



San Diego County Regional Airport Authority
Federal Aviation Administration (FAA)
Overall Airport Concessionaire Disadvantage Business
Enterprise (ACDBE)
Goal-Setting Methodology

Federal Fiscal Years (FFY) 2024-2026
Goal Period: October 1, 2024-September 30, 2026

Overall ACDBE Race-Neutral Goal for Non-Car Rental Concessions: 13.93%
Overall ACDBE Race-Neutral Goal for Car Rental Concessions: 1.73%

_____, 2024
Submitted in fulfillment of:
Title 49 Code of Federal Regulations Part 23

ACDBE GOAL METHODOLOGY

I. INTRODUCTION

The San Diego County Regional Airport Authority (“the Authority”), as a recipient of federal funds, is required under 49 Code of Federal Regulations (CFR) Part 23 to establish an Airport Concessionaire Disadvantaged Business Enterprise (ACDBE) program. Under these regulations, recipient airports are required to establish goals for ACDBE participation in airport concessionaire opportunities if concessionaire revenues annually exceed prescribed amounts. The goals are determined for a three (3) year period on a triennial basis. The following sections detail the methodologies used to determine ACDBE participation goals for car rental concessionaires and non-car rental concessionaires. The methodology for setting each goal includes a determination of a base figure, followed by an adjustment to that base figure, and recognition of several factors.

Due to the COVID-19 pandemic and transportation limitations, the Authority had a decrease in passenger traffic and revenue. This adjustment was incorporated into the analysis of the non-car rental and car rental concessions for the previous goal methodology. Since 2021, airport revenue and passenger traffic has increased steadily; because of this, an adjustment should be made to the overall goal. Over the past five (5) years, the non-car rentals have maintained a participation percentage of over 20%. It is recommended that the goal be adjusted to **13.93%**.

Market Area

The Authority’s market area is the geographical area in which the substantial majority of firms which seek to do concessions business with the Authority and in which the firms receive a substantial majority of concessions related revenues are located. The Authority has defined their market area as the State of California

II. ACDBE GOAL METHODOLOGY FOR NON-CAR RENTAL CONCESSIONS FOR FFYs 2024-2026

Based on historical data, the Authority annually has non-car rental concession revenues greater than \$200,000. Because revenues exceed this amount, according to Part 23, the Authority must establish a goal for non-car rental ACDBE participation. The goal is intended to cover the three (3) year period for Federal Fiscal Years (FFYs) 2024-2026. The following subsections outline the methodology used to determine the goal for non-car rental ACDBE participation.

Current Non-Car Rental Concessions

Currently the Airport has contracts with 103 non-car rental concessionaires. These include retail, food & beverage, advertising. The non-car rental concessionaires are listed below with their gross receipts for FFY 2023 and the projection of gross receipts for the upcoming triennial period. The Airport's current gross receipts for non-car rental concessionaires exceed \$200,000 as shown in Table 1 below.

Table 1

Concession Name	NAICS Code	Gross Receipts \$ for FFY 2023	Projection of Gross Receipts \$ for FFY 2024-2026
Airspace Swissport	722513 Limited-Service Restaurants	\$9,045,965.98	\$316,066.00
Ambrosio 15	722513 Limited-Service Restaurants	0	\$3,500,000.00
Artisan Market T2E	722513 Limited-Service Restaurants	\$6,417,733.77	\$21,735,369.00
Banker's Hill & Bar Restaurant T1	722511 Full-Service Restaurants	\$7,388,368.00	\$15,775,177.00
BaumTech, LLC (ATM)	522320 Financial Transactions Processing, Reserve, and Clearinghouse Activities	0	\$272,758.00
Bay Books of Coronado T1W	459210 Book Retailers and News Dealers	\$451,726.48	\$1,493,101.00
Be Relax Spa - T2E	812199 Other Personal Care Services	\$468,081.33	\$1,374,854.00
Be Relax Spa - T2W	812199 Other Personal Care Services	\$193,671.95	\$550,408.00
Beaudevin T2W	722513 Limited-Service Restaurants	\$669,587.80	\$2,301,704.00
Better Buzz Coffee Roasters	722513 Limited-Service Restaurants	0	\$5,500,000.00
Big City Bagels	722513 Limited-Service Restaurants	\$516,601.76	\$1,766,695.00
Brookstone T2W	459420 Gift, Novelty, and Souvenir Retailers	\$501,028.96	\$1,704,976.00
Bubbles Seafood & Wine Bar T2W	722513 Limited-Service Restaurants	\$669,593.79	\$2,123,619.00
California Pizza Kitchen T2E	722513 Limited-Service Restaurants	\$2,219,887.51	\$7,357,746.00

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Camden Food Company T2W	722513 Limited-Service Restaurants	\$3,810,341.69	\$12,451,462.00
Certified Folder Display	459210 Book Retailers and News Dealers	\$76,028.82	\$73,732.00
CLEAR ID	561621 Security Systems Services (except Locksmiths)	0	\$9,500,000.00
CNBC Express - T2E	459210 Book Retailers and News Dealers	\$255,625.26	\$911,121.00
Cutwater Spirits and Lofty Coffee	722511 Full-Service Restaurants	0	\$8,000,000.00
Einstein Bros Bagels - T1E	722513 Limited-Service Restaurants	\$3,996,113.37	\$8,467,949.00
Einstein Bros Bagels - T2W	722513 Limited-Service Restaurants	\$1,242,126.55	\$4,262,595.00
Elegant Desserts T2W	722513 Limited-Service Restaurants	\$516,601.76	\$1,692,516.00
Fresh Attraction T2E (Temp)	722513 Limited-Service Restaurants	0	\$1,438,835.00
Fuelrod	449210 Electronics and Appliance Retailers	\$170,140.99	\$27,830.00
Gaslamp Marketplace T2W	459210 Book Retailers and News Dealers	0	\$3,373,004.00
Grab & Go Subs featuring Café Moto Coffee	722513 Limited-Service Restaurants	0	\$2,115,000.00
Grab N Go (Temp) T1	722513 Limited-Service Restaurants	0	\$3,478,893.00
Herb & Air	722511 Full-Service Restaurants	0	\$4,000,000.00
Hudson News (T1E)	459210 Book Retailers and News Dealers	\$6,979,321.77	\$12,042,310.00
Hudson News (T2W FIS) (former Gaslamp Quarter)	459210 Book Retailers and News Dealers	0	\$6,040,594.00
Hudson News (T2W)	459210 Book Retailers and News Dealers	0	\$18,981,896.00
InMotion Entertainment T2E	449210 Electronics and Appliance Retailers	\$1,239,971.66	\$4,202,122.00
In-Ter-Space Services Inc. dba Clear Channel	541850 Indoor and Outdoor Display Advertising	\$2,980,139.76	\$7,640,521.00

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Irvine Leasing, LLC dba Rainbow Vending	445132 - Vending machine merchandiser, sale of products	0	\$356,270.00
Jack in the Box T1	722513 Limited-Service Restaurants	\$1,355,575.99	\$3,050,451.00
Jack in the Box T2E	722513 Limited-Service Restaurants	\$2,674,271.79	\$9,036,928.00
Jet Box (Temp) T1	722513 Limited-Service Restaurants	0	\$6,328,558.00
Kusi News T1W	459210 Book Retailers and News Dealers	\$6,212,558.13	\$12,974,697.00
Liberty Station Gifts	459420 Gift, Novelty, and Souvenir Retailers	0	\$2,041,077.00
Lindbergh Field News T2W	459210 Book Retailers and News Dealers	\$416,820.01	\$1,355,921.00
Luna Grill Mediterranean Kitchen	722513 Limited-Service Restaurants	0	\$2,700,000.00
McDonalds	722513 Limited-Service Restaurants	0	\$4,400,000.00
Novecientos Grados - A Tony Hawk Public House	722511 Full-Service Restaurants	0	\$11,990,000.00
Old Town News & Market T2E	459210 Book Retailers and News Dealers	\$5,581,557.90	\$18,118,344.00
Pacifica Breeze Café T1	722513 Limited-Service Restaurants	\$1,767,385.80	\$3,821,377.00
Panda Express T2E	722513 Limited-Service Restaurants	\$2,978,298.20	\$10,216,424.00
Pannikin Coffee & Tea T2E	722513 Limited-Service Restaurants	\$2,511,010.25	\$8,381,598.00
Parfait Paris	722513 Limited-Service Restaurants	0	\$3,500,000.00
Peet's Coffee & Tea (T2E)	722513 Limited-Service Restaurants	\$3,212,146.68	\$8,840,237.00
Peet's Coffee & Tea (T2W)	722513 Limited-Service Restaurants	\$3,121,345.89	\$8,261,119.00
Peet's Coffee (T1)	722513 Limited-Service Restaurants	\$2,511,849.08	\$7,349,219.00
PGA Tour Grill T2W	722511 Full-Service Restaurants	\$4,086,519.51	\$13,540,474.00

PGA Tour Shop	458110 Clothing and Clothing Accessories Retailers	\$872,220.55	\$3,033,462.00
Phil's BBQ T2W	722511 Full-Service Restaurants	\$5,514,501.12	\$18,290,536.00
Prado at the Airport T2E	722511 Full-Service Restaurants	\$6,705,830.88	\$22,409,903.00
Qdoba T2W	722513 Limited-Service Restaurants	\$2,006,452.14	\$6,759,694.00
Reach TV	541850 Indoor and Outdoor Display Advertising	0	\$241,704.00
ReachTV	515120 Television Broadcasting	0	\$269,534.00
Ready Credit	522320 Financial Transactions Processing, Reserve, and Clearinghouse Activities	\$92,666.16	\$26,528.00
Red Mango T2W	722513 Limited-Service Restaurants	\$190,635.44	\$770,839.00
Rip Curl T2W	458110 Clothing and Clothing Accessories Retailers	\$574,038.66	\$1,861,456.00
Saffron Thai T2W	722513 Limited-Service Restaurants	\$2,189,380.91	\$7,352,668.00
SAN Life Market featuring Illy Coffee T2E (Temp)	722513 Limited-Service Restaurants	\$73,062.75	\$260,641.00
SAN Supply Co./Goods Express @ SAN	459420 Gift, Novelty, and Souvenir Retailers	\$558,239.73	\$4,690,400.00
San-D News Cart T2W	459210 Book Retailers and News Dealers	\$339,861.82	\$1,224,976.00
Sapphire Lounge	722410 - Lounges, cocktail	0	\$125,000.00
SIP Wine & Beer	722513 Limited-Service Restaurants	0	\$2,507,000.00
Sky Free Shop T2W	458110 Clothing and Clothing Accessories Retailers	\$1,511,310.28	\$4,850,987.00
Smarte Carte	445132 - Vending machine merchandiser, sale of products	\$761,951.50	\$155,381.00
Soundbalance T2W	449210 Electronics and Appliance Retailers	\$1,746,408.42	\$5,482,921.00
Starbucks T1 Pre (currently SAN Life Market T1 featuring Illy) T1	722513 Limited-Service Restaurants	\$240,588.58	\$445,973.00
Starbucks T2W	722513 Limited-Service Restaurants	\$3,838,836.16	\$12,796,098.00

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Stellar News Express T1	459210 Book Retailers and News Dealers	\$425,976.62	\$861,229.00
Stellar News Express T2W	459210 Book Retailers and News Dealers	\$4,214,026.40	\$13,482,675.00
Stone Brewing Co T2W	722511 Full-Service Restaurants	\$4,539,911.71	\$14,737,900.00
Sunglass Hut T2W	459420 Gift, Novelty, and Souvenir Retailers	\$371,503.12	\$1,277,225.00
Swarovski T2W	458110 Clothing and Clothing Accessories Retailers	\$366,973.92	\$1,109,293.00
TBD	445132 - Vending machine merchandiser, sale of products	0	\$293,399.00
Tech on the Go (T1W)	449210 Electronics and Appliance Retailers	0	\$1,041,508.00
Tech on the Go (T2W)	449210 Electronics and Appliance Retailers	0	\$1,806,201.00
The Arts District Market	459420 Gift, Novelty, and Souvenir Retailers	0	\$5,955,199.00
The Beach House T1W	458110 Clothing and Clothing Accessories Retailers	\$375,300.22	\$1,158,775.00
The Counter T1	722513 Limited-Service Restaurants	\$4,908,241.34	\$10,513,728.00
The Taco Stand	722513 Limited-Service Restaurants	0	\$4,250,000.00
Tommy V's T2W	722513 Limited-Service Restaurants	\$1,080,618.40	\$3,538,486.00
Univision Travel Store/ Goods Express @ SAN/No Boundaries	459420 Gift, Novelty, and Souvenir Retailers	0	\$13,156,000.00
Urban Crave (T1)	722513 Limited-Service Restaurants	\$11,489,526.33	\$37,659,235.00
Urban Crave T1	722513 Limited-Service Restaurants	\$1,603,505.39	\$3,511,434.00
US News & World Report T2E	459210 Book Retailers and News Dealers	\$4,178,152.94	\$13,606,364.00
Warwick's of La Jolla T2W	459420 Gift, Novelty, and Souvenir Retailers	\$2,098,943.99	\$6,683,872.00
TOTAL		\$149,106,663.67	\$538,933,771.00

Step 1: Determination of the Base Figure

To establish the Base Figure of the relative availability of ACDBEs to all comparable firms (ACDBEs and non-ACDBEs) available to bid or propose on concessions, the Authority followed one of the five prescribed federal goal-setting methodologies in accordance with the 49 CFR Part 23 regulations. This was accomplished by accessing the California Unified Certification Program (CUCP) Directory of Certified ACDBE Firms and the 2018 U.S. Census Bureau County Business Patterns Database.

Table 2 represents the projected gross receipts for each concessionaire type for Federal Fiscal Years 2024-2026. Table 2 also shows the concessionaire type weighting. This percentage is the amount of each concessionaire type divided by the total projected gross receipts for FFY **2024-2026**.

Table 2

Concessionaire Type	NAICS Codes	Projection of Gross Receipts	% by Type
Vending Machine Operators	445132	\$805,050.00	0.15%
Electronics and Appliance Retailers	449210	\$12,560,582.00	2.33%
Clothing and Clothing Accessories Retailers	458110	\$12,013,973.00	2.23%
Book Retailers and News Dealers	459210	\$104,539,964.00	19.40%
Gift, Novelty, and Souvenir Retailers	459420	\$35,508,749.00	6.59%
Television Broadcasting	515120	\$269,534.00	0.05%
Financial Transactions Processing, Reserve, and Clearinghouse Activities	522320	\$299,286.00	0.06%
Indoor and Outdoor Display Advertising	541850	\$7,882,225.00	1.46%
Security Systems Services (except Locksmiths)	561621	\$9,500,000.00	1.76%
Lounges, cocktail	722410	\$125,000.00	0.02%
Full-Service Restaurants	722511	\$108,743,990.00	20.18%

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Limited-Service Restaurants	722513	\$244,760,156.00	45.42%
Other Personal Care Services	812199	\$1,925,262.00	0.36%
Total		\$538,933,771.00	100.00%

To determine the base figure for the relative availability of ACDBEs within the market area, the Airport calculated the ratio of ready, willing, and able ACDBE firms to all firms (ACDBEs and non-ACDBEs) located in the market area for each of the concessionaire types.

$$\sum \frac{\text{Number of Ready, Willing, and Able ACDBEs}}{\text{Number of All Available Firms}} \times \text{Concession Type\%} = \text{ACDBE Relative Availability}$$

- For the numerator: California Unified Certification Program Directory of Certified ACDBE Firms
- For the denominator: 2022 U.S. Census Bureau's County Business Pattern (CBP) Database

The Base Figure resulting from this weighted calculation is shown in Table 3 below.

Table 3

Concessionaire Type	NAICS	ACDBE	CBP	ACDBE Relative Availability	Weighting	Adjusted Base Figure
Vending Machine Operators	445132	9	223	4.04%	0.15%	0.01%
Electronics and Appliance Retailers	449210	3	1877	0.16%	2.33%	0.00%
Clothing and Clothing Accessories Retailers	458110	17	1011	1.68%	2.23%	0.04%
Book Retailers and News Dealers	459210	16	70	22.86%	19.40%	4.43%
Gift, Novelty, and Souvenir Retailers	459420	10	1967	0.51%	6.59%	0.03%
Television Broadcasting	515120	0	391	0.00%	0.05%	0.00%
Financial Transactions Processing, Reserve, and Clearinghouse Activities	522320	3	715	0.42%	0.06%	0.00%

Indoor and Outdoor Display Advertising	541850	8	297	2.69%	1.46%	0.04%
Security Systems Services (except Locksmiths)	561621	5	812	0.62%	1.76%	0.01%
Lounges, cocktail	722410	21	3007	0.70%	0.02%	0.00%
Full-Service Restaurants	722511	58	30588	0.19%	20.18%	0.04%
Limited-Service Restaurants	722513	73	32250	0.23%	45.42%	0.10%
Other Personal Care Services	812199	5	2960	0.17%	0.36%	0.00%
Total ACDBE Goal Figure					100.00%	4.71%

Step 2: Adjusting the Base Figure

Upon establishing the Base Figure, the Authority reviewed and assessed other known evidence potentially impacting the relative availability of ACDBEs within the market area, in accordance with prescribed narrow tailoring provisions set forth under 49 CFR Part 23.51 Step 2 ACDBE Goal Adjustment guidelines.

Historical Non-Car Rental ACDBE Participation

Past ACDBE participation attainment provides demonstrable evidence of ACDBE availability and capacity to perform on the Authority's non-car rental concessions. Table 4 shows the ACDBE participation achieved on non-car rental concessionaires for the last five (5) federal fiscal years.

Table 4

	Non-Car Rental ACDBE Goals	Non-Car Rental ACDBE Participation
FFY 18	19.10%	23.97%
FFY 19	19.10%	23.14%
FFY 20	19.10%	23.19%
FFY 21	10.80%	21.39%
FFY 22	10.80%	22.19%
Median ACDBE Participation within the Last Five (5) Years		23.14%

*The median is defined as **the middle point in a dataset**—half of the data points are smaller than the median and half of the data points are larger.*

To arrive at an overall goal, the Authority added the Step 1 ACDBE Base Figure with the Step 2 Adjustment Figure and then divided the total by two (2).

Non-Car Rental ACDBE Base Figure (4.71%)	+	Non-Car Rental Median ACDBE Participation Within the Last Five (5years) (23.14%)	=	Non-Car Rental ACDBE Triennial Goal (13.93%)
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1) Disparity Studies

The Authority has not conducted a Disparity Study for non-car rental concessions nor are they aware of any relevant studies of a similar size and location. Therefore, no adjustment was made to the base figure based on disparity study data.

2) Other Considerations

The Authority is not aware of any other factors or adverse considerations that would have a material effect on ACDBE availability within the Authority's marketplace or on ACDBE's ability to participate (meeting bonding, insurance, and financial requirements) in the Authority's FAA-assisted contracting program. Therefore, no further consideration toward a goal adjustment was made. The Authority will continue to explore and consider all available evidence that materially would affect the opportunities for ACDBEs to form, grow, and compete in the Airport's concessionaire program.

ACDBE Triennial Goal for Non-Car Rental Concessions FFY 2024-2026

The Airport Non-Car Rental ACDBE Triennial Goal for FFY 2024-2026 is 13.93%. The Airport must project the amount of the goal that will be met with both race-conscious and race neutral means. The Airport operates a strictly race-neutral ACDBE program and will meet all of the goals with race-neutral means, as shown below.

Non-Car Rental ACDBE Goal	13.93%
Race-Conscious Projection	0.00%
Race-Neutral Projection	13.93%

Race -Neutral Measures

49 CFR Part 23 requires that airports meet the maximum feasible portion of their overall ACDBE goals utilizing race-neutral means. Race-neutral participation includes any time that an ACDBE wins a contract through customary competitive procedures. Race-conscious methods are focused on assisting only ACDBEs, such as establishing a contract goal of ACDBE participation. Although the airport has not achieved its non-car rental participation goals in the past, the Authority will provide greater effort in executing the following race-neutral measures to help achieve the non-car rental ACDBE goal:

- Locating and identifying ACDBEs and other small businesses who may be interested in participating as concessionaires.
- Notifying ACDBEs of concession opportunities and encouraging them to compete, when appropriate.
- When practical, structuring concession activities to encourage and facilitate the participation of ACDBEs.
- Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the Airport's ACDBE program will affect the procurement process;
- Providing technical assistance to ACDBEs in overcoming limitations, such as obtaining bonding or financing

III. ACDBE GOAL METHODOLOGY FOR CAR RENTAL CONCESSIONS FOR FFYs 2024-2026

The Authority annually has car rental concessionaire revenues greater than \$200,000. Because revenues exceed this amount, according to Part 23, the Authority must establish a goal for car rental ACDBE participation. The goal is intended to cover the three (3) year period for FFY 2024-2026. The following subsections outline the methodology used to determine the goal for non-car rental ACDBE participation.

Current Car Rental Concessionaires

Current car rental concessionaires and their FFY 2023 revenues are listed in Table 5 below.

Concessionaire	Gross Receipt for FFY 2023	Contract Commencement Date	Contract Termination Date
Alamo Rent a Car	\$27,124,431	1/20/2017	6/30/2026
Avis Rent a Car	\$62,697,915	1/1/2016	6/30/2026
Budget Rent a Car	\$55,882,653	1/20/2016	6/30/2026
Dollar Thrifty Automotive Group	\$16,094,805	1/20/2017	6/30/2026
Enterprise Rent a Car	\$45,905,659	1/20/2017	6/30/2026
Fox Rent-A-Car	\$10,192,933	1/1/2016	6/30/2026
Hertz Rent A Car	\$55,551,087	1/20/2016	6/30/2026
National Car Rental	\$39,062,799	1/20/2017	6/30/2026
Payless Car Rental	\$13,553,499	1/20/2016	6/30/2026
Sixt Car Rental	\$17,797,357	10/16/2017	10/16/2027

Source: San Diego County Regional Airport Authority Car Rental Concessionaires' Contract Agreements

Step 1: Determination of Base Figure

The methodology used to determine a base figure of car ACDBE rental participation is to obtain the number of ready, willing, and able ACDBE firms that provide car rental services or provide goods and services to car rental concessionaires and dividing that number by the total number of ready, willing, and able firms in the market area. For the purpose of determining this goal, the market area is the State of California as car rental firms generally operate on a regional basis, shifting cars and resources among a region as needs dictate.

Table 6 below details the types of firms expected to provide car rental sales and goods and services to the Authority.

Table 6

Type of Goods or Services	NAICS Code	ACDBE Firms	All Firms	% ACDBE Availability
Commercial and institutional building construction	236220	1	4341	0.02%

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Electrical contractors and other wiring installation contractors	238210	3	9460	0.03%
Other building equipment contractors	238290	0	726	0.00%
Bottled Water Manufacturing	312112	1	46	2.17%
Commercial printing (except screen and books)	323111	0	1938	0.00%
Pump and pumping equipment manufacturing	333911	0	22	0.00%
Radio and television broadcasting and wireless communications equipment manufacturing	334220	0	154	0.00%
Sign manufacturing	339950	1	588	0.17%
Motor vehicle supplies and new parts merchant wholesalers	423120	0	1854	0.00%
Tire and tube merchant wholesalers	423130	1	259	0.39%
Furniture Merchant Wholesalers	423210	0	925	0.00%
Computer and computer peripheral equipment and software merchant wholesalers	423430	0	1372	0.00%
Service establishment equipment and supplies merchant wholesalers	423850	0	536	0.00%
Stationery and office supplies merchant wholesalers	424120	1	459	0.22%
Clothing and Clothing Accessories Merchant Wholesaler (child car seats)	424350	0	369	0.00%
Petroleum and petroleum products merchant wholesalers (except bulk stations and	424720	2	428	0.47%
New car dealers	441110	0	1989	0.00%
Automotive parts and accessories stores	441310	0	3567	0.00%
Office supplies and stationery stores	453210	0	541	0.00%
Specialized Freight Trucking, Long-Distance (Vehicle Transport Services)	484230	2	854	0.23%
Other Airport Operations	488119	1	202	0.50%
Motor vehicle towing	488410	0	1247	0.00%
Other Support Activities for Road Transportation	488490	3	1081	0.28%
Couriers and express delivery services	492110	1	1345	0.07%
Local Messengers and Local Delivery	492210	1	873	0.11%
Wired Telecommunications Carriers	517111	0	184	0.00%
Insurance agencies and brokerages	524210	0	14342	0.00%

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Passenger car leasing (specifically automotive and equipment leasing)	532112	0	53	0.00%
Truck, utility trailer, and RV rental and leasing	532120	1	607	0.16%
Offices of certified public accountants	541211	0	7432	0.00%
Tax Preparation Services	541213	0	4600	0.00%
Administrative management and general management consulting services	541611	39	15764	0.25%
Human resources consulting services	541612	6	1200	0.50%
Temporary Help Services (Staffing Agency)	561300	0	698	0.00%
Help Supply Services	561320	1	4288	0.02%
Repossession services	561491	0	85	0.00%
Travel Agencies	561510	0	1356	0.00%
Investigation and Personal Background Check Services	561611	1	653	0.15%
Security systems services (except locksmiths)	561621	2	812	0.25%
Exterminating and pest control services	561710	0	1900	0.00%
Janitorial services	561720	7	6442	0.11%
Landscaping services	561730	1	9139	0.01%
Carpet and upholstery cleaning services	561740	2	744	0.27%
Hazardous waste treatment and disposal	562211	0	99	0.00%
All Other Traveler Accommodation	721199	0	142	0.00%
General automotive repair	811111	5	9518	0.05%
Automotive exhaust system repair	811112	0	208	0.00%
Automotive body, paint, and interior repair and maintenance	811121	1	4023	0.02%
Automotive glass replacement shops	811122	0	742	0.00%
Automotive oil change and lubrication shops	811191	2	775	0.26%
Car washes	811192	4	2062	0.19%
All other automotive repair and maintenance	811198	3	1004	0.30%
Consumer electronics repair and maintenance	811211	0	199	0.00%
Drycleaning and Laundry Services (Uniform Cleaning Services)	812320	0	2123	0.00%
Legislative Bodies	921120	0	1471	0.00%

Total	93	127,841	0.07%
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Step 2: Adjusting the Base Figure

After determining the base figure of ACDBE participation, the figure may be adjusted based upon local supporting evidence such as historic participation, disparity study information, and local availability of ACDBE firms.

3) Historical ACDBE Participation

Table 7 below shows the historical car rental ACDBE participation obtained by the Airport for the last five (5) federal fiscal years (FFY).

Table 7

Federal Fiscal Year	Car Rental ACDBE Goal	Car Rental ACDBE Participation
FFY 18	2.40%	9.84%
FFY 19	9.63%	7.23%
FFY 20	2.10%	3.39%
FFY 21	2.90%	2.16%
FFY 22	2.90%	1.97%
Median ACDBE Participation		3.39%

The Authority exceeded ACDBE car rental participation with race-neutral means during the last five (5) federal fiscal years due to the high ACDBE participation of one ACDBE-certified car rental concessionaire, Santa Monica Ford. In FFY 2019, Santa Monica Ford was acquired by a non-ACDBE certified concessionaire. Therefore, their participation will no longer be counted towards the overall ACDBE goal.

The Airport evaluated the ACDBE car rental participation excluding Santa Monica Ford in Table 8 below. These figures more accurately reflect the Airport's anticipated ACDBE participation in car rental concessions and will be used to adjust the base figure.

Table 8

Federal Fiscal Year	Car Rental ACDBE Goal	Car Rental ACDBE Participation
FFY 18	2.40%	9.84%
FFY 19	9.63%	7.23%
FFY 20	2.10%	3.39%
FFY 21	2.90%	2.16%
FFY 22	2.90%	1.97%
Median ACDBE Participation		3.39%

An adjustment to the base figure was made based on historical car rental ACDBE participation, excluding Santa Monica Ford, as shown below.

To arrive at an adjusted base figure, the airport added our Step 1 ACDBE Base Figure with our Step 2 Adjustment Figure (the median ACDBE participation) and divided by two (2).

Car Rental ACDBE Base Figure	+	Car Rental Median ACDBE Participation within the Last Five (5) Years	÷ 2	=	Car Rental ACDBE Triennial Goal
(0.07%)		(3.39%)			(1.73%)

4) Disparity Studies

The Authority has not conducted a Disparity Study nor are they aware of any relevant studies of a similar size and location. Therefore, no adjustment was made to the base figure based on disparity study data.

5) Other Considerations

The Authority is not aware of any other factors or adverse considerations that would have a material effect on ACDBE availability within the Airport marketplace or on ACDBE's ability to participate (meeting bonding, insurance, and financial requirements) in the Authority's FAA-assisted contracting program. Therefore, no further consideration toward a goal adjustment was made. The Authority will continue to explore and consider all available evidence that materially would affect the opportunities for ACDBEs to form, grow, and compete in the Authority's concessionaire program.

ACDBE TRIENNIAL GOAL FOR CAR RENTAL CONCESSIONS FFY 2024-2026

In accordance with the requirements of 49 CFR Part 23, the Authority has established a Car Rental ACDBE Triennial Goal for FFY 2024-2026 of 1.73%.

The Authority must project the amount of the goal that will be met with both race-conscious and race-neutral means. As the Authority has not consistently met its car-rental ACDBE goals in the past 3 years, it expects to meet the triennial goal with race-neutral and race-conscious means. The average ACDBE participation since 2020 is 2.06%, therefore the race-conscious projection will be the difference between this average and the ACDBE goal as shown below.

Car Rental ACDBE Goal	1.73%
Race-Conscious Projection	0.00%
Race-Neutral Projection	1.73%

IV. RACE-NEUTRAL IMPLEMENTATION MEASURES

The Authority is implementing several race and gender-neutral remedies. To outreach and promote the participation of ACDBEs and small businesses in the Authority FAA-assisted contracting program and to increase the effectiveness of these remedies, the Authority plans to continue utilizing existing remedies and will continue to explore other options for consideration based on the Authority success in meeting its overall ACDBE goals based on these efforts.

The Authority will:

- Encourage ACDBEs and the small business contracting community to register and receive solicitation notices through its on-line procurement website: <https://www.san.org/business>
- Arrange contract solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate and maximize ACDBE and other small business participation.
 - The Authority will encourage prime contractors to identify subcontracting work that ACDBEs may bid on.
 - The Authority will provide greater detail on the importance of the ACDBE program at pre-bid/proposal meetings.
 - The Authority will invite all ACDBEs in the market area to perform the type of work included in a solicitation to the pre-bid/proposal meeting.
 - The Authority will provide time before or after pre-bid/proposal meetings to allow for prime and subcontractor networking.
 - The Authority will disseminate bid opportunity information to Minority and Women Business Organizations within the market area.
- The Authority will offer instructions and clarification on bid specifications, procurement policy, procedures, and general bidding requirements. The Authority will provide information on sub-contracting practices and bonding requirements and provide instructions and clarification on job performance requirements.
 - The Authority will review and revise solicitation language to emphasize the importance of the ACDBE program.
 - The Authority will utilize the California Unified Certification Program website to provide prospective bidders with a list of all ACDBEs in the market area that perform the type of work included in a solicitation: http://www.dot.ca.gov/hq/bep/find_certified.htm
- Maintain a file of successful bid documents from past procurements and permit potential participants to review and evaluate such documents.
 - The Authority will offer unsuccessful ACDBE bidders the opportunity for a debrief to help them understand areas in which they can improve their bid/proposal in the future.
- Host and participate in workshops for the ACDBE and small business contracting community.
 - The Authority will attend and participate in vendor fairs and conferences hosted by other public agencies and organizations to learn about best practices for ACDBE and small business inclusion on procurement.
 - The Authority will host opportunity awareness and outreach events for ACDBEs and potential ACDBEs on how to do business with the airport. The opportunity awareness events may include networking, upcoming projects, learn how to be a successful ACDBE, and ACDBE certification.
- As a supportive service to help develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for ACDBEs and other small businesses, the Authority will actively promote the small business opportunity awareness and outreach events, programs, and support services offered by other agencies that have established ACDBE and other small business programs.

- The Authority will refer ACDBEs and other small businesses to the local Small Business Development Centers, and other local government related entities for technical assistance and other business development services.
- The Authority will advise its contracting community of the online directory of certified ACDBEs, found at the California Unified Certification Program website: <https://californiaucp.dbesystem.com/> and Federal Aviation Administration National Certified ACDBE Directory: <https://faa.dbesystem.com/>.
- The Authority will advise the contracting community of the available small businesses certified by the California Department of General Services (DGS): <http://www.dgs.ca.gov/pd/Programs/eprocure.aspx>
- On a case-by-case basis and depending on the availability and capacity of small businesses to perform subcontract opportunities, the Authority will implement race-neutral Small Business Enterprise goals on federally funded contracts.

Fostering Small Business Participation¹

The Authority has implemented several strategies to foster small business participation in its contracting process. These include the following:

- Conducting “How to do Business with San Diego County Regional Airport Authority” and ACDBE Certification workshops.
- Hosting opportunity awareness, educational, and business networking events that educate concessionaires on future opportunities and encourages small minority businesses and ACDBEs to engage with prime concessionaires on partnerships such as “Meet the Primes”, “Concessionaire Panel”, and “Rental Car Supplier Diversity Event”.
- On larger prime contracts requiring the prime concessionaire to consider subcontracting opportunities of a size that small businesses, including ACDBEs, can reasonably perform, rather than self-performing all the work involved.
- Ensuring that a reasonable number of prime contracts are of a size that small businesses, including ACDBEs, can reasonably perform.
- Provide outreach and technical assistance to current Authority’s concessionaires, past Authority’s concessionaires, and potential businesses who may qualify for ACDBE-certification by encouraging them to seek and obtain ACDBE-certification.

V. PUBLIC PARTICIPATION AND FACILITATION

In accordance with Public Participation Regulatory Requirements of Title 49 CFR Part 26, minority, women, local business associations, and community organizations within the Authority’s market area were consulted and provided an opportunity to review the triennial goal analysis and provide input.

The Authority issued a Public Notice on the website publishing the Authority’s Draft Proposed FAA Overall ACDBE Goal-Setting Methodology for FFY 2024-FFY 2026 (ATTACHMENT 1). The notice informed the public of the proposed non-car rental and car rental goal settings, and the Authority would accept comments on the goal analysis for 30 days.

The Authority reached out to local minority, women, and community business organizations to provide them information on the Authority ACDBE program and specifically the Draft Proposed FAA Overall ACDBE Goal-Setting Methodology for FFY 2024-2026. Each organization was contacted and given an opportunity to participate in a webinar. The Authority hosted a webinar on _____ and presented a brief overview of the ACDBE program and the goal and methodology for **FFY 2024-2026** (ATTACHMENT 3).

San Diego County Regional Airport Authority FAA ACDBE Goal Methodology FFY 2024-2027
A summary of all comments received on the goal methodology, and efforts made to contact organizations is listed in ATTACHMENT 2.

¹ See Title 49 CFR Part 26 Section 26.39 "Fostering Small Business Participation."

ATTACHMENT 1

ATTACHMENT 2