

Walla Walla Regional Airport Walla Walla, Washington

FY 2026-2028

Overall Goal for the Airport Concessions Disadvantaged Business Enterprise (ACDBE) Program



Attachment 5

Section 23.45: Overall Goal Calculation for Car Rentals

Name of Recipient: Walla Walla Regional Airport (ALW)

Goal Period: FY 2026-2028 – October 1, 2026 through September 30, 2028

Overall Three-Year Goal:

2.3%, to be accomplished through 0% RC and 2.3% RN

ACDBE CAR RENTAL GOAL METHODOLOGY**Market Area**

The market area is the geographical area in which the substantial majority of firms seeking to do concessions business with the airport are located, and in which the firms receiving the substantial majority of concessions-related revenues are located.

There is very little opportunity to purchase goods and services from ACDBEs locally. Some goods and services are purchased from nationwide sources. The Airport's car rental is neither a DBE or ACDBE. For car rental calculations the Airport looks at all associated business activities in the State of Washington and all ACDBE's registered in the State of Washington for each business activity.

Base of Car Rental Goal

To calculate the base of the goal, the Port of Walla Walla considered gross receipts from the last three years (2022-2024) of its rental car agencies.

The Walla Walla Regional Airport currently has one (1) car rental: Avis-Budget. The gross revenues generated by car rental agencies at the Walla Walla Regional Airport over the past three fiscal years are shown in Table 1 below.

Table 1
Gross Receipts (Revenue) for Previous 3 Years - Car Rental Concessions

Fiscal Year	Concessions Revenue
2022	\$577,453
2023	\$553,921
2024	\$664,369
Total	\$1,795,743
Average	\$598,581

The Walla Walla Regional Airport estimates that revenues to existing car rental concessions will grow by 10% over the next three years. The increase is projected due to increasing passenger traffic. However, Walla Walla Regional Airport continues to experience commercial air service schedule fluctuations with our air-carrier that may affect enplanements. $\$1,795,743 \times 1.10\% = \$1,975,317$, which is the base of the goal or \$658,439 annual average.

The Walla Walla Regional Airport expects no new car rental prime concession opportunities during this goal period.

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 Sponsor will submit to the FAA an appropriate adjustment to the overall goal. This will be submitted to the FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity. (23.45(i))

Methodology used to Calculate Overall Goal

There is one (1) car rental agency currently doing business at the airport and it is nationally owned. ACDBEs providing goods or services for the car rental at the airport are considered regardless of location in the State of Washington as long as they are registered ACDBEs in the State of Washington.

The Airport can meet its goal by including the purchase from ACDBEs of goods and services used in businesses conducted at the Airport. The dollar value from purchases of goods and services from all firms (ACDBEs and non-ACDBEs) may be added to the denominator.

Step 1: 23.51(c)

Numerator: Ready, willing, and able car rental ACDBEs in the market area

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

Type of Goods/Services Offered	NAICS	ACDBE Registered Businesses	All Registered Businesses (1)	
New Car Dealers	441110	0	488	
Automotive Supplies	423120	0	236	
Office Supplies	424120	1	54	
Cleaning Supplies	423850	6	85	
Insurance	524210	15	2598	
Locksmith	561622	3	93	
Drug Testing	621999	4	141	

Automotive Body, Paint, and Interior Repairs	811121	1	722	
Automotive Glass Replacement	811122	0	213	
Automotive Oil Change	811191	0	222	
Automotive Detailing Services	811192	4	428	
Roadside Assistance	488410	1	294	
TOTAL			5437	
		38/5574=.0068=.68%		

The data source or demonstrable evidence used to derive the **numerator** was:

The certification agency for the State of Washington is the Office of Minority and Women Business Enterprises (OMWBE). Certification authority is delegated to OMWBE through an agreement with the State of Washington. OMWBE provides staff to conduct ACDBE certification, recertification, decertification, appeals, challenges, investigations of third-party allegations, and public awareness activities pertaining to certification programs. Firms certified as ACDBE, DBE, MBE, WMBE, and WBE were used, as any of these could be certified as an ACDBE, even if they are not currently.

For information on the certification process, including the application process, visit <https://omwbe.wa.gov>.

The data source or demonstrable evidence used to derive the **denominator** was:

The American Fact Finder search tool on the census website was used, <https://data.census.gov> for searching for firms in the State of Washington.

When we divided the numerator by the denominator we arrived at the Step 1 base figure for our overall goal for car rental concessions of: **0.68%**.

Step 2: EXAMINATION OF CRITERIA FOR ADJUSTMENT TO BASE FIGURE 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, we examined evidence to determine what adjustment was needed to the Step 1 base figure in order to arrive at the overall goal. This figure may be adjusted based on local supporting evidence, such as historic participation, and local availability of ACDBE firms.

In order to reflect as accurately as possible, the ACDBE participation we would expect in the absence of discrimination we have adjusted our base figure by 1.62%. Therefore, our overall goal for car rental concessions is 2.3%.

The data used to determine the adjustment to the base figure was as follows:

Past Participation

The goal and participation results for 2022, 20223 and 2024 for car rentals are:

FY	ACDBE Goals			Actual Participation		
	RC	RN	Total	RC	RN	Total
22	0	1.00%	1.00%	0	1.55%	1.55%
23	0	1.00%	1.00%	0	4.27%	4.27%
24	0	1.00%	1.00%	0	3.93%	3.93%

Arranging this historical data from low to high, 1.55%, 3.93% and 4.27%, the median is 3.93% which is the figure we will use to make our Step 2 adjustment.

To arrive at an overall goal, we added our Step 1 base figure with our Step 2 adjustment figure and then averaged the total at an overall goal of 2.3%.

(Step 1 of .68% plus Step 2 of 3.93% = 4.61%, divided by 2 = 2.3%).

PUBLIC PARTICIPATION

Consultation: Section 23.43.

In accordance with 49 CFR Part 23 requirements, the Port of Walla Walla consulted with the following stakeholders online via ZOOM on September 4, 2025 at 9:00 AM.

Interested Community Organizations/Groups:

1. Airport Concessionaires: Avid-Budget Car Rental
2. State of Washington Office of Minority and Women Business Enterprises (OMWBE)
3. A notice of the proposed goal was published on the airport's website and the goal was available for inspection for 30-days following the date of the notice. Written comments were also accepted for 45 days after the date of publication.

The consultation meeting was intended to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs and/or ACDBEs, and the Port of Walla Walla's efforts to establish a level playing field for the participation of DBEs and/or ACDBEs.

Following the consultation, the proposed overall goal will be published on September 4, 2025 on the Walla Walla Regional Airport's website (www.wallawallaairport.com), informing the public that the proposed goal and its rationale are available for review and comments 30-days following the date of notice.

Breakout of Estimated Race-Neutral & Race Conscious Participation

Section 23.51

The Port of Walla Walla will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The Port of Walla Walla uses the following race-neutral measures.

We understand that we will be expected to actually take these steps, and this is not merely a paper exercise.

1. Locating and identifying ACDBEs and other small businesses who may be interested in participating as concessionaires under 49 CFR Part 23;
2. Notifying ACDBEs of concession opportunities and encouraging them to compete, when appropriate;
3. When practical, structuring concession activities so as to encourage and facilitate the participation of ACDBEs;
4. Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process; and
5. Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation.

We estimate that, in meeting our overall goal of 2.3%, we will obtain 2.3% from race-neutral participation and 0% through race-conscious measures.

In order to ensure that our ACDBE program will be narrowly tailored to overcome the effects of discrimination, if we use concession specific goals we will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation (see 26.51(f)) and we will track and report race-neutral and race conscious participation 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.

We will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.