



Alaska Department of Transportation & Public Facilities

Disadvantaged Business Enterprise Goal Methodology

Federal Fiscal Years 2023-2025

Federal Aviation Administration

Prepared by the Alaska Department of Transportation and Public Facilities

Civil Rights Office

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Alaska DOT&PF FAA FFY 2023-2025 DBE Goal Methodology

The Alaska Department of Transportation and Public Facilities (Alaska DOT&PF or the Department), as a recipient of Federal Aviation Administration (FAA) funding, is required to submit a Disadvantaged Business Enterprise (DBE) goal methodology triennially. This goal methodology has been prepared according to the criteria set forth in 49 CFR Part 26.45, and it is based on demonstrable evidence of the availability of all DBE firms that are ready, willing, and able to perform work on FAA-assisted contracts relative to all businesses that are ready, willing and able to participate on FAA-assisted contracts.¹

In September 2019, the Department contracted with MGT Consulting Group, LLC, (MGT) to conduct a DBE Availability and Disparity Study Update (2021 Disparity Study). The 2021 Disparity Study examined five years of data and includes construction and professional services procurement activities from October 1, 2014 to September 30, 2019 (FFY2015-FFY2019).² This methodology is based substantially on the 2021 Disparity Study results, federal guidance, and relevant case law including *Western States Paving v. Washington State Dept. of Transportation* 907F.3rd (9th Cir. 2005).

For Federal Fiscal Years 2023-2025, Alaska DOT&PF has established an overall **DBE goal of 10.56%** to be accomplished through the use of race-neutral means.

To establish the race-conscious and race-neutral projections for FFY 2023-2025, Alaska DOT&PF relied primarily on statistical and anecdotal evidence, as well as legal analysis provided in the 2021 Disparity Study. Based on this evidence, the Department will maintain an entirely race-neutral DBE program for airports in the Central and Southcoast Regions and implement an entirely race-neutral DBE program in the Northern Region.

Beginning in FFY 2015, Alaska DOT&PF was directed by FAA to establish overall goals at each of its airports. This was accomplished by addressing each airport on a regional basis, where all airports in each operating region shared the same goal. Alaska DOT&PF has previously attempted to operate its DBE program for FAA on an airport-by-airport basis, and has identified several difficulties with this approach. First, many airports in Alaska have only one, if any, contracts awarded during any given year. In practice, this has the effect of hindering the Department's ability to monitor DBE utilization on an ongoing basis and adjust the measures it uses to meet overall goals. Additionally, as a single recipient of federal-aid airport funds, Alaska DOT&PF operates its rural airports as one statewide aviation system, and administering the DBE program separately for each airport requires resources which could otherwise be used more efficiently to promote DBE utilization across the State of Alaska.

To improve DBE program implementation and accommodate the unique aspects of the Alaska DOT&PF statewide aviation system, the Department proposed establishing a single overall DBE goal representative of the level of DBE participation that could be reasonably expected across all Alaska DOT&PF airports, absent the effects of discrimination.

¹ *Tips for Goal-Setting in the Disadvantaged Business Enterprise (DBE) Program*, U.S. Department of Transportation (Office of Civil Rights, December 22, 2014), <https://www.transportation.gov/osdbu/disadvantaged-business-enterprise/tips-goal-setting-disadvantaged-business-enterprise>.

² MGT Consulting Group, *Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study*, Tallahassee, Florida 2021, Pg. 1

Alaska DOT&PF has implemented a set of measures meant to facilitate DBE participation on its FAA-assisted contracts. The measures include providing business consulting services, technical education, as well as efforts to identify and certify new DBEs. While difficult to quantify, Alaska DOT&PF believes that these measures helped increase DBE utilization in the past, and the Department will continue to expand its race-neutral measures to achieve the overall goal in the upcoming triennial period.

Method

To arrive at a step one base figure that is representative of the relative availability of DBEs ready, willing, and able to perform work on FAA-assisted contracts, Alaska DOT&PF reviewed acceptable methods identified in 49 CFR Part 26 to determine which would yield the most accurate results. Three methods were considered by Alaska DOT&PF, and the summary of findings regarding each method follow.

Use DBE Directories and Census Bureau Data

49 CFR Part 26.45(c) (1) provides for the use of DBE directory and Census Bureau data to determine the base figure for the relative availability of DBEs. This method relies on using the Alaska Unified Certifications Program (AUCP) DBE Directory to determine the number of ready, willing, and able DBEs in the relevant market area. The number of DBEs is expressed as a percentage of the number of all ready, willing, and able businesses in the relevant market area that perform work in the same North American Industry Classifications System (NAICS) codes, as determined by the Census Bureau's County Business Patterns (CBP) database.

This method was disregarded for several reasons. Primarily, this method was found to be a less accurate of measure of DBE availability than the 2021 Disparity Study, as this data is already accounted for in the 2021 Disparity Study's availability analysis. Additionally, this method fails to take into account the availability of firms that could potentially become certified, providing a less accurate estimate of DBE availability.

Use a Bidders List

49 CFR Part 26.45(c) (2) provides for the use of bidders list data to determine the base figure for the relative availability of DBEs. This method relies on determining the number of DBEs that have bid or quoted on the Department's FAA-assisted prime and subcontracts during the previous three years, and expressing this figure relative to the number of all businesses that have bid or quoted on FAA-assisted prime and subcontracts during the same period. If using the bidders' list method, recipients are required to have in place a mechanism to directly capture data on DBE and non-DBE prime and subcontractors that submit bids or quotes on FAA-assisted contracts. In compliance with 49 CFR Part 26.11(c), Alaska DOT&PF maintains a bidders list containing data about the population of DBE and non-DBE contractors and subcontractors who seek to work on its FAA-assisted contracts. Alaska DOT&PF requires that all firms submit a copy of form 25D-6 (Bidder Registration Form) on an annual basis by January 1, before any contract can be awarded to a bidder.

Alaska DOT&PF reviewed the bidders list method and ultimately disregarded it because, similar to using the DBE directory and Census Bureau data method, this method fails to account for the

availability of firms that could potentially become certified, providing a less accurate estimate of DBE availability.

Use Data from a Disparity Study

49 CFR Part 26.45(c) (3) provides for the use of disparity study data to determine the base figure for the relative availability of DBEs. In September 2019, the Department contracted with MGT Consulting Group, LLC, (MGT) to conduct a DBE Availability and Disparity Study Update (2021 Disparity Study). The 2021 Disparity Study examined five years of data and includes construction and professional services procurement activities from October 1, 2014 to September 30, 2019 (FFY2015-FFY2019). MGT analyzed the availability of firms by business type (Construction and Professional Services) for prime contractors, prime consultants, and subcontractors by using the BizTrak vendor list, DBE list, Bidders list, Firm list, and Utilized vendors as the basis for availability database³

MGT used Alaska DOT&PF's BizTrak vendor list, DBE list, Bidders list, Firm list, and Utilized vendors as the basis for the availability database. There is case law where studies estimating availability based on vendor data have been upheld in federal court. 170 Vendor data was extracted from the Alaska DOT&PF's vendor data sets.⁴

It has been noted that many vendor lists are deficient on non-M/WBE participation. To remedy this, MGT supplemented the vendor lists collected using a custom census to ascertain additional vendors that are available to do work for the Alaska DOT&PF. Availability estimates were based on firms represented in the study's custom census. It should be noted that there are deficiencies to Dun & Bradstreet, which include:

- No racial, ethnic, and gender information.
- No indication of whether a firm has a professional license in the state of Alaska.

MGT staff addressed these deficiencies by first pulling the entire universe of firms within the Alaska DOT&PF market areas from Dun & Bradstreet. The sample was limited to firms located in the state of Alaska and identified as providing construction or professional services. Once the sample was pulled, MGT staff cross referenced these firms with a combined directory of firms compiled from the following sources: Alaska DOT&PF UCP list, Alaska DOT&PF Bidders list, Alaska DOT&PF AASHTOWare/BizTrak vendor list, Alaska DOT&PF firm data, Small Business Administration 8(a) list of firms, Afognak Native Corporation, Ahtna, Inc., Arctic Slope Regional Corporation, Bering Straits Native Corporation, Bristol Bay Native Corporation, Calista Corporation, The Aleut Corporation. Once this process was completed, the remaining deficiencies were addressed by conducting a short survey.

Firms were asked:

- Ethnicity, race, and gender information.
- Verify the NAICS code assigned in the Dun & Bradstreet data.

³ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021, Pg. 5-1

⁴ Ibid. Pg. 5-1

After compiling these sources into the Master Vendor Availability Database, MGT verified the business licenses of those firms surveyed by referencing them to the Alaska Department of Commerce, Community, and Economic Development's Division of Corporations, Business, and Professional Licensing database. Those that did not have licenses were deemed not available.

Additionally, vendors that have done work in multiple regions of Alaska and those vendors that have indicated a desire to work in multiple regions are deemed available in those regions. As such a straight aggregation of the raw vendor numbers shown throughout the chapter is not possible as there are overlaps of vendors who are available in multiple regions. The statewide count is a unique or unduplicated count of firms.

Finally, MGT only utilized those vendors that were part of the NAICS procurement codes utilized by the Alaska DOT&PF for construction and professional services.⁵

Alaska DOT&PF found the disparity study method to be the most appropriate and acceptable method for several reasons. First, the 2021 Disparity Study contains the most accurate data concerning the availability of Minority, Women, Disadvantaged Business Enterprises (M/W/DBEs) in the relevant market area. Second, federal regulations allow for using data from disparity studies to calculate the step one base figure, and there is precedent for federal funds recipients using disparity study data for multiple goal cycles⁶. Lastly, the 2021 Disparity Study availability analysis accounts for both certified DBEs and firms that could potentially become certified, consistent with United States Department of Transportation (USDOT) Tips for Goal-Setting in the DBE Program guidance.

The following describes the process used by the Department to establish the proposed overall DBE goal for FFY 2023-2025, and follows the goal setting process outlined in 49 CFR Part 26.45. The process outlined in 49 CFR Part 26.45 can be categorized into three parts:

1. Step One Base Figure
2. Step Two Overall Goal
3. Race-Neutral and Race-Conscious Projections

STEP ONE – BASE FIGURE

Relevant Market Area

For the 2021 Disparity Study, MGT developed a Master Contract Database based on contracts, Professional Services Agreements, and subrecipient data awarded by Alaska DOT&PF airports from October 1, 2014 to September 30, 2019. In identifying the relevant market area, the Department analyzed this data which found that 99.44% of dollars awarded on FAA-assisted contracts were awarded

⁵ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021, Pg. 5-2

⁶ California Department of Transportation FFY 2016 – FFY 2018 DBE Goal Methodology and FHWA approval letter dated 8/28/2015.

to firms located within the geographic boundary of the State of Alaska.⁷ Therefore, Alaska was determined to be the relevant market area.

LOCATION	ALL (\$)	Construction (\$)	Professional Services (\$)
Inside Alaska	\$593,627,985.43	\$553,576,800.62	\$40,051,184.81
Outside Alaska	\$3,370,930.00	\$2,810,600.00	\$560,330.00
TOTAL	\$596,998,915.43	\$556,387,400.62	\$40,611,514.81
LOCATION	ALL (%)	Construction (%)	Professional Services (%)
Inside Alaska	99.44%	99.49%	98.62%
Outside Alaska	0.56%	0.51%	1.38%
TOTAL	100.00%	100.00%	100.00%

Table 1: Market Area Analysis

Availability

To arrive at the Step-One base figure, the Department used data from the 2021 Disparity Study in accordance with 49 CFR Part 26.4 (c)(3) to determine the availability of ready, willing, and able DBEs relative to all businesses ready, willing, and able to participate in FAA-assisted contracts. The Department has established the **Step-One base figure at 10.56%** for all regions.⁸

STEP TWO – ADJUSTMENTS

The Alaska DOT&PF analyzed available evidence to determine what Step-Two adjustments, if any, were needed to arrive at an accurate estimation of the relative availability of DBEs. The following summarizes the evidence that was considered.

Current Capacity of DBEs to Perform FAA-Assisted Work

The Department explored adjusting the base figure to account for past participation and the current capacity of DBEs to perform work on its FAA-assisted contracts. The Master Vendor Availability Database from the 2021 Disparity Study which was used to calculate the Step-One base figures includes DBE firms as ready, willing, and able, by analyzing the following data sources: custom census and Alaska DOT&PF vendor data sets. The custom census ascertained additional vendors that could be available to do work for the Alaska DOT&PF; however, not all of these firms have done work for Alaska DOT&PF.⁹

Considering an adjustment for past participation may achieve a more accurate DBE goal. In the 2021 Disparity Study the median DBE utilization on FAA-assisted projects during the study period is 11.81%. This figure suggests that an adjustment may be necessary based on the current capacity of DBEs to perform on FAA assisted contracts.

⁷ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021. Pg. A-1.

⁸ Ibid. pg. J-3.

⁹ Ibid. Pg. 5-1

Potentially Eligible & Former Firms

Alaska DOT&PF also reviewed the AUCP DBE Directory and compared it with the Master Vendor Availability Database and determined that several DBEs that were included as firms that are ready, willing, and able to perform on Alaska DOT&PF contracts have since been decertified. As several firms have been removed from the program, this may indicate that an adjustment to the base figure could be necessary. However, considering that the 2021 Disparity Study utilized refined availability data based on demonstrable evidence of the availability of ready, willing, and able DBEs relative to all businesses ready, willing, and able to participate in DOT-assisted contracts, Alaska DOT&PF determined that the no adjustment should be made based on changes to the AUCP DBE Directory listing.

Non-Certified Firms

There were M/WBEs that were utilized on Alaska DOT&PF projects (hence, they were available) that were not certified as DBEs. These M/WBEs, if certified, would raise relative DBE availability. However, no comprehensive data was available on how many of these M/WBEs could be certified as DBEs. Alaska DOT&PF does know that several of these M/WBEs, particularly some successful prime contractors, were former DBEs that graduated from the DBE program.¹⁰

"But For" Discrimination

The 2021 Disparity Study provides some evidence of lower rates of entry into and earnings from self-employment for women and minorities. These disparities could be quantified to raise women and minority business availability by the difference between the self-employment rates of nonminority males and other groups. However, no quantifiable data was available to determine what his adjustment should be; therefore, no adjustment to the DBE goal was made for this analysis of "but for" discrimination.¹¹

Other Disparity Studies within the Jurisdiction

Since the previous Disparity Study that was completed in 2014, there have been no other disparity studies conducted in the relevant market area. The original Alaska DOT&PF Disparity Study was completed in 2008.

Financing, Bonding, and Insurance

The 2021 Disparity Study conducted its analysis of financial barriers to minority and women-owned firms based on minority firms' access to credit. This metric was determined with Public Use Microdata Samples (PUMS) and information from a 2018 Small Business Administration (SBA) study.¹² Additionally, MGT conducted a survey of Alaska DOT&PF vendors, and found that 62.96% of firms indicated that access to credit presented a challenge to their business within the last twelve month period.¹³ MGT also noted that of the firms surveyed regarding access to credit, 68.42% were M/W/DBE

¹⁰ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021. Pg. J-4

¹¹ Ibid. Pg. J-4

¹² Ibid. Pg. 6-18

¹³ Ibid. Pg. 6-18

firms, and indicated that the primary reason that their applications were denied was a lack of overall business history.¹⁴

Additionally based on a 2019 Alaska Small Business Survey published by the Alaska Small Business Development Center (SBDC), respondents indicated that the number of successful bank loans declined from previous years by 13%.¹⁵ Additionally, the report observed that in previous years, most businesses (37%) had been able to obtain bank loans. This difference indicates a significant decrease in the overall market's availability for small businesses to obtain bank financing.

The anecdotal analysis from Chapter 7 of the 2021 Disparity Study indicates that 6.47% of 201 vendors surveyed, which were both prime contractors and consultants, identified insurance requirements such as general and professional liability were barriers to bidding on Alaska DOT&PF contracts.¹⁶

The CRO has made efforts through the DBE program to address potential barriers to M/W/DBE firms in Alaska receiving financing, bonding, and insurance. The CRO has conducted trainings and workshops, and provided DBE firms with opportunities to learn from in-state insurance and bonding professionals. These efforts have likely provided some of the certified DBE firms assistance in obtaining these forms of support. However, no quantitative data on the number, and specific kinds of firms that had experienced difficulty obtaining financing, bonding and insurance has been captured. Since there is no reliable quantitative data available to base an adjustment on, no adjustment has been made.

Employment and Self-Employment Analysis

MGT's study conducted a multivariate regression analysis of Public Use Microdata Samples (PUMS) derived from the 2012 U.S. Census Bureau's Survey of Business Owners (SBO) data.¹⁷ This analysis attempts to determine if:

- Racial, ethnic, and gender minority groups are less likely than non-minority males to be self-employed
- Racial, ethnic, and gender status have an impact on individuals' earnings
- Racial, ethnic, and gender discrimination influence the probability of being self-employed

The 2021 Disparity Study analysis indicates that, based on the variables, minorities were less likely to be self-employed.¹⁸

The statistical evidence presented in the study demonstrates that a self-employment and self-employment earnings disparity exists between minority and women owned businesses in the market area.¹⁹ These indices of disparate opportunity are consistent with presumed levels of discrimination in

¹⁴ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021Pg. 6-23

¹⁵ Unknown. *2019 Alaska Small Business Survey Report*, Alaska Small Business Development Center (UAA Business Enterprise Institute, March 11, 2020), <https://aksbdc.org/2020/03/2019-alaska-small-business-survey-report/>.

¹⁶ Ibid. Pg. 7-8

¹⁷ Ibid. Pg. 6-2

¹⁸ Ibid. Pg. 6-11, 6-12

¹⁹ Ibid. Pg. 6-11, 6-12

the private sector. These indices were also observed in the previous Disparity Study from 2014. Based on data presented in the 2021 Disparity Study, Alaska DOT&PF concludes that an adjustment may be necessary, but the data does not present uniform statistical findings throughout all minority categories that will allow for an accurate calculation of the potential adjustment. For this reason, Alaska DOT&PF will not make an adjustment to the proposed DBE Goal based on this information.

Barriers to Doing Business with Alaska DOT&PF

In the 2021 Disparity Study, MGT conducted surveys and interviews with a random sample of 565 business owners and representatives of firms having done business with, or attempted to do business with, the Alaska DOT&PF. The combined results of the surveys, public meetings, focus groups, and in-depth interviews provides the anecdotal data addressed in this section. During the collection of the anecdotal data, 201 firms responded to survey questions about Alaska DOT&PF’s procurement process, and perspectives about working with, or attempting to obtain work with, firms on Alaska DOT&PF contracts.

The 2021 Disparity Study found that across both prime and subcontractors, the major areas of concern were being able to compete with large firms. Additionally, both 10.95% of prime, and 11.24% of subcontractors M/W/DBE respondents indicated that, “slow or non-payment for project work” was the most significant barrier to doing business with Alaska DOT&PF.²⁰ Prime contractors also indicated that “unnecessarily” restrictive contract specifications and narrow bidding windows to prepare bids or quotes presented barriers.

Subcontractors also identified that overall contracts were too large (11.24%), and that an informal network of primes and subcontractors excluded some individual companies from doing work on Alaska DOT&PF projects (11.24%).²¹

Discrimination and Disparate Treatment

Anecdotal data collected by MGT through the survey, in-depth interviews, and public meetings indicated discriminatory practices as indicated below:

	By Alaska DOT&PF	By Primes	Private Sector
M/W/DBE Primes	3.48%		
Non-M/W/DBE Primes	3.17%		
M/W/DBE Subcontractors		6.74%	
Non-M/W/DBE Subcontractors		5.26%	

²⁰ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021. Pg. 7-8, 7-9

²¹ Ibid. Pg. 7-9

M/W/DBE Firms			12.20%
Non-M/W/DBE Firms			9.94%

Table 2: Discrimination by M/W/DBE Status²²

Further, the study indicated that 59.55% of M/W/DBE respondents reported that they were “seldom or never” solicited for work when contracts did not have a set DBE utilization goal.²³ Additionally, 6.5% of M/W/DBE respondents said that there was unequal or unfair treatment within the private sector. Another 4.49% of respondents said that they had either experienced or been witness to situations where M/W/DBE firms were only consulted to satisfy Alaska DOT&PF contract requirements. The same percentage (4.49%) of respondents also stated that prime contractors had double standards for performance of M/W/DBEs.²⁴ While a large percentage of M/W/DBE survey respondents said that they would not be utilized in the absence of DBE goals, the statistical data indicated that there generally was utilization of M/W/DBE subcontractors in construction and on PSAs in the absence of goals.²⁵

Summary of Step-Two Considerations

Alaska DOT&PF considered the previously discussed evidence in its entirety to determine what, if any, Step-Two adjustments were necessary to arrive at an overall DBE goal that accurately reflects the relative availability of DBEs ready, willing, and able to perform work on FAA-assisted contracts. Challenges related to encouraging non-certified firms to become certified and the removal of some DBE firms from the program are factors indicating that an adjustment to the Step-One base figure could be necessary. Additionally, the median past participation of 11.81% indicates that an adjustment to the Step-One base figure may be necessary. Considering both the reduction in firms and the median past participation, and the fact that the 2021 Disparity Study utilized refined availability data, Alaska DOT&PF determined that no Step-Two adjustments are warranted.

Race-Neutral / Race-Conscious Goals

Alaska DOT&PF proposes an overall DBE goal of 10.56% for FFY 2023-2025. The following evidence was considered in establishing the Department’s projections for the portions of the goal to be met through race-conscious and race-neutral means.

As study results demonstrate, there are both quantitative and anecdotal reasons to address the issue of disparate or discriminatory conditions in the marketplace. In creating this Goal Methodology, Alaska DOT&PF considered all of the relevant evidence presented, and applied the standards of strict scrutiny and narrow tailoring in its DBE goal setting process. The 2021 Disparity Study concluded that based on the level of non-goal M/W/DBE subcontractor participation, the statistical analysis in the study did not

²² MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021 ‘Table 7-6.’ Pg. 7-11

²³ Ibid. Pg. 7-11

²⁴ Ibid. Pg. 7-12

²⁵ Ibid. Pg. 8-5

provide, “a strong factual predicate for across-the-board race- and gender-conscious DBE subcontractor goals or setting a race-conscious component of the annual DBE goal.”²⁶

The 2021 Disparity Study includes disparity analysis of construction prime contractors and subcontractors, by business ownership classification for M/W/DBE firms on FAA-assisted projects. This data shows overall, M/W/DBE firms with a disparity index of 94.49 were underutilized on FAA-assisted construction projects but this disparity index does not indicate a substantial level of disparity. The disparity is based on the racial, ethnic, and gender classification regardless of DBE certification status. The disparity analysis indicates that four ethnicities were utilized at a substantial level of disparity, which is a disparity index below 80.00.²⁷ While disparity was observed throughout the business categories and ethnicities, it was not statistically sufficient in all ethnicities to warrant a specific ethnicity/gender program. For example, in construction Alaska Native Corporations, Alaska Tribal Corporations, and Hispanic Americans were either overutilized or not utilized at all, and as such there would be no need to have a specific ethnicity/gender program.²⁸

Under 49 CFR 26.51, recipients are directed to meet the maximum feasible portion of the overall goal by using race/gender-neutral means. Additionally, the 9th Circuit Court’s decision in *Western States Paving v. Washington State* held that application of a race-conscious component of a program must be narrowly tailored, and be limited to an area that race-based corrective measures are instituted to account for clear discrimination (strict scrutiny).²⁹ Further, the Court recognized that even in jurisdictions absent discrimination, the overall proportionality of work DBE firms could be expected to participate in would be less than in an area where race and gender requirements are established, because the implementation of those requirements effectively create a competitive advantage for DBE firms.

In the 2021 Disparity Study, a significant percentage of anecdotal survey respondents indicated that M/W/DBE firms would not be utilized in the absence of DBE goals. Statistical data from the 2021 Disparity Study indicates that even in the absence of DBE goals, there was still utilization of M/W/DBE subcontractors on construction and PSA contracts. In fact M/W/DBEs received 16.03 percent of the dollars awarded on projects with DBE goals compared to 18.11 percent of the dollars awarded on projects with no DBE goals.³⁰

The 2021 Disparity Study found that while a large percentage of M/W/DBE survey respondents said that they would not be utilized in the absence of DBE goals, the statistical data indicated that there generally was utilization of M/W/DBE subcontractors in construction and on PSAs in the absence of goals. For this reason the 2021 Disparity Study recommended that Alaska DOT&PF should continue to consider the use of aspirational subcontractor project goals for selected groups in regions where there is very low

²⁶ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021. Pg. 8-4.

²⁷ Ibid. Appendix A, Pg. A-13

²⁸ Ibid. Pg. 5-9

²⁹ *Western States Paving v. Washington State Department of Transportation et al.*, United States Court of Appeals, Ninth Circuit, 2005. 407 F 3d, Pg. 1000.

³⁰ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021. Pg. 6-13.

DBE subcontractor utilization. These project goals are called aspirational because Alaska DOT&PF sets the aspirational DBE project goals on projects in a similar fashion as race-conscious DBE goals, with one difference: bids are not rejected for failure to meet the DBE project goal, or for failure to submit good faith efforts documentation.³¹ The Alaska DOT&PF currently sets aspirational goals on most projects, and will continue to do so through the DBE goal period of FFY 2023-2025.

Alaska DOT&PF analyzed the DBE utilization data³² used in the 2021 Disparity study to determine the past participation of DBE prime contractors. The total dollars awarded on FAA-assisted construction and PSA contracts during the study period of 2015-2019 was \$596,998,915.43³³ and of that \$34,802,466.50 or 5.83% of was awarded to DBE prime contractors. Of the five DBE firms that make up these DBE primes, three are Alaska Native Corporation (ANC) owned. In September of 2016, the USDOT issued guidance that clarified how ANC-owned firms can qualify for DBE certification under the special rules 49 CFR 26.73(i). The result of this guidance was an increase of ANC-owned firms becoming DBE certified. Alaska DOT&PF expects participation in the DBE program by ANC-owned firms to continue to progressively increase as these firms continue to recognize business opportunities presented by FAA-assisted projects. Based on the evidence ANC-owned firms participate as DBE prime contractors; therefore, Alaska DOT&PF expects to continue to see participation from DBE prime contractors at similar or higher levels during this goal period.

In consideration of the available evidence, including the level of non-goal M/W/DBE subcontractor participation, the 2021 Disparity Study's legal, statistical, and disparity analyses, Alaska DOT&PF found that the available evidence did not provide a strong factual predicate for setting a race-conscious component of the triennial DBE goal. Alaska DOT&PF proposes to transition to a completely race neutral program with a **DBE goal of 10.56% through entirely race-neutral means.**

Race-Neutral Measures

Alaska DOT&PF recognizes that moving to a 100% race-neutral program constitutes a shift in policy, and has prepared changes to its race-neutral program. As more DBE participation data for FAA-assisted contracts let by Alaska DOT&PF becomes available, future modifications to the race-conscious/race-neutral split of the overall goal may be necessary.

The following describes DOT&PF's race-neutral efforts and is broken out into two sections. The first section describes new initiatives to encourage DBE participation, some of which are made possible by redirecting resources currently used to implement Alaska DOT&PF's race-conscious program. The second section illustrates the race-neutral efforts of Alaska DOT&PF's current program, which the Department will continue to implement moving forward.

³¹ MGT Consulting Group, Alaska DOT&PF Disadvantaged Business Enterprise Disparity Study, Tallahassee, Florida 2021. Pg. 8-4, and 8-5.

³² Ibid. Pg. 4-4

³³ Ibid. Appendix Pg. A-1

New Initiatives

In transitioning to a race-neutral program, DOT&PF CRO has taken steps to strengthen its race-neutral efforts in order to continue facilitating DBE participation absent the use of race-conscious project goals.

Alaska DOT&PF has been implementing an entirely race-neutral DBE program for airports in the Central and Southcoast Regions and through this has realized some additional actions that can be taken and we will be implementing the following measures:

Community Outreach and Events: The DBELO and DBE Supportive Services office will attend as many community events as possible that are likely to yield participation from small businesses and potential DBEs, and use these events to promote contracting opportunities at the Alaska DOT&PF. Events such as: Juneteenth Celebration, Make-It Monday Forum, procurement events hosted by Alaska PTAC, Small Business Outreach events hosted by SBDC and SBA, attending Resource Partnership Meetings with Business Partners, and events hosted by our contractors and partners like Alaska Works and AGC.

Post Award Conference: The CRO organizes and facilitates post award conferences for rural Alaska DOT&PF airport projects, which is included as a Statewide Airport Special Provision and was recently updated in March 2023. The post award conference is a public meeting held in the community of the project location. The Contractor attends the post award conference and presents information together with the Department to the community. The conference is scheduled in cooperation with the local community and other participants. The following minimum information at the post award conference:

- 1) Overview of the project
- 2) Project timeline
- 3) Project impacts on the community
- 4) Project job numbers and types of employees.
- 5) Contractor's employment opportunities and hiring process
- 6) DBE Program Overview

Continued Efforts

Alaska DOT&PF has a broad range of race-neutral measures already in place to encourage the participation of all small businesses on its FAA-assisted contracts. Alaska DOT&PF policies and procedures seek to facilitate small business participation and nondiscrimination in its FAA-assisted contracts let by the Department. It is Alaska DOT&PF's policy to ensure nondiscrimination in the award and administration of USDOT-assisted contracts. In addition, Alaska statutes address issues of prompt payment between both the Department and prime contractors, as well as between prime contractors and subcontractors for contracts let by the Department. The Alaska DOT&PF DBE is currently implementing the following measures:

Aspirational Subcontractor Project Goals: The Alaska DOT&PF has been setting aspirational project goals for FAA-assisted contracts for airports in the Central and Southcoast Regions since 2015 in the same manner that it currently sets race-conscious project goal. This benefits the DBE program in several ways by allowing Alaska DOT&PF to gauge the actual level of DBE participation on its FAA-assisted

contracts versus the amount that would be expected based on current CRO goal setting processes. Additionally, setting aspirational project goals will allow the CRO to maintain its current infrastructure in the event that conditions warrant implementing a race-conscious element of the overall DBE goal.

Supportive Services and Training: Through the CRO Office of Support Services, DOT&PF seeks to improve business and economic opportunities for small businesses through providing firms with training classes and technical education. Workshops and training are frequently offered by the CRO Office of Support Services free of charge to certified DBE firms. These trainings cover a diverse range of topics, not limited to: Construction Law, Bonding, Marketing and Advertising, Human Resource Management, Joint Ventures, DOT&PF Procurement, Government Contracting, and Contract Law.

Administrative Support: Administrative support strategies include measures taken to facilitate DBE participation through adjustments in policy or by establishing initiatives. The Alaska DOT&PF has taken steps to provide administrative support to DBEs wherever it is feasible to do so. The result of these efforts is the Plan Holders Self Registration List (PHSRL) In February of 2013, the CRO initiated the development of the DBE Stakeholders Committee, composed of DBEs, Prime Contractors, and the Associated General Contractors of Alaska. The objectives of the committee were to create an online portal to connect primes & DBEs, increase DBE participation, foster open communication, improve procurement opportunities for DBEs, and improve the GFE process.

The result of the committee's efforts is the PHSRL which is an online portal that allows DBEs, SBEs, and non-DBE subcontractors to self-register as interested primes, subcontractors and consultants on all Alaska DOT&PF projects. The PHSRL gives prime contractors access to all subcontractors who are interested in participating on a project, and benefits DBEs by allowing firms to express interest in individual projects. The PHSRL gives DBEs access to Online Public Notices, whereby firms receive automatic email notifications that will notify them of upcoming projects. Additionally, this allows DBEs to sign up for non-federally funded projects, thereby increasing their business opportunities to participate in State funded projects.

Since the PHSRL was implemented, the CRO has performed outreach to raise awareness of the PHSRL, and provides assistance wherever possible to ensure that firms that are interested in bidding are able to access the platform.

Marketing and Outreach: Marketing and outreach refers to efforts taken to market and publicize the DBE program, as well as outreach efforts to connect with DBEs and potential DBEs. The CRO performs many types of outreach in the form of creating and maintaining a DBE Directory, hosting statewide outreach initiatives, publishing newsletters, by maintaining the CRO website, and through:

- 1) The Transporter

The CRO Office of Support Services publishes a quarterly newsletter, The Transporter, to communicate DBE program news, upcoming events, and any other important news concerning DBE firms. The

newsletter is made available on the CRO website, and is also emailed to prime contractors, industry stakeholders, and all DBE firms.

2) Facilitating Meetings and Networking between DBEs and Prime Contractors

Throughout the year, the CRO Office of Support Services hosts networking opportunities for DBEs to connect them with government procurement offices, prime contractors, other DBEs, and private industry through the Future Connections Program which is an outreach strategy coordinated with industry partners to introduce DBEs to prime contractors and government agencies. As well through the Annual DBE and Small Business Subcontractor Conference, which serves as an opportunity for DBEs to network, receive the latest information about the DBE program, receive quality training, and learn about business resources.

Financial Assistance Strategies: Several loan programs are available to small businesses in the State of Alaska, including:

1) The DBE Reimbursement Program

The DBE Reimbursement Program is offered through the CRO Office of Support Services. Through this program, DBE firms may receive assistance to cover the costs of training or consultation and/or association fees/dues that enhance the management skills or expertise of the DBE. A 50% reimbursement program is available to individuals of qualifying DBE firms. Under this program firms may be reimbursed for 50% tuition or other costs (up to \$2,500.00 per calendar year) for business or technical training, workshops, consulting services, and professional association fees/dues. Small Business Development Center core classes are reimbursed at 90% through the program.

2) Short Term Lending Program (STLP)

The STLP is a program facilitated by USDOT which provides access to working capital through revolving lines of credit guaranteed by the STLP. These lines of credit can be used for transportation-related contracts with the accounts receivables for these contracts constituting the collateral.

3) Micro Loan Fund

The Alaska Division of Economic Development has provided a Micro Loan Fund for secured loans up to \$35,000.00 for one individual over six years. These loans can be used for working capital, equipment, construction, or other commercial purposes for Alaska Businesses.

4) 504 Loan Program and 7(a) Loan Guarantee Program

Small businesses can also take advantage of the U.S. Small Business Administration 504 Loan Program and 7(a) Loan Guarantee Program.

5) Kenai Peninsula Economic Development District

The Kenai Peninsula Economic Development District also has provided a revolving loan fund for loans between \$5,000.00 and \$50,000.00, as well as a micro loan fund for loans between \$1,000.00 and \$25,000.00.

Public Participation & Consultation

Pursuant to 49 CFR Part 26.45, Alaska DOT&PF conducted outreach to obtain public comment. Outreach efforts included participation in a public comment period on the initially proposed goal methodology during the period from March 17, 2023, to April 17, 2023. Public comment was solicited via mail, e-mail, live video, social media, and a teleconference held on April 7, 2023. On March 17, 2023 The CRO published a public notice advisory with a link to the proposed goal methodology, and a notice of the online public comment period was posted to the State of Alaska Online Public Notices web portal. On March 17, 2023, and again on April 4, 2023, the CRO emailed notifications of the public comment period for the Goal Methodology to DBE, non-DBE, and the following key stakeholder organizations:

- Associated General Contractors of Alaska (AGC)
- Minority Business Development Agency (MBDA)
- Procurement Technical Assistance Center (PTAC)
- Alaska Chambers of Commerce
- The Federation of Community Councils
- Alaska Small Business Development Center (SBDC)
- U.S. Small Business Administration (SBA)

The CRO received no written comments during the period of March 17, 2023- April 17, 2023. The majority of comments were received during the teleconference held on April 7, 2023. The following is a summary of the questions and comments from this event:

A representative of the city of Sitka asked for further explanation of Step Two and the chart contained within it.

We responded by further explaining each of the categories of evidence that were considered, and how and why those decisions were arrived at. We described the chart in terms of how the data was collected for the 2021 Disparity Study and then applied it in statistical measures.

The same attendee inquired about how this goal methodology could potentially be applied to the city of Sitka's airport if approved.

Further discussion is needed on this topic, and information about 49 CFR 26.45 was provided along with contact information for another municipality so they could potentially share information about what is required and how to accomplish it.

Upon review, Alaska DOT&PF determined that revisions to the Goal Methodology were not required.

Alaska DOT&PF FAA FFY 2023-2025 DBE Goal Methodology

Projected Alaska DOT&PF Airport Projects for FFY2023-2024

Project	Amount	Type	Region
FFY 2023			
Taxiway K & Taxilane E Apron Rehabilitation	\$3,500,000.00	Construction	CR
Taxiway Zulu West Improvements Pymt 1 (Total \$66.2M)	\$66,200,000.00	Construction	CR
Security Fencing Improvements (RW 15 to Pt Woronzof)	\$500,000.00	Construction	CR
Equipment 2023	\$3,998,205.00	Equipment	CR
Master Plan Update Phase 2	\$1,434,516.50	PSA	CR
ANC Water Main Improvements	\$14,517,347.00	Construction	CR
ANC Passenger Boarding Bridge N7	\$4,427,975.00	Construction	CR
ANC RON 3 and 4 Rehabilitation	\$3,200,000.00	Construction	CR
Kilo Tug Road Reconstruction	\$3,500,000.00	Construction	CR
Visual Paging System Installation (ADA)	\$2,099,966.00	Design/Build	CR
LHD Aircraft Drive and Lakeshore Drive Repairs (using rolled PE for 2019-2022)	\$3,300,000.00	Construction	CR
NT CBP Level 1 Improvements (moved to 2023)	\$1,536,000.00	Construction	CR
PFAS Site Investigations	\$908,000.00	PSA	CR
Annual Improvements	\$939,437.00	Construction	CR
Environmental Projects	\$130,477.00	PSA	CR
Information Technology Improvements	\$1,252,582.00	PSA	CR
Facility Improvements, Renovations and Upgrades	\$1,435,251.00	Construction	CR
Advanced Project Design and Planning	\$743,721.00	PSA	CR
Airport Roadway Improvements 2023 (Postmark Drive (FedEx to N Lights Blvd)	\$1,500,000.00	Construction	CR
Homer Airport Improvements - NTP 1 & 3	\$34,485,900.00	Construction	CR
Homer Airport Improvements - NTP 2	\$10,230,000.00	Construction	CR
Kongiganak Airport Rehabilitation	\$25,296,357.00	Construction	CR
Kwethluk Airport Rehabilitation Project	\$36,020,906.00	Construction	CR
Mekoryuk SRE Building Replacement	\$5,936,250.00	Construction	CR
Mekoryuk Rehabilitation	\$29,628,750.00	Construction	CR
Scammon Bay Airport Relocation Feasibility Study	\$609,375.00	PSA	CR
Sleetmute Airport Runway Resurfacing	\$8,378,299.00	Construction	CR
Rehabilitation GA Apron and TW	\$15,000,000.00	Construction	NR
SRE 2023	\$1,600,000.00	Equipment	NR
Surface Seal Pavement 2023	\$300,000.00	Construction	NR
FAI Security Fencing Improvements 2023	\$400,000.00	Construction	NR
Baggage Handling System (BHS) Upgrades	\$200,000.00	Construction	NR
FAI Advanced Project Design and Planning	\$32,619.00	PSA	NR
FAI Annual Improvements	\$358,813.00	Construction	NR
FAI Environmental Assessment and Cleanup	\$225,102.00	PSA	NR
FAI Facility Improvement, Renovations, & Upgrades	\$130,477.32	Construction	NR

Alaska DOT&PF FAA FFY 2023-2025 DBE Goal Methodology

FAI Information Technology Improvements	\$112,551.00	PSA	NR
FAI Airfield and Roadway Pavement Reconstruction & Maintenance	\$0.00	Construction	NR
FAI Safety and Security Improvements	\$0.00	Construction	NR
Chalkyitsik Airport Improvements	\$14,109,375.00	Construction	NR
Chalkyitsik Airport Improvements	\$14,109,375.00	Construction	NR
Little Diomed Helipad Improvements	\$5,906,250.00	Construction	NR
Kaltag Airport Improvements - Stage 2 & Stage 3	\$557,215.00	Construction	NR
Marshall Airport Improvements	\$15,000,000.00	Construction	NR
St Mary's Airport Improvements	\$15,717,573.00	Construction	NR
Chignik SREB Replacement	\$1,081,781.00	Construction	SC
Haines ALP Update and Narrative	\$515,625.00	PSA	SC
Sitka Terminal Building Modifications	\$15,001,791.00	Construction	SC
Wrangell Gate Replacement & Security Upgrades	\$2,952,903.00	Construction	SC

FFY 2024

NT Northside Aprons & TL Reconstruction Pymt 1 (\$20.9M Est)	\$20,900,000.00	Construction	CR
TW R North Rehabilitation Pymt 1 (\$17.9M)	\$17,905,000.00	Construction	CR
TL U Improvements	\$2,100,000.00	Construction	CR
Equipment 2024	\$4,500,000.00	equipment	CR
Noise Update Study	\$2,500,000.00	PSA	CR
Sand and Chemical Storage Facility Renewal	\$2,500,000.00	Construction	CR
Terminal Boarding Bridges Upgrades	\$9,685,506.00	Construction	CR
Taxiway K / R Intersection Joint Repairs (use APR&M)	\$600,000.00	Construction	CR
Reconfigure NT CBP Operation (moved from 2022)	\$1,536,000.00	Construction	CR
Watch/Alarm Room relocation (dispatch)	\$5,000,000.00	Construction	CR
Annual Improvements	\$2,468,230.00	Construction	CR
Environmental Projects	\$200,000.00	PSA	CR
Information Technology Improvements	\$2,000,000.00	PSA	CR
Facility Improvements, Renovations and Upgrades	\$2,673,419.00	Construction	CR
Advanced Project Design and Planning	\$1,500,000.00	PSA	CR
Chenega Airport Lighting Improvements	\$3,727,687.00	Construction	CR
Chevak Airport Improvements	\$24,357,187.00	Construction	CR
Homer Airport Master Plan Update	\$703,125.00	PSA	CR
Napakiak Feasibility Study (Phase I)	\$611,000.00	PSA	CR
Nightmute Airport Rehabilitation	\$22,397,812.00	Construction	CR
Seward SREB and Sand Storage Building	\$4,253,230.00	Construction	CR
Talkeetna Airport Lighting Improvements	\$3,778,875.00	Construction	CR
Passenger Boarding Bridge (PBB) Replacement 5 and Replacement 6	\$3,000,000.00	Construction	NR
Construct Hardstands at Gates A & B	\$3,500,000.00	Construction	NR
Rehabilitate South Deicing Basin	\$3,000,000.00	Construction	NR

Alaska DOT&PF FAA FFY 2023-2025 DBE Goal Methodology

Wetlands Management Plan	\$300,000.00	PSA	NR
Master Plan Update	\$1,942,869.00	PSA	NR
SRE 2024	\$1,875,000.00	Equipment	NR
Surface Seal Pavement 2024	\$300,000.00	Construction	NR
FAI Security/Perimeter Fencing Improvements 2024	\$400,000.00	Construction	NR
Taxiway A Lighting Rehabilitation	\$1,500,000.00	Construction	NR
FAI Advanced Project Design and Planning	\$200,000.00	PSA	NR
FAI Annual Improvements	\$369,577.00	Construction	NR
FAI Environmental Assessment and Cleanup	\$300,000.00	PSA	NR
FAI Facility Improvement, Renovations, & Upgrades	\$300,000.00	Construction	NR
FAI Information Technology Improvements	\$115,928.00	PSA	NR
FAI Airfield and Roadway Pavement Reconstruction & Maintenance	\$250,000.00	Construction	NR
FAI Safety and Security Improvements	\$100,000.00	Construction	NR
Buckland Airport Improvements	\$10,312,500.00	Construction	NR
Deering Airport and Access Road Improvements	\$25,500,000.00	Construction	NR
Mountain Village SRE Building Replacement	\$2,331,250.00	Construction	NR
Kotzebue Crosswind Runway Improvements	\$8,718,750.00	Construction	NR
Valdez SREB and Deicing Buildings Replacement	\$14,859,187.00	Construction	NR
Buckland Airport Improvements	\$10,312,500.00	Construction	NR
Deadhorse Perimeter Fence, Drainage & Access Road	\$27,600,000.00	Construction	NR
False Pass SREB	\$3,984,375.00	Construction	SC
Hydaburg Seaplane Facility Replacement	\$5,625,000.00	Construction	SC
Ketchikan Seaplane Ramp Relocation and Floats Removal	\$2,343,750.00	Construction	SC
Ketchikan Terminal Area Expansion Phase A	\$8,514,933.00	Construction	SC
Sitka Terminal Building Modifications	\$4,764,896.00	Construction	SC
Unalaska Apron & Taxiway Pavement Rehabilitation	\$8,651,713.00	Construction	SC
Yakutat Automated Wildlife Detection System	\$2,214,023.00	Construction	SC

FFY 2025

RON 2 Joint Repairs	\$900,000.00	Construction	CR
Taxilane E Improvements	\$14,978,000.00	Construction	CR
Equipment 2025	\$4,815,000.00	Equipment	CR
Improve Airport Drainage (Outfall D)	\$6,139,471.00	Construction	CR
TW Zulu West Extension Phase 1 (TW R-H) NTP 1	\$40,100,000.00	Construction	CR
TSA Passenger Screening Expansion	\$20,000,000.00	Construction	CR
Airport Sustainability Plan	\$2,848,678.00	PSA	CR
7R Concrete Keel Joints (use APR&M)	\$1,000,000.00	Construction	CR
Annual Improvements	\$2,641,006.10	Construction	CR
Environmental Projects	\$214,000.00	PSA	CR
Information Technology Improvements	\$2,140,000.00	PSA	CR
Facility Improvements, Renovations and Upgrades	\$2,860,558.33	Construction	CR

Alaska DOT&PF FAA FFY 2023-2025 DBE Goal Methodology

Advanced Project Design and Planning	\$1,605,000.00	PSA	CR
Bethel Taxiway, Apron, Fencing Improvements, and Service Road	\$18,750,000.00	Construction	CR
Hope Master Plan (ALP update only)	\$590,625.00	PSA	CR
Kwigillingok Airport improvements	\$26,024,062.00	Construction	CR
Scammon Bay Airport Relocation Reconnaissance Study (Phase II)	\$703,125.00	Construction	CR
Takotna Airport Improvements	\$12,602,812.00	Construction	CR
Tununak Airport Rehabilitation	\$15,366,563.00	Construction	CR
Reconstruct / Expand AFM Building	\$40,000,000.00	Construction	NR
SRE 2025	\$1,800,000.00	Equipment	NR
Surface Seal Pavement 2025	\$300,000.00	Construction	NR
FAI Security/Perimeter Fencing Improvements 2025	\$400,000.00	Construction	NR
Float Pond Study (Does not qualify. LHD is separate. What about East Ramp?)	\$500,000.00	PSA	NR
Rehabilitation of Tower Base Bldg (Elec, HVAC, roofing upgrades and ENV mitigation)	\$1,000,000.00	Construction	NR
FAI Advanced Project Design and Planning	\$206,000.00	PSA	NR
FAI Annual Improvements	\$380,665.00	Construction	NR
FAI Environmental Assessment and Cleanup	\$309,000.00	PSA	NR
FAI Facility Improvement, Renovations, & Upgrades	\$309,000.00	Construction	NR
FAI Information Technology Improvements	\$119,405.00	PSA	NR
FAI Airfield and Roadway Pavement Reconstruction & Maintenance	\$257,500.00	Construction	NR
FAI Safety and Security Improvements	\$103,000.00	Construction	NR
Deadhorse Perimeter Fence, Drainage & Access Road	\$27,600,000.00	Construction	NR
Gambell SREB Replacement	\$2,375,000.00	Construction	NR
Cordova Runway Rehabilitation	\$39,615,000.00	Construction	NR
Cordova Airport ARFF Building	\$29,758,750.00	Construction	NR
Ketchikan Terminal Area Expansion Phase A	\$10,000,000.00	Construction	SC
King Salmon SREB	\$15,960,000.00	Construction	SC
Kodiak Airport Drainage & Ramp Repave	\$33,684,375.00	Construction	SC
Kokhanok Resurfacing and Fencing	\$6,468,750.00	Construction	SC
Murphy's Pullout SPB Expansion	\$6,937,500.00	Construction	SC
Sitka Terminal Building Modifications	\$9,604,051.00	Construction	SC
Haines Repaving, Drainage, and Lighting	\$24,609,375.00	Construction	SC
Murphy's Pullout SPB Expansion	\$6,937,500.00	Construction	SC