

# AIRPORT CONCESSIONS DISADVANTAGED BUSINESS ENTERPRISE PROGRAM

FY 2020-2022 GOALS REPORT

PREPARED FOR:



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# **SECTION 1 - ACDBE POLICY STATEMENT**

The Yuma County Airport Authority, Inc. (Airport), sponsor of Yuma International Airport, has established an Airport Concession Disadvantage Business Enterprise (ACDBE) Program in accordance with the regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 23. The Airport has received Federal financial assistance from the DOT and, as a condition of receiving this assistance, has signed an assurance that it will comply with 49 CFR Part 23.

It is the policy of the Airport to ensure that ACDBEs, as defined in 49 CFR Part 23, have an equal opportunity to participate as Airport concessionaires. It is also the Airport's policy to:

- 1. Ensure nondiscrimination in the award and administration of opportunities for concessions.
- 2. Create a level playing field on which ACDBEs can compete fairly for opportunities for concessions.
- 3. Ensure that the Yuma County Airport Authority's ACDBE program is narrowly tailored in accordance with applicable law.
- 4. Ensure that only firms which fully meet the requirements of 49 CFR Part 23 eligibility standards are permitted to participate as ACDBEs at our airport.
- 5. Help remove barriers to the participation of ACDBEs in opportunities for concessions.
- 6. Provide flexibility in establishing and providing opportunities for ACDBEs.

Gen Grosse, Property and Community Relations Manager, has been delegated as the ACDBE Liaison Officer (ACDBELO). In that capacity, Gen Grosse is responsible for implementing all aspects of the ACDBE Program. Implementation of the ACDBE Program is accorded the same priority as compliance with all other legal obligations incurred by the Airport in its financial assistance agreements with the DOT.

The Airport has disseminated this policy statement to the Yuma County Airport Authority and all components of its organization. This statement has been distributed to ACDBE and non-ACDBE concessionaires in the Yuma market area by way of the Airport's website.

Gen Grosse, Property and Community Relations Manager	Date	



# **SECTION 2 - GENERAL REQUIREMENTS**

The Airport is a recipient of U.S. DOT funds for airport improvement projects which requires compliance with the requirements of 49 CFR Part 23. Some of these requirements are highlighted below.

# 2.1. ACDBE POLICY STATEMENT

49 CFR Part 23 requires the establishment of an ACDBE Policy Statement which can be found in Section 1.2 of this report.

#### 2.2. APPLICABILITY

The regulations of 49 CFR Part 23 apply to recipients of Federal airport funds authorized by 49 U.S.C. 47101, et. seq.

#### 2.3. DEFINITION OF TERMS

The terms used for the purpose of the Airport's ACDBE program are those contained in 49 CFR Part 23, section 23.3. and 49 CFR Part 26, section 26.5.

#### 2.4. NON-DISCRIMIATION

The Airport will not exclude any person from participation in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and administration of opportunities for concessions covered by 49 CFR Part 23 on the basis of sex, race, color, or national origin. Additionally, the Airport will not, directly or through contractual or other arrangements, use criteria or methods of administration that would have the effect of defeating or substantially impairing the accomplishment of the ACDBE program objectives with respect to individuals of a particular race, color, sex, or national origin. The Airport will also take all necessary and reasonable steps to ensure nondiscrimination in the award and administration of contracts and agreements.

# 2.5. RECORD KEEPING

Per 49 CFR Part 23.27, the Airport will provide reports of ACDBE participation to the FAA annually, by or before March 1, to demonstrate commitments and attainments, as required by FAA reporting form "Uniform Report of ACDBE Participation" (49 CFR Appendix A to Part 23). The Airport will retain sufficient basic information of ACDBE participation for a minimum of three (3) years to be considered by the FAA to be in compliance with Part 23.

#### 2.6. OVERALL GOAL SETTING

The calculations and rationale for the overall goal of ACDBE participation is detailed in Section 3 of this report and were conducted in accordance with 49 CFR Part 23.



#### SECTION 3 - INTRODUCTION TO GOALS AND METHODOLOGIES

As a recipient of Federal funds for projects, the Airport is required under 49 CFR Part 23 to establish goals for ACDBE participation in airport concessionaire opportunities since its annual concession revenues, averaged over the three-year period prior to submitting the overall goals, exceed \$200,000. This report details the methodologies used to determine ACDBE participation goals for the three-year period of Federal Fiscal Years (FY) 2020-2022. Goals are determined separately for car rental and non-car rental concessionaires.

#### SECTION 4 - NON-CAR RENTAL ACDBE GOALS AND METHODOLOGIES

The Airport's annual non-car rental concession revenues, averaged over the three-year period preceding the date on which these overall goals are required to be submitted, exceed \$200,000. Therefore, pursuant to 49 CFR Part 23, the Airport must establish a goal for non-car rental ACDBE participation. This section presents the methodology used to determine the goal for non-car rental ACDBE participation.

#### 4.1. DETERMINATION OF MARKET AREA

Defined in 49 CFR Part 23.51(a), a market area is the geographical area in which the substantial majority of firms which seek to do concession business with the Airport are located, and the geographical area in which the firms which receive the substantial majority of concessions-related revenues are located. For the purpose of determining an overall non-car rental ACDBE participation goal, the Airport has determined that the market area encompasses Yuma, La Paz, Pima, and Maricopa Counties, as it is unlikely that concessionaires outside of this area would provide concession services such as food and beverage.

# 4.2. CURRENT NON-CAR RENTAL CONCESSIONAIRES AND OPPORTUNITIES

As of FY 2019, the Airport has two contracts with non-car rental concessionaires: a full-service restaurant and a vending company. The concessionaires and their FY 2019 gross revenues are listed in Table 4.1.

Table 4.1 - FY 2019 Non-car Rental Concessions and Gross Revenues

Concession Type	FY 2019 Gross Revenues	DBE Certified (Yes/No)
Full-Service Restaurant	\$981,371.53	No
Vending	\$3,715.90	No
Advertising*	\$19,247.21	No
Total FY 2019 Gross Revenue	\$984,547.43	

Source: Yuma County Airport Authority, Inc., 2020.

Note: \* = Advertising was brought in-house in April 2019. The Airport does not anticipate contracting another firm for advertising services.

Advertising was brought in-house in April 2019 and the Airport does not anticipate contracting another firm for advertising services during this goal period. Therefore, the concession opportunities currently available during this goal period are limited to the restaurant and vending company. Additionally, no ACDBE sub-concessionaires have been contracted by the restaurant or the vending company. It is not anticipated that any new non-car rental concession opportunities will arise prior to the end of this goal period. Should any arise, however, the Airport will submit an overall goal adjustment to the FAA.



#### 4.3. STEP ONE: DETERMINATION OF BASE FIGURE

The first step in determining the goal for non-car rental ACDBE participation is to obtain a base figure for the relative availability of ACDBEs. To determine the relative availability of non-car rental ACDBEs, the availability of non-car rental ACDBE concessionaires in the market area must be compared to the overall availability of all non-car rental concessionaires in the market area. The Arizona Department of Transportation (ADOT) United Certification Program (UCP) was referenced to determine the number of certified ACDBE firms in the market area that fall into the North American Industrial Classification System (NAICS) codes of the concession opportunities available at the Airport during this goal period. Additionally, the U.S. Census Bureau's 2017 County Business Pattern (CBP) data was referenced to determine the total number of firms in the market area within the respective NAICS codes. **Table 4.2** shows the non-car rental concession types anticipated at the Airport during this goal period and the relative availability of ACDBE firms within the market area that perform work in the same NAICS codes.

**Table 4.2 - Non-car Rental ACDBE Availability** 

Concession Type	NAICS Code	Market Area ACDBE Firms	Market Area ACDBE Firms Willing to Work in Yuma County	Total Market Area Firms	Percent ACDBE Availability
Full-Service Restaurant	722511	4	0	3,304	0.00%
Vending	454210	2	0	71	0.00%
Relative Availability of ACDBEs		0	3,375	0.00%	

#### Sources:

North American Industry Classification System (accessed April 2020).

Arizona Department of Transportation Unified Certification Program UTRACS (accessed April 2020): https://utracs.azdot.gov/Search/U.S. Census Bureau, 2017 County Business Patterns: https://www.census.gov/programs-surveys/cbp.html

#### Notes:

 $NAICS = North\ American\ Industrial\ Classification\ System$ 

ACDBE = Airport Concession Disadvantage Business Enterprise

Market Area = Yuma, La Paz, Pima, and Maricopa Counties

 $\textit{NAICS codes represent the concession opportunities currently available at the \textit{Airport during this goal period.} \\$ 

Market area ACDBE firms willing to work in Yuma County were determined from available data on ADOT's UCP UTRACS application.

As depicted in **Table 3.2**, although there are four full-service restaurants and two vending ACDBE firms in the market area, none of these firms have indicated a willingness to do business in Yuma County according to the ADOT UCP. Per 49 CFR Part 23, the relative availability of non-car rental ACDBE concessionaires in the market area is defined by the availability of all ready, willing, and able non-car rental ACDBE concessionaires in the market area (numerator) compared to the overall availability of ready, willing, and able non-car rental concessionaires in the market area (denominator). Because the non-car rental ACDBE concessionaires in the market area are not willing to work in Yuma County, the numerator is 0. Therefore, the base figure for the Airport's overall goal for non-car rental concessions is 0.00% ( $0 \div 3,375 = 0$ ).

#### 4.4. STEP TWO: EXAMINATION OF EVIDENCE FOR ADJUSTMENT TO BASE FIGURE

The base figure identified in Step 1 is considered to be a foundation from which an examination of available evidence is based. Pursuant to 49 CFR Part 23, this base figure may be adjusted to more accurately reflect the local economic climate of a given market or to take historical ACDBE participation into consideration. Step 2 of the goal setting process requires an assessment of factors that may contribute to an overall goal adjustment.



0.00%

#### 4.4.1. HISTORICAL ACDBE PARTICIPATION

A base figure adjustment may be made based on the current capacity of ACDBEs to perform work at the Airport as measured by the volume of work ACDBEs have performed in recent years. As depicted in **Table 4.3**, the historical ACDBE participation at the Airport was examined to gain an understanding of how much non-car rental ACDBE participation has occurred over the past five fiscal years.

 Fiscal Year
 Non-car Rental ACDBE Goal
 Non-car Rental ACDBE Participation

 2014
 0.01%
 0.00%

 2015
 0.01%
 0.00%

 2016
 0.01%
 0.00%

 2017
 0.01%
 0.00%

0.01%

**Table 4.3 - Historical Non-car Rental ACDBE Participation (FY 2014-2018)** 

Source: FAA Civil Rights Connect database (accessed April 2020).

The Airport has not counted any non-car rental concessionaire ACDBE participation or noted an ACDBE goal achievement in non-car rental concessions over the past five fiscal years. Classified as a nonhub Airport in the 2019-2023 National Plan of Integrated Airport Systems (NPIAS) Report, the Airport had 79,731 enplaned passengers in 2018 according to the FAA. On average, the Airport is serviced by approximately seven departures per day from one airline. The aircraft used by the airline are regional jets with seating capacities of 80 seats or less. Based on the relatively low passenger activity, the Airport is not a prime target for significant airport concessionaire operations. Therefore, historical non-car rental ACDBE participation is 0.00% and reflects the current concession opportunities at the Airport and limited availability of ready, willing, and able non-car rental ACDBE concessionaires in the market area as discussed in **Section 4.2**.

# 4.4.2. DISPARITY STUDIES

2018

ADOT analyzes the availability of Disadvantaged Business Enterprise (DBE) firms every three years in a disparity study which informs the department's overall DBE goals. The results of the most recent disparity study, completed in April 2020, suggest that the number of minority- and women-owned firms in the State of Arizona have increased by 5 percent since 2015. Subsequently, ADOT's DBE goals increased. While this disparity study is relevant to the total number of DBE firms within the Airport's market area, the number of ACDBE firms willing to work in Yuma County remains unchanged. Therefore, this disparity study will not be considered in the determination of the overall non-car rental ACDBE goal. The Airport is not aware of any additional disparity studies within the market area that may impact this goal-setting process.

# 4.5. DETERMINATION OF OVERALL NON-CAR RENTAL ACDBE GOAL

Based on this evaluation—including the Airport's current and anticipated concession types during this goal period; the local availability of ready, willing, and able non-car rental ACDBE concessionaires in the market area; and the Airport's historical non-car rental ACDBE participation—there is little evidence to support an upward adjustment of the base figure for non-car rental ACDBE participation. However, to



make a good faith effort, the Airport has determined an overall non-car rental ACDBE participation goal of 0.01%. The Airport's current non-car rental concessionaires will be encouraged to meet this goal through the purchase of goods and services.

#### 4.6. BREAKOUT OF ESTIMATED RACE-NEUTRAL AND RACE-CONSCIOUS PARTICIPATION

Pursuant to 49 CFR Part 23, airports are required to detail the portions of the overall participation goal that will be accomplished using race-neutral and race-conscious participation methods. Race-neutral participation includes any instance when an ACDBE firm wins a contract through customary competitive procedures without making distinctions or classifications on the basis of race or gender. Race conscious methods focus specifically on assisting only ACDBES, such as establishing a contract goal of ACDBE participation. 49 CFR Part 23 requires that airports meet the maximum feasible portion of their overall ACDBE participation goal utilizing race-neutral means.

The Airport expects to meet the entirety of its overall goal by employing race-neutral means of facilitating ACDBE participation. The Airport does not expect to establish contract goals to achieve the overall goal. Race-conscious participation methods will not be utilized due to the aforementioned limited availability of non-car rental ACDBE concessionaires in the market area and the non-car rental concession opportunities anticipated at the Airport during this goal period.

The Airport will prioritize the use of the following race-neutral participation methods to meet the overall non-car rental ACDBE goal of 0.01%:

- Locate and identify ACDBEs and other small businesses who may be interested in participating as concessionaires.
- Notify ACDBEs of concession opportunities and encourage them to compete, when appropriate.
- When practical, structure concession activities so as to encourage and facilitate the participation of ACDBEs.
- Provide technical assistance to ACDBEs in overcoming limitations, such as obtaining bonding or financing.

# **SECTION 5 - CAR RENTAL ACDBE GOALS AND METHODOLOGIES**

The Airport's annual car rental concession revenues, averaged over the three-year period preceding the date on which these overall goals are required to be submitted, exceed \$200,000. Therefore, pursuant to 49 CFR Part 23, the Airport must establish a goal for car rental ACDBE participation. The methodology used to determine the goal for car rental ACDBE participation is presented in this section.

#### **5.1. DETERMINATION OF MARKET AREA**

Defined in 49 CFR Part 23.51(a), a market area is the geographical area in which the substantial majority of firms which seek to do concession business with the Airport are located, and the geographical area in which the firms which receive the substantial majority of concessions-related revenues are located. In the case of car rental concessions, the Airport's car rental concessionaires are national brands that generally operate on a regional basis, shifting cars and resources among various locations as needed. None of these companies are ACDBE-owned. Therefore, the market area is based on the location of the car rental firms'



respective suppliers of goods and services. The Airport has determined that the market area for the purchase of goods and services, with the exception of vehicle purchases, is the State of Arizona. Based on the geographic locations of the firms that provide vehicles to the Airport's car rental concessionaires, the market area for vehicle purchases (new and used car dealers) was determined to include the States of Arizona and California.

#### 5.2. CURRENT CAR RENTAL CONCESSIONAIRES AND OPPORTUNITIES

As of FY 2019, the Airport has four on-airport car rental concessionaires. These concessionaires and their FY 2019 gross revenues are listed in **Table 4.4**.

 Car Rental Concessionaire
 FY 2019 Gross Revenues

 Avis
 \$1,530,613.92

 Budget
 \$1,385,231.09

 Enterprise
 \$3,155,063.41

 Hertz
 \$2,606,843.05

 Total FY 2019 Gross Revenue
 \$8,677,751.47

Table 4.4 - FY 2019 Car Rental Concessions and Gross Revenues

Source: Yuma County Airport Authority, Inc., 2020.

Note: Though Avis and Budget belong to the same parent company, Avis Budget Group, Inc., the concession revenue is reportedly separately.

The car rental ACDBE participation opportunities during this goal period will include those firms which provide goods and services to the Airport's car rental concessionaires, such as automobile sales, office supplies, automotive repair, and administrative services. It is not anticipated that any new car rental concession opportunities will arise prior to the end of this goal period. However, should any arise, the Airport will submit an appropriate overall goal adjustment to the FAA for approval.

#### 5.3. STEP ONE: DETERMINATION OF BASE FIGURE

The first step in determining the goal for car rental ACDBE participation is to obtain a base figure for the relative availability of ACDBE firms that provide goods and services to car rental concessionaires. To determine the relative availability, the availability of ready, willing, and able ACDBEs which provide these goods and services in the market area must be compared to the overall availability of all ready, willing, and able firms which provide these goods and services in the market area. Similar to step one for the non-car rental goal, the ADOT UCP was referenced to determine the number of certified ACDBE firms in the market area that fall into the NAICS codes of the types of firms that are expected to be able to provide goods and services to the Airport's car rental concessionaires. Additionally, the U.S. Census Bureau's 2017 CBP data was referenced to determine the total number of firms in the market area within the respective NAICS codes.

**Table 4.5** shows the types of firms that are expected to be able to provide goods and services to the Airport's car rental concessionaires during this goal period and the relative availability of ACDBE firms within the market area that perform work in the same NAICS codes.



**Table 4.5 - Car Rental ACDBE Availability** 

Concession Type	NAICS Code	Market Area ACDBE Firms	Market Area ACDBE Firms Willing to Work in Yuma County	Total Market Area Firms	Percent ACDBE Availability
Car Rental Companies	532111	0	0	195	0.00%
New Car Dealers*	441110	1	1	2,296	0.04%
Used Car Dealers*	441120	0	0	1,913	0.00%
Auto Parts Supply	441310	0	0	687	0.00%
Tire Dealers	441320	0	0	379	0.00%
General Auto Repair	811111	1	0	1,508	0.00%
Auto Exhaust Repair	811112	0	0	19	0.00%
Other Auto Repair	811118	0	0	72	0.00%
Auto Body Repair	811121	0	0	547	0.00%
Auto Glass Repair	811122	0	0	238	0.00%
Auto Oil Change	811191	1	0	121	0.00%
Auto Car Wash Services	811192	3	0	343	0.00%
Petroleum-Fuel Sales	424720	1	0	40	0.00%
Towing Services	488410	0	0	116	0.00%
Accounting Services	541211	1	0	1,122	0.00%
Commercial Printing	323111	1	1	295	0.34%
Office Supplies	453210	0	0	105	0.00%
Insurance Agent/Broker	524210	1	1	2,803	0.04%
Janitorial Services	561720	4	1	1,153	0.09%
Professional Development	611430	6	3	168	1.79%
Administrative Management	541611	24	4	1,840	0.22%
Advertising Services	541810	5	1	256	0.39%
Relative Availability of ACDBE	s		12	16,216	0.07%

#### Sources:

North American Industry Classification System (accessed April 2020).

Arizona Department of Transportation Unified Certification Program UTRACS (accessed April 2020): https://utracs.azdot.gov/Search/U.S. Census Bureau, 2017 County Business Patterns: https://www.census.gov/programs-surveys/cbp.html

#### Notes:

NAICS = North American Industrial Classification System

ACDBE = Airport Concession Disadvantage Business Enterprise

Market Area = State of Arizona (including firms not physically located within Arizona but are registered to do business in the state as ACDBEs).

\* = The market area for new and used car dealers encompasses the States of Arizona and California

 ${\it NAICS codes represent the concession opportunities currently available \ at the \ Airport \ during \ this \ goal \ period.}$ 

 $\textit{Market area ACDBE firms willing to work in Yuma County were determined from available data on ADOT's \textit{UCP UTRACS application}. \\$ 

Percentages are rounded to the nearest hundredth.



It should be noted that total ACDBE firms in the market area may include firms who possess an interstate certification, meaning they are physically located in another state but are registered within the State of Arizona to do business as ACDBEs. Though the market area has been defined as the State of Arizona, those ACDBE firms that possess interstate certifications may operate remotely and are eligible to contribute to the Airport's car rental ACDBE participation goal if willing to do business in Yuma County.

Although there are 49 ACDBE firms in the market area, only 12 have indicated a willingness to do business in Yuma County according to the ADOT UCP. As previously discussed, 49 CFR Part 23 defines the relative availability of car rental ACDBE concessionaires in the market area by the availability of all ready, willing, and able car rental ACDBE concessionaires in the market area (numerator) compared to the overall availability of ready, willing, and able car rental concessionaires in the market area (denominator). Because 12 car rental ACDBE firms are willing to work in Yuma County, the numerator is 12. Therefore, the base figure for the Airport's overall goal for car rental concessions is 0.07% (12 ÷ 16,216 = 0.07).

#### 5.4. STEP TWO: EXAMINATION OF EVIDENCE FOR ADJUSTMENT TO BASE FIGURE

Following the calculation of the base figure in Step 1, an evaluation of local conditions and available evidence is required to determine what adjustment, if any, is needed to arrive at the overall goal. Pursuant to 49 CFR Part 23, Step 2 assesses the factors that may contribute to a base figure adjustment.

#### 5.4.1. HISTORICAL ACDBE PARTICIPATION

A base figure adjustment may be made based on the current capacity of ACDBEs to perform work at the Airport as measured by the volume of work ACDBEs have performed in recent years. As depicted in **Table 4.6**, the historical ACDBE participation at the Airport was examined to gain an understanding of how much car rental ACDBE participation has occurred over the past five fiscal years.

**Fiscal Year Car Rental ACDBE Goal Car Rental ACDBE Participation** 2014 1.71% 0.00% 2015 1.71% 1.57% 2016 1.71% 0.70% 2017 1.71% 18.20% 2018 1.71% 18.77%

**Table 4.6 - Historical Car Rental ACDBE Participation (FY 2014-2018)** 

Source: FAA Civil Rights Connect database (accessed April 2020).

With a historical goal of 1.71%, the Airport has noted a car rental ACDBE goal achievement in three of the past five years—including a significant increase in participation in FY 2017 and FY 2018. The Airport's historical car rental ACDBE participation was considered in the determination of the overall goal.

# 5.4.2. DISPARITY STUDIES

ADOT analyzes the availability of Disadvantaged Business Enterprise (DBE) firms every three years in a disparity study which informs the department's overall DBE goals. The results of the most recent disparity study, completed in April 2020, suggest that the number of minority- and women-owned firms in the State



of Arizona have increased by 5 percent since 2015. Subsequently, ADOT's DBE goals increased. While this disparity study is relevant to the total number of DBE firms within the Airport's market area, the number of ACDBE firms willing to work in Yuma County remains unchanged. Therefore, this disparity study will not be considered in the determination of the overall car rental ACDBE goal. The Airport is not aware of any additional disparity studies within the market area that may impact this goal-setting process.

#### 5.5. DETERMINATION OF OVERALL CAR RENTAL ACDBE GOAL

To arrive at an overall car rental ACDBE goal, the Step 1 base figure (0.07%) was compared to local ACDBE availability and the Airport's historical car rental ACDBE participation. With a significant increase in ACDBE participation in recent years, the Airport determined it was appropriate to make an adjustment to the base figure. Given the historical car rental ACDBE participation has greatly varied over the past five fiscal years, the Airport's five-year average participation was utilized in determining the overall goal:

- Average car rental ACDBE participation (FY 2014-2018) = (0.00 + 1.57 + 0.70 + 18.20 + 18.77) ÷ 5
- Average car rental ACDBE participation (FY 2014-2018) = 7.85%

This five-year participation average was then added to the base figure and averaged to arrive at an overall car rental ACDBE goal:

- Car rental ACDBE goal = (0.07 + 7.85) ÷ 2
- Car rental ACDBE goal = 3.96%

# 5.6. BREAKOUT OF ESTIMATED RACE-NEUTRAL AND RACE-CONSCIOUS PARTICIPATION

49 CFR Part 23 requires airports to detail the portions of the overall participation goal that will be accomplished using race-neutral and race-conscious participation methods. Race-neutral participation includes any instance when an ACDBE firm wins a contract through customary competitive procedures without making distinctions or classifications on the basis of race or gender. Race conscious methods focus specifically on assisting only ACDBES, such as establishing a contract goal of ACDBE participation. 49 CFR Part 23 requires that airports meet the maximum feasible portion of their overall ACDBE participation goal utilizing race-neutral means.

The Airport expects to meet the entirety of its overall car rental ACDBE goal by employing race-neutral means of facilitating ACDBE participation. The Airport does not expect to establish contract goals to achieve the overall goal. Race-conscious participation methods will not be utilized due to the aforementioned limited availability of car rental ACDBE concessionaires in the market area and the car rental concession opportunities anticipated at the Airport during this goal period.

The Airport will prioritize the use of the following race-neutral participation methods to meet the overall car rental ACDBE goal of 3.96%:

- Locate and identify ACDBEs and other small businesses who may be interested in participating as concessionaires.
- Notify ACDBEs of concession opportunities and encourage them to compete, when appropriate.
- When practical, structure concession activities so as to encourage and facilitate the participation of ACDBEs.



 Provide technical assistance to ACDBEs in overcoming limitations such as obtaining bonding or financing.

# **SECTION 6 - CONSULTATION WITH STAKEHOLDERS**

The Airport encourages the participation of ACDBES in its airport concessions program. Prior to submitting these goals to the FAA, and pursuant to 49 CFR Part 23, the Airport will consult with various stakeholders and groups which may have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the recipient's efforts to increase participation of ACDBEs. The following organizations were contacted for their input on the effects of discrimination and DBE opportunities for the Airport:

- Yuma County Chamber of Commerce
- Arizona Hispanic Chamber of Commerce
- Greater Phoenix Black Chamber of Commerce
- Arizona Western College Small Business Development Center
- Associated Minority Contractors of Arizona
- Arizona Department of Transportation Business Engagement & Compliance Office
- National Association of Women Business Owners
- National Center for American Indian Enterprise Development
- Current Car Rental Concessionaires
- Current Non-Car Rental Concessionaires

The outreach message was distributed to the preceding organizations and is included in **Appendix A**.

#### **SECTION 7 - PUBLIC PARTICIPATION**

The Airport published a notice on the Yuma International Airport website (www.flyyuma.com/dbe.html) and in the local newspaper, *The Yuma Sun*, announcing the proposed rental car and non-rental car ACDBE goals for the three-year period of FY 2020-2022. The notice informed the public that the FY 2020-2022 ACDBE Goals Report would be available for inspection on the Airport's website and that the Airport would accept comments and questions on the goals and methodologies. The notice included the email address where comments could be sent and a link where the document could be reviewed. **Appendix B** provides a copy of the notice.

#### **SECTION 8 - SUMMARY OF ACDBE GOALS**

As a result of the methodologies presented within this report, and in accordance with the requirements of 49 CFR Part 23, the Yuma County Airport Authority has established the following ACDBE participation goals for the period of FY 2020- 2022. Both goals are anticipated to be achieved through the employment of race-neutral measures.

Non-Car Rental ACDBE Goal: 0.01 %
 Car Rental ACDBE Goal: 3.96%



# **APPENDIX A**

# **Consultation Outreach Message**

Dear Sir or Madam,

Yuma International Airport is in the process of updating its Airport Concessions Disadvantaged Business Enterprise (ACDBE) goals for the period of Federal Fiscal Years 2020-2022. As part of this process, our firm is assisting the Airport in consulting with industry groups, community organizations, minority and women's groups, and current airport concessionaires to obtain information that may contribute to the development of these goals.

Based on the Airport's historic and current non-car rental and car rental concession contracts, along with the availability of ACDBE concessionaries in the market area according to the Arizona Department of Transportation United Certification Program (UCP) database, the Airport has proposed a non-car rental ACDBE goal of 0.01% and a car rental ACDBE goal of 3.96%. These are annual goals of participation for FY 2020-2022 and include both prime contracts and subcontracts.

The Airport is seeking information from your organization that may further inform this goal-setting process, including but not limited to: the availability of disadvantaged and non-disadvantaged businesses in the Yuma market area, barriers or impediments which may impact an ACDBE firm's entry into the Yuma market area, and the equal treatment of ACDBEs in the bidding process.

Your input is valued and appreciated. If your organization has any comments, please respond to this email by **May 8, 2020.** For more information on the Airport's ACDBE program and the methodologies used to arrive at these goals, the draft ACDBE Goals Report is available for review on the Airport's website at <a href="https://www.flyyuma.com/dbe.html">www.flyyuma.com/dbe.html</a>.

Thank you for your time.

Sincerely,

#### **John Coliton**

Kimley-Horn and Associates, Inc. 189 S Orange Avenue #1000 Orlando, FL 32801 (407) 427-1695 john.coliton@kimley-horn.com



# **APPENDIX B**

#### **Public Notice**

The Yuma County Airport Authority has established an Airport Concessions Disadvantaged Business Enterprise (ACDBE) Program in accordance with 49 CFR Part 23. The Yuma International Airport anticipates receiving Federal financial assistance from the Department of Transportation (DOT) for projects during the period of Federal Fiscal Years 2020-2022 and, as a condition of receiving this assistance, must comply with 49 CFR Part 23.

The Airport has established an overall annual goal for non-car rental ACDBE participation of 0.01% of the total dollar amount of annual non-car rental concession revenues. The Airport has also established a car rental ACDBE goal of 3.96% of annual car rental concession revenues. These proposed goals and the methodologies used to arrive at the goals are available for public review and comment on the Airport's website at <a href="https://www.flyyuma.com/dbe.html">www.flyyuma.com/dbe.html</a>.

Comments and questions will be accepted until May 8, 2020 and may be sent to John Coliton of Kimley-Horn at john.coliton@kimley-horn.com.

