

ACDBE OVERALL CONCESSION GOALS
Federal Fiscal Years 2026 - 2028
Sitka Rocky Gutierrez Airport (SIT)

Airport Sponsor: State of Alaska Department of Transportation and Public Facilities
(DOT & PF) and City and Borough of Sitka
Airport: Sitka Rocky Gutierrez Airport
Goal Period: From: October 1, 2025
Through: September 30, 2028

ACDBE Goal for Non-Car Rental Concessions: 0.0% (Race Neutral)

ACDBE Goal for Car Rental Concessions: 0.57% (Race Neutral)

**Section 23.45: Separate Overall Goal Calculation
for Non-Car Rental Concessions**

Amount of Goal

Sitka Rocky Gutierrez Airport (the "Airport" or "SIT") overall goal for concessions other than car rental during the period beginning October 1, 2025, and ending September 30, 2028, is 0.0%. The goal is expressed as a percentage of the total estimated gross receipts for concessions at the Airport.

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.

The Airport determines the market area for each concession opportunity as it arises. The market area is defined as the geographical area in which the substantial majority of firms which seek to do the specific concessions business with the airport are located and the geographical area in which the firms receive a substantial majority of concessions related revenues are located. Due to the remote nature of Sitka, **the market area for the non-car rental concessionaires is the City and Borough of Sitka.**

The calculation for determining the overall goal for the three-year period is as follows:

Federal Fiscal Year 2026-2028

Total estimated gross receipts for all concessions excluding car rentals = \$4,895,084
Estimated ACDBE gross receipts = \$0
 $\$0/\$4,895,084 = 0.0\%$

Methodology used to Calculate Overall Goal

Overall goals have been determined by consolidating the total estimated gross revenues and estimated ACDBE gross revenues for continuing and anticipated new concession agreements that will become effective during the goal period, if any. Goals for each new concession are determined through an analysis of the opportunity, potential for ACDBE participation and the relative availability of ACDBE firms who are ready, willing, and able to perform under the agreement.

In accordance with 49 CFR part 23.51(c) ACDBE goals for specific opportunities are determined as follows:

Step 1: 23.51(c)

The Airport determines the base figure for the relative availability of ACDBEs for the specific

opportunity. The base figure may be calculated in a number of ways, depending upon what is most appropriate for the specific opportunity.

Examples are as follows:

Option 1: Ready, willing, and able ACDBEs in the appropriate trade in the determined market area divided by all ready, willing and able companies in the appropriate trade in the determined market area.

The data source or demonstrable evidence used to derive the numerator may be either the DBE/ACDBE directory (23.51(c)(1)) or an active participant list (23.51(c)(2)).

If the Airport uses ACDBE directories, which directories and which NAICS codes were used will be identified. The Airport may also augment available ACDBEs with firms in local MBE/WBE directories or trade association lists. If the Airport uses these sources to augment the numerator, the sources used and the number of firms added to the numerator will be identified.

If the Airport uses an Active Participant List, where the information was obtained will be identified. Such information may come from past experience with firms that have run concessions or sought concession contracts or leases, knowledge about the universe of firms in certain concession services that tend to be interested in participating, and attendance lists from informational and outreach meetings about upcoming concession opportunities.

Option 2: Disparity Study - There are no relevant disparity studies from the Airport's market area at this time.

Option 3: Goal of another sponsor – The Airport may use the goal of another airport or DOT sponsor in the same, or substantially similar market if their overall goal is in compliance with 49 CFR part 23. Should the Airport elect to do so, the Airport will include information as to why our airport concession opportunity has the same or substantially similar market. There are currently no similar facilities in the relevant geographic region.

Option 4: Alternative Methods – The Airport may elect to use other methods to determine the base figure, however it must be based on demonstrable evidence of local market conditions and be designed to arrive at a goal that is rationally related to the relative availability of ACDBEs in the market area.

Step 2: 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, the Airport will examine evidence to determine what adjustment, if any, is needed to the base figure in order to arrive at the overall goal.

In accordance with 23.51(d), any adjustment will be designed to reflect as accurately as

possible the ACDBE participation the Airport would expect in the absence of discrimination. In addition, the Airport will document the basis on which the base figure was adjusted using the specific data.

Sitka Rocky Gutierrez Airport Non-Rental Car Concessions

SIT ACDBE Goals for FFY 2026-28 have been set by evaluating availability of ACDBE concessionaires for each concession contract that will become available as listed below and shown on the following chart.

Food/Beverage/Vending - The food/beverage/vending contract is currently operating on a month-to-month holdover. There is no goal in the contract. In addition, there is no availability in the geographic region for this trade. The market area for this concession is defined as the City and Borough of Sitka as this is the geographical area in which the substantial majority of firms which seek to do concessions business with the Airport are located and the geographical area in which the firm currently operating the concession is located.

During FFY 2026, SIT will be entering into direct negotiations for a vending concessionaire. According to SIT management, currently there is one vending operator in the relevant market. Alaska DOT&PF is undertaking a search to determine the interest of any potential vending concessionaire from a wider market area. It is unlikely that this operation generates enough volume to warrant an ACDBE goal in the future.

SIT will open a new restaurant concession at the completion of the terminal remodel in FFY 2026. As part of this project, a new restaurant/bar space upstairs, post security screening will be developed. However, due to the small and isolated nature of Sitka, it is not expected to draw responses from vendors outside the local community. However, as previously stated, there are no ACDBE food or restaurant concessionaires in the market area.

News/Gift/Retail - The News/Gift/Retail contract is currently operating on a month-to-month holdover. There is no goal in the contract. In addition, there is no availability in the geographic region for this trade. The market area for this concession is defined as the City and Borough of Sitka as this is the geographical area in which the substantial majority of firms which seek to do concessions business with the Airport are located and the geographical area in which the firm currently operating the concession is located. For FFY 2026-2028, the contract will continue without a goal as the contract will not be re-solicited during this time period.

Revenues – Gross revenues for SIT will be projected to include the new upstairs restaurant, a modest decrease in the downstairs restaurant (Nugget) caused by the increased dining competition, a new vending contract, and the gift shop. Since SIT has never had a restaurant in the Sterile Area, an estimated annual revenue of \$500,000 will be used. The new upstairs restaurant is expected to reduce the Nugget Restaurant's historical revenue. As such, the anticipated revenue for the Nugget Restaurant will be decreased by 15%. The gift shop is not anticipated to have any significant changes in revenue.

Estimated Future Gross Receipts	
Fiscal Year	Concession Revenue (Excluding Car Rental)
FY26	\$1,418,050
FY27	\$1,735,078
FY28	\$1,741,955
Total	\$4,895,084

Goal Calculation – SIT has calculated its goal by using Option 1 as described above; ready, willing, and able ACDBEs in the appropriate trade in the determined market area divided by all ready, willing and able companies in the appropriate trade in the determined market area. The data source for the numerator is the Alaska DOT&PF AUCP Disadvantaged Business Enterprise Directory¹. The data source for the denominator was the US Census Bureau, County Business Patterns².

NAICS	Type of Concession	Total ACDBE's	Total All Firms	% ACDBE Availability
453220/459420	Gift Shop	0	3	0.00%
72251X	Restaurants/Eating Places	0	23	0.00%
445132/454210	Vending	0	1 ³	0.00%
Total		0	27	

Step 2 – Adjustments

The ACDBE regulation (49 CFR part 23) provides for a Step 2 adjustment of the developed base goal for a variety of factors, including the current capacity of ACDBEs to perform work in the concession program, as measured by the volume of work ACDBEs have performed in recent years. ACDBE achievement for the most recent three-year period is as follows:

¹ <https://dot.alaska.gov/cvlrts/directory.shtml>

² <https://data.census.gov/table?q=CBP2022.CB2200CBP>

³ Note: Found using internet search, no such firms found in the Census Table.

Actual Past History of ACDBE Participation			
YEAR	TOTAL GROSS REVENUES	ACDBE GROSS REVENUES	ACDBE %
2022	\$1,120,100	\$0	0.0%
2023	\$1,686,320	\$0	0.0%
2024	\$1,404,010	\$0	0.0%

Given that the base goal is 0.0% and there has been no participation over the last three years, there is no past history goal adjustment.

There is no other relevant data to support an adjustment to the base goal. Therefore, the proposed overall ACDBE goal for the three-year period commencing October 1, 2025, and ending September 30, 2028, is **0.0%**.

Breakout of Estimated Race-Neutral & Race Conscious Participation

SIT's ACDBE Program is currently a race-neutral program utilizing race-neutral goals. The Airport will continue to use race-neutral methods to encourage further participation throughout the goal period, including the following:

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;
5. Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation; and
6. Implementing a small business program in compliance with 49 CFR part 23, section 23.26 as submitted and approved with the ACDBE Program Plan.

Consultation with Stakeholders 23.43

The goal setting process used by SIT to establish the overall goal submitted to the operating administrations for approval includes consultation with minority, women's and ACDBE community organizations, and other officials or organizations which could be expected to have information concerning the availability of ACDBEs and non-ACDBEs. This consultation process is also intended to gather information concerning the effects of discrimination on opportunities for ACDBEs and establishing a level playing field for the participation of ACDBEs. SIT held a stakeholder meeting virtually on October 7, 2025, at approximately 1345 AKDT. SIT posted flyers, advertised on Facebook, issued a news release, and advertised on their website. Exclusive of the DOWL, SALT, and SIT personnel, two people attended. No comments were received.

Overall Goal Calculation for Car Rentals (23.45)
FFY 2026-2028

Background

Sitka Rocky Gutierrez Airport currently has one on-airport car rental concession, Alaska Rent A Car (Avis). A second car rental concession will be added in FFY 2026. The ACDBE car rental goal developed herein will apply to the three-year goal period. The goal has been developed based on the purchase of goods/services. Car rental concession revenues were approximately \$1.4 million in 2024. Total purchases for the same period were approximately \$89,000.

In accordance with the regulation regarding ACDBE participation in Airport Concessions, SIT has conducted research to determine an appropriate ACDBE goal for car rental concessions at the Airport. The methodology for setting the goals is included in this report.

49 CFR Part 23 provides the following guidance for establishing concession goals:

§ 23.51(a) Your objective in setting a goal is to estimate the percentage of the base calculated under §§23.47–23.49 that would be performed by ACDBEs in the absence of discrimination and its effects.

(1) This percentage is the estimated ACDBE participation that would occur if there were a “level playing field” for firms to work as concessionaires for your airport.

(2) In conducting this goal setting process, you are determining the extent, if any, to which the firms in your market area have suffered discrimination or its effects in connection with concession opportunities or related business opportunities.

(3) You must complete the goal-setting process separately for each of the two overall goals identified in §23.41 of this part.

(b) (1) Each overall concessions goal must be based on demonstrable evidence of the availability of ready, willing and able ACDBEs relative to all businesses ready, willing and able to participate in your ACDBE program (hereafter, the “relative availability of ACDBEs”).

(2) You cannot simply rely on the 10 percent national aspirational goal, your previous overall goal, or past ACDBE participation rates in your program without reference to the relative availability of ACDBEs in your market.

(3) Your market area is defined by the geographical area in which the substantial majority of firms which seek to do concessions business with the airport are located and the geographical area in which the firms which receive the substantial majority of concessions-related revenues are located. Your market area may be different for different types of concessions.

Counting Participation in Car Rentals

Given there limited ACDBE car rental firms operating in airports and none in Alaska, SIT has elected to base the Car Rental ACDBE goal on the purchase of goods and services from ACDBE or potential/ACDBE firms. The regulation provides for counting ACDBE participation for car rentals as follows:

§ 23.53 How do car rental companies count ACDBE participation toward their goals?

- (a) As a car rental company, you may, in meeting the goal the airport has set for you, include purchases or leases of vehicles from any vendor that is a certified ACDBE.*
- (b) As a car rental company, if you choose to meet the goal the airport has set for you by including purchases or leases of vehicles from an ACDBE vendor, you must also submit to the recipient documentation of the good faith efforts you have made to obtain ACDBE participation from other ACDBE providers of goods and services.*
- (c) While this part does not require you to obtain ACDBE participation through direct ownership arrangements, you may count such participation toward the goal the airport has set for you.*
- (d) The following special rules apply to counting participation related to car rental operations:*
 - (1) Count the entire amount of the cost charged by an ACDBE for repairing vehicles, provided that it is reasonable and not excessive as compared with fees customarily allowed for similar services.*
 - (2) Count the entire amount of the fee or commission charged by an ACDBE to manage a car rental concession under an agreement with the concessionaire toward ACDBE goals, provided that it is reasonable and not excessive as compared with fees customarily allowed for similar services.*
 - (3) Do not count any portion of a fee paid by a manufacturer to a car dealership for reimbursement of work performed under the manufacturer's warranty.*
- (e) For other goods and services, count participation toward ACDBE goals as provided in part 26, §26.55 and §23.55 of this part. In the event of any conflict between these two sections, §23.55 controls.*
- (f) If you have a national or regional contract, count a pro-rated share of the amount of that contract toward the goals of each airport covered by the contract. Use the proportion of your applicable gross receipts as the basis for making this pro-rated assignment of ACDBE participation.*

Example to paragraph (f): Car Rental Company X signs a regional contract with an ACDBE car dealer to supply cars to all five airports in a state. The five airports each account for 20 percent of X's gross receipts in the state. Twenty percent of the value of the cars purchased through the ACDBE car dealer would count toward the goal of each airport.

Market Area

The Car Rental Concessions at the Airport are currently operated by one company. A second company will be added in FFY 2026. Based on the types of goods/services purchased by the firm, SIT has separated the market area based on the type of goods/services purchased as shown on the chart below. The geographic region for the purchase of vehicles includes various areas of the country, including from manufacturers in various states. SIT will, therefore, use a national geographic region for vehicle purchases and other categories of purchases that are typically procured through national contracts or from vendors in various states, a state-wide geographic region for regional purchases, and a local geographic region for categories of goods/services purchased locally.

Goal-Setting Step I

The regulation provides the following examples of potential approaches for accomplishing Step

1, determining the base figure, as follows:

23.51(c) Step 1. You must begin your goal setting process by determining a base figure for the relative availability of ACDBEs. The following are examples of approaches that you may take toward determining a base figure. These examples are provided as a starting point for your goal setting process. Any percentage figure derived from one of these examples should be considered a basis from which you begin when examining the evidence available to you. These examples are not intended as an exhaustive list. Other methods or combinations of methods to determine a base figure may be used, subject to approval by the FAA.

(1) Use DBE Directories and Census Bureau Data. Determine the number of ready, willing and able ACDBEs in your market area from your ACDBE directory. Using the Census Bureau's County Business Pattern (CBP) data base, determine the number of all ready, willing and able businesses available in your market area that perform work in the same NAICS codes. Divide the number of ACDBEs by the number of all businesses to derive a base figure for the relative availability of ACDBEs in your market area.

2) Use an Active Participants List. Determine the number of ACDBEs that have participated or attempted to participate in your airport concessions program in previous years. Determine the number of all businesses that have participated or attempted to participate in your airport concession program in previous years. Divide the number of ACDBEs who have participated or attempted to participate by the number for all businesses to derive a base figure for the relative availability of ACDBEs in your market area.

(3) Use data from a disparity study. Use a percentage figure derived from data in a valid, applicable disparity study.

(4) Use the goal of another recipient. If another airport or other DOT recipient in the same, or substantially similar, market has set an overall goal in compliance with this rule, you may use that goal as a base figure for your goal.

(5) Alternative methods. (i) You may use other methods to determine a base figure for your overall goal. Any methodology you choose must be based on demonstrable evidence of local market conditions and be designed to ultimately attain a goal that is rationally related to the relative availability of ACDBEs in your market area.

SIT has decided to use the DBE Directories and Census Bureau Data method for determining availability as follows:

The most recent available census bureau data is for 2022. The NAICS codes for the various trades typically utilized by car rental concessions were determined through discussions with car rental concessionaires and are shown on the chart below. Both DBEs and ACDBEs from the Alaska DBE Directory have been included as any firm that meets the DBE eligibility requirements are potential ACDBEs. Some categories of services typically associated with car rental operations are not used and have therefore been excluded from the calculations. Those categories are noted in the chart.

The data source or demonstrable evidence used was:

- Alaska Unified Certifications Program (AUCP) DBE Directory: The AUCP DBE Directory contains detailed information on certified ACDBEs/DBEs.
<https://dot.alaska.gov/cvlrts/directory.shtml>
- National Certified Directory: The FAA National DBE/ACDBE Directory is a nationwide list of certified Disadvantaged Business Enterprises (DBE) and Airport Concession Disadvantaged Business Enterprises (ACDBE). <https://faa.dbesystem.com/>
- Census Bureau Data: The Census Bureau's County Business Pattern (CBP) database contains data regarding available firms by location and NAICS code.
<https://data.census.gov/>

Base Figure Calculations				
NAICS CODE	Type of Goods and Services	Total ACDBEs/DBEs	Total All Firms	%
424720	Fuel Dealers	0	*3	0.00%
488410	Towing	0	*7	0.00%
561720	Janitorial Services	0	5	0.00%
811111	General Auto Repair	0	*5	0.00%
811121	Auto Body Repair	0	*3	0.00%
811122	Auto Glass	0	*12	0.00%
811191	Oil Change	0	*6	0.00%
811192	Car Wash/Detail	0	*2	0.00%
811212	Computer/Office Repair	0	*3	0.00%
Total Borough		0	46	0.00%
423130	Tire Wholesaler	0	3	0.00%
423850	Cleaning Supplies	0	9	0.00%
441310	Auto Parts Supplies	0	117	0.00%
517311	Phone System	1	167	0.60%
561621	Alarm System	Not used by SIT Concessionaire		
Total State		1	296	.34%
459410/453210	Office Supplies	32	4,254	0.75%
441110	New Car Dealership	5	21,835	0.02%
524210	Insurance	261	135,100	0.19%
541211	Accounting	341	55,642	0.61%
541810	Advertising Agency	694	14,962	4.64%
Total National		1,333	231,793	0.58%
Total		1,334	232,135	0.57%
*Not shown in census - internet search utilized				

The base car rental ACDBE goal is 0.57%.

The addition of a new car rental concession is anticipated in FFY26, and those changes have been accounted for in this goal.

If a new concession opportunity arises, beyond the car rental concession scheduled for FY26, 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 Alaska DOT&PF 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. (23.45(i)).

Step 2 - Examine the data to determine what adjustment, if any, is needed to the Base Figure

The ACDBE regulation (49 CFR part 23) provides for a Step 2 adjustment of the developed base goal for a variety of factors, including the current capacity of ACDBEs to perform work in the concession program, as measured by the volume of work ACDBEs have performed in recent years. ACDBE achievement for the most recent three-year was reported as \$0/0%. SIT has elected not to adjust the goal as the goal has been set as race-neutral and the lack of achievement is not considered a reflection of capacity. For informational purposes, the history of achievement is as follows:

Gross Revenue			
Year	Gross Revenues	Purchase \$	ACDBE \$
FFY 2022	\$1,475,371	Not recorded	\$0
FFY 2023	\$1,494,237	\$93,597	\$0
FFY 2024	\$1,356,491	\$89,011	\$0

SIT proposes the Car Rental ACDBE Goal at 0.57%.

Race-Neutral/Race-Conscious Recommendation

The current car rental agreement does not include a race-conscious ACDBE goal. The future car rental agreement is not expected to have a race-conscious ACDBE goal, therefore the goal will be set as race-neutral.

Consultation with Stakeholders

The goal setting process used by recipients to establish their annual overall goal submitted to the operating administrations for approval includes consultation with minority, women's and ACDBE community organizations, and other officials or organizations which could be expected to have information concerning the availability of ACDBEs and non-ACDBEs. This consultation process is also intended to gather information concerning the effects of discrimination on opportunities for ACDBEs and establishing a level playing field for the participation of ACDBEs. Prior to submitting the ACDBE goal to the FAA the Sponsor held a public meeting virtually on October 7, 2025. There were approximately 596 invites/notices sent out by the Alaska Civil Rights office and 19% of the emails were opened. The City and Borough of Sitka posted flyers,

advertised on Facebook, and issued a news release. Two people attended. No comments were received.