

Placer County Department of Public Works – Transit
Overall DBE Goal & Methodology – FY 2019 thru 2021

Placer County Transit has established an overall 3-year (triennial) Disadvantaged Business Enterprise goal (DBE) as required by the Federal Transit Administration. It will be applicable to U.S. Department of Transportation (Transit) contracting opportunities (excluding the purchase of transit vehicles) that may be awarded during the fiscal years of 2019 – 2021 with an effective date of October 1, 2018 through September 30, 2021. Placer County proposed an overall 3-year goal of 3.28%. In accordance with Title 49 CFR Part 26 (Section 26.45), Placer County based its goal and methodology on an analysis of ready, willing and able firms that were available to bid on FTA-assisted contracts for the 3-year goal period. The County used data from the Census Bureau, County Business Patterns (CBP), California Unified Certification Program (CUCP), and the North American Industry Classification System (NAICS).

STEP 1: Determining the Base Figure - 49 CFR Section 26.45(c)

Placer County began the process by determining which projects may be awarded during the proposed 3-year goal period along with the possible contracting opportunities represented by the corresponding NAICS Codes.

NAICS CODE	PROJECT DESCRIPTION	AMOUNT OF DOT FUNDS
237120	CNG Imprv. TART – Fueling Station Install	100,000
423830	CNG Imprv. TART – Fueling Station Equip	436,941
532490	CNG Improvements TART – Equip Rental	10,000
	TOTALS BY NAICS	\$546,941

Our local market area consists of Placer County along with 10 surrounding counties in our local geographic area (defined as counties within Caltrans District 3). This represents the areas where most of our contracting dollars are spent and where most contractors and subcontractors are located.

The base figure was determined by dividing the number of ready, willing and able DBE firms that corresponded to the NAICS codes and work category codes for the upcoming projects.

$$\text{BASE Figure} = \frac{\text{Number of ready, willing and able DBEs}}{\text{Number of ALL ready, willing and able firms}} \times \text{weight} \times 100$$

- Numerator data came from: California Unified Certification Program (CUCP) as of 5/8/18
- Denominator data came from: 2015 Census Bureau Data, County Business Patterns (CBP)

	NAICS Code	Project	Number of DBEs avail to perform this work	Number of all firms available (including DBEs)	Relative Availability
1)	237120	CNG Imprv. TART – Fueling Station Install	17	106	0.16038
2)	423830	CNG Imprv. TART – Fueling Station Equip	12	2813	0.00427
3)	532490	CNG Improvements – Equip Rental	6	1272	0.00472
Combined Totals			35 <i>(numerator)</i>	4191 <i>(denominator)</i>	0.0084

The resulting data was “weighted” on a project-by-project basis from the 3-yr anticipated budget, then considered the DBE availability relative to our anticipated contracting opportunities.

The table below shows the first part of the weighting process; the project dollars divided by the total FTA-assisted contract funds.

	NAICS Code	Project	Amount of DOT funds on project:	% of total DOT funds (weight)
1)	237120	CNG Imprv. TART – Fueling Station Install	100,000	0.18284
2)	423830	CNG Imprv. TART – Fueling Station Equip	436,941	0.79888
3)	532490	CNG Improvements – Equip Rental	10,000	0.01828
Total FTA-Assisted Contract Funds			\$546,941	1

The table below completes the weighting process and determines the final 3-year DBE goal for Transit projects.

(Weight) x (Availability) = Weighted Base Figure

	NAICS Codes	Project	Weight	x	Availability	Weighted Base Figure
1)	237120	CNG Imprv. TART – Fueling Station Install	0.18284	X	0.16038	0.0293
2)	423830	CNG Imprv. TART – Fueling Station Equip	0.79888	x	0.00427	0.0034
3)	532490	CNG Improvements – Equip Rental	0.01828	x	0.00472	0.0001
					Total	0.0328
					Expressed as a % (*100)	3.28%

STEP 2: Determining if an Adjustment is Necessary - 49 CFR Section 26.45(d)

After calculating and determining the base figure of the relative availability of DBEs and in order to reflect as accurately as possible the DBE participation we would expect in the absence of discrimination, we did not adjust our overall goal.

We reviewed our prior three years of Uniform Reports of DBE Commitment/Award and Payments to determine that we only had one fiscal year that had any DBE participation. This was due to only having one FTA contract issued during the past three year triennial goal period (2016 – 2018).

We have reviewed the Executive Summary of the Caltrans 2014 Disparity Study for FTA Contracts which exhibited substantial disparity among most of the DBE groups which further explains the County's decision not to adjust the goal.

We determined that no adjustment should be made based on these facts.

PROPOSED OVERALL 3-YEAR DBE GOAL:

The final proposed goal for the Fiscal years of 2019 – 2021 (October 1, 2018 through September 30, 2021) is **3.28%**.

Race-Conscious and Race-Neutral – 49 CFR Section 26.51(c)

Placer County has determined that race-conscious means will be used to achieve all of the goal since we have very little participation in the prior 3-year goal period to use for analysis. Therefore we must not proportion any of the goal to race-neutral means. In reviewing the proposed project for this triennial period, the project that may be bid through our procurement department will be done through an invitation for bids with a *responsive* or *responsible* low-bidder process. The project is an upgrade to our CNG Facility for TART (Tahoe Truckee Area Regional Transit). The upgrade will add two CNG storage vessels to the existing vessel rack, add one compressor to the existing CNG compressor skid, along with two time-fill stations at the existing bus parking spaces and finally the addition of a canopy over the CNG time-fill stations. Until we have historical data to show that bidders utilize DBEs through a race-neutral method, we feel we must use a Race-Conscious program to ensure that DBEs are utilized.

We also reviewed the Executive Summary of the Caltrans 2014 Disparity Study for FTA Contracts and noted that during the study period Caltrans did not apply DBE contract goals to any FTA-funded contracts. Overall, certified DBEs only received .2 percent of the contract dollars which gives more data to back up our reasoning for using Race-Conscious goals.

In this next 3-year goal period, if we obtain any DBE participation through race-neutral means, we will maintain the data separately and report it as such on the appropriate Semi-annual reports. We will also maintain the data for future triennial goal-setting periods.

Race-Conscious and Race-Neutral Goals	
Race-Conscious Percentage of Goal	3.28%
Race-Neutral Percentage of Goal	0%
Total Goal	3.28%

Race-Neutral Measures

Placer County has designed and implemented a DBE link on our website to provide useful information; instructions for required forms and reports; links to important announcements and activities and certification resources. Placer County does not participate in the certification process for DBEs, however, we offer a link on our website to the DOT for new DBE certifications along with a link for finding certified DBEs on the California Unified Certification Program (CUCP). We also offer links to Small Business Information along with upcoming local events for our geographic area.

We have a website link to our Procurement Department which is part of Public Purchase, a web based e-procurement service. Interested bidders and proposers can see all open bid solicitations with all the necessary information for bidding or proposing along with the dates (opening and closing). This website also allows them to access bid opportunities to other government entities. Bidders and Proposers can sign up for automatic email notification of upcoming bidding opportunities.

Pre-Bid, Pre-Proposal and Pre-Construction meetings have been initiated with primes and DBEs to review the requirements of the program and assist with the bidding process and after the contract award to ensure DBE participation and prompt payment monitoring.

DBE Staff is participating in educational and instructional programs focused on training for the DBE process and requirements along with outreach and communication.