

SNOHOMISH COUNTY AIRPORT (PAE)/PAINE FIELD

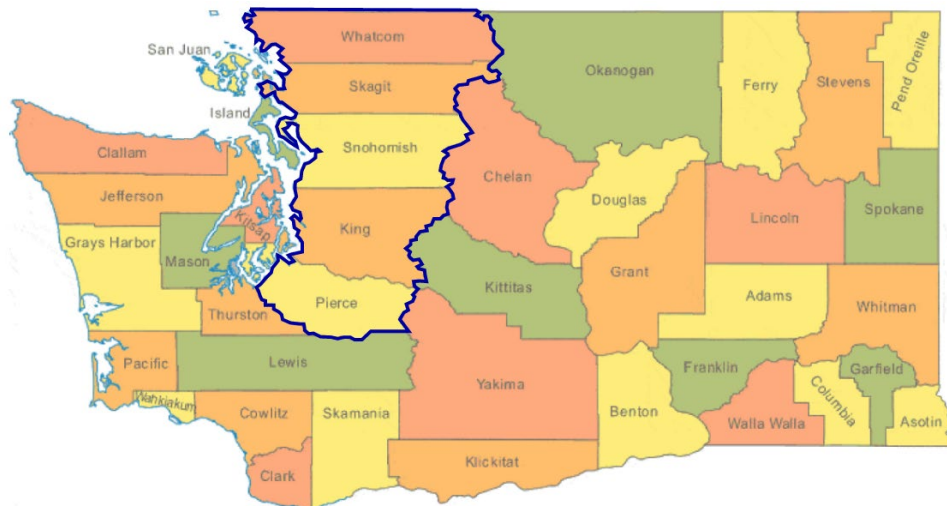
FY 2025 to 2027 Overall DBE Goal

Snohomish County Airport’s overall goal for Fiscal Years (FY) 2025-2027 is 6.28% of the federal financial assistance the Airport will expend on DOT-assisted contracts. The entire goal will be race neutral. The Airport anticipates contracting \$39,286,445 in DOT-assisted contracts during FY 2025-2027, as shown in Table 1, which means that the Airport has established a goal of expending \$2,467,188 with DBEs during the period. The method used to arrive at the Airport’s overall goal is explained below.

Fiscal Year	Proposed Project Description	Primary Entitlement (PE)	Discretionary FAA Funding (DIS)	Federal Funding Total
2025	Taxilane Echo Reconstruction (Phase 2 – Construction)	\$7,758,000	\$0	\$7,758,000
2025	Reconstruct RW 16R/34L (Phase 2 - Design)	\$1,980,000	\$0	\$1,980,000
2026	Reconstruct RW 16R/34L (Phase 1 - Construction)	\$8,578,650	\$13,000,000	\$21,578,650
2027	Reconstruct Central T-Hangar Taxilanes	\$4,250,000	\$0	\$4,250,000
2027	Reconstruct Central GA Apron & TW D (South)	\$3,719,795	\$0	\$3,719,795
	Total	\$26,286,445	\$13,000,000	\$39,286,445

Airport Market Area

Snohomish County Airport’s Market Area is defined as the area in which the substantial majority (generally, at least 75%) of the contractors and subcontractors with whom the airport does business are located and the area in which the airport spends the substantial amount of its contracting dollars and able to perform the work. Based on reasonable proximity to perform work at the airport in addition to historical participation the market area will consist of Pierce, King, Whatcom, Skagit and Snohomish Counties.



Goal Setting Methodology

For FY 2025 to FY 2027, the Airport used the following method to calculate its annual percentage goal:

Step 1: Determine a Base Figure for the Overall Goal – The Airport calculated a base figure using the criteria suggested in 49 CFR Part 26.45. The determination was based on a level of DBE participation relative to all businesses ready, willing and able to participate on federally assisted contracts, and reflected a level the Administration would expect in the absence of discrimination.

Step 1a: The Airport has identified the type of work items for all projects, based on the Scope of Work, and the North American Industrial Code System (NAICS) classifications in the construction, professional services and material/supplier categories. www.naics.com

- 237110 – Utility Construction
- 237310 – Prime Contractors
- 238110 – Misc. Concrete Specialty Works
- 238210 – Electrical
- 238910 – Site Preparation and Earthwork
- 238990 – Other Specialty Contractors
- 423320 – Asphalt and Concrete Supply
- 423510 – Pipe Supply
- 423610 – Electrical Supply
- 484220 – Trucking/Hauling
- 541330 – Engineering Services
- 541370 – Surveying and Mapping
- 541380 – Testing Laboratories
- 561730 – Seeding and Erosion Control
- 561790 – Sweeping
- 561990 – Traffic Control

Using these codes, the DBE businesses within the Market area were compiled from WSDOT Certified Firms Directory (<https://omwbe.diversitycompliance.com/>). This resulted in 338 DBE firms in Snohomish County Airport's Market Area.

Since the projects listed in Table 1 have similar scopes and will utilize the same NAICS codes across all three years, the Airport will not break down the goal by year. **The calculated goal will apply to each year: FY2025, FY2026, and FY2027.**

Step 1b: Using the Census Bureau's 2022 County Business Pattern (<https://data.census.gov/table?q=050XX00US53033,53053,53057,53061,53073>), the Airport determined 7,068 non-DBE and DBE businesses corresponding to the selected work areas that were in the airport's market area. A base figure for the overall goal was determined by weighting. A weighted percentage was calculated by multiplying the approximate total percentage of the contract dollars for the upcoming future projects allocated for each work area classification divided by the

number of DBE firms over the total number of reasonable firms that can perform the work. The base figure, calculated by adding the individual weighted percentages, is 10.20%. This data is shown in Table 2 below.

TABLE 2					
FY 2025 to 2027 Determination of Base Figure					
NAICS Classification	NAICS Code	Number of DBE Firms in Airport Market Area	Number of All Firms in Airport Market Area	Approximate Percentage of Contract Dollars	Weighted Percentage
Utility Construction	237110	21	140	5.0%	0.75%
Prime Contractors	237310	23	125	25.0%	4.60%
Misc. Concrete Specialty Works	238110	8	419	5.0%	0.10%
Electrical	238210	22	1,160	5.0%	0.09%
Site Preparation and Earthwork	238910	33	646	5.0%	0.26%
Other Specialty Contractors	238990	10	460	2.0%	0.04%
Asphalt and Concrete Supply	423320	4	65	5.0%	0.31%
Pipe Supply	423510	1	117	1.0%	0.01%
Electrical Supply	423610	14	195	1.0%	0.07%
Trucking/Hauling	484220	57	299	5.0%	0.95%
Engineering Services	541330	62	1,044	25.0%	1.48%
Surveying and Mapping	541370	10	77	5.0%	0.65%
Testing Laboratories	541380	11	121	5.0%	0.45%
Seeding and Erosion Control	561730	24	1,799	2.0%	0.03%
Sweeping	561790	13	227	2.0%	0.11%
Traffic Control	561990	25	174	2.0%	0.29%
Total		338	7,068	100%	10.20%

Step 2: Adjust Base Figure

In determining if an adjustment to the base figure was needed, the airport reviewed past participation levels and sought out disparity studies.

Step 2a. Review Past Participation. The Airport reviewed its DBE past participation levels to determine if an adjustment to the base figure was required. A summary of past participation levels is shown in Table 3. The average DBE achievement for FAA funded projects in the past 3 years was 13.17%. The airport used the past 3 years to compare, since it is the most recent data and they were similar in scope (Design and Airfield Construction) to the projects performed under this goal. Since 13.17% is similar to our base figure, the goal will not be adjusted based on past participation.

TABLE 3						
DBE Past Participation						
Year	Brief Description	Overall Goal	Race Neutral Goal	Race Conscious Goal	Actual DBE Achievement	Actual Race Neutral
2015	16R-34L & Taxiway Alpha Electrical Improvements (Pavement Rehabilitation)	4.87	4.87	0	1.53	1.53
2016	Rehabilitation of Taxiway Hotspots 1 & 2 Improvements (Awarded)	4.87	4.87	0	0	0
2017	Rehabilitation of Taxiway Hotspot 1 & 2 Improvements (Ongoing Payments)	4.87	4.87	0	2.88	2.88
2017	Taxiway Bravo and North Ramp Reconstruction Project (AIP 057)	4.87	4.87	0	10.20	10.20
2018	Runway 16R-34L Fog Seal Project (AIP 058)	4.73	4.73	0	19.87	19.87
2020	Master Plan Update (AIP 059)	4.73	4.73	0	0	0
2022	Taxiway Echo (AIP 061)	5.31	5.31	0	10.7	10.7
2023	East GA Apron for Taxiway Foxtrot (AIP 066)	5.31	5.31	0	28.8	28.8
2024	Pre-Environmental Design for Runway 16R/34L (AIP 067)	5.31	5.31	0	0	0

Step 2b. Identify Disparity Studies. The Washington State Department of Transportation (WSDOT) completed a disparity study in 2019 titled Washington State Airports Disparity Study, Colette Holt & Associates. <https://wsdot.wa.gov/sites/default/files/2022-02/Washington-State-Airports-Disparity-Study-2019.pdf>

While the disparity study found that the airport DBE programs in WSDOT are in compliance, more could be done to level the playing field for DBE business. The study states the following:

“There are disparities of various magnitudes in opportunities for FAA funded contracts and subcontracts. Outside the industries with high concentrations of DBEs, minority and women entrepreneurs still face challenges in contracting opportunities. That a few firms have overcome systemic barriers to achieve contracts from the Airports does not mean that the playing field is level for all firms.”

Some recommendations to help level the playing field include: increased access to contracting information and outreach to DBEs; partnering with other organizations to provide outreach and networking opportunities for DBES, prime contractors and Airport staff; focus on leveling the playing field for prime contract participation, including through reducing contract size; providing annual forecast of projected contracts; and providing training to DBEs on how to perform on FAA-assisted work and Airport staff about the DBE program.

The disparity study provided the following recommendation for adjusting contract goals:

To perform the Step 2 analysis required by § 26.45(d) to adjust the Step 1 figure to reflect the level of DBE availability that would be expected in the absence of discrimination, the Airports can use the statistical disparities in Chapter V in the rates at which DBEs form businesses. This is the type of “demonstrable evidence that is logically and directly related to the effect for which the adjustment is sought.”

The Airport determined that business formation rates for construction and construction-related services found in Chapter V in the Disparity Study shall be used to adjust the goal. The average rate in construction (Table 5-8) was 5.94%. The average rate in construction-related services (Table 5-12) was 2.71%. To further adjust our goal from the base figure in Step 1, the goal was averaged with the two disparity study percentages $[(5.94+2.71+10.20)/3 = 6.28\%]$. **The adjusted goal based on the disparity study is 6.28%.**

The disparity study also addresses the use of race-neutral versus race-conscious measures (contract goals). In Chapter II, it states that “a recipient may terminate race-conscious contract goals if it meets its annual overall goal through race-neutral means for two consecutive years.” The airport has reported an 10.70% achievement in 2022 and a 28.8% achievement in 2023, both exceeding their goals using race-neutral means. **Therefore, the FY25-27 goal will remain entirely race-neutral.**

Step 2c. Consult Minority Professional Associations. In establishing our overall goal, we consulted with WSDOT and their DBE Program manager to obtain information concerning availability of DBE and non-DBE businesses and the effects of discrimination on opportunities for DBEs.

Breakout of Estimated Race-Neutral and Race-Conscious Participation (See 26.51)

The Administration will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation on Airport DOT/FAA-assisted projects. Snohomish County has adopted a Snohomish County Federally Funded Transportation Program/Title VI Plan, updated April 30, 2019 that will be used for applicable portions of this CFR 49 Part 26 DBE Program. In addition, the following race-neutral measures may be used to

increase DBE participation:

- Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by DBEs and other small businesses and by making contracts more accessible to small businesses, by means such as those provided under §26.39 of this part.
- Providing technical assistance and other services;
- Carrying out information and communications programs on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists for bidders; ensuring the dissemination to bidders on prime contracts of lists of potential subcontractors.
- Provide information on the County website with contact information for the DBE directory.

As Washington and Snohomish County Airport is located in the 9th Circuit Court of Appeals decision in the Western States Paving Company vs. Washington State Transportation which affects the breakout of the race-neutral/race-conscious portions of the goal and in accordance with the recommendations of the disparity study available.

Per federal regulations and the Disparity Study addressed in Step 2b, the entire goal of 6.28% will be race-neutral.

The Airport will adjust the estimated breakout of race neutral and race conscious participation as needed to reflect actual DBE participation and will track and report race-neutral and race-conscious participation separately. For reporting purposes, race-neutral DBE participation includes, but is not necessarily limited to participation through a prime contract a DBE obtains through customary competitive procurement procedures; DBE participation through a subcontract that does not carry a DBE goal; DBE participation on a prime contract exceeding a contract goal; and DBE participation through a subcontract that did not consider a firm's DBE status in making the award.

We will maintain data separately on DBE achievements in those contracts with and without contract goals, respectively.

PUBLIC PARTICIPATION

Consultation: Section 26.45(g)(1).

Before establishing the overall goal, the Administration consulted with the Snohomish County Department of Finance Purchasing Division. The Snohomish County Department of Finance Purchasing Division is very active in the small business community and conducts numerous outreach efforts through the year to involve minority and woman's organizations and contractor groups. These efforts include:

- In-person meetings with small business subcontractors to discuss opportunities, barriers, and provide information on where to obtain resources needed
- Attended outreach events involving minority and woman's organizations
- Quarterly email distribution of project opportunities to small, minority, and woman businesses
- Conducts DBE training seminars

Additionally, the Snohomish County Department of Finance Purchasing Division works closely with the Snohomish County APEX Accelerator a few times a year. APEX Accelerator offers webinars, one-on-one counseling, workshops, and other support for local based businesses. APEX Accelerator and the County co-sponsor several outreach events each year. In November 2024, the airport participated in the North Puget Sound Contracting Conference, which allowed small and diverse businesses to meet with government buyers and prime contractors. The last webinar was held in December with the next likely to be in April 2025.

The Snohomish County Department of Finance Purchasing Division also attends the Snohomish County Economic Alliance's North Puget Sound Contracting Conference and Summer Networking events annually. They also participate in Seattle's annual Reverse Vendor Trade show in November and plan to attend in 2025.

PUBLIC NOTICE

The Administration will publish a notice of the proposed overall goal on the County website, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the airport for 30 days following the date of the notice. This notice will also inform the public that the Snohomish County Airport and the DOT/FAA will accept comments on the goals for 45 days from the date of the notice.

Snohomish County Airport/Paine Field Administration has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation, 49 CFR Part 26. For Fiscal Years 2025-2027, the Airport has established an overall goal of 6.28% of the Federal financial assistance it will receive for improvements to the airport. The Airport estimates it will meet this goal through 6.28% race neutral means. The proposed DBE goal and its rationale will be available for review between 8:00 a.m. and 5:00 p.m. at Snohomish County Airport, 9901 24th Pl W, Suite A, Everett, WA 98204.

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

Nickolis A. Landgraff
Seattle Paine Field International Airport
9901 24th Pl W, Suite A
Everett, WA 98204
Direct (425) 388-5103
Nickolis.landgraff@co.snohomish.wa.us

Comments that were received in the past from the public are shown below:

1. “The bidding process is complicated for the average small business.”
 - a. Response: The county’s purchasing portal can be found online at: <https://snoco.procurement.com/home>
For purchasing related questions please contact 425-388-3344 or purchasing@snoco.org.
2. “The DBE program should include other groups such as Veteran owned businesses.”
 - a. Response: 49 CFR 26.67 outlines groups eligible for DBE certification. If you think you might be eligible, contact the Washington State OMWBE: <https://omwbe.wa.gov/>
3. “The DBE goal should not be race neutral.”
 - a. Response: The 2019 WSDOT disparity study does not demonstrate that race-based measures are demonstrably needed. Study: <https://wsdot.wa.gov/sites/default/files/2016/05/09/OEO-Washington-State-Airports-Disparity-Study-2019.pdf>
4. “How is compliance monitored and enforced?”
 - a. Response: Compliance is monitored and enforced through the Airport and through the FAA’s Office of Civil Rights.
5. “How does Paine Field intend to improve participation in the future?”

- a. Response: The Airport's goal is to build the local DBE community and continue outreach efforts to small businesses. The more DBE's bidding in the market area, the higher the goal, and the more likely it is contract dollars will go to a DBE.
6. "Why was a specific NAICS code excluded?"
- a. Response: If a NAICS code was excluded from the goal, it is because Paine Field does not anticipate requiring services covered under that NAICS code during the goal period.

CONTRACT GOALS

The Airport will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using race-neutral 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 race-neutral means.

The Airport 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 DBE's 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.

Please contact Nickolis Landgraff, Airport Business Manager, with any questions or comments regarding this methodology:

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