



**County of Sonoma
Department of Transportation & Public Works
Charles M. Schulz-Sonoma County Airport**

ACDBE

**AIRPORT CONCESSION
DISADVANTAGED BUSINESS
ENTERPRISE**

PROGRAM PLAN 2022

Submitted to:

U.S. Department of Transportation
Federal Aviation Administration



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I. POLICY STATEMENT AND PROGRAM OBJECTIVES

A. Policy Statement/Objectives (§23.1, §23.23)

The Sonoma County Department of Transportation and Public Works, Charles M. Schulz-Sonoma County Airport (hereinafter referred to as “Airport”) is a recipient of U.S. Department of Transportation (U.S. DOT) Federal Assistance funds through the Federal Aviation Administration (FAA). As a condition of receiving this assistance the Airport has established an Airport Concession Disadvantaged Business Enterprise (ACDBE) program in accordance with regulations of the U.S. Department of Transportation (USDOT), 49 CFR Part 23¹. The Airport is a non-hub primary airport and has received federal funds authorized for airport development after January 1988 (authorized under Title 49 of the United States Code). The Airport has signed airport grant assurances that it will comply with 49 CFR Part 23.”

In accordance with the U.S DOT’s ACDBE Program, the goal of the Airport’s ACDBE Program is to ensure that minority-owned, women-owned, and other disadvantaged small businesses can fairly compete for contracts and subcontracts financed in whole, or in part, with U.S. DOT funds.

It is the policy of the Airport to ensure that ACDBEs as defined in Part 23, have an equal opportunity to receive and participate in concession opportunities. It is also our policy to:

1. To ensure non-discrimination in the award and administration of opportunities for concessions by airports receiving U.S. DOT financial assistance.
2. To create a level playing field on which ACDBEs can compete fairly for opportunities for concessions.
3. To ensure that our ACDBE program is narrowly tailored in accordance with applicable law.
4. To ensure that only firms that fully meet this part’s eligibility standards are permitted to participate as ACDBEs at our airport(s).
5. To help remove barriers to the participation of ACDBEs in opportunities for concessions at our airport(s).
6. To provide appropriate flexibility to our airports in establishing and providing opportunities for ACDBEs.

As evidence of the Airport’s commitment to pursue these policy objectives, the Airport DBE Department Analyst has been designated, as the ACDBE Liaison Officer (ACDBELO). In this capacity the DBE Department Analyst is responsible for implementing all aspects of the ACDBE program, however all Airport staff share in the responsibility for making the Airport’s ACDBE Program a success and shall give their full cooperation to the ACDBELO in the implementation of this Policy. The ACDBELO has direct access to the Transportation & Public Works Director for ACDBE-related matters.

Implementation of the ACDBE Program is afforded the same priority as compliance with all other legal obligations incurred by the Airport in its financial assistance agreements with U.S. DOT. It is the expectation of the Transportation & Public Works Director that all Airport personnel shall adhere to the full spirit and intent of the ACDBE Program in pursuing all ACDBE requirements, accordingly.

¹ <https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=43cea5e913f19ba8508e0ba2fd2c18b7&mc=true&r=PART&n=pt49.1.23>



This policy is posted on the Transportation & Public Works Department DBE Program webpage and is available to the public and to the ACDBE and non-ACDBE business communities that perform or are interested in performing work on Airport concessions. Questions regarding Airport's ACDBE Program should be addressed to the ACDBELO.

Johannes J. Hovertsz

Director of Sonoma County Department of Transportation and Public Works

3-8-2022

Date



II. **SUBPART A- GENERAL REQUIREMENTS**

A. **Objectives (§23.1)**

The objectives are found in the policy statement on the first page of this program.

B. **Definition of Terms (§23.3)**

The Airport will use terms in this program that have the meaning defined in §23.3 and §26.5 where applicable.

C. **Applicability (§23.5)**

The Airport is a primary non-hub airport and the sponsor of federal airport funds authorized for airport development after January 1988 that was authorized under Title 49 of the United States Code.

D. **Non-Discrimination Requirements (§23.9)**

The Airport will never exclude any person from participation in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and performance of any contract covered by 49 CFR Part 23 on the basis of race, color, sex, or national origin.

In administering its ACDBE program, the Airport will not, directly or through contractual or other arrangements, use criteria or methods of administration that have the effect of defeating or substantially impairing accomplishment of the objectives of the ACDBE Program with respect to individuals of a particular race, color, sex, or national origin.

The Airport acknowledges these representations are also in accordance with obligations contained in its Civil Rights, DBE and ACDBE Airport grant assurances.

The Airport will include the following assurances in all concession agreements and management contracts it executes with any firm:

1. "This agreement is subject to the requirements of the U.S. Department of Transportation's regulations, 49 CFR Part 23. The concessionaire or contractor agrees that it will not discriminate against any business owner because of the owner's race, color, national origin, or sex in connection with the award or performance of any concession agreement, management contract, or subcontract, purchase or lease agreement, or other agreement covered by 49 CFR Part 23.
2. "The concessionaire or contractor agrees to include the above statements in any subsequent concession agreement or contract covered by 49 CFR part 23, that it enters and cause those businesses to similarly include the statements in further agreements."

E. **Compliance and Enforcement (§23.11)**

The Airport will comply with and is subject to the provisions of 49 CFR Part 26 (§§ 26.101 and 26.105 23.107, and 2 CFR Parts 180 and 1200).

The Airport will comply with this part or be subject to formal enforcement action under §26.105 or appropriate program sanctions, such as the suspension or termination of Federal funds, or refusal to



approve projects, grants or contracts until deficiencies are remedied. Program sanctions may include actions consistent with 49 U.S.C. §§ 47106(d), 47111(d), and 47122.

2 C.F.R. Part 180, Government-wide Debarment and Suspension (Non-procurement), effective November 15, 2006, adopted and supplemented by DOT at 2 C.F.R. Part 1200, effective June 2, 2008, provides Office of Management and Budget (OMB) guidance for Federal agencies on the government-wide debarment and suspension system for non-procurement transactions, programs and activities. 2 C.F.R. Part 1200 adopts the OMB guidance in subparts A through I of 2 CFR part 180, as supplemented by part 1200, as the Department of Transportation policies and procedures for non-procurement suspension and debarment.

The Airport's compliance with all requirements of this part is enforced through the procedures of Title 49 of the United States Code, including 49 U.S.C. 47106(d), 47111(d), and 47122, and regulations implementing them.

The following enforcement actions apply to firms participating in the Airport's ACDBE program:

- a. For a firm that does not meet the eligibility criteria of subpart D of this part and that attempts to participate as an ACDBE on the basis of false, fraudulent, or deceitful statements or representations or under circumstances indicating a serious lack of business integrity or honesty, the U.S. DOT or the FAA may initiate suspension or debarment proceedings against the firm under 2 CFR Parts 180 and 1200.
- b. For a firm that, in order to meet ACDBE goals or other ACDBE program requirements, uses or attempts to use, on the basis of false, fraudulent or deceitful statements or representations or under circumstances indicating a serious lack of business integrity or honesty, another firm that does not meet the eligibility criteria of subpart D of this part, U.S. DOT or FAA may initiate suspension or debarment proceedings against the firm under 2 CFR Parts 180 and 1200.
- c. U.S. DOT may take enforcement action under 49 CFR Part 31, Program Fraud and Civil Remedies, against any participant in the ACDBE program whose conduct is subject to such action under 49 CFR Part 31.
- d. U.S. DOT may refer to the Department of Justice, for prosecution under 18 U.S.C. §§ 1001 or other applicable provisions of law, any person who makes a false or fraudulent statement in connection with participation of an ACDBE in the ACDBE program or otherwise violates applicable Federal statutes.

Compliance reviews: The FAA may review the Airport's compliance with this part at any time, including but not limited to, reviews of paperwork, on-site reviews, and review of the airport sponsor's monitoring and enforcement mechanism, as appropriate. The FAA Office of Civil Rights may initiate a compliance review based on complaints received.

Any person who knows of a violation of this part by the Airport may file a complaint under 14 CFR Part 16 with the Federal Aviation Administration Office of Chief Counsel.

III. SUBPART B – ACDBE PROGRAMS

A. ACDBE Program Updates (§23.21)

The Airport is a non-hub primary airport required to have an ACDBE program.



As a condition of eligibility for FAA financial assistance, the Airport will submit its ACDBE program and overall goals to FAA according to §23.45(a).

Until the Airport's new ACDBE program is submitted and approved, the Airport will continue to implement our ACDBE program that was in effect previously, except with respect to any provision that is contrary to 49 CFR Part 23.

This ACDBE program will be implemented at the Charles M. Schulz-Sonoma County Airport.

When the Airport makes significant changes to its ACDBE program, the Airport will provide the amended program to the FAA for approval prior to implementing the changes.

B. Administrative Provisions (§23.23)

Policy Statement

The Airport is committed to operating its ACDBE program in a nondiscriminatory manner. The entire Program will be available from the Sonoma County Transportation and Public Works DBE Program webpage and hard copies will be made available to the public upon request.

The Airport's Policy Statement is elaborated on the first page of this program.

ACDBE Liaison Officer (ACDBELO)

The Airport has designated the following individual as our ACDBELO:

Adam Borovkoff
Department Analyst
Charles M. Schulz-Sonoma County Airport
2290 Airport Blvd.
Santa Rosa, CA 95403
(707) 565-7062

Adam.borovkoff@sonoma-county.org

In that capacity, the ACDBELO is responsible for implementing all aspects of the ACDBE program and ensuring that the Airport complies with all provisions of 49 CFR Part 23. The ACDBELO has direct, independent access to the Sonoma County Director of Transportation and Public Works concerning ACDBE program matters. An organizational chart displaying the ACDBELO's position in the organization is found in Attachment A to this program.

The ACDBELO is responsible for developing, implementing and monitoring the ACDBE program, in coordination with other appropriate officials. The ACDBELO has a staff of 2 to assist in the administration of the program. The duties and responsibilities include the following:

1. Gathers and reports statistical data and other information as required by FAA or USDOT.
2. Reviews third party contracts and purchase requisitions for compliance with this program.
3. Works with all departments to set overall triennial goals.
4. Ensures that bid notices and requests for proposals are available to ACDBEs in a timely manner.
5. Identifies contracts and procurements so that ACDBE goals are included in solicitations (both race-neutral methods and contract specific goals)



6. Analyzes the Airport's progress toward attainment and identifies ways to improve progress.
7. Participates in pre-bid meetings.
8. Advises the Department Director on ACDBE matters and achievement.
9. Provides ACDBEs with information and assistance in preparing bids, obtaining bonding, financing, and insurance; acts as a liaison to the OSDBU-Minority Resource Center (MRC).
10. Plans and participates in ACDBE training seminars.
11. Acts as liaison to the Unified Certification Program (UCP) in California.
12. Provides outreach to ACDBEs and community organizations to advise them of opportunities.

ACDBE Directory

The Airport, through the California Unified Certification Program (UCP), maintains a directory identifying all firms eligible to participate as DBEs and ACDBEs. The Directory lists the firm's name, address, phone number, date of the most recent certification, and the type of work the firm has been certified to perform as an ACDBE.

The UCP will ensure that the Directory lists each type of work for which a firm is eligible to be certified by using the most specific NAICS code available to describe each type of work. The UCP will make any changes to the current directory entries necessary to meet the requirements of this paragraph.

The Directory is revised in real time intervals. The Airport provides the Directory website link² on all RFP advertisements and accompanying materials.

C. Ensuring Nondiscriminatory Participation of ACDBEs (§23.25)

The Airport will take the following measures to ensure nondiscriminatory participation of ACDBEs in concessions, and other covered activities (§23.25(a)):

The Airport will monitor ACDBE concession activities and periodically review subcontracts to ensure compliance with the ACDBE program requirements.

The Airport will seek ACDBE participation in all types of concession activities, rather than concentrating participation in one category or a few categories to the exclusion of others (§23.25(c)).

The Airport's overall goal methodology and a description of the race-neutral measures it will use to meet the overall ACDBE goals are described in §23.25. The goals are set consistent with the requirements of Subpart D (§23.25(b), (d)).

If the Airport projects that race-neutral measures alone, are not sufficient to meet an overall goal, it will use race-conscious measures as described in §23.25 (e) (1-2) with FAA approval.

The Airport will require businesses subject to ACDBE goals at the airport (except car rental companies) to make good faith efforts to explore all available options to meet goals, to the maximum extent practicable, through direct ownership arrangements with ACDBEs (§23.25(f)).

² <https://dot.ca.gov/programs/civil-rights/dbe-search>



The Airport will not use set-asides or quotas as a means of obtaining ACDBE participation (§23.25(g)).

D. Reporting (§23.27)

The Airport will retain sufficient basic information about our ACDBE program implementation, ACDBE certification, and the award and performance of agreements and contracts to enable the FAA to determine our compliance with Part 23. This data will be retained for a minimum of 3 years following the end of the concession agreement or other covered contract.

Beginning March 1, 2006, the Airport will submit to the FAA Regional Civil Rights Office, an annual ACDBE participation report on the form in Appendix A of Part 23 via FAA Connect.

E. Compliance and Enforcement Procedures (§23.29)

The Airport will use the following monitoring and enforcement mechanisms to ensure compliance with 49 CFR Part 23.

1. Active Participants' List

The Airport will maintain an Active Participants' List. The Airport will require all concession-related contractors proposing on concession-related opportunities to return, at the time of proposal due date, the following information about the contract participants:

- Firm name
- Firm address and telephone number
- Firm's status as an ACDBE or non-ACDBE
- Age of firm
- Type of work
- Estimated annual gross receipts of the firms

The Airport will use this information to maintain and update its active participant list. This list will be augmented by any concession expressing an interest in doing business at the Airport.

2. Monitoring Participation of ACDBEs

The Airport will implement a monitoring and enforcement mechanism to ensure that work committed to ACDBEs at contract award is actually performed by the ACDBE. This mechanism will provide a running tally of actual ACDBE attainments (e.g., payments actually made to ACDBE firms), including a means of comparing those attainments to commitments. This will be accomplished by the following mechanism:

- a. Monthly reporting of prime concessionaires.
- b. The Airport may perform interim audits of ACDBE participation. The audit will review gross receipts earned by or payments for goods and services and management agreements to ACDBEs to ensure that the actual amount equals or exceeds the dollar amounts stated in the report of proposed ACDBE participation.
- c. The Airport will also review the reports submitted by the concessionaires to ensure that ACDBE participation levels remain in compliance with the contract requirements. This information will be used to provide the statistical data for the achievement reports.

If the contract requirements regarding the ACDBE Program are not met, the Airport will implement the contract remedies specified in the contract. The Airport may include in the contracts, remedies



available by federal, state, and local law. Such remedies may include, but are not limited to, termination of the contract in whole or in part.

3. Recordkeeping and Reporting

The Airport will retain sufficient basic information regarding its program implementation, and the award and performance of agreements and contracts to enable the FAA to determine its compliance with 49 CFR Part 23 and in compliance with the Airport’s approved retention schedule.

Contractors must retain records and documents for three (3) years following the performance of the contract. These records will be made available for inspection upon request by any authorized representative of the Airport, FAA, or U.S. DOT.

The Airport will submit an annual report of ACDBE participation to the FAA Regional Civil Rights office via FAA Connect.

The Airport will bring to the attention of the Department of Transportation any false, fraudulent, or dishonest conduct in connection with the program, so that USDOT can take the steps (e.g., referral to the Department of Justice for criminal prosecution, referral to the USDOT Inspector General, action under suspension and debarment or Program Fraud and Civil Penalties rules) provided in §26.107.

The Airport will consider similar action under our own legal authorities, including responsibility determinations in future contracts.

IV. SUBPART C – CERTIFICATION AND ELIGIBILITY

A. Certification Standards (§23.31)

The Airport is the member of the California Unified Certification Program (CUCP) administered by the State of California. The CUCP will meet all of the requirements of this section.

The CUCP’s directory³ of eligible DBEs specifies whether a firm is certified as a DBE for purposes of Part 26, and ACDBE for purposes of part 23, or both.

Prior to entering into a new contract, extension, or option with a currently certified ACDBE, the Airport will review the ACDBE’s eligibility at that time (i.e., “as soon as possible”) rather than waiting until the latest date allowed under Part 23.

V. GOALS, GOOD FAITH EFFORTS, AND COUNTING

A. Basic Overall Goal Requirement (§23.41)

The Airport will establish two separate overall ACDBE goals; one for car rentals and another for concessions other than car rentals. The overall goals will cover a three-year period and the Airport will review the goals annually to make sure the goal continues to fit the Airport’s circumstances. The Airport will report any significant overall goal adjustments to the FAA.

If the average annual concession revenues for car rentals over the preceding three (3) years do not exceed \$200,000, the Airport need not submit an overall goal for car rentals. Likewise, if the average annual concession revenues for concessions other than car rentals over the preceding three (3) years do not exceed \$200,000, the Airport need not submit an overall goal for concessions other than car rentals. The

³ <https://dot.ca.gov/programs/civil-rights/dbe-search>



Airport understands that “revenue” means total revenue generated by concessions, not the fees received by the airport from concessionaires.

The Airport’s overall goals will provide for participation by all certified ACDBEs and will not be subdivided into group-specific goals.

B. Consultation in Goal Setting (§23.43)

The Airport consults with stakeholders before submitting the overall goals to the FAA. Stakeholders will include, but not be limited to, minority and women’s business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires themselves, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the sponsors efforts to increase participation of ACDBEs.

When submitting overall goals, the Airport will identify the stakeholders that were consulted and provide a summary of the information obtained from the stakeholders.

C. Overall Goals (§23.45)

The Airport is a non-hub primary airport. As a condition of eligibility for FAA financial assistance, the Airport will submit its overall goals according to the following schedule:

Primary Airport Size	Date Due	Period Covered	Next Goal Due
Non-Hubs	October 1, 2019	2019/2020/2021	October 1, 2021 (2022/2023/2024)

If a new concession opportunity arises at a time that falls between the normal submission dates above and the estimated average of annual gross revenues are anticipated to be \$200,000 or greater, the Airport will submit an appropriate adjustment to our overall goal to FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity (§23.45i).

The Airport will establish overall goals in accordance with the 2-Step process as specified in §23.51. After determining the total gross receipts for the concession activity, the first step is to determine the relative availability of ACDBEs in the market area, “base figure.” The second step is to examine all relevant evidence reasonably available in the Airport’s jurisdiction to determine if an adjustment to the Step 1 “base figure” is necessary so that the goal reflects as accurately as possible the ACDBE participation the Airport would expect in the absence of discrimination. Evidence may include, but is not limited to past participation by ACDBEs, a disparity study, evidence from related fields that affect ACDBE opportunities to form, grow, and compete (such as statistical disparities in ability to get required financing, bonding, insurance, or data on employment, self-employment, education, training, and union apprenticeship)

The Airport will arrange solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by ACDBEs and other small businesses and by making contracts more accessible to small businesses, by means such as those provided under §26.39.



A description of the methodologies to calculate both the overall goal for car rentals and concessions other than car rentals, including the goal calculations and the data the Airport relied, on can be found on the Sonoma County Transportation and Public Works DBE Program webpage⁴.

Projection of Estimated Race-Neutral & Race-Conscious Participation (§23.45(f), §23.25(d-e))

The breakout of estimated race-neutral and race-conscious participation can be found with the goal methodology on the Sonoma County Transportation and Public Works DBE Program webpage⁴. This section of the program is reviewed annually when the goal calculation is reviewed under §23.41(c).

Pursuant to current guidance from the United States Department of Transportation with respect to the holding by the 9th Circuit in *Western States Paving Co. v. U.S. Dept. of Transportation*, 407 F. 3d 983 (2005), the Airport shall operate a race neutral program with respect to ACDBE participation until such time as the State of California or the Airport has completed studies required by the 9th Circuit sufficient to support a specific ACDBE Goal in this business area. (Current Federal Transit Administration/Department of Transportation Guidance exists in the Federal Register / Vol. 71, No. 56, pages 14775 – 14778).

Concession Specific Goals

The Airport will use race-neutral measures for concession opportunities unless it can demonstrate discrimination through a disparity study. In the event that the Airport can demonstrate discrimination in its concessions, it will consider concession specific goals to meet any portion of the overall goals the Airport does not project being able to meet using race-neutral means.

If the Airport determines discrimination and establishes concession specific goals, goals will only be set on those concessions that have direct ownership arrangements (except car rentals), sublease, or subcontracting possibilities. The Airport will require businesses subject to ACDBE goals at the airport (except car rental companies) to make good faith efforts to explore all available options to meet goals, to the maximum extent practicable, through direct ownership arrangements with DBEs (§23.25 (f)).

Car rental firms are not required to change their corporate structure to provide for direct ownership arrangements. In the case of a car rental goal, where it appears that all or most of the goal is likely to be met through the purchases by car rental companies of vehicles or other goods or services from ACDBEs, one permissible alternative is to structure the goal entirely in terms of purchases of goods and services.

If the Airport determines discrimination, it need not establish a concession specific goal on every such concession, and the size of concession specific goals will be adapted to the circumstances of each such concession (e.g., type and location of concession, availability of ACDBEs).

If the objective of a concession specific goal is to obtain ACDBE participation through direct ownership with an ACDBE, the Airport will calculate the goal as a percentage of the total estimated annual gross receipts from the concession (§23.25(e)(1)(i)).

If the concession specific goal applies to purchases and/or leases of goods and services, the Airport will calculate the goal by dividing the estimated dollar value of such purchases and/or leases from

⁴ <https://sonomacounty.ca.gov/TPW/DBE-Program/>



ACDBEs by the total estimated dollar value of all purchases to be made by the concessionaire (§23.25(e)(1)(ii)).

Good Faith Efforts on Concession Specific Goals (§23.25(e)(1)(iii), (iv))

If the Airport determines that a concession specific goal is necessary, it will award the concession only if the competitor makes good faith efforts to meet the goal. A competitor may do so either by obtaining enough ACDBE participation to meet the goal or by documenting that it made sufficient good faith efforts to do so. [§23.25(e)(1)(iv)] Examples of good faith efforts are found in Appendix A to 49 CFR Part 26. The procedures applicable to 49 CFR §26.51 and §26.53, regarding contract goals apply to the Airport’s concession specific goals.

If the Airport receives approval from FAA to use concession specific goals, it will require bidders/offerors to demonstrate that it has either met the contract goal or document good faith efforts. Examples of good faith efforts are found in Appendix A to Part 26. The Airport will count ACDBE participation toward overall goals for car rental as provided in §23.53. The Airport will count ACDBE participation toward overall goals other than car rental as provided in §23.55.

D. Section 23.57 (b) Goal Shortfall Accountability (§23.57)

If the awards and commitments on the Airport’s Uniform Report of ACDBE Participation at the end of any fiscal year are less than the overall goal applicable to that fiscal year, the Airport will:

- (1) Analyze in detail the reasons for the difference between the overall goal and awards and commitments in that federal fiscal year.
- (2) Establish specific steps and milestones to correct the problems the Airport identified in the analysis to enable the Airport to fully meet our goal for the new fiscal year.

E. Section 23.61 Quotas or Set-asides (§23.61)

The Airport does not use quotas or set-asides as a means of obtaining ACDBE participation.

VI. SUBPART E – OTHER PROVISIONS

A. Section 23.71 Existing Agreements (§23.71)

The Airport will assess potential for ACDBE participation when an extension or option to renew an existing agreement is exercised, or when a material amendment is made. The Airport will use any means authorized by part 23 to obtain a modified amount of ACDBE participation in the renewed or amended agreement.

B. Section 23.73 Privately-Owned or Leased Terminal Buildings (if applicable) (§23.73)

The Airport does not have any privately-owned or leased terminal buildings.

C. Section 23.75 Long-Term Exclusive Agreements (§23.75)

The Airport will not enter into a long-term and exclusive agreements for concessions without prior approval of the FAA Regional Civil Rights Office. The Airport understands that a “long-term” agreement



is one having a term of longer than five (5) years. We understand that an “exclusive” agreement is one in which an entire category of a particular business opportunity is limited to a single business entity. If special, local circumstances exist that make it important to enter into a long-term and exclusive agreement, the Airport will submit detailed information to the FAA Regional Civil Rights Office for review and approval.

D. Section 23.79 Geographic Preferences (§23.79)

The Airport will not use a “local geographic preference,” i.e., any requirement that gives an ACDBE located in one place (e.g., Sonoma County) an advantage over ACDBEs from other places in obtaining business as, or with, a concession at the Airport.



VII. ATTACHMENT A: ORGANIZATIONAL CHART

