

**FINAL**

**FY 2024 - FY 2026**

**DISADVANTAGED BUSINESS ENTERPRISE PROGRAM METHODOLOGY  
FOR**



**SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT**

**SAVANNAH, GEORGIA**

**AUGUST 14, 2023**

**METHODOLOGY for Establishing the FY 2024 – FY 2026 Overall Disadvantaged Business Enterprise (DBE) Goal for:**

*SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
Savannah, Georgia*

In fulfillment of the requirements of 49 CFR Part 26, the Savannah Airport Commission (hereafter ‘the Airport Commission’) has developed a proposed Overall Goal for FY 2024-2026 FAA-AIP projects for the Savannah/Hilton Head International Airport. The methodology used in establishing this goal is described herein.

Airport Sponsor: **Savannah Airport Commission**

Airport: **Savannah/Hilton Head International Airport**

DBELO: **Dawoud Stevenson**

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**I. Detailed Methodology: Specific Steps**

**A. Amount of Goal**

The Airport Commission’s FY 2024-2026 overall goal for the Federal financial assistance it will expend in USDOT-assisted contracts is the following:

Overall Goal:	<b><u>12.39%</u></b>
Race-Neutral:	<b><u>3.10%</u></b>
Race-Conscious:	<b><u>9.29%</u></b>

Given the amount of USDOT-assisted contracts that the Airport Commission expects to let from FY 2024-2026, which is approximately **\$103,496,830** this means that the Authority has set a goal of spending approximately **\$12,827,204** with DBEs during this period.

**B. Determination of the Market Area of the study**

The normal market area was based on discussions with the Airport Commission staff and an assessment of bidders from similar recent projects. Specifically, the market area is based on where the substantial majority of bidders, both successful and unsuccessful, are located as illustrated in **Table 1** below. A number of bidders had very small portions of work and were from other states. Consultation with the staff led to an agreement that the following counties comprised the primary market area.

**Table 1: Market Area for Savannah/Hilton Head International Airport**

County	Bidders	Percent of bidders
Bryan	7	1.7%
Chatham	127	31.4%
Cobb	9	2.2%
DeKalb	7	1.7%
Fulton	42	10.4%
Gwinnett	10	2.5%
<b>Market Area</b>	<b>202</b>	<b>50.0%</b>
Other	202	50.0%
<b>Total</b>	<b>404</b>	<b>100.0%</b>

**C. Determination of relevant NAICS codes**

The DBE goal-setting process begins with the Airport Commission providing information concerning the projects proposed for FY 2024-2026. The projects are listed and briefly described for each fiscal year, in Table 2a-2c, below. Notice, a list of major NAICS codes corresponding to these projects were developed and are also shown in 2a-2c, below:

**Table 2a: Savannah/Hilton Head International Airport  
FY 2024 Projects & Activities**

FY	PROJECT	ACTIVITY	NAICS
FY 2024	1. Fuel Storage Facility Tank Additions & Improvements	Concrete	238110
		Electrical	238210
		Site Prep	238910
		Petroleum Bulk Stations and Terminals	424710
		Landscaping	561730
	2. Connector & Bridge to Land Acquisition	Drainage	237110
		Highway & Street	237310
		Other Heavy and Civil Engineering Construction	237990
		Concrete	238110
		Electrical	238210
		Site Prep	238910
	3. Demo FedEx Building/GA Ramp - Phase II	Drainage	237110
		Other Heavy and Civil Engineering Construction	237990
		Concrete	238110

		Highway & Street	238210
		Site Prep	238910
FY 2024	4. Reconstruct Taxiway F	Highway & Street	237310
		Site Prep	238910
		Engineering	541330
		Geotechnical Testing	541380
		Landscaping	561730
		Highway & Street	237310
	5. Taxiway G & Bridge	Drainage	237110
		Site Prep	238910
		Other Heavy and Civil Engineering Construction	237990
		Concrete	238110
		Highway & Street	238210

SOURCE: Savannah/Hilton Head International Airport

**Table 2b: Savannah/Hilton Head International Airport  
FY 2025 Projects & Activities**

<b>FY</b>	<b>PROJECT</b>	<b>ACTIVITY</b>	<b>NAICS</b>
FY 2025	1. Construct Air Cargo Apron – Phase II	Highway & Street	237310
		Site Prep	238910
		Engineering	541330
		Geotechnical Testing	541380
		Landscaping	561730
		Highway & Street	237310
	2. Reconstruct & Expand North Apron	Site Prep	238910
		Highway & Street	237310
		Engineering	541330
		Geotechnical Testing	541380
		Landscaping	561730
	3. RW 10-28 Asphalt Reconstruction & Design	Highway & Street	237310
		Site Prep	238910
		Engineering	541330
		Geotechnical Testing	541380
		Landscaping	561730

SOURCE: Savannah/Hilton Head International Airport

**Table 2c: Savannah/Hilton Head International Airport  
FY 2026 Projects & Activities**

FY	PROJECT	ACTIVITY	NAICS
FY 2026	1. Completion of Taxiway H	Highway & Street	237310
		Site Prep	238910
		Engineering	541330
		Geotechnical Testing	541380
		Landscaping	561730
	2. Taxiway Connectors & Improvements	Highway & Street	237310
		Site Prep	238910
		Engineering	541330
		Geotechnical Testing	541380
		Landscaping	561730

SOURCE: Savannah/Hilton Head International Airport

**D. Determination of Relative Availability of DBEs in Market Area, Compared to all Firms:**

After the upcoming projects have been determined, along with breakdowns of major NAICS codes for each fiscal year, the next step in the goal setting process is to develop a base figure, or Step 1 goal. The Step 1 goal is based on some type of analysis of “relative availability”, i.e. the availability of DBE’s and/or potential DBE’s in the market area, to work on those projects, compared to ALL firms potentially available to work on those projects, in the same market area. In this approach, the primary data sources are the U.S. Census Bureau, County Business Patterns, for “all businesses”, and the Georgia Unified Certification Program (UCP) directory for DBE firms in those market area counties. The relative DBE availability percent derived for each major trade/NAICS code, is multiplied by the percentage of dollars in that trade/NAICS, to yield a “weighted” DBE dollar amount. In the end, all of the DBE dollars are added together and calculated as a percentage of the total dollars for all of the projects, to yield the “final” Step 1 goal, or base figure. The results are shown in the series of Tables 3a, through 3j.

**Table 3a: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2024**

<b>FY 2024 - Fuel Storage Facility Tank Additions &amp; Improvements</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Concrete	238110	18	145	12.41%	\$1,168,033	\$144,997
Electrical	238210	29	783	3.70%	\$622,951	\$23,072
Site Prep	238910	35	195	17.95%	\$778,689	\$139,765
Petroleum Bulk Stations and Terminals	424710	0	28	0.00%	\$1,946,721	\$0
Landscaping	561730	29	1128	2.57%	\$233,607	\$6,006
<b>Total</b>					<b>\$4,750,000</b>	<b>\$313,840</b>
<b>Weighted Base Figure</b>						<b>6.61%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3b: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2024**

<b>FY 2024 - Connector &amp; Bridge to Land Acquisition</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Drainage	237110	10	77	12.99%	\$129,586	\$16,829
Highway & Street	237310	9	73	12.33%	\$11,251	\$1,387
Other Heavy and Civil Engineering Construction	237990	3	34	8.82%	\$561,377	\$49,533
Concrete	238110	18	145	12.41%	\$22,561,228	\$2,800,704
Electrical	238210	29	783	3.70%	\$155,415	\$5,756
Site Prep	238910	35	195	17.95%	\$581,143	\$104,308
<b>Total</b>					<b>\$24,000,000</b>	<b>\$2,978,518</b>
<b>Weighted Base Figure</b>						<b>12.41%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3c: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2024**

<b>FY 2024 - Demo FED EX Building/GA Ramp - Phase II</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Drainage	237110	10	77	12.99%	\$70,475	\$9,153
Other Heavy and Civil Engineering Construction	237990	3	34	8.82%	\$303,586	\$26,787
Concrete	238110	18	145	12.41%	\$5,041,701	\$625,866
Highway & Street	238210	9	73	12.33%	\$27,106	\$189,741
Site Prep	238910	35	195	17.95%	\$1,057,131	\$3,342
<b>Total</b>					<b>\$6,500,000</b>	<b>\$854,889</b>
<b>Weighted Base Figure</b>						<b>13.15%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3d: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2024**

<b>FY 2024 - Reconstruct Taxiway F</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Highway & Street	237310	9	73	12.33%	\$3,735,608	\$460,554
Site Prep	238910	35	195	17.95%	\$1,095,067	\$196,550
Engineering	541330	62	1065	5.82%	\$576,351	\$33,553
Geotechnical Testing	541380	9	91	9.89%	\$298,849	\$29,556
Landscaping	561730	29	1128	2.57%	\$57,635	\$1,482
<b>Total</b>					<b>\$5,763,510</b>	<b>\$721,696</b>
<b>Weighted Base Figure</b>						<b>12.52%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3e: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2024**

<b>FY 2024 - Taxiway G &amp; Bridge</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Drainage	237110	10	77	12.99%	\$85,264	\$11,073
Site Prep	238910	35	195	17.95%	\$1,160,921	\$208,370
Other Heavy and Civil Engineering Construction	237990	3	34	8.82%	\$10,858,531	\$958,106
Concrete	238110	18	783	2.30%	\$452,807	\$10,409
Highway & Street	238210	9	73	12.33%	\$925,476	\$114,100
<b>Total</b>					<b>\$13,397,736</b>	<b>\$1,290,985</b>
<b>Weighted Base Figure</b>						<b>9.64%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3f: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2025**

<b>FY 2025 - Construct Air Cargo Apron - Phase II</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Highway & Street	237310	9	73	12.33%	\$9,560,393	\$1,178,679
Site Prep	238910	35	195	17.95%	\$2,802,561	\$503,024
Engineering	541330	62	1065	5.82%	\$1,475,032	\$85,870
Geotechnical Testing	541380	9	91	9.89%	\$764,831	\$75,643
Landscaping	561730	29	1128	2.57%	\$147,503	\$3,792
<b>Total</b>					<b>\$14,750,320</b>	<b>\$1,847,008</b>
<b>Weighted Base Figure</b>						<b>12.52%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.



**Table 3g: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2025**

<b>FY 2025 - Reconstruct &amp; Expand North Apron</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Highway & Street	237310	9	73	12.33%	\$4,861,111	\$599,315
Site Prep	238910	35	195	17.95%	\$1,425,000	\$255,769
Engineering	541330	62	1065	5.82%	\$750,000	\$43,662
Geotechnical Testing	541380	9	91	9.89%	\$388,889	\$38,462
Landscaping	561730	29	1128	2.57%	\$75,000	\$1,928
<b>Total</b>					<b>\$7,500,000</b>	<b>\$939,136</b>
<b>Weighted Base Figure</b>						<b>12.52%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3h: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2025**

<b>FY 2025 - RW 10-28 Asphalt Reconstruction &amp; Design</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Highway & Street	237310	9	73	12.33%	\$2,430,556	\$299,658
Site Prep	238910	35	195	17.95%	\$712,500	\$127,885
Engineering	541330	62	1065	5.82%	\$375,000	\$21,831
Geotechnical Testing	541380	9	91	9.89%	\$194,444	\$19,231
Landscaping	561730	29	1128	2.57%	\$37,500	\$964
<b>Total</b>					<b>\$3,750,000</b>	<b>\$469,568</b>
<b>Weighted Base Figure</b>						<b>12.52%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3i: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2026**

<b>FY 2026 - Completion of Taxiway H</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>% DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Highway & Street	237310	9	73	12.33%	\$9,722,222	\$1,198,630
Site Prep	238910	35	195	17.95%	\$2,850,000	\$511,538
Engineering	541330	62	1065	5.82%	\$1,500,000	\$87,324
Geotechnical Testing	541380	9	91	9.89%	\$777,778	\$76,923
Landscaping	561730	29	1128	2.57%	\$150,000	\$3,856
<b>Total</b>					<b>\$15,000,000</b>	<b>\$1,878,272</b>
<b>Weighted Base Figure</b>						<b>12.52%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**Table 3j: DBES—SAVANNAH/HILTON HEAD INTERNATIONAL AIRPORT  
by Relevant NAICS Codes—FY 2026**

<b>FY 2026 - Taxiway Connectors &amp; Improvements</b>						
<b>Trades</b>	<b>NAICS</b>	<b># of DBE Firms</b>	<b>All Firms</b>	<b>%DBE Availability</b>	<b>NAICS Dollars</b>	<b>DBE Dollars</b>
Highway & Street	237310	9	73	12.33%	\$5,185,185	\$639,269
Site Prep	238910	35	195	17.95%	\$1,520,000	\$272,821
Engineering	541330	62	1065	5.82%	\$800,000	\$46,573
Geotechnical Testing	541380	9	91	9.89%	\$414,815	\$41,026
Landscaping	561730	29	1128	2.57%	\$80,000	\$2,057
<b>Total</b>					<b>\$8,000,000</b>	<b>\$1,001,745</b>
<b>Weighted Base Figure</b>						<b>12.52%</b>

SOURCES:

1. 2021 County Business Patterns, U.S. Census Bureau.
2. Georgia UCP DBE Directory, June 2023.

**NOTE: The County Business Patterns data were used as the source to determine the denominator, or the number of all firms in the market area. The DBE directories listed above were used to determine the numerator, or the number of DBE firms in the market area.**

**E. Determination of the “Weighted” DBE Base Figure**

As noted in D., above, the Step 1 DBE Base Figure for each project was derived by multiplying the dollars for each activity by the percentage of relevant DBE firms to all relevant firms.

The total DBE goal in dollars was divided by the total project costs to derive the individual Step 1 goals for each of the 10 projects for FY 2024-26. These are shown in Table 4, below:

**Table 4: Savannah/Hilton Head International Airport Step 1 DBE Goals for FY 2024 -26 Projects**

<b>Projects for FY 26-24</b>	<b>Step 1 DBE Goal</b>
Fuel Storage Facility Tank Additions & Improvements	6.61%
Connector & Bridge to Land Acquisition	12.41%
Demo FED EX Building/GA Ramp - Phase II	13.15%
Reconstruct Taxiway F	12.52%
Taxiway G & Bridge	9.64%
Construct Air Cargo Apron - Phase II	12.52%
Reconstruct & Expand North Apron	12.52%
RW 10-28 Asphalt Reconstruction & Design	12.52%
Completion of Taxiway H	12.52%
Taxiway Connectors & Improvements	12.52%

**II. Adjustments to the DBE Base Figure**

After the DBE Base Figure has been developed, the regulations (49 CFR Part 26) require that:

“...additional evidence in the sponsor’s jurisdiction be considered to determine what adjustment, if any, is needed to the base figure in order to arrive at your overall goal” (26:45(d)).

**A. Adjustment Factors to Consider**

The regulations further state that there are several types of evidence that must be considered when adjusting the base figure. These include:

*“(i) The current capacity of DBEs to perform work in your USDOT-assisted contracting program, as measured by the volume of work DBEs have performed in recent years.*

The historical overall DBE goals accomplished at the Airport in recent years were examined relative to the above consideration. Notice the annual DBE percent accomplishment indicated in Table 5 below:

**Table 5: Savannah/Hilton Head International Airport DBE Accomplishment**

<b>Report Period</b>	<b>DBE Goal</b>	<b>DBE Percent Achieved</b>	<b>Over-/Under-Achieved</b>
FY 2015	9.80%	8.00%	-1.80%
FY 2016	9.80%	12.90%	3.10%
FY 2017	10.60%	73.30%	62.70%
FY 2018	10.60%	10.90%	0.30%
FY 2019	10.60%	27.50%	16.90%
FY 2020	10.60%	0.60%	-10.00%
FY 2021	12.10%	3.70%	-8.40%
FY 2022	12.10%	15.20%	3.10%
<b>Median</b>	<b>10.60%</b>	<b>12.90%</b>	<b>3.10%</b>

The median DBE accomplishment for the periods as shown above for the Airport Commission is **12.90%**.

**B. Consultations**

The Airport Commission held a virtual public meeting on **August 8, 2023**. The purpose of the meeting was to solicit information from interested stakeholders about the draft goal, as well as the availability of potential DBEs at the Airport, the effects of discrimination on opportunities for DBEs, and the Airport Commission’s effort to increase DBE participation. Please see Appendix A for the attendee list and public comments.

A total of 13 people attended the August 8 meeting. The attendees consisted of a mix of DBE businesses, Airport Commission staff, representatives of other compliance programs (e.g., City of Savannah) and the SAV DBE consultant team (see the attendee list in Appendix B).

At the meeting, the consultants reviewed in detail the methodology, showing how the final proposed new triennial DBE goal was derived. Afterwards, the floor was open

for questions. There was little additional discussion. A question/answer summary is shown in Appendix B.

**C. Adjustment to Step 1 DBE Base Figures: Savannah/Hilton Head International Airport, FY 2024 – FY 2026**

With the adjustment factors considered to this point, the Airport Commission will adjust each of the Step 1 base figures as calculated above by averaging the accomplishment factor shown in Table 5 above **(12.90%)** with each of the base figures, for an adjusted overall DBE goal, shown in Table 6, below:

**Table 6: Savannah/Hilton Head International Airport  
FY 2024 – FY 2026 Overall Goal**

<b>Fiscal Year</b>	<b>Project</b>	<b>Step 1</b>	<b>Step 2 adjustment</b>	<b>Overall Goal</b>	<b>AIP Dollars</b>	<b>DBE Goal (dollars)</b>
<b>FY 2024</b>	Fuel Storage Facility Tank Additions & Improvements	6.61%	12.90%	9.76%	\$4,750,000	\$463,363
	Connector & Bridge to Land Acquisition	12.41%	12.90%	12.66%	\$24,000,000	\$3,037,200
	Demo FED EX Building/GA Ramp - Phase II	13.15%	12.90%	13.03%	\$6,500,000	\$846,625
	Reconstruct Taxiway F	12.52%	12.90%	12.71%	\$5,763,510	\$732,542
	Taxiway G & Bridge	9.64%	12.90%	11.27%	\$13,483,000	\$1,519,534
<b>FY 2024 Total</b>				<b>12.11%</b>	<b>\$54,496,510</b>	<b>\$6,599,264</b>
<b>FY 2025</b>	Construct Air Cargo Apron - Phase II	12.52%	12.90%	12.71%	\$14,750,320	\$1,874,766
	Reconstruct & Expand North Apron	12.52%	12.90%	12.71%	\$7,500,000	\$953,250
	RW 10-28 Asphalt Reconstruction & Design	12.52%	12.90%	12.71%	\$3,750,000	\$476,625
<b>FY 2025 Total</b>				<b>12.71%</b>	<b>\$26,000,320</b>	<b>\$3,304,641</b>

<b>FY 2026</b>	Completion of Taxiway H	12.52%	12.90%	12.71%	\$15,000,000	\$1,906,500
	Taxiway Connectors & Improvements	12.52%	12.90%	12.71%	\$8,000,000	\$1,016,800
<b>FY 2026 Total</b>				<b>12.71%</b>	<b>\$23,000,000</b>	<b>\$2,923,300</b>
<b>FY 2024 - FY 2026 Overall Goal</b>				<b>12.39%</b>	<b>\$103,496,830</b>	<b>\$12,827,204</b>

The total DBE goal in dollars was divided by the total federal portion of project costs to derive the overall DBE goal of **12.39%** for FY 2024 - FY 2026.

**III. Process**

The Airport Commission normally submits its overall goal to the FAA on or before August 1 of each goal period.

Before establishing the overall goal this year, the Airport Commission consulted with minority, women's and general contractor groups, community organizations, and other officials or organizations to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Airport Commission's efforts to establish a level playing field for the participation of DBEs.

Following this consultation, the Airport Commission published a notice of the proposed overall goal on its website informing the public that the proposed goal and its rationale were available for review and comment during normal business hours by contacting the DBELO. The notice included appropriate email addresses to which comments could be sent and addresses where the proposal could be requested. This process was used to establish the goals for FY 2024 through FY 2026.

The Airport Commission's overall goal submission to the FAA will include a summary of information and comments received during this public participation process and our responses.

The Airport Commission will begin using the overall goal on October 1 of each year, unless the Airport Commission has received other instructions from DOT/FAA (or, if the goal is established on a project basis) by the time of the first solicitation for a DOT/FAA-assisted contract for the projects.

**IV. Breakout of Estimated Race-Conscious/Race-Neutral Participation**

The Airport Commission will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. The Airport Commission will use a combination of the following race-neutral means to increase DBE participation:

1. *Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate DBE, and other small businesses participation (e.g., unbundling large contracts to make them more accessible to small businesses, encouraging prime contractors to subcontract portions of work that they might otherwise perform with their own forces);*
2. *Disseminating information communications 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).*

The Airport Commission proposes a race-conscious goal of **9.29%** and a race-neutral goal of **3.10%**, for a total of **12.39%**. The reason for this breakout is that the projects from the previous years show that the median amount by which the past DBE goals were over-achieved is **3.1%** (see **Table 5**).

The Airport Commission will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual DBE participation (26.51(f)) and it 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, the following: DBE participation through a prime contract a DBE obtains 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.

## **V. Contract Goals**

The Airport Commission will use contract goals to meet any portion of the overall goal that it 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 our overall goal that is not projected to be met through the use of race-neutral means.

The Airport Commission will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. The Airport Commission need not establish a contract goal on every such contract, and the size of contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work, availability of DBEs to perform the particular type of work).

The Airport Commission will express its contract goals as a percentage of the Federal share of a DOT-assisted contract.