to the AZ UTRACS system for assistance in locating small business. Their primary focus is on local employment/training issues and assisting businesses with relocating and referrals to other agencies for assistance. Anecdotal information concerning small businesses was the continued lack of available start up and on-going finances for small businesses. They were aware of ADOT's Statewide DBE/SBC outreach programs.

- City of Phoenix and Sky Harbor International Airport

Consultation was made with City of Phoenix, Equal Opportunity Department, and Sky Harbor International Airport to discuss the current status of the DBE program and contract goal setting and the status of the current City of Phoenix Small Business Enterprise Program.

Result: Phoenix staff confirmed that the number of ready, willing, and able DBEs is accurate, and that the City of Phoenix Database information is current. Staff also related that the City's small business enterprise and outreach program had recently won awards as one of the best programs in the country. Staff indicated that Phoenix Sky Harbor International Airport would soon be publishing their proposed new three-year goals. Staff felt the differences between the two periods were related to the change in construction specialties and their outreach program success. Sky Harbor International Airport has established a current race neutral overall goal of 6.90% for its Airport DBE Program.

- Tucson International Airport

Consultation was made with the DBELO at Tucson Airport Authority (TAA) to confirm the number of ready, willing and able DBEs that were considered in the Airport's market area as it relates to the Airport's contracting opportunities and to discuss the Small Business Certification process. Additionally, TAA was asked about any statistical and/or anecdotal information concerning the DBE Program.

Result: The DEBLO confirmed that the number of ready, willing, and able DBEs as utilized in the AZ UTRACS was accurate. They also related that in their opinion the small business element of the DBE Program would likely evolve into something similar to the ADOT SBC program with shared data between all certifying agencies all available to all interested parties. Tucson International Airport has set a race neutral DBE goal during the three-year period of 7.00% for its construction program.

Additionally, a search of the internet revealed a number of airports which had posted their Airport DBE Plans and Goals online. A sample search revealed the following:

- Grand Canyon National Park Airport – RN DBE goal for its FFY 2017-19 of 7.25%
- PHX-Mesa Gateway Airport – RN DBE goal for FFY 2018-2020 of 11.5%
- Mesa Falcon Field Airport – RN DBE goal for FFY 2015-2018 of 8.5%
- Ajo Airport – RN DBE goal for FFY 2020-2022 of 9.92%

The information collected during this consultation phase will be helpful during the bidding process. The City will hold a pre-bid meeting to discuss these identified issues along with offering assistance in obtaining quotes and providing the contractors with contact information.

Additional consultation shall also be made available at any pre-bid/pre-proposal meetings the City conduct throughout the fiscal year, which shall be open to all interested parties, both DBE and non-DBE.

4.2 Public Participation Notification

As a matter of practice, should public commentary be made resulting in a revision to the goal's calculation or rationale, the City shall notify the FAA immediately. Additionally, if the FAA determines that the methodology in setting the goal is inadequate or the goal has not been calculated correctly, a revised goal may be established by the FAA after consulting with the City.

4.3 Public Notice Language

A published notice announcing the proposed overall goal before submission to the FAA is required. The notice must be posted on the City's official internet website and may be posted in any other sources (e.g., minority focused media, trade association publications). If the proposed goal changes following review by the FAA, the revised goal must be posted on the City's website. The announcement of the proposed goal and its rationale should be made available to inform the public that the proposed overall goal is available for inspection during normal business hours at the sponsor's principal office for a 30-day comment period. Notice of the comment period must include addresses to which comments may be sent. The public comment must be documented and included in the final report.

The City of Buckeye hereby announces the Buckeye Municipal Airport - Disadvantaged Business Enterprise (DBE) Airport Program for federal fiscal year (FFY) 2021 – 2023. The proposed program and goal along with its rationale is available for inspection between 8 am and 5 pm, Monday through Friday, at the Buckeye Municipal Airport, for a 30-day period from the date of publication. Both the Public Works and Airport website should be utilized to provide notice to the public.

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

***City of Buckeye, Construction & Contracting Division
Attn: Christopher Williams - DBELO
530 Monroe Avenue
Buckeye, AZ 85326
E-mail: cwilliams@buckeyeaz.gov***

Or

***Federal Aviation Administration
Attn: Mr. Alexander Horton
DBE/ACDBE Compliance Specialist, Eastern Region & Arizona
Office of Civil Rights- ACR-4 Federal Aviation Administration
Certificate Management Office (CMO-29)
2895 SW 145th Ave, Suite #291
Miramar, FL 33027***

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