



SEPTEMBER 2022


# FY 23-25 ACDBE GOAL METHODOLOGY

LAUGHLIN/BULLHEAD INTERNATIONAL AIRPORT

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# Table of Contents

Overall Goal Calculation for Non-Car Rental Concessions FY 2023-25.....	2
Market Area .....	2
Base of the Goal .....	3
Methodology used to Calculate Overall Goal .....	4
Step 1 - Actual Relative Availability of ACDBEs - §23.51 (c) .....	4
Step 2 – Adjustments to Step 1 Base Figure .....	5
Past Participation .....	5
Disparity Studies .....	6
Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation .....	6
Consultation .....	7
Public Participation .....	8
Overall Goal Calculation for Car Rental Concessions FY 2023-25.....	9
Goal Based on Gross Receipts - Determination .....	9
Market Area .....	10
Base of the goal .....	10
Step 1 - Actual Relative Availability of ACDBEs - §23.51 (c) .....	11
Step 2 Adjustments to Step 1 Base Figure .....	12
Past Participation .....	13
Disparity Studies .....	13
Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation .....	14
Consultation .....	15
Public Participation .....	16
Appendix A .....	17
Public Participation Message.....	17
Appendix B .....	18
Public Notice .....	18

# Overall Goal Calculation for Non-Car Rental Concessions FY 2023-25

The Mohave County Airport Authority (MCAA) as sponsor for the Laughlin/Bullhead International Airport has established an Airport Concession Disadvantaged Business Enterprise (ACDBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 23. Laughlin/Bullhead International Airport is a primary airport and has received federal funds authorized for airport development after January 1988 (authorized under Title 49 of the United States Code). Laughlin/Bullhead International Airport has signed airport grant assurances that it will comply with 49 CFR Part 23.

**Name of Recipient:** Mohave County Airport Authority

**Name of Airport(s):** Laughlin/Bullhead International Airport

**Goal Period:** FY 2023-25 (10/1/2022 through 9/30/2025)

**Overall Three-Year Goal:** 1.00%, to be accomplished through 0.00% Race Conscious and 1.00% Race Neutral

## **Methodology used to Calculate Overall Goal**

Laughlin/Bullhead International Airport in conducting this goal-setting process is determining the extent, if any, to which the firms in the market area have suffered discrimination or its effects in connection with concession opportunities and related business opportunities.

## **Market Area**

The 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 in which the firms which receive the substantial majority of concessions-related revenues are located. Mohave County Airport Authority has determined that the market area for Laughlin/Bullhead International Airport is the Arizona counties of Coconino, La Paz, Maricopa, Mohave (Home County), and Yavapai. Non-car rental concessions are not nationally sourced as it is unlikely that concessionaires outside the local market area would provide food and beverage concessions.

Laughlin/Bullhead International Airport is located in Mohave County, Arizona and is bordered on the west by California and Nevada. Mohave County is geographically the second largest county and the sixth highest populated county in the state; however, it is only home to 2.6% of the businesses in the state. Laughlin/Bullhead International Airport anticipates that the majority of ACDBE participation will be located in the Arizona county of Maricopa as it is the most populated county in the state and represents the substantial majority of the ACDBE population in Arizona. In efforts to increase ACDBE participation Laughlin/Bullhead International Airport will also include the surrounding Arizona counties of Coconino, La Paz, and Yavapai.

As of FY 2022, the Laughlin/Bullhead International Airport has one contract with non-car rental concessionaires; furthermore, food and beverage concessions are the only anticipated non-car rental concession opportunities Laughlin/Bullhead International Airport expects during this goal period for the identified market area.

## **Base of the Goal**

To calculate the base of the goal, Mohave County Airport Authority considered the most recent previous 3 years of gross concession receipts and the projected potential concession revenue (gross receipts) three years into the future including upcoming new opportunities.

**Table 1: Historic Gross Receipts for Non-Car Rental Concessions**

<b>Year</b>	<b>Non-Car Rental Concessions Gross Receipts</b>
2020	\$279,633
2021	\$232,037
2022	\$282,103
<b>Average</b>	<b>\$264,591</b>

*Gross receipts from 10/1 of the prior year to 9/30 of the year shown. The final two months of 2022 are estimated using an average of the monthly gross receipts from the preceding ten months.*

There is no anticipation for major changes or new opportunities for non-car rental concessions revenue. While non-car rental revenue has stayed fairly consistent since 2020, Laughlin/Bullhead International Airport will use a 3% inflation factor to predict the growth rate for the next three years anticipating increased passenger traffic from the COVID recession and rising prices. Furthermore, Laughlin/Bullhead International Airport anticipates that the non-car rental concessions opportunities will remain the same in the upcoming years and the only non-car rental concession offered at Laughlin/Bullhead International Airport will be food and beverage. The estimated annual future gross receipts are established using the average of the three-year gross receipts and are shown below:

**Table 2: Projected Gross Receipts for Non-Car Rental Concessions**

<b>Year</b>	<b>Base Non-Car Rental Concession Gross Receipts</b>	<b>Annual Growth / Reduction Estimate</b>	<b>Annual Gross Receipts Estimate</b>
2023	\$264,591	3%	\$272,529
2024	\$272,529	3%	\$280,705
2025	\$280,705	3%	\$289,126
Three-Year Total Gross Receipts:			\$842,360
Average Annual Growth Rate:			3%

$\$272,529 + \$280,705 + \$289,126 = \mathbf{\$842,360}$  which is the recipient's base of the goal for non-car rental concessions.

The following are not included in the total gross receipts for concessions: (a) the gross receipts of car rental operations, (b) the dollar amount of a management contract or subcontract with

a non-ACDBE, (c) the gross receipts of business activities to which a management contract or subcontract with a non-ACDBE pertains, and (d) any portion of a firm's estimated gross receipts that will not be generated from a concession.

If a new concession opportunity arises prior to the end of this goal period, Mohave County Airport Authority will submit to the FAA an appropriate adjustment to the overall goal. This will be submitted to FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity.

## **Methodology used to Calculate Overall Goal**

Mohave County Airport Authority will include goods and services purchases from ACDBEs toward meeting the goal. The dollar value from purchases of goods and services from ACDBEs may be added to the numerator, and the dollar value from purchases of goods and services from all firms (ACDBEs and non-ACDBEs) may be added to the denominator.

Mohave County Airport Authority can meet the percentage goal by including any business operated through a management contract or subcontract with an ACDBE. Mohave County Airport Authority, and the businesses at the airport, will add the dollar amount of a management contract or subcontract with an ACDBE to the total participation by ACDBEs in airport concessions (both the numerator AND the denominator) and to the base from which the recipients' percentage goal is calculated. However, the dollar amount of a management contract or subcontract with a non-ACDBE and the gross revenue of business activities to which the management contract or subcontract pertains will not be added to this base in either the numerator or denominator.

Mohave County Airport Authority, and the businesses at the airport, shall make good faith efforts to explore all available options to achieve, to the maximum extent practicable, compliance with the goal through direct ownership arrangements, including joint ventures and franchises.

### **Step 1 - Actual Relative Availability of ACDBEs - §23.51 (c)**

We determined the base figure for the relative availability of ACDBEs other than car rentals. The base figure was calculated as follows:

Numerator: Ready, willing, and able non-car rental ACDBEs in the market area  
\_\_\_\_\_divided by\_\_\_\_\_

Denominator: All ready, willing and able non-car rental concession firms in the market area

The data source(s) used in the calculation included:

- Arizona Department of Transportation ACDBE Firm Directory: <https://utracs.azdot.gov/Search>
- NAICS: <https://www.naics.com/>
- Census Bureau Data: <https://data.census.gov/cedsci/>

- Arizona Department of Transportation 2020 Disparity Study completed by Keen Independent Research in August 2020

The base figure was calculated as follows:

□  
**Table 3: Base Non-Car Rental ACDBE Availability**

Concession Activity	NAICS	# ACDBE Certified Firms	# Total Firms	% Availability
Baked Goods Retailers	445291	0	24	0.00%
Food Service Contractors	722310	0	415	0.00%
Packaged Frozen Food Merchant Wholesalers	424420	0	13	0.00%
Mobile Food Services	722330	0	120	0.00%
Other Grocery and Related Products Merchant Wholesalers	424490	1	176	0.57%
Average ACDBE Availability:				0.13%

$$\text{FY23-25 Base Figure} = \frac{\sum \text{of ACDBEs}}{\sum \text{of All Firms}} = \frac{1}{748} = 0.13\%$$

When we calculated the average availability, we arrived at the Step 1 base figure for our overall goal for non-car rental concessions of **0.13%**. As depicted in the calculation above the ACDBE availability in the market area is highly limited.

## **Step 2 – Adjustments to Step 1 Base Figure**

After calculating a base figure of the relative availability of ACDBEs, Laughlin/Bullhead International Airport examined evidence to determine what adjustment was needed to the Step 1 base figure in order to arrive at the overall goal.

Mohave County Airport Authority examined two factors as possible adjustments to the Step 1 base figure:

### **Past Participation**

Mohave County Airport Authority will not adjust the base ACDBE availability goal based on historical ACDBE participation because Laughlin/Bullhead International Airport does not have historical ACDBE data to reference to make an adjustment to the Step 1 base figure. Over the forthcoming years Laughlin/Bullhead International Airport will document ACDBE participation as required by the FAA and utilize the obtained participation data for future ACDBE goal adjustments.

## Disparity Studies

Mohave County Airport Authority researched the market area for any disparity studies that have been recently conducted for the Bullhead City, AZ (Mohave County) area. The findings are as follows:

- Every three years, ADOT performs a disparity study to analyze the availability of DBEs in efforts to aid in setting the department's DBE goals. The most recently completed disparity study, finalized in August 2020 by Keen Independent Research can be found at:  
[https://azdot.gov/sites/default/files/media/2020/08/KeenIndependent\\_ADOT\\_2020DisparityStudy\\_FinalReport\\_08262020.pdf](https://azdot.gov/sites/default/files/media/2020/08/KeenIndependent_ADOT_2020DisparityStudy_FinalReport_08262020.pdf)

While the scope of ADOT's 2020 Disparity Study did not include ACDBEs the airport reviewed the disparity study for disparity similarities between DBEs and ACDBEs in the state.

Mohave County Airport Authority also searched for ACDBE and concession disparities throughout the state and did not locate any recently completed Disparity Studies applicable to the market area or ACDBEs.

Mohave County Airport Authority will utilize the conclusions and results documented in ADOT's 2020 Disparity Study when implementing its FY23-25 ACDBE goal; however, the airport will not use the Disparity Study to adjust the proposed FY23-25 ACDBE goal given the varying scope of the study.

Per U.S. DOT, if the Step 1 base figure is under 1% you must adjust the goal upward to at least 1.0% based on planned outreach efforts to certified and potential ACDBEs. Therefore, in order to reflect as accurately as possible, the ACDBE participation the airport would expect in the absence of discrimination the airport will adjust its base figure upward by 0.87%. The airport's overall goal for non-car rental concessions is 1.00%.

### **Breakout of Estimated "Race and Gender Neutral" (RN) and "Race and Gender Conscious" (RC) Participation**

Mohave County Airport Authority will make every reasonable effort to meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. Mohave County Airport Authority will use the following race-neutral measures.

MCAA and Laughlin/Bullhead International Airport understand that we will be expected to actually take these steps and that this is not merely a paper exercise.

- Locate and identify ACDBEs and other small businesses who may be interested in participating as concessionaires under 49 CFR Part 23
- Notify ACDBEs of concession opportunities and encouraging 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 inability to obtain bonding or financing
- Ensuring that competitors for concession opportunities are informed during pre-solicitation communication about how the sponsor's ACDBE program will affect the procurement process
- Provide information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation

If race-neutral measures, standing alone, are not sufficient to meet the overall goal, the following race-conscious measures may be used to meet the overall goal:

- Establish concession-specific ACDBE goals for particular concession opportunities

Mohave County Airport Authority estimates that, in meeting the overall goal of 1.00%, it will obtain 1.00% from race-neutral participation and 0.0% through race-conscious measures.

Due to the limited availability of non-car rental ACDBE concessionaires in the market area and the non-car rental concession opportunities anticipated during the goal period, Mohave County Airport Authority expects to meet the goal employing race-neutral means of facilitating ACDBE participation. The Mohave County Airport Authority reviewed Yuma International Airport's ACDBE goal. Yuma International Airport is located within reasonable proximity to Laughlin/Bullhead International Airport and has similar concession opportunities, the airport has employed a fully race-neutral approach to obtaining ACDBE participation due to the limited availability of ACDBE concessionaries who are ready, willing, and able to participate in the airport's concession opportunities.

In order to ensure that Mohave County Airport Authority's ACDBE program will be narrowly tailored to overcome the effects of discrimination, if concession specific goals are used, Laughlin/Bullhead International Airport will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation and race-neutral and race conscious participation will be tracked separately. For reporting purposes, race-neutral ACDBE participation includes, but is not necessarily limited to, the following: ACDBE participation through a prime contract that an ACDBE obtains through customary competitive procurement procedures; ACDBE participation through a subcontract on a prime contract that does not carry ACDBE goal; ACDBE participation on a prime contract exceeding a concession specific goal; and ACDBE participation through a subcontract from a prime contractor that did not consider a firm's ACDBE status in making the award.

Mohave County Airport Authority will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.

## **Consultation**

Mohave County Airport Authority routinely meets with stakeholders in an effort to increase ACDBE participation. Stakeholders consulted include minority and women's business groups, community



organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires themselves, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the sponsor's efforts to increase participation of ACDBEs.

Prior to submitting the goal to the FAA, and pursuant to 49 CFR Part 23, Laughlin/Bullhead International Airport consulted 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 ACDBE opportunities for the Laughlin/Bullhead International Airport:

- Bullhead Area 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 Non-Car Rental Concessionaires

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

No comments were received.

## **Public Participation**

Laughlin/Bullhead International Airport published a notice on the Laughlin/Bullhead International Airport website, DBEPlans.com, and in the FAA Match Maker system, announcing the proposed non-rental car ACDBE goal for the three-year period of FY 2023-2025. The notice included the email address where comments could be sent. Appendix B provides a copy of the notice.

No comments were received.

# Overall Goal Calculation for Car Rental Concessions FY 2023-25

The Mohave County Airport Authority (MCAA) as sponsor for the Laughlin/Bullhead International Airport has established an Airport Concession Disadvantaged Business Enterprise (ACDBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 23. Laughlin/Bullhead International Airport is a primary airport and has received federal funds authorized for airport development after January 1988 (authorized under Title 49 of the United States Code). Laughlin/Bullhead International Airport has signed airport grant assurances that it will comply with 49 CFR Part 23.

**Name of Recipient:** Mohave County Airport Authority

**Name of Airport(s):** Laughlin/Bullhead International Airport

**Goal Period:** FY 2023-25 (10/1/2022 through 9/30/2025)

**Overall Three-Year Goal:** 1.00%, to be accomplished through 0.00% Race Conscious and 1.00% Race Neutral

## **Methodology used to Calculate Overall Goal**

The airport in conducting this goal-setting process is determining the extent, if any, to which the firms in the market area have suffered discrimination or its effects in connection with concession opportunities and related business opportunities.

## **Goal Based on Goods and Services Purchases - Determination**

Upon review of the market, it appears that all or most of the goal is likely to be met through the purchases by car rental companies of vehicles or other goods/services from ACDBEs. This is due to the fact that no certified ACDBE car rental companies exist within the market area. As such, the Laughlin/Bullhead International Airport has structured the goal entirely in terms of the purchases of goods and services.

We determined the goal based on outreach for the purchases of goods and services from certified ACDBE firms and/or potential ACDBE firms in the market area. This basis is in lieu of a goal based upon a percentage of total gross receipts of car rental operations at the Airport. We will make a good faith effort to pursue opportunities to meet the goods and services goal. We will continue to consult and work with the Arizona DOT & Arizona UCP, our car rental concessionaires at the airport, similarly situated airports in our region, minority and women businesses in the State, minority serving institutions, local pro-business organizations, and targeted media publications to find prospective ACDBE firms. We will work with our car rental companies to strategize outreach to Arizona DOT & Arizona UCP certified ACDBEs that may be able to provide car rental goods and services, to encourage current vendors who may be eligible for ACDBE certification to apply, and to encourage firms already working at the airport but certified as ACDBE in other states, to apply

via the interstate certification process. The Arizona DOT & Arizona UCP are aware of this requirement and are on board to assist and process certifications as required by 49 CFR Subpart C.

As of FY 2022, Laughlin/Bullhead International Airport has two on-airport car rental concessionaires: Avis and Hertz.

We can meet the percentage goal by including the purchase from ACDBEs of goods and services used in businesses conducted at Laughlin/Bullhead International Airport. Car rental company concessionaires at Laughlin/Bullhead International Airport stated that the goods and services they may need in the goal period are: automobile sales, automotive repair, automotive detailing, and insurance services.

## **Market Area**

The 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 in which the firms which receive the substantial majority of concessions-related revenues are located.

Mohave County Airport Authority has divided the market area for rental car concessions into two categories based on services offered (regional and statewide). The identified regional market area consists of the Arizona counties of Coconino, La Paz, Maricopa, Mohave (Home County), and Yavapai. The statewide market area is the State of Arizona.

## **Base of the Goal**

To calculate the base of the goal, Mohave County Airport Authority considered the most recent previous 3 years of gross concession receipts and the projected potential concession revenue (gross receipts) three years into the future including upcoming new opportunities.

***Table 4: Historic Gross Receipts for Car Rental Concessions***

<b>Year</b>	<b>Car Rental Concessions Gross Receipts</b>
2020	\$1,605,154
2021	\$1,623,631
2022	\$2,317,602
<b>Average</b>	<b>\$1,848,796</b>

*Gross receipts from 10/1 of the prior year to 9/30 of the year shown. The final two months of 2022 are estimated using an average of the monthly gross receipts from the preceding ten months.*

There is no anticipation for major changes or new opportunities for car rental concessions revenue. Laughlin/Bullhead International Airport will use a 3% inflation factor to predict the growth rate for the next three years anticipating increased passenger traffic from the COVID recession and rising prices. The estimated annual future gross receipts are established using the average of the three-year gross receipts are shown below:

**Table 5: Projected Gross Receipts for Car Rental Concessions**

Year	Base Car Rental Concession Gross Receipts	Annual Growth / Reduction Estimate	Annual Gross Receipts Estimate
2023	\$1,848,796	3%	\$1,904,260
2024	\$1,904,260	3%	\$1,961,388
2025	\$1,961,388	3%	\$2,020,230
Three-Year Total Gross Receipts:			\$5,885,878
Average Annual Growth Rate:			3%

\$1,904,260 + \$1,961,388 + \$2,020,230 = **\$5,885,878** which is the recipient's base of goal for car rental concessions.

The following are not included in this base: (a) non-car rental operations.

If a new concession opportunity arises prior to the end of this goal period and the estimated average of annual gross revenues are anticipated to be \$200,000 or greater, the Mohave County Airport Authority will submit to the FAA an appropriate adjustment to the overall goal. This will be submitted to FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity.

**Step 1 - Actual Relative Availability of ACDBEs - \$23.51 (c)**

We determined the base figure for the relative availability of ACDBEs for car rental goods and services purchases. The base figure was calculated as follows:

Numerator: Ready, willing, and able car rental ACDBEs in the market area  
 \_\_\_\_\_ divided by \_\_\_\_\_

Denominator: All ready, willing and able car rental concession firms in the market area

The data source(s) used in the calculation included:

- Arizona Department of Transportation ACDBE Firm Directory: <https://utracs.azdot.gov/Search>
- NAICS: <https://www.naics.com/>
- Census Bureau Data: <https://data.census.gov/cedsci/>
- Arizona Department of Transportation 2020 Disparity Study completed by Keen Independent Research in August 2020

The calculation and explanation for this is as follows:

□  
**Table 6: Base Car Rental ACDBE Availability**

Concession Activity	NAICS	Market Area	# ACDBE Certified Firms	# ACDBE Certified Firms willing to work in Mohave County	# Total Firms	% Availability
All other automotive repair and maintenance	811198	Region	0	0	64	0.00%
Automotive Body, Paint, and Interior Repair and Maintenance	811121	Region	1	0	422	0.00%
Automotive Glass Replacement Shops	811122	Region	0	0	175	0.00%
Automotive Oil Change and Lubrication Shops	811191	Region	1	0	72	0.00%
Car Washes	811192	Region	4	1	238	0.42%
General Automotive Repair	811111	Region	1	0	1125	0.00%
Insurance Agencies and Brokerages	524210	Statewide	1	1	2794	0.00%
Motor Vehicle Supplies and New Parts Merchant Wholesalers	423120	Statewide	0	0	226	0.00%
New Car Dealers	441110	Statewide	0	0	311	0.00%
Passenger Car Rental	532111	Statewide	0	0	184	0.00%
Tire and Tube Merchant Wholesalers	423130	Statewide	0	0	43	0.00%
Used Car Dealers	441120	Statewide	0	0	399	0.00%
Wholesale Trade Agents and Brokers	425120	Statewide	7	1	615	0.16%
Average ACDBE Availability:						0.04%

$$\text{FY23-25 Base Figure} = \frac{\sum \text{of ACDBEs willing to work in Mohave County}}{\sum \text{of All Firms}} = \frac{3}{6668} = 0.04\%$$

When we calculated the average availability, we arrived at the Step 1 base figure for our overall goal for car rental concessions of **0.04%**.

## **Step 2 Adjustments to Step 1 Base Figure**

The base calculation determined 0.04% as a reasonable ACDBE goal based on the applicable number of ACDBEs in Arizona who are ready, willing, and able to perform services in Mohave County, AZ in the identified areas of work. Mohave County Airport Authority then considered evidence to determine what possible adjustments, if any, were needed to narrowly tailor the base figure.

## Past Participation

Mohave County Airport Authority reviewed the historical ACDBE car rental participation over the past five years.

*Table 7: Historical ACDBE Car Rental Participation*

Fiscal Year	Total Dollars	ACDBE \$s excluding Ford of Santa Monica	Race Conscious (%)	Race Neutral (%)	Total Achievement (%)
FY 21	\$1,623,631	\$32,425	0.0%	2.00%	2.00%
FY 20	\$1,605,154	\$47,685	0.0%	2.97%	2.97%
FY 19	\$3,165,125	\$38,826	0.0%	1.23%	1.23%
FY 18	\$2,233,589	\$35,767	0.0%	1.60%	1.60%
FY 17	\$2,386,547	\$30,033	0.0%	1.26%	1.26%
<b>Median Historical Participation</b>					<b>1.60%</b>

Arranging this historical data from low to high, 1.23%, 1.26%, 1.60%, 2.00%, and 2.97%, the median is 1.60% which is our Step 2 figure.

To arrive at an overall goal, we added our Step 1 base figure with our Step 2 adjustment figure and then averaged the total arriving at an overall goal of 0.82%. (Step 1 0.04% plus Step 2 1.60% = 1.64% divided by 2 = 0.82%).

## Disparity Studies

Mohave County Airport Authority researched the market area for any disparity studies that have been conducted recently for the Bullhead City, AZ (Mohave County) area. The findings are as follows:

- Every three years, ADOT performs a disparity study to analyze the availability of DBEs in efforts to aid in setting the department's DBE goals. The most recently completed disparity study, finalized in August 2020 by Keen Independent Research can be found at:  
[https://azdot.gov/sites/default/files/media/2020/08/KeenIndependent\\_ADOT\\_2020DisparityStudy\\_FinalReport\\_08262020.pdf](https://azdot.gov/sites/default/files/media/2020/08/KeenIndependent_ADOT_2020DisparityStudy_FinalReport_08262020.pdf)

While the scope of ADOT's 2020 Disparity Study did not include ACDBEs the airport reviewed the disparity study for disparity similarities between DBEs and ACDBEs in the state.

Mohave County Airport Authority also searched for ACDBE and concession disparities throughout the state and did not locate any recently completed Disparity Studies applicable to the market area or ACDBEs.

Mohave County Airport Authority will utilize the conclusions and results documented in ADOT's 2020 Disparity Study when implementing its FY23-25 ACDBE goal; however, the airport will not

use the Disparity Study to adjust the proposed FY23-25 ACDBE goal given the varying scope of the study.

The adjustment calculation determined 0.82% as a reasonable ACDBE goal; however, per USDOT guideline, if the suggested goal is under 1% you must adjust the goal upward to at least 1.00% based on planned outreach efforts to certified and potential ACDBEs. Therefore, the airport will adjust its adjusted figure upward by 0.18%. The airport's overall goal for car rental concessions is 1.00%.

## **Breakout of Estimated "Race and Gender Neutral" (RN) and "Race and Gender Conscious" (RC) Participation**

Mohave County Airport Authority will make every reasonable effort to meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. Mohave County Airport Authority will use the following race-neutral measures.

MCAA and Laughlin/Bullhead International Airport understand that we will be expected to actually take these steps and that this is not merely a paper exercise.

- Locate and identify ACDBEs and other small businesses who may be interested in participating as concessionaires under 49 CFR Part 23
- Notify ACDBEs of concession opportunities and encouraging 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 inability to obtain bonding or financing
- Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process
- Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation

If race-neutral measures, standing alone, are not sufficient to meet an overall goal, the following race-conscious measures may be used to meet the overall goal:

- Establish concession-specific ACDBE goals for particular concession opportunities

Mohave County Airport Authority estimates that, in meeting the overall goal of 1.00%, it will obtain 1.00% from race-neutral participation and 0.00% through race-conscious measures.

Due to the limited availability of car rental ACDBE concessionaires in the market area and the car rental concession opportunities anticipated during the goal period, Mohave County Airport Authority expects to meet the goal employing race-neutral means of facilitating ACDBE participation. The Mohave County Airport Authority reviewed Yuma International Airport's

ACDBE goal. Yuma International Airport is located within reasonable proximity to Laughlin/Bullhead International Airport and has similar concession opportunities, the airport has employed a fully race-neutral approach to obtaining ACDBE participation due to the limited availability of ACDBE concessionaires who are ready, willing, and able to participate in the airport's concession opportunities.

In order to ensure that Mohave County Airport Authority's ACDBE program will be narrowly tailored to overcome the effects of discrimination, if concession specific goals are used, Laughlin/Bullhead International Airport will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation and race-neutral and race-conscious participation will be tracked separately. For reporting purposes, race-neutral ACDBE participation includes, but is not necessarily limited to, the following: ACDBE participation through a prime contract that an ACDBE obtains through customary competitive procurement procedures; ACDBE participation through a subcontract on a prime contract that does not carry ACDBE goal; ACDBE participation on a prime contract exceeding a concession specific goal; and ACDBE participation through a subcontract from a prime contractor that did not consider a firm's ACDBE status in making the award.

Mohave County Airport Authority will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.

## **Consultation**

Mohave County Airport Authority routinely meets with stakeholders in an effort to increase ACDBE participation. Stakeholders consulted included minority and women's business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires themselves, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the sponsor's efforts to increase participation of ACDBEs.

Prior to submitting these goals to the FAA, and pursuant to 49 CFR Part 23, Laughlin/Bullhead International Airport consulted 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 Laughlin/Bullhead International Airport:

- Bullhead Area Chamber of Commerce
- Arizona Hispanic Chamber of Commerce
- Black Chamber of Arizona
- Mohave Community 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 and Non-Car Rental Concessionaires



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

No comments were received.

## **Public Participation**

Laughlin/Bullhead International Airport published a notice on the Laughlin/Bullhead International Airport website, DBEPlans.com, and in the FAA Match Maker system, announcing the proposed rental car ACDBE goals for the three-year period of FY 2023-2025. 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.

No comments were received.

# Appendix A

## **Public Participation Message**

Subject: Laughlin/Bullhead International Airport Federal Aviation Administration FY2023-25 ACDBE Goal

The Mohave County Airport Authority as sponsor for Laughlin/Bullhead International Airport has established an Airport Concession Disadvantaged Business Enterprise (ACDBE) Goal in accordance with 49 CFR Part 23. Laughlin/Bullhead International Airport anticipates receiving federal financial assistance from the Department of Transportation (DOT) for projects during the period of Federal Fiscal Years 2023 through 2025 and as a condition of receiving this assistance, must comply with 49 CFR Part 23.

Mohave County Airport Authority/Laughlin/Bullhead International Airport has established an overall annual ACDBE goal for non-car rental ACDBE participation of 1.00% of the total dollar amount of annual non-car rental concession revenues. The Airport has also established a car rental ACDBE goal of 1.00% of annual car rental concession revenues.

A public teleconference meeting will be held to discuss Laughlin/Bullhead International Airport's proposed FAA ACDBE goal and accept comments regarding the goal. Via the teleconference the airport authority is seeking to obtain information that could further aid the goal setting process; such as information pertaining to the availability of disadvantaged and non-disadvantaged businesses in Mohave County, barriers impacting ACDBE firm's entry into Mohave County, as well as other factors impacting ACDBE's in Mohave County. The teleconference is scheduled for September 23<sup>rd</sup>, 2022 from 4PM to 5PM Mountain Standard Time. If you are interested in participating in the teleconference, please send an email to [lsplillers@DBEPlans.com](mailto:lsplillers@DBEPlans.com) by Thursday, September 22<sup>nd</sup> and the teleconference information will be sent to you prior to the September 23<sup>rd</sup> meeting. If you're unable to participate in the teleconference and want to provide a comment, please email comments to [lsplillers@DBEPlans.com](mailto:lsplillers@DBEPlans.com). Comments will be accepted until 5:00PM (MST) on September 23<sup>rd</sup>, 2022.

Thank you in advance for your time and consideration,

DBE Plans & Goals Preparation Services, LLC

# Appendix B

## Public Notice

**Mohave County Airport Authority  
Laughlin/Bullhead International Airport  
Airport Concession Disadvantaged Business Enterprise Goal  
Fiscal Year 2023-2025  
Public Notice**

The Mohave County Airport Authority as sponsor for Laughlin/Bullhead International Airport has established an Airport Concessions Disadvantaged Business Enterprise (ACDBE) Goal in accordance with 49 CFR Part 23. Laughlin/Bullhead International Airport anticipates receiving federal financial assistance from the Department of Transportation (DOT) for projects during the period of Federal Fiscal Years 2023 through 2025 and as a condition of receiving this assistance, must comply with 49 CFR Part 23.

Mohave County Airport Authority/Laughlin/Bullhead International Airport has established an overall annual ACDBE goal for non-car rental ACDBE participation of 1.00% of the total dollar amount of annual non-car rental concession revenues. The Airport has also established a car rental ACDBE goal of 1.00% of annual car rental concession revenues.

The Airport Authority and Airport will receive and consider public comments on the proposed goal until 5PM Mountain Standard Time on September 23<sup>rd</sup>, 2022. Please email these comments to [Ispillers@dbeplans.com](mailto:Ispillers@dbeplans.com) of DBE Plans & Goals Preparation Services, LLC.

A teleconference will be held on September 23, 2022 from 4PM to 5PM Mountain Standard Time for the purpose of consulting with stakeholders to obtain information relevant to the goal setting process. If you would like to comment on the proposed goal, please dial into the teleconference at (415) 464-6800 with conference code 2180581#.