

**Mission:** To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.



# Port of Portland DBE Triennial Goal Portland International Airport

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Federal Fiscal Years 2023-2025

## **Executive Summary**

The Port of Portland (Port) submits its triennial Disadvantaged Business Enterprise (DBE) goal and goal-setting methodology for Federal Fiscal Year (FFY) period 2020-2021 to the Federal Aviation Administration (FAA) of the United States Department of Transportation (USDOT), in accordance with Title 49 Code of Federal Regulations (CFR) Part 26.

For FFYs 2023-2025, the Port has established an overall DBE goal of 10.1%. The Port plans to achieve the overall DBE goal through 4.1% race-neutral (RN) means and 6% race-conscious (RC) means.

To meet the requirements of 49 CFR 26.45, the Port of Portland (Port) completed a disparity study led by Collette Holt and Associates, a nationally recognized law and consulting firm that specializes in disparity studies.

The disparity study provided a statistical analysis of baseline DBE availability which was used to establish the Step 1 base figure of DBE availability in the Port's market area. The disparity study further analyzed Census Bureau and other econometric and social science evidence to determine whether there are disparities between DBEs and non-DBEs in factors impacting entrepreneurial success on Port contracts and subcontracts. It also provided anecdotal data on DBEs' experiences in seeking Port prime contracts and subcontracts, and whether firms owned by minorities or women have equal opportunities to compete.

The Ports goal methodology consists of two steps:

1. Establish the base figure for the relative availability of DBEs
2. Adjust the base figure based on analysis of available evidence

The port used the 2018 Disparity Study to calculate the base figure of the relative availability of DBEs. For this methodology, the 2018 Disparity Study is the most up-to-date study conducted for the Port regarding ready, willing, and able minority-and women-owned businesses. We adjusted the base figure after an evaluation of past participation, comments from public consultation forums and one-on-one in person meetings.

Annually, the Port will monitor DBE participation for federal-aid contracts to determine if market conditions warrant adjustments to the overall DBE goal. Additionally, the Port will monitor and make necessary adjustments to the RN and RC measures toward the overall goal.

# Overall DBE Three-Year Goal Methodology

**Name of Recipient:** Portland International Airport

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

**DOT-assisted contract amounts:**

Year 1	\$26,206,000
Year 2	\$39,555,000
Year 3	\$16,620,000
Totals	\$82,381,000

**Overall Three-Year Goal:** 10.1%, to be accomplished through 6.0% Race Conscious and 4.1% Race Neutral

**Total dollar amount to be expended on DBEs:** \$6,885,306

**Describe the Number and Type of Contracts that the airport anticipates awarding:**

Contracts in Fiscal Year #1 (2023)

1. Ground Source Heating - \$18,400,000
2. PDX Master Plan - \$5,250,000
3. South Runway PCC Panel/Joint Rehabilitation - \$2,556,000

Contracts in Fiscal Year #2 (2024)

1. PDX Circulation & Capacity Improvements - \$23,811,000
2. Taxiway K / Taxiway T North, S Runway Exits - Design & Const. - \$15,744,000

Contracts in Fiscal Year #3 (2025)

1. Taxiway A Rehab and Reconstruction - Design and Const. - \$16,620,000

## **Overall Goal Setting Methodology**

The two-step goal-setting process required by regulations CFR 49 Part 26 and the findings of Western States has been used to determine the recommended overall goal for FFY 2023-2025

1. Establish a base figure for the relative availability of DBEs
2. Determine the base figure adjustment, if necessary

The base figure is intended to be a measurement of the current ready, willing and able DBEs as a percentage of all businesses ready, willing and able to perform the recipients anticipated FAA-assisted contracts.

The base figure was established using the Ports most recent 2018 Disparity Study.

## **Market Area**

The Port's market area is a geographical area that represents where the majority of the contractors that do business with the Port are located. The market was determined by our most recent 2018 Disparity study which identified the State of Oregon, and King County, WA, and Clark County, WA as our market area.

### **Step 1. Actual relative availability of DBEs**

The base figure for the relative availability was calculated as follows:

Method: Use Disparity Study - completed by Colette Holt and Associates for study period 2012-2016 and was completed in December 2018

Weighted Availability of DBE firms:

#### **Fiscal Year #1**

For 10/1/2022 - 9/30/2023, award of the following is anticipated:

<b>Project Name</b>	<b>Trade Description</b>	<b>NAICS Description</b>	<b>NAICS</b>	<b>Trade (\$)</b>	<b>DBE (%)</b>	<b>DBE (\$) (= Trade \$ x DBE %)</b>
Ground Source Heating	Fencing Contractors	All Other Specialty Trade Contractors	238990	\$122,849	7.0%	\$8,599
Ground Source Heating	Electrical Contractors	Electrical Contractors & Other Wiring Installation Contractors	238210	\$1,364,985	8.4%	\$114,659
Ground Source Heating	Electronic Control System Installation	Electrical Contractors & Other Wiring Installation Contractors	238210	\$764,392	8.4%	\$64,209
Ground Source Heating	Industrial Building Construction	Industrial Building Construction	236210	\$436,795	9.1%	\$39,748

Ground Source Heating	Landscaping	Landscaping	561730	\$40,950	4.9%	\$2,007
Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	DBE (%)	DBE (\$) (= Trade \$ x DBE %)
Ground Source Heating	Mobilization	Mobilization	000000	\$2,183,976	0.0%	\$0
Ground Source Heating	Concrete Paving	Highway, Street, & Bridge Construction	237310	\$163,798	14.5%	\$23,751
Ground Source Heating	Boring & Tunneling	Other Heavy & Civil Engineering Construction	237990	\$6,715,727	14.5%	\$973,780
Ground Source Heating	Plumbing, Heating & Air Conditioning	Plumbing, Heating, and Air Conditioning	238220	\$5,459,941	5.6%	\$305,757
Ground Source Heating	Utility Line Construction	Water & Sewer Line and Related Structures Construction	237110	\$1,146,588	8.8%	\$100,900
<b>Ground Source Heating</b>				<b>\$18,400,000</b>	<b>8.9%</b>	<b>\$1,633,409</b>

Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	DBE (%)	DBE (\$) (= Trade \$ x DBE %)
PDX Master Plan	Website Development	Custom Computer Programming Services	541511	\$262,500	7.1%	\$18,638
PDX Master Plan	Stakeholder Engagement	Public Relations Agencies	541820	\$1,312,500	15.4%	\$202,125
PDX Master Plan	Graphic Design	Graphic Design Services	541430	\$262,500	21.1%	\$55,388
PDX Master Plan	Document Production	Document Preparation Services	561410	\$525,000	41.6%	\$218,400
PDX Master Plan	Economic Impact Analysis	Other Scientific & Technical Consulting Services	541690	\$262,500	7.7%	\$20,213
PDX Master Plan	Engineering Services	Engineering Services	541330	\$2,625,000	7.5%	\$196,875
<b>PDX Master Plan</b>				<b>\$5,250,000</b>	<b>13.6%</b>	<b>\$711,638</b>

Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	DBE (%)	DBE (\$) (= Trade \$ x DBE %)
S Runway PCC Panel/Joint Rehab	Mobilization	Mobilization	000000	\$255,600	0.0%	\$0
S Runway PCC Panel/Joint Rehab	Concrete Paving	Highway, Street, & Bridge Construction	237310	\$1,789,200	14.5%	\$259,434
S Runway PCC Panel/Joint Rehab	Concrete Sawing & Drilling	Site Preparation Contractors	238910	\$76,680	11.5%	\$8,818

S Runway PCC Panel/Joint Rehab	Traffic Control	All Other Support Services	561990	\$153,360	4.5%	\$6,901
S Runway PCC Panel/Joint Rehab	Sweeping	All Other Services to Building and Dwellings	561790	\$281,160	25.6%	\$71,977
<b>South Runway PCC Panel/Joint Rehab</b>				<b>\$2,556,000</b>	<b>13.6%</b>	<b>\$347,130</b>
<b>Year 1 Total</b>				<b>\$26,206,000</b>	<b>10.3%</b>	<b>\$2,692,177</b>

## Fiscal Year #2

For 10/1/2023 - 9/30/2024, award of the following is anticipated:

Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	DBE (%)	DBE (\$) (= Trade \$ x DBE %)
PDX Circulation & Capacity Improvements	Electrical Contractors	Electrical Contractors & Other Wiring Installation Contractors	238210	\$500,031	8.4%	\$42,003
PDX Circulation & Capacity Improvements	Excavation Contractors	Site Preparation Contractors	238910	\$23,811	11.5%	\$2,738
PDX Circulation & Capacity Improvements	Concrete Sawing & Drilling	Site Preparation Contractors	238910	\$95,244	11.5%	\$10,953
PDX Circulation & Capacity Improvements	Demolition	Site Preparation Contractors	238910	\$214,299	11.5%	\$24,644
PDX Circulation & Capacity Improvements	Finish Carpentry	Finish Carpentry Contractors	238310	\$238,110	6.6%	\$15,715
PDX Circulation & Capacity Improvements	Signage/Wayfinding	Signage Manufacturing	339950	\$1,428,660	15.9%	\$227,157
PDX Circulation & Capacity Improvements	Baggage/Conveying Equipment	Conveyor & Conveying Equipment Manufacturing	333921	\$20,715,570	0.0%	\$0
PDX Circulation & Capacity Improvements	Plumbing, Heating & Air Conditioning	Plumbing, Heating, and Air Conditioning	238220	\$47,622	5.6%	\$2,667
PDX Circulation & Capacity Improvements	Communication Line	Power & Communication Line & Related Structures Construction	237130	\$190,488	13.6%	\$25,906
PDX Circulation & Capacity Improvements	Exterior Improvements	Commercial & Institutional Building Construction	236220	\$261,921	11.2%	\$29,335
PDX Circulation & Capacity Improvements	Misc. Metals	Fabricated Metal Product Manufacturing	332323	\$47,622	8.5%	\$4,048

PDX Circulation & Capacity Improvements	Firestop Contractors	Fire/Thermal Protection	238310	\$47,622	6.6%	\$3,143
<b>PDX Circulation &amp; Capacity Improvements</b>				<b>\$23,811,000</b>	<b>1.6%</b>	<b>\$388,309</b>
<b>Project Name</b>	<b>Trade Description</b>	<b>NAICS Description</b>	<b>NAICS</b>	<b>Trade (\$)</b>	<b>DBE (%)</b>	<b>DBE (\$) (= Trade \$ x DBE %)</b>
TW K (Gates D3-E1)/ TW T North, S Rwy. Exits - Design & Const.	Mobilization	Mobilization	000000	\$1,416,960	0.0%	\$0
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Asphalt Paving	Highway, Street, & Bridge Construction	237310	\$6,900,339	14.5%	\$1,000,549
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Striping	Highway, Street, and Bridge Construction	237310	\$157,440	14.5%	\$22,829
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Electrical Contractors	Electrical Contractors & Other Wiring Installation Contractors	238210	\$787,200	8.4%	\$66,125
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Excavation Contractors	Site Preparation Contractors	238910	\$834,432	11.5%	\$95,960
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Dump Trucking	Specialized Freight Trucking	484220	\$472,320	12.1%	\$57,151
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Pilot Car Services	Other Support Activities for Road Transportation	488490	\$314,880	19.0%	\$59,827
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Sweeping (Power Sweeping Washing Services)	All Other Services to Building and Dwellings	561790	\$472,320	25.6%	\$120,914
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Storm Drainage	Other Heavy and Civil Engineering Construction	237990	\$78,720	14.5%	\$11,414
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Engineering Services	Engineering Services	541330	\$1,000,000	7.5%	\$75,000
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Traffic Control	All Other Support Services	561990	\$629,760	4.5%	\$28,339
TW K (Gates D3-E1)/ TW T North, S Rwy Exits - Design & Const.	Airport Runway Construction	Highway, Street, & Bridge Construction	237310	\$2,679,629	14.5%	\$388,546

<b>Taxiway K (Gates D3-E1) Taxiway T North, South Runway Exits Design and Construction</b>	<b>\$15,744,000</b>	<b>12.2%</b>	<b>\$1,926,654</b>
<b>Year 2 Total</b>	<b>\$39,555,000</b>	<b>5.9%</b>	<b>\$2,314,963</b>

### Fiscal Year #3

For 10/1/2024 - 9/30/2025, award of the following is anticipated:

<b>Project Name</b>	<b>Trade Description</b>	<b>NAICS Description</b>	<b>NAICS</b>	<b>Trade (\$)</b>	<b>DBE (%)</b>	<b>DBE (\$) (= Trade \$ x DBE %)</b>
Twy A Rehab & Reconstruction – Design & Construction	Pilot Car Services	Other Support Activities for Road Transportation	488490	\$166,200	19.0%	\$31,578
Twy A Rehab & Reconstruction – Design & Construction	Striping	Highway, Street, and Bridge Construction	237310	\$66,480	14.5%	\$9,640
Twy A Rehab & Reconstruction – Design & Construction	Airport Runway Construction	Highway, Street, & Bridge Construction	237310	\$2,175,502	14.5%	\$315,448
Twy A Rehab & Reconstruction – Design & Construction	Asphalt Paving	Highway, Street, & Bridge Construction	237310	\$4,965,498	14.5%	\$719,997
Twy A Rehab & Reconstruction – Design & Construction	Electrical Contractors	Electrical Contractors & Other Wiring Installation Contractors	238210	\$2,127,360	8.4%	\$178,698
Twy A Rehab & Reconstruction – Design & Construction	Excavation Contractors	Site Preparation Contractors	238910	\$1,329,600	11.5%	\$152,904
Twy A Rehab & Reconstruction – Design & Construction	Asphalt Coating & Sealing	All Other Specialty Trade Contractors	238990	\$33,240	7.0%	\$2,327
Twy A Rehab & Reconstruction – Design & Construction	Dump Trucking	Specialized Freight Trucking	484220	\$997,200	12.1%	\$120,661
Twy A Rehab & Reconstruction – Design & Construction	Traffic Control	All Other Support Services	561990	\$265,920	4.5%	\$11,966
Twy A Rehab & Reconstruction – Design & Construction	Sweeping (Power Sweeping Washing Services)	All Other Services to Building & Dwellings	561790	\$232,680	25.6%	\$59,566
Twy A Rehab & Reconstruction – Design & Construction	Erosion Control Services	Landscaping Services	561730	\$83,100	4.9%	\$4,072



Twy A Rehab & Reconstruction – Design & Construction	Landscaping	Landscaping	561730	\$16,620	4.9%	\$814
Twy A Rehab & Reconstruction – Design & Construction	Storm Drainage	Other Heavy & Civil Engineering Construction	237990	\$166,200	14.5%	\$24,099
Twy A Rehab & Reconstruction – Design & Construction	Milling	Highway, Street, & Bridge Construction	237310	\$664,800	14.5%	\$96,396
Twy A Rehab & Reconstruction – Design & Construction	Mobilization	Mobilization	000000	\$1,329,600	0.0%	\$0
Twy A Rehab & Reconstruction – Design & Construction	Engineering Services	Engineering Services	541330	\$2,000,000	7.5%	\$150,000
<b>Taxiway A Rehabilitation and Reconstruction – Design and Construction</b>				<b>\$16,620,000</b>	<b>11.3%</b>	<b>\$1,878,166</b>
<b>Year 3 Total</b>				<b>\$16,620,000</b>	<b>11.3%</b>	<b>\$1,878,166</b>

The base goal projection after weighting is as follows:

- Total Weighted DBE Availability: **\$6,885,306**
- Total for All Trades: **\$82,381,000**

Dividing the weighted DBE totals by the total estimate for all trades gives a base DBE availability figure for the projects anticipated during the goal-setting period. This figure is expressed as a percentage and serves as the basis for the three-year overall goal.

Base of DBE Goal: **8.4%**

### Past History Participation

One piece of data used to determine the adjustment to the base figure was the median of historical DBE accomplishments, as follows:

Fiscal Year	Total Grant \$ Amount	DBE Goals			Accomplishments			Type of Work
		Race Conscious (%)	Race Neutral (%)	Total	Race Conscious (%)	Race Neutral (%)	Total	
FY 17	\$17,772,138	9.8%	2.1%	12.0%	9.8%	4.1%	13.9%	Runway Improvements & Squitter Purchase
FY 18	\$0	9.8%	2.1%	12.0%	0.0%	0.0%	0.0%	No Work
FY 19	\$13,557,208	7.1%	3.9%	11.0%	7.2%	4.7%	11.9%	Runway Improvements & Airfield Storm Drainage
FY 20	\$7,637,620	7.1%	3.9%	11.0%	7.1%	2.8%	9.9%	Runway Improvements
FY 21	\$787,849	7.1%	3.9%	11.0%	7.1%	55.6%	62.7%	Deicing Vault Rehab

Arranging this historical data from low to high (0%, 9.9%, 11.89%, 13.94%, 62.73%), the median is **11.9%**.

Step 1 Base averaged with historical median:  **$(8.4\% + 11.9\%) / 2 = 10.1\%$**

To arrive at an overall goal, the Step 1 base figure was added to the Step 2 adjustment figure and the total was averaged, arriving at an overall goal of **10.1%**. Port of Portland believes this adjusted goal accurately reflects DBE participation that can be achieved for the type(s) of work being awarded during this three-year goal period (FY 2023-25).

### **Other Evidence Considered**

The Port researched its market area and comparable jurisdictions for any recent disparity studies to determine if any adjustments to the goal should be considered.

#### **Oregon Department of Transportation (ODOT) – 2019 Update**

ODOT completed their disparity study of their FHWA funded contracts in 2016. The study was completed by Keen Independent Research. ODOT updated this study in spring 2019 for study period 2014-2017. This study was not used to adjust the Port's goal because ODOT's market area is dissimilar than the Port's. In addition, the range of contract opportunities for DBE participation at ODOT are vastly different from the range & kind of opportunities available at the Port & airport runway construction projects in general. Consequently, the study findings would not be directly applicable to the Port.

#### **State of Washington Disparity Study – 2019**

The State of Washington completed their disparity study of their federally funded contracts in 2019. The study was completed by Colette Holt and Associates and examined state purchases between 2012-2016. This study was not used to adjust the Port's goal methodology because the market area is dissimilar than the Port's. In addition, the range of contract opportunities for DBE participation for the State of Washington are vastly different from the range & kind of opportunities available at the Port & airport runway construction projects in general. Consequently, the study findings would not be directly applicable to the Port.

Furthermore, there are no applicable disparity studies for the local market area or recent legal case information from the relevant jurisdictions to show evidence of barriers to entry or competitiveness of DBEs in the market area that is sufficient to warrant making an adjustment to the base goal.

The Ports most recent 2018 study completed by Collette Holt & Associates, is the most applicable disparity study as it was narrowly tailored to the Port of Portland contract types, NAICS codes and market area.

No further adjustment was made to the Port's proposed overall DBE goal for FFY 23-25.

### **Breakout of Estimated “Race & Gender Neutral” (RN) & “Race & Gender Conscious” (RC) Participation**

The Port of Portland will meet the maximum feasible portion of the overall goal by using race neutral means of facilitating DBE participation. The Port has many race and gender-neutral remedies and partners with other organizations serving small businesses in the region to outreach and promote the participation of DBEs and other small businesses in the Port's FAA-assisted contracting program. The Port plans to continue to implement the following race-neutral measures for FFY2022-2025 and will continue to explore other options for consideration based on the Port's success in meeting its overall DBE goal from these efforts:

1. The Port will arrange solicitations, times for presentation of bids, quantities, specifications, and delivery schedule in ways that facilitate participation by DBE and other small businesses. This includes unbundling large contracts to make it feasible for a small contractors to perform the work. We will also require or encourage our prime contractors to subcontract out portions of work they might otherwise perform with their own forces;
2. The Port will hold planned and scheduled pre-bid conferences for FAA-funded projects, which will include a networking component to promote teaming and subcontracting opportunities between prospective prime contractors and DBEs and other small businesses;
3. The Port will continue to administer its nationally recognized Mentor-Protégé program which provides technical assistance to small businesses as well as facilitates relationships between large prime contractors and DBEs;
4. The Port will continue to promote Port projects at community outreach events including encouraging DBE contractors to consider bidding on Port projects;
5. The Port has implemented a technical assistance program to support DBEs and other small businesses performing work on Port projects. The supportive services program helps develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs and other small businesses;
6. The Port will conduct open pre-bid meetings for all interested bidders and ensure the DBELO and staff are present to answer questions and provide guidance for DBEs interested in bidding work.
7. The Port will continue to provide contractors with a list of DBE certified businesses and graduates of our Mentor-Protégé program whose work scopes match the work scope need for specific projects;
8. The Port will provide services to help DBEs and other small businesses improve long-term development, increase opportunities to participate in a variety of kinds of work, handle increasingly significant projects, and achieve eventual self-sufficiency;

9. The Port will continue to host our annual open house event “Contractor-Connect” which is open to all DBEs and small businesses interested in performing Port work. The event is hosted at the Port HQ every March and is free to the public. The open house is a “Meet the Primes” event featuring our top 20 prime contractors as well as Port representatives from all business lines. Contractor-Connect also includes workshops on how to do business with the Port, upcoming projects, and information on Port compliance systems. The purpose of the event is to facilitate relationship building between large prime contractors and DBEs and other small businesses interested in performing work on Port projects;
10. The Port provides assistance to new start-up firms, particularly in fields in which DBE participation has historically been low;
11. The Port will ensure our DBE directory is distributed, through print and electronic means, to the widest feasible universe of potential prime contractors;
12. The Port in conjunction with other USDOT funded agencies in our region host a DBE focused open house annually. This event “Growing Portland” features our partner agencies from FTA, FAA, and FHWA all under one roof for DBEs and potential DBEs to learn about upcoming federal-aid contracts, learn how to get DBE certified, understand what resources are available to provide technical assistance, and how to bid work with us. The event also has representatives from all agency business lines for the DBEs to meet;
13. In addition to the list below, the Port sponsors and attends several community events throughout the year to promote its FAA-funded contracting program.

Open Houses	Attendees
Growing Portland Open House – Winter	300
Contractor-Connect - Fall	300
Tradeshows	
Oregon Association of Minority Entrepreneurs Tradeshow (OAME)	500
Business Expo West	500
Oregon Public Purchasing Assoc. Reverse Vendor Tradeshow	1000
US Army Corps Portland Industry Day	500
Monthly Community Meetings	
OAME Contractors and A/E Outreach (Monthly)	300
Prime Business Development Group (Monthly)	100
National Association of Minority Entrepreneurs (Monthly)	75
Salem Capitol Connections (Monthly)	75
Latino Built	75

The Port of Portland estimates that in meeting the established overall goal of 10.1%, it will obtain 4.1% from RN participation and 6.0% through race conscious measures.

To determine the portions of the goal to be met through race neutral and race conscious measures, the Port evaluated past race-neutral DBE participation, as defined in 49 CFR 26.51(a). The Port's median percentage on federal AIP grant funded contracts through race neutral means for FFY 2023-2025 was 4.1%. Therefore, the Port projects that it will meet 4.1% of its overall goal through race-neutral measures and 6% of its overall goal through race-conscious measures.

Federal Fiscal Year	Total DBE Participation	RN Participation	RC Participation
2017	13.9%	4.10%	9.84%
2018	0%	0%	0%
2019	11.9%	4.7%	7.19%
2020	9.9%	2.8%	7.10%
2021	62.7%	55.63%	7.10%

The Port has a robust Small Business Technical Assistance program in place that is open to all small businesses who are either interested in performing work at the Port or need assistance post award. We also, host semi-annual meet the primes and open house events, that are also open to all small businesses. We anticipate we these efforts will realistically achieve at least 4.1% additional DBE participation; therefore, 4.1% of the 10.1% goal is anticipated to be met via race-neutral means & the remaining 6.0% through race-conscious participation.

The Port will adjust the estimated breakout of race-neutral and race-conscious DBE participation as needed to reflect actual DBE participation (see §26.51(f)) and track and report race neutral and race conscious participation separately. For reporting purposes, RN DBE participation includes, but is not necessarily limited to the following: DBE participation through a prime contract obtained through customary competitive procurement procedures; DBE participation through a subcontract on a prime contract that does not carry a DBE goal, DBE participation on a prime contract exceeding a contract goal, and DBE participation through a subcontract from a prime contractor that did not consider a firm’s DBE status in making the award.

### **Disparity Study Findings**

The Port completed a disparity study in December 2018. Colette Holt & Associates was the disparity study consultant. The study time period was 2012 through 2016. The study findings and recommendations related to the Port’s DBE program were:

1. The DBE weighted availability of DBE firms for FAA-Funded contracts was found to be 13%;
2. The study initially showed an overutilization of black contractors due to one contractor who received an unusually high share of contract dollars in NAICS code 238210 (Electrical Contractors and Other Wiring Installation Contractors). Given the weight of this code in the study, its inclusion presented a distorted view for overall black utilization. The study consultant recommended that the weighted availability with NAICS code 238210 be used for goal setting, as it best represents the firms ready, willing, and able to perform Port contracts and associated subcontracts.
3. All races were shown to have disparities in Port contracting opportunities.
4. Anecdotal interviews and survey results strongly suggest that minorities and women continue to suffer discriminatory barriers to full and fair access to contracts and associated subcontracts in the Port’s market area.
5. Both quantitative and anecdotal evidence establishes that minorities and white women in the Port’s market area continue to experience significant disparities in

and barriers to their fair and equal access to the Port's FAA-funded contracts, non-FAA-funded contracts, concession opportunities, and the aviation and construction industry in the Portland area. While DBEs did not experience large disparities in their utilization on FAA-funded contracts, the underutilization of minority- and women-owned businesses on non-FAA-funded contracts, coupled with the anecdotal and economy-wide results, support the inference that utilization is the result of the Port's strong administration of the DBE program, not the absence of discrimination on the basis of race and gender in the Port's market area.

6. The study's results support the determination that the Port has a strong basis in evidence to continue to implement a fully race-conscious DBE program that includes all groups for race-conscious relief for its FAA-funded contracts. The study therefore recommended the Port continue to implement a narrowly tailored DBE program and the use of race-conscious efforts for its FAA-funded contracts.

## **Consultation**

As required in 49 CFR Part 26.45, the Port employed a consultative process requesting input from organizations serving DBEs, minority-owned or women-owned businesses, state, or local offices of procurement, federal, state, or local offices responsible for enforcing civil rights laws, local labor offices and organizations.

In establishing the overall goal, the Port of Portland provided for consultation and publication. This process included consultation with minority, women, and general contractor groups, community organizations, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Port's efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process, and was conducted before the goal methodology was submitted to the operating administration for review. Details of the consultation are as follows.

The consultation engaged in was both a in person public meeting with a teleconferencing option for attendees and a virtual public meeting. The in-person public meeting was held at the Oregon Association of Minority Entrepreneurs – Big Jim Conference Room, 731 N. Hayden Meadows Dr. Portland, OR 97217 September 30<sup>th</sup>, 9:30 am to 11am. The virtual public meeting was held on October 7<sup>th</sup>, 10:00 am to 11:00 am. Both events were interactive and included an overview of the goal methodology and information on upcoming DBE projects for PDX.

We also met one-on-one with interested stakeholders and provided written copies as requested for those who could not attend one of our public meetings. Those stakeholders who could not attend a meeting were given the option to provide written comments to the Ports DBELO either standard mail, email or online via our Pot website.

In addition, we issued a press release to Oregon and Washington media outlets and published notices in the Daily Journal of Commerce Oregon, Daily Journal of Commerce Seattle, and the Portland Business Journal. Additionally, we posted notices to the FAA DBE Matchmaker System, and sent public notice announcements and goal setting methodology seeking comments on our proposed goal and methodology used to the following organizations:

- National Association of Minority Contractors Oregon
- National Association of Minority Contractors Washington
- Associated General Council Oregon/SW Washington
- Southwest Washington Contractors Association
- Oregon Association of Minority Entrepreneurs
- Prime Business Development Group
- Construction Design Entrepreneurs Washington
- Latino Built
- Portland Business Alliance
- Hispanic Metropolitan Chamber of Commerce
- Philippine American Chamber of Commerce
- Native American Chamber of Commerce
- Black American Chamber of Commerce
- Salem Capitol Connections

The following comments were received during the course of the consultation: No Comments Received

A notice of the proposed goal was published on the Port's official website before the methodology was submitted to Federal Aviation Administration.

A notice was published in the Daily Journal of Commerce and the Portland Business Tribune regarding the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Port Headquarters for 30 days following the date of the notice, and informing the public that the Port will accept comments on the goals for 30 days from the date of the notice.

If the proposed goal changes following review by Federal Aviation Administration, the revised goal will be posted on Port's official website.

Notwithstanding paragraph (f)(4) of §26.45, the Port's proposed goals will not be implemented until this requirement has been met.

**PUBLIC NOTICE**  
**Disadvantaged Business Enterprise Program**  
**Proposed Goal FFY 2023-2025**

In accordance with requirements of the U.S. Department of Transportation as set forth in 49 CFR Part 26, the Port of Portland hereby announces its proposed Disadvantaged Business Enterprise (DBE) participation triennial overall goal for Portland International Airport (PDX) of 10.1% for FAA-funded contracts/agreements. 6% will be achieved through race-conscious methods and 4.1% will be achieved through race-neutral methods. The proposed goal pertains to federal fiscal years 2023 through 2025 (10/1/2022 - 9/30/2025).

**Public Information Sessions**

Two public information sessions on the goal and methodology will be held for the purpose of consulting with stakeholders to obtain information relevant to the goal-setting process:

October 7<sup>th</sup>, 2022

Virtual meeting

10:00am – 11:00am

Microsoft Teams

Meeting ID: 266 213 881 603

Passcode: hVxvQv

971-254-1226

Phone Conference ID: 824-788-647#

September 30<sup>th</sup>, 2022

In person meeting

9:30am – 11am

731 N, Hayden Meadows Dr.

Big Jim Conference Room

Portland, OR 97217

**Request for Public Comment on Proposed DBE Goal**

The proposed goal and methodology are available for review on the Ports website [www.portofportland.com/business/dbe](http://www.portofportland.com/business/dbe). If you would like to have a physical copy mailed to you or would like an in-person meeting or phone call to provide comments on the proposed DBE goal, please contact Kimberly Sutton at the email or phone number below.

The proposed goal and its attendant methodology are available for inspection between 8:00 a.m. 5:00 p.m. Monday through Friday at Port of Portland 7200 NE Airport Way, Portland OR 97218 for 30 days from the date of this publication. Comments on the DBE goal will be accepted for 30 days from the date of this publication and can be sent to the following:

Kimberly Sutton  
7200 NE Airport Way  
Portland, OR 97218  
503-415-6587  
kimberly.sutton@portofportland.com

OR

Federal Aviation Administration  
Office of Civil Rights  
Sonia Cruz  
sonia.cruz@faa.gov



## **Contract Goals**

The Port of Portland will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using 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 Port of Portland will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. It 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 such contract (e.g., type and location of work and availability of DBEs to perform the particular type of work).

We will express our contract goals as a percentage of the total amount of a DOT-assisted contract.