

Fiscal Years 2018-20

**Overall Goal for
Disadvantaged Business Enterprise
Participation in Federal Transit Administration
Assisted Programs
(Including Goal Setting Methodology)**

Prepared by

San Luis Obispo Regional Transit Authority (RTA)
179 Cross Street, San Luis Obispo, CA 93401
(805) 781-4397, www.SLORTA.org

Adopted by

RTA Board of Directors
September 6, 2017

Submitted to

U.S. Department of Transportation
Federal Transit Administration
San Francisco, California

September 8, 2017

SAN LUIS OBISPO REGIONAL TRANSIT AUTHORITY
OVERALL DBE GOAL FOR FFYs 2018-2020

I. EXECUTIVE SUMMARY

The U.S. Department of Transportation (DOT) prescribes its Disadvantaged Business Enterprise (DBE) program and requirements for recipients of Federal funds from DOT in the Code of Federal Regulations (CFR) Title 49, Part 26 (Regulations). Specific instructions are found in Section 26.45 entitled “How do recipients set overall goals.”

As a recipient of DOT financial assistance via the Federal Transit Administration (FTA), San Luis Obispo Regional Transit Authority (RTA) has established a recommended overall DBE goal for FYs 2018-20 of 5.1% based on all FTA-assisted contracting funds anticipated to be awarded between October 1, 2017 and September 30, 2020.

The goal is based on demonstrable evidence of the availability of ready, willing and able DBEs relative to all businesses ready, willing and able to participate in our FTA-assisted contracts. The overall goal reflects RTA’s determination of the level of DBE participation expected to be achieved absent the effects of discrimination. RTA intends to meet this goal to the maximum extent feasible through race-neutral measures and does not intend to establish specific goals for any contracts unless needed.

This new report includes the change requested by Lynette Little, Civil Rights Officer, Region IX in a concurrence letter dated April 13, 2017 letter and is adopted at the September 6, 2017 RTA Board of Directors meeting. These public comments and how RTA plans to address these comments will be submitted to FTA on September 8, 2017 as an attachment 3 to this methodology.

II. DBE GOAL FOR FY 18-20

The proposed overall DBE Goal for FY 18-20 is 5.1%. The goal applies to FTA-funded contracts awarded by RTA and its sub-recipients from October 1, 2017 through September 30, 2020. The analysis described herein indicates the proposed goal of 5.1% can be achieved entirely through race and gender neutral measures. In accordance with the decision by the US Court of Appeals for the Ninth Circuit in *Western States Paving Company v. United States and Washington State Department of Transportation*, USDOT recipients in the Ninth Circuit, which includes California, cannot consider the use of a race- or gender-conscious goal unless a finding of statistically significant disparity (disparity study) has been made for the ethnic and gender groups to be included in the race- or gender-conscious goal. RTA has not conducted a disparity study and, therefore, did not consider the use of a race- or gender-conscious goal as part of the overall goal. However, based on the results of the analysis described in sections IV and V of this report, RTA believes it can achieve the weighted goal figure calculated in Step One

entirely through race- and gender-neutral measures. A summary of disparity studies conducted by Caltrans and the Los Angeles County Metropolitan Transportation Authority is provided in section V of this report.

III. METHODOLOGY FOR SETTING THE OVERALL DBE GOAL

As noted in Section I (Executive Summary), the DBE goal was calculated using the two-step process described in the “Tips for Goal Setting” guidance provided by USDOT. The two step process for calculating the overall DBE goal is to:

- Step 1: Calculate a base figure to determine the relative availability of DBEs; and
- Step 2: Adjust the base figure if necessary.

The DBE Directory and Census Data method was used to calculate the base figure of the relative availability of DBEs to perform the types of contracts that RTA intends to let. A detailed description of the methodology used in Step One and associated calculations and assumptions are provided in Section IV. In Step Two, past DBE participation and projects from previous years in relation to projects proposed in FYs 18-20 was utilized to determine if the base figure should be adjusted. A description of this analysis conducted for Step Two is provided in Section V.

Determination of Local Market Area

The boundaries of the local market area were determined by examining the area in which the substantial majority of the contractors and subcontractors that are more likely to submit bids for the type of projects that will be performed in the upcoming years, as RTA had none of these major types of projects in the past five years.

IV. STEP ONE - BASE FIGURE CALCULATION

The purpose of Step One is to determine what percentage of DBEs represents all firms that are ready, willing, and able to compete for USDOT-assisted contracting. This percentage is calculated by dividing the number of DBEs ready, willing and able to bid for the types of work to be funded during a three-year period, by the number of all firms (DBEs and non-DBEs) ready, willing and able to bid for the types of work to be funded during the same three-year period. The calculation is summarized in the equation below:

$$\text{Step One-Base Figure} = \frac{\text{Ready, Willing and Able DBEs}}{\text{All Firms Ready, Willing and Able (including DBEs and non-DBEs)}}$$

To complete the calculation, the first item of work was to develop a list of contracts that RTA intends to let in FYs 18-20. This list of anticipated projects/contracts is provided in Attachment 1. A total of 11 anticipated contracts were identified that total \$11.9 million.

The DBE firms that are ready, willing and able to perform the anticipated work were identified using the California Unified Certification Program (CUCP) Statewide DBE Directory. DBE firms that indicated their willingness to work in Caltrans District 5 (Monterey County, San Benito County, San Luis Obispo County, Santa Barbara County and Santa Cruz County) were selected. North American Industry Classification System (NAICS) codes were then assigned to each project to help identify DBEs and all firms that are ready, willing and able to compete for the anticipated projects. NAICS codes were obtained from the US Census Bureau web page located at: <http://www.census.gov/eos/www/naics/>.

USDOT recommends that weighting be used to help ensure that the Step One Base Figure is as accurate as possible. Weighting increased the Base Figure from 3.1% to 5.1%.

The calculations for Step One- Base Figure and Weighted Figure calculation of 3.1% and 5.1% are shown in Attachment 2.

V. STEP TWO BASE FIGURE ADJUSTMENT

The purpose for Step Two of the goal setting calculation is to adjust the Step One figure to make it more precise, if necessary. The factors listed below were considered to determine whether such an adjustment is necessary:

- Past DBE participation;
- Disparity studies conducted in the local market area.

Past DBE Participation

The DBE goals achieved in the previous three federal fiscal years were examined to determine the median DBE participation although RTA did not have any examples of the proposed project type in these years. The DBE goals achieved in the past three fiscal years are:

FY 14/15 = 0%
FY 15/16 = 2.0%
FY 16/17 = 2.6%

Median = 2.0%

The median DBE participation for the previous three-year period is 2.0%. However, RTA believes that with the projects that are proposed it will make every effort to achieve our overall goal of 5.1% and that the large increase may be due, in part, to the construction of our new facilities as compared to past years.

Disparity Studies Conducted in the Local Market Area

The Los Angeles County Metropolitan Transportation Authority (Metro) conducted a disparity study in 2012 known as the Metro 2012 DBE Program Disparity Study. The study documented a disparity for African Americans, Asian-Pacific Americans, Subcontinent Asian Americans and Hispanic Americans. The study also initially found that Caucasian females were over utilized. In a subsequent analysis, it was determined that Caucasian females were underutilized.

Based on the factors listed above to consider whether to adjust the Base Figure, it is determined that no adjustment should be made. Therefore, the overall goal for FYs 18-20 is proposed at 5.1% to be achieved through race and gender neutral measures.

The calculations for Step Two- Base Figure Adjustment are shown in Attachment 2.

VI. Public Notice and Consultation

The public notice and consultation process will be conducted for setting the DBE Goal for FFYs 18-20 is provided in Attachment 3. Copies of all correspondences are incorporated into attachment.

Attachment 1
List of Anticipated Projects
FY 18-20

FEDERAL GRANTS WITH FY 18-20 CONTRACTING OPPORTUNITY

Project	Antic. Federal Grants FY 18-20 Capital & Planning	3-Yr Total Maintenance & Planning	Amount with Contracting Opportunity	Amount without Contracting Opportunity	Notes - see below
A	B	C	D	E	F
New Ops & Maint Facility	\$7,600,000		\$7,600,000		
Paso Yard Ops Facility	\$800,000		\$800,000		
Bus Stop Improvements (including shelters, amenities, etc)	\$326,000		\$326,000		
Service Vehicle	\$60,000		\$60,000		
Support Equipment	\$81,000		\$81,000		
Six (6) Replacement Buses	\$2,460,000		\$2,460,000		
Upgrade Network Switch Infrastructure	\$12,000			\$12,000	1
SQL Servers (2) Upgrade	\$22,600			\$22,600	1
ADA software Upgrade	\$80,000			\$80,000	1
Upgrade Fare collection system	\$350,000			\$350,000	1
TOTALS	\$11,791,600		\$11,327,000	\$464,600	

PLANNING GRANTS					
Transit Planning & Programming					
Consultant Services (SRTP)	\$125,000	\$125,000	\$125,000		
TOTALS	\$125,000	\$125,000	\$125,000	\$0	

SUMMARY					
Capital Totals	\$11,791,600		\$11,327,000	\$464,600	
Planning Totals	\$125,000		\$125,000	\$0	
TOTALS	\$11,916,600		\$11,452,000	\$464,600	

Notes:

1 - Sole Source- software purchased from only source, the manufacturer

Attachment 2
FY 16-18 Goal Determination Calculations
Step 1 and Step 2

FY 18-20 GOAL DETERMINATION

A	B	C		D	E	F	G	H	I
Project	NAICS	Number of Firms		Step 1 Percent DBE	Amt with contracting Opportunity	Anticipated DBE Expenditure	Weighted Percent DBE	Step 2 Percent DBE	Notes - See Below
		Overall Total	DBE Only						

CAPITAL GRANTS

New Ops & Maint Facility	236220	2,103	134	6.4%	\$7,600,000	\$484,261	4.3%	4.3%	1
Paso Yard Ops Facility	236220	2,103	134	6.4%	\$800,000	\$50,975	0.5%	0.5%	1
Bus Stop Improvements (including shelters, amenities, etc)	236220	2,103	134	6.4%	\$326,000	\$20,772	0.2%	0.2%	1
Service Vehicle	441110	2,738	1	0.0%	\$60,000	\$22	0.0%	0.0%	1
Support Equipment	811213	1,597	7	0.4%	\$81,000	\$355	0.0%	0.0%	1
Six (6) Replacement Buses	336120	904	0	0.0%	\$2,460,000	\$0	0.0%	0.0%	1
Upgrade Network Switch Infrastructure	334210	904	0	0.0%		\$0	0.0%	0.0%	2
SQL Servers (2) Upgrade	331111	904	0	0.0%		\$0	0.0%	0.0%	2
ADA software Upgrade	511210	351	13	3.7%		\$0	0.0%	0.0%	2
Upgrade Fare collection system	511210	351	13	3.7%		\$0	0.0%	0.0%	2
TOTALS		14,058	436	3.1%	\$11,327,000	\$556,385	5.1%	5.1%	

PLANNING GRANTS

Transit Planning & Programming									
Consultant Services (SRTP)	541611	2,354	494	21.0%	\$125,000	\$26,232	21.0%	21.0%	1
TOTALS		2,354	494	21.0%	\$125,000	\$26,232	21.0%	21.0%	

SUMMARY

Capital Totals		14,058	436	3.1%	\$ 11,327,000	\$556,385	5.1%	5.1%	
Planning Totals		2,354	494	21.0%	\$ 125,000	\$26,232	21.0%	21.0%	
TOTALS		16,412	930	5.7%	\$11,452,000	\$582,617	5.1%	5.1%	

Notes:

1. Step 2 reflects adjustment for weighting,
- 2.Sole Source- software purchased from only source, the manufacturer

Attachment 3
Public Notice and Consultation

This memo is to summarize the process RTA followed for public participation regarding its proposed DBE goal as required by the FTA concurrence letter for previous DBE goal dated April 13, 2017. RTA will conduct public outreach that will properly address it in our submission.

DBE Goal Setting Consultation Process

On July 28, 2017, RTA mailed the “Notice to Disadvantage Business Enterprise Resource and Assistance Agencies” (copy provided below) to the organizations listed in Resource Agency Listing (copy provided below). This letter notified these groups of RTA’s goal and requested consultation. Subsequently, RTA sent these same organizations a follow-up letter (copy provided below) and a follow up phone call was made on August 11, 2017 inviting them to a meeting at RTA’s office on August 23, 2017.

RTA published its Disadvantaged Business Enterprise Goal on August 4, 2017 in our local paper, The Tribune, which is available online and in hardcopy. The notice was also posted on our website and in our lobby of our Administration office and on the public board located just outside our building for 30 days.

RTA made every concerted effort, as required, to obtain public participation for its DBE Goal.

NOTICE TO DISADVANTAGED BUSINESS ENTERPRISE RESOURCE AND ASSISTANCE AGENCIES

July 28, 2017

In accordance with Federal Regulations 49 CFR Part 26, San Luis Obispo Regional Transit Authority (RTA) is committed to enabling participation of Disadvantaged Business Enterprises (DBEs) in its contracting opportunities as reflected in the RTA Disadvantaged Business Enterprise (DBE) Program.

It is the policy of RTA to ensure nondiscrimination based on race, color, sex or national origin in the award and administration of contracts assisted by the U.S. Department of Transportation (DOT). It is the intention of RTA to create a level playing field on which DBEs can compete fairly and participate in the performance of contracts and subcontracts relating to RTA's procurement activities. The DBE Program is the result of RTA's commitment to the participation of small business firms owned and controlled by socially and economically disadvantaged individuals for purchasing and contracting opportunities.

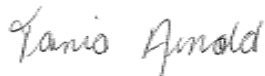
In this regard, RTA wishes to notify your organization and all interested parties that it is proposing to establish an overall DBE goal for Federal fiscal years 2018-20. This DBE goal will be applicable to contracts and procurements financed, in whole or in part, by the U.S. DOT, Federal Transit Administration (FTA).

In establishing its overall DBE goal, RTA wishes to consult with minority, women and general contractor groups, community organizations and other groups that may have information that will be useful to RTA in its procurement efforts. In this regard, we solicit your assistance by providing RTA with information concerning:

- a. DBEs and non-DBEs that may wish to participate in RTA's contracting opportunities.
- b. The effects of discrimination on opportunities for DBEs.
- c. RTA's efforts to establish a level playing field for the participation of DBEs.

Please direct your input to: San Luis Obispo Regional Transit Authority
Attn: Tania Arnold, Deputy Director/CFO (DBE Liaison)
179 Cross St.
San Luis Obispo, CA 93401

Thank you for your assistance and, if you have any comments or questions, please call me at (805) 781-4397, and refer to the DBE Program.



Tania Arnold
DBE Liaison

Resource Agency Listing

Arroyo Grande Grover Beach Chamber of Commerce 800 W Branch Street Arroyo Grande, CA 93420Arr	Morro Bay Chamber of Commerce 695 Harbor Street Morro Bay, CA 93442Mor	Paso Robles Chamber of Commerce 1225 Park Street Paso Robles, CA 93446
Atascadero Chamber of Commerce 6904 El Camino Real Atascadero, CA 93422	Latino Outreach Council of San Luis Obispo County 267 W Tefft St Nipomo, CA 93444	Templeton Chamber of Commerce 321 South Main Street Templeton, CA 93465La
San Luis Obispo Chamber of Commerce 895 Monterey Street San Luis Obispo, CA 93401	Pismo Beach Chamber of Commerce 581 Dolliver Street Pismo Beach, CA 93449	Nipomo Chamber of Commerce 239 West Tefft Street Nipomo, CA 93444
Santa Maria Chamber of Commerce 614 South Broadway Santa Maria, CA 93454	Women's Network of SLO P.O. Box 1741 San Luis Obispo, CA 93406	Northern Chumash Tribal Council 15980 18 th Street Los Osos, CA 93402

August 4, 2017

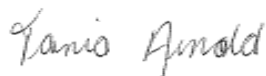
To: Organizations Representing Potential Contracting Partners
From: San Luis Obispo Regional Transit Authority
Subject: **Consultation for RTA Disadvantaged Business Enterprise/Small Business Enterprise Program**

Recently, your firm received a letter from my office with information on how you can participate in development of RTA's Disadvantaged Business Enterprise (DBE) goal. RTA is very interested in meeting directly with your organization to get your suggestions for our goal. To this end, RTA has scheduled a meeting at RTA's office to discuss how this participation goal is established. This important meeting will be held in the Upstairs Conference Room at RTA's office at 179 Cross Street, San Luis Obispo, CA 93401, at 1:30 p.m. on Wednesday, August 23rd, and your organization is strongly urged to attend.

The letter sent to you earlier also offered to schedule a meeting specifically with your organization at your convenience, and that offer still stands, but the general meeting now scheduled for August 23rd hopefully provides another option for your participation in RTA's program. It would preferable to have all these meetings wrapped up by August 25th so that RTA can proceed with finalizing its DBE goal.

Should you have any questions, or to schedule a separate meeting, please do not hesitate to contact Tania Arnold Deputy Director/CFO DBE Liaison at (805) 781-4397. We hope to meet with you shortly.

Sincerely,

A handwritten signature in cursive script that reads "Tania Arnold".

Tania Arnold
Deputy Director/CFO DBE Liaison

Log of DBE Consultation Outreach Calls:

Agency	Phone Number	When	Outcome
Arroyo Grande Grover Beach Chamber of Commerce	805-489-1488	8/11/17 at 12:41 p.m.	spoke with staff who will share with President, Judith called me back and we chatted about it and she asked for it to be e-mailed Judith@aggbchamber.com
Morro Bay Chamber of Commerce	805-772-4467	8/11/17 at 12:47 p.m.	message recording doesn't match for Chamber but I left a message, unable to find another valid phone number or e-mail; spoke with Gina at Paso Chamber and she will contact the President of that Chamber and have them reach out to me
Paso Robles Chamber of Commerce	805-238-0506	8/11/17 at 12:51 p.m.	Gina did received the information and did not have any questions
Atascadero Chamber of Commerce	805-466-2044	8/11/17 at 12:54 p.m.	Vicky requested the information be sent to info@atascaderochamber.org to ensure the President has seen it
Latino Outreach Council of San Luis Obispo	805-610-3385	8/11/17 at 12:57 p.m.	has not seen it, please e-mail clararoa1@hotmail.com, CR Lara
Templeton Chamber of Commerce	805-434-1789	8/11/17 at 12:34 p.m.	left message, also e-mailed info@templetonchamber.com
San Luis Obispo Chamber of Commerce	805-781-2777	8/11/17 at 12:59 p.m.	send via e-mail slochamber@slochamber.org
Pismo Beach Chamber of Commerce	805-773-4382	8/11/17 at 1:10 p.m.	send via e-mail peter@pismochamber.com rochelle@pismochamber.com
Nipomo Chamber of Commerce	805-929-1583	8/11/17 at 1:22 p.m.	left message, also e-mailed info@NipomoChamber.org
Santa Maria Chamber of Commerce	805-925-2403	8/11/17 at 1:15 p.m.	need to speak with Teri O., she will be calling me back shortly
Women's Network of SLO	805-345-1031	8/11/17 at 1:27 p.m.	left message on Jean Jones President number, also e-mailed slowomensnetwork@gmail.com
Northern Chumash Tribal Council	805-801-0347	8/11/17 at 1:33 p.m.	left message and e-mailed fcollins@northernchumash.org

PUBLIC NOTICE
DISADVANTAGED BUSINESS ENTERPRISE GOAL
August 2, 2017

The San Luis Obispo Regional Transit Authority (RTA), in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR, Part 26 proposes an overall goal of 5.1% for participation by Disadvantaged Business Enterprises (DBEs) on Federal Transit Administration (FTA) assisted contracts during the federal fiscal years from October 1, 2017 to September 30, 2020.

The proposed goal and its rationale are available for inspection during normal business hours at RTA's Administrative Offices, located at 179 Cross Street, San Luis Obispo, CA 93401 for thirty (30) days from the date of this notice. Written comments should be directed to Tania Arnold, Deputy Director/CFO DBE Liaison, San Luis Obispo Regional Transit Authority, 179 Cross Street, San Luis Obispo, CA 93401 and/or Regional Director, U.S. Department of Transportation, Federal Transit Administration, 201 Mission Street, Suite 2210, San Francisco, CA 94105. Comments will be received for thirty (30) days from the date of this publication.

Noticia Pública
Empresa de Negocio Desventaja (DBE)
2 de Agosto de 2017

De acuerdo con las regulaciones de U.S. Departamento de Transporte (DOT), 49 CFR, Parta 26, propone un objetivo general de 5.1% para la participación de Empresa de Negocio Desventaja (DBE) en administración federal de tránsito (FTA) de contratos asistidos durante los ejercicios fiscales federales desde el 1 de octubre de 2017 hasta el 30 de septiembre de 2020.

El objetivo propuesto y su justificación pueden ser inspeccionados durante las horas normales de trabajo en las oficinas administrativas del RTA ubicadas en RTA ubicadas en 179 Cross Street, San Luis Obispo, CA 93401 durante 30 días a partir de la fecha de este aviso. Los comentarios escritos deben dirigirse a Tania Arnold, Deputy Director/CFO DBE Liaison, San Luis Obispo Regional Transit Authority, 179 Cross Street, San Luis Obispo, CA 93401 y/o Director Regional, Departamento de Transporte de los Estados Unidos, Administración Federal de Tránsito, 201 Mission Street, Suite 2210, San Francisco, CA 94105. Los comentarios serán recibidos por treinta (30) días a partir de la fecha de esta publicación.

Advertisement of Public Notice

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In The Superior Court of The State of California
In and for the County of San Luis Obispo

AD #3203223
RTA

STATE OF CALIFORNIA

ss.

County of San Luis Obispo

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen and not interested in the above entitled matter; I am now, and at all times embraced in the publication herein mentioned was, the principal clerk of the printers and publishers of THE TRIBUNE, a newspaper of general Circulation, printed and published daily at the City of San Luis Obispo in the above named county and state; that notice at which the annexed clippings is a true copy, was published in the above-named newspaper and not in any supplement thereof – on the following dates to wit; AUGUST 4, 2017 that said newspaper was duly and regularly ascertained and established a newspaper of general circulation by Decree entered in the Superior Court of San Luis Obispo County, State of California, on June 9, 1952, Case #19139 under the Government Code of the State of California.

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.


(Signature of Principal Clerk)

DATE: AUGUST 4, 2017

AD COST: \$193.60

PUBLIC NOTICE
DISADVANTAGED BUSINESS
ENTERPRISE GOAL
August 2, 2017

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2 de Agosto de 2017

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August 4, 2017

3203223

Screenshot of Website
(to be provided in the final draft)

