

FY 2025 - FY 2027

Overall Goal for Disadvantaged Business Enterprise Participation in Federal Transit Administration Assisted Programs

Prepared by the

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Disadvantaged Business Enterprise (DBE)

FY 2025 - FY 2027 Triennial Overall DBE Goal for FTA-Assisted Programs

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INTRODUCTION

The Santa Barbara Metropolitan Transit District (MTD) has prepared this FY 2025 - FY 2027 triennial overall Disadvantaged Business Enterprise (DBE) goal for projects assisted by the U.S. Department of Transportation (USDOT), Federal Transit Administration (FTA), in compliance with Code of Federal Regulations (CFR) Title 49--Transportation, Subtitle A--Office of the Secretary of Transportation, Part 26--Participation By Disadvantaged Business Enterprises In Department Of Transportation Financial Assistance Programs, Subpart C--Goals, Good Faith Efforts, and Counting, Section 26.45--How do recipients set overall goals.

The purpose of the DBE goal-setting process is to level the playing field so that DBEs can compete fairly for USDOT-assisted contracts. The program is narrowly-tailored in accordance with applicable law.

BACKGROUND

As a condition of receiving funding from FTA, MTD annually signs an assurance that it will comply with FTA's DBE requirements. In accordance with Title 49 CFR Part 26 provisions, MTD is required to develop and submit a Triennial Overall DBE Goal for its FTA-assisted projects. This document presents MTD's Overall DBE Goal and Methodology for FY 2025 - FY 2027.

FTA-ASSISTED CONTRACTING PROGRAM

MTD utilizes much of its FTA Section 5307 funding for operations. Thus, all of MTD's operating expenditures are federalized. MTD's FY 2025 budget estimates Section 5307 operating funding to total \$5,193,521. MTD also has budgeted an additional \$5,408,817 in COVID-19 relief operating funding for FY 2025. Thus, FTA operating assistance for FY 2025 is budgeted at a total of \$10,602,338. This represents 32.0 percent of MTD's FY 2025 operating budget. The percentage of MTD's operating funding from the Section 5307 program and COVID-19 relief is not expected to change significantly in FY 2026 or FY 2027. Thus, it is assumed that 32.0 percent of every MTD operating expenditure will be from FTA funds for the entire three-year period.

Table 1 below lists the operating expenditures that comprise potential contracting opportunities in FY 2025. These contracting opportunities comprise 26.2 percent of MTD's operating budget. The table includes both the total amount budgeted and the FTA share (i.e., 32.0 percent of the total) of each potential contracting opportunity. As shown in the table, nearly \$8.7 million in total funds, including nearly \$2.8 million in FTA funds, are potentially available for contracting opportunities. This amount is not expected to vary significantly in FY 2026 or FY 2027.

TABLE 1: MTD FY 2025 Operating Budget Contracting Opportunities

OPERATIONS	TOTAL COST	FTA SHARE
<i>Drivers</i>		
Uniforms	\$16,500	\$5,288
<i>Hiring & Training</i>		
Medical Exams & License Fees	\$29,100	\$9,325
Employment Advertising	\$10,000	\$3,205
Training, Travel & Meetings	\$16,500	\$5,288
<i>Risk & Safety</i>		
Public Liability - Professional Services	\$309,331	\$99,127
Public Liability - Insurance	\$893,078	\$286,193
Workers Comp - Professional Services	\$309,331	\$99,127
Workers Comp - Insurance	\$220,825	\$70,765
Workers Comp - Misc Risk & Safety	\$53,062	\$17,004
<i>Transportation Subsidies</i>		
ADA Complementary Paratransit	\$1,169,519	\$374,781
<u>MAINTENANCE</u>		
<i>Mechanics</i>		
Uniforms	\$7,139	\$2,288
<i>Cleaners & Fuelers</i>		
Uniforms	\$4,855	\$1,556
Medical Exams & License Fees	\$4,229	\$1,355
<i>Supervision</i>		
Training, Travel & Meetings	\$10,000	\$3,205
<i>Vehicle Consumables</i>		
Fuel & Lubrication	\$2,171,759	\$695,956
Tire Lease	\$156,098	\$50,023
Tire Mounting	\$16,248	\$5,207
<i>Vehicle Parts & Supplies</i>		
Subtotal (All)	\$705,000	\$225,922
<i>Vendor Bus Repairs</i>		
Subtotal (All)	\$45,000	\$14,421
<i>Risk & Safety</i>		
Workers Comp - Professional Services	\$16,281	\$5,217
Workers Comp - Insurance	\$11,622	\$3,724
<u>PASSENGER ACCOMMODATIONS</u>		
<i>Passenger Facilities</i>		
Bldgs & Grds - Subtotal (All)	\$860,305	\$275,691
<i>Transit Development</i>		
Training, Travel & Meetings	\$3,000	\$961
Planning Services & Supplies	\$1,500	\$481
<i>Marketing & Community Relations</i>		
Media Ad Placement	\$80,000	\$25,637
Brochures, Publications, & Promotions	\$6,000	\$1,923
Market Research	\$2,500	\$801
Training, Travel & Meetings	\$3,000	\$961
<i>Fare Revenue Collection</i>		
Outside Services - Subtotal (All)	\$178,420	\$57,176
<u>GENERAL OVERHEAD</u>		
<i>Finance</i>		
Financial Audit Services	\$63,890	\$20,474
<i>Utilities</i>		
Telephone & Data Communication	\$83,986	\$26,914
Two-Way Radios	\$27,163	\$8,705
<i>Operating Facilities</i>		
Service Vehicles - Subtotal (All)	\$80,000	\$25,637
Bldgs & Grds - Contract Maintenance	\$119,000	\$38,134
Bldgs & Grds - Overpass Site Maintenance	\$10,000	\$3,205
<i>District Administration</i>		
Admin Services - Public Officials Insurance	\$128,977	\$41,332
Admin Services - Legal Counsel	\$75,000	\$24,034
Admin Services - Pension Admin	\$1,000	\$320
Admin Services - Licenses & Equipment Maintenance	\$541,739	\$173,604
Admin Services - Miscellaneous Services	\$131,183	\$42,039
Admin Services - Office & Computer Supplies	\$60,000	\$19,227
Admin Services - Conferences, Meetings & Training	\$20,000	\$6,409
Admin Services - Misc	\$15,000	\$4,807
GRAND TOTAL CONTRACTING OPPORTUNITIES	\$8,667,140	\$2,777,449

As shown in Table 2, MTD does not anticipate the use of FTA funds for capital projects, with the exception of transit revenue vehicle purchases. Pursuant to FTA regulations, transit revenue vehicle purchases are not included in this calculation of MTD’s overall DBE annual goal.

TABLE 2: MTD FY 2025 Capital Projects

Capital Projects	Total Cost	FTA Share
Revenue Vehicles	\$30,602,083	n/a
Other Capital Projects	\$13,355,302	\$0
<i>Total Capital Projects</i>	<i>\$43,957,385</i>	<i>\$0</i>

MTD’s total contracting opportunities that are applicable to the overall DBE goal-setting process are presented in Table 3. As the table shows, in FY 2025 MTD expects to have a total of \$2,777,449 of FTA funds in FTA-assisted contracting opportunities.

TABLE 3: MTD FY 2025 Contracting Opportunities Summary

Line Item	FTA Share
Federal Operating Contracting Opportunities	\$2,777,449
Federal Capital Contracting Opportunity	\$0
<i>Total Federal Contracting Opportunities</i>	<i>\$2,777,449</i>

GOAL METHODOLOGY

Step 1: Determination and Weighting of a Base Figure

MTD does not have any subrecipients. MTD followed an approved federal methodology to determine the Base Figure for the relative availability of DBEs to all comparable firms (DBE and Non-DBE) available to bid on MTD’s FTA-assisted potential contracting opportunities. Table 4 presents the North American Industry Classification System (NAICS) codes for the various potential contracting opportunities shown in Table 1 above. Table 4 also presents the amount of FTA funding available, the number of all firms, the number of DBE firms certified by the California Unified Certification Program (CUCP), and the percent of all firms that are CUCP-certified DBE firms for those NAICS codes.

TABLE 4: Total Firms & California Unified Certification Program (CUCP) DBE Firms by NAICS Code

NAICS Codes	Description	FTA Funding	Number of Firms ¹		Percent DBE
			All Firms	DBE Firms	
441310	Automotive Parts & Accessories Stores	\$225,922	2,230	4	0.18%
441320	Tire Dealers	\$55,230	1,198	4	0.33%
453210	Office Supplies & Stationery Stores	\$19,227	412	8	1.94%
454310	Fuel Dealers	\$695,956	61	0	0.00%
485991	Special Needs Transportation	\$374,781	223	9	4.04%
517110	Wired Telecommunications Carriers	\$26,914	1,652	7	0.42%
517210	Wireless Telecommunications Carriers (except Satellite)	\$8,705	1,864	1	0.05%
522110	Commercial Banking	\$57,176	4,854	0	0.00%
524210	Insurance Agencies & Brokerages	\$402,014	9,755	17	0.17%
524292	Third Party Admin. of Insurance & Pension Funds	\$220,797	549	4	0.73%
541110	Offices of Lawyers	\$24,034	18,800	24	0.13%
541430	Graphic Design Services	\$1,923	2,547	26	1.02%
541611	Admin. Management Consulting Services	\$20,474	11,333	965	8.51%
541890	Other Services Related to Advertising	\$33,648	537	47	8.75%
561499	All Other Business Support Services	\$1,282	274	43	15.69%
561730	Landscaping	\$38,134	4,589	5	0.11%
561790	Other Services to Buildings & Dwellings	\$320,934	947	39	4.12%
611430	Professional & Management Development Training	\$16,824	539	168	31.17%
621999	All Other Misc. Ambulatory Health Care Services	\$10,681	712	5	0.70%
811121	Automotive Body, Paint, & Interior Repair & Maintenance	\$40,057	2,767	8	0.29%
811212	Computer & Office Machine Repair & Maintenance	\$173,604	421	20	4.75%
812331	Linen Supply	\$9,131	72	2	2.78%
	Total/Base Figure	\$2,777,449	66,336	1,406	2.12%

Note 1: All firms from 2021 County Business Patterns (US Census Bureau); DBE firms from CUCP (Caltrans).

The methodology included accessing the 2021 U.S. Census Bureau County Business Patterns NAICS codes database (for all firms) and the CUCP-certified DBE database (for DBE firms) in the categories of work defined in Table 1 for MTD's market area. For all firms, the market area comprises the following California counties: Los Angeles, Monterey, San Benito, San Luis Obispo, Santa Barbara, Santa Cruz, and Ventura. For DBE firms, the market area comprised all CUCP-certified DBE firms that indicated an interest in working in Santa Barbara County. This methodology resulted in a Base Figure that 2.12 percent of all available firms in the MTD market area are certified by the CUCP as DBE firms.

MTD next weighted the Base Figure using the “Weighted Base Figure Worksheet” provided by FTA. Table 5 shows the results of the weighting process. As shown, the Weighted Base Figure resulting from this methodology is 1.82 percent.

TABLE 5: Weighted Base Figure

NAICS Codes	Description	Weight	Availability	Weighted Base Figure
441310	Automotive Parts & Accessories Stores	0.08134	0.00179	0.0001
441320	Tire Dealers	0.01988	0.00334	0.0001
453210	Office Supplies & Stationery Stores	0.00692	0.01942	0.0001
454310	Fuel Dealers	0.25057	0.00000	n/a
485991	Special Needs Transportation	0.13494	0.04036	0.0054
517110	Wired Telecommunications Carriers	0.00969	0.00424	0.0000
517210	Wireless Telecommunications Carriers (except Satellite)	0.00313	0.00054	0.0000
522110	Commercial Banking	0.02059	0.00000	n/a
524210	Insurance Agencies & Brokerages	0.14474	0.00174	0.0003
524292	Third Party Admin. of Insurance & Pension Funds	0.07950	0.00729	0.0006
541110	Offices of Lawyers	0.00865	0.00128	0.0000
541430	Graphic Design Services	0.00069	0.01021	0.0000
541611	Admin. Management Consulting Services	0.00737	0.08515	0.0006
541890	Other Services Related to Advertising	0.01211	0.08752	0.0011
561499	All Other Business Support Services	0.00046	0.15693	0.0001
561730	Landscaping	0.01373	0.00109	0.0000
561790	Other Services to Buildings & Dwellings	0.11555	0.04118	0.0048
611430	Professional & Management Development Training	0.00606	0.31169	0.0019
621999	All Other Misc. Ambulatory Health Care Services	0.00385	0.00702	0.0000
811121	Automotive Body, Paint, & Interior Repair & Maintenance	0.01442	0.00289	0.0000
811212	Computer & Office Machine Repair & Maintenance	0.06250	0.04751	0.0030
812331	Linen Supply	0.00329	0.02778	0.0001
Total				0.0182
Percent				1.82%

Step 2: Adjusting the Base Figure

Following the establishment and weighting of the Base Figure, MTD reviewed and assessed other evidence that could potentially affect the relative availability of DBEs within the market area. This is in accordance with the prescribed narrow-tailoring provisions set forth under 49 CFR Part 26.45.

Past DBE Goal Attainment

Historical DBE participation attainments provide demonstrable evidence of DBE availability and capacity to perform. Thus, MTD calculated past DBE participation attainments for the three most recent completed federal fiscal years:

- FFY 2021 – 0.42%
- FFY 2022 – 1.00%
- FFY 2023 – 0.64%

In the first six months of FFY 2024, MTD achieved 0.45%. MTD continues to believe that the Weighted Base Figure of 1.82 percent is achievable with the continuation of the agency's efforts to encourage DBE firms to become certified by the CUCP and bid on MTD projects. Thus, MTD believes that it is not appropriate to revise the Base Figure based on past DBE goal attainment.

Evidence from Disparity Studies

MTD is not aware of any disparity studies conducted within our jurisdiction. However, the Los Angeles County Metropolitan Transportation Authority (Metro) conducted a disparity study in 2012 (the "Metro 2012 DBE Program Disparity Study"). MTD currently uses a strictly race-neutral DBE program. If MTD continues to fail to reach its DBE overall goal, the agency will re-evaluate its DBE program to determine whether contract goals are necessary to achieve the overall goal.

If after re-evaluation MTD believes a race-conscious program is necessary, MTD, as required by the Western States decision, will gather evidence to determine if discrimination in the transportation contracting industry is present.

DBE goal of Another Recipient

MTD did not base its DBE goal on the DBE goal of another recipient.

Evidence from Related Fields

MTD is unaware of any disparities in the ability of DBEs to get the financing, bonding, and insurance required to participate in MTD's program. MTD is also unaware of any data on employment, self-employment, education, training and union apprenticeship programs that MTD can relate to the opportunities for DBEs to perform in its program.

Continuing Effects of Past Discrimination

MTD is unaware of any demonstrable evidence that is logically and directly related to continuing effects of past discrimination. Thus, MTD has no basis to adjust the base figure to alleviate the continuing effects of past discrimination.

OVERALL DBE GOAL

As discussed under Goal Methodology: Step 2 above, MTD has no basis for adjusting the base figure. Thus, MTD's final triennial overall DBE goal for FY 2025 - FY 2027 for DBE participation in FTA-assisted programs is 1.82 percent. The goal is available for all CUCP-certified DBEs on a Race Neutral basis.

If appropriate, MTD may adjust the three-year overall goal during the three-year period to which it applies, in order to reflect changed circumstances. If so, MTD will submit such an adjustment to the FTA for review and approval.

RACE-NEUTRAL IMPLEMENTATION MEASURES

MTD will employ various actions to increase future DBE participation and achieve the overall goal:

- MTD will continue to identify existing contractors that could potentially qualify for CUCP certification as DBE firms, and will encourage such firms to apply for certification. Staff will assist such firms in their application as appropriate.
- MTD will increase staff participation in outreach opportunities to firms that may qualify for DBE certification, including professional organizations and publications geared to such firms. Staff will encourage interested firms to apply for DBE certification and will assist them as appropriate.
- MTD will work with nearby transit operators to consider joint participation in DBE-oriented contracting information events.
- MTD will continue to identify strategies for increasing DBE participation if the agency continues to fail to meet its DBE goal. Such strategies may include the future implementation of a race-conscious component.

Fostering Small Business Participation

MTD's DBE program includes an element to structure contracting requirements to facilitate competition by small business concerns. The element takes all reasonable steps to eliminate obstacles to participation by small business concerns.

The small business participation element includes the following strategies:

- In multi-year design-build contracts, MTD will require bidders on the prime contract to specify elements of the contract or specific subcontracts that are of a size that small businesses, including DBEs, can reasonably perform.
- On prime contracts exceeding \$100,000, MTD will encourage the prime contractor to provide subcontracting opportunities of a size that small businesses, including DBEs, can reasonably perform, rather than self-performing all the work involved.

- MTD will structure applicable procurements to facilitate the ability of consortia or joint ventures consisting of small businesses, including DBEs, to compete for and perform prime contracts.
- To meet the portion of MTD’s overall goal projected to be met through race-neutral measures, MTD will ensure that a reasonable number of prime contracts are of a size that small businesses, including DBEs, can reasonably perform.
- MTD will actively implement these program elements to foster small business participation a requirement of good faith implementation of MTD’s DBE program.

PUBLIC PARTICIPATION AND FACILITATION

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

MTD conducted the following outreach activities during the development of the overall DBE goal:

- MTD published a link on the “Doing Business” section of the agency’s website (www.sbmtd.gov) to MTD’s DBE program, including this Triennial Goal document, for a public comment period on June 28, 2024. The document will remain posted on the website during the entire three-year period (see Attachment 1).
- Staff emailed a DBE “Stakeholder Letter” to various advocacy groups representing potential DBE firms and general contracting firms for dissemination to their members (see Attachment 2). Such groups include:
 - Women’s Economic Ventures
 - Santa Barbara South Coast Chamber of Commerce
 - Greater Santa Barbara Hispanic Chamber of Commerce
- On July 11, 2024, MTD intends to conduct an online virtual meeting to describe MTD’s DBE program and the methodology that was utilized to arrive at the proposed DBE goal. The meeting was open to all persons or businesses that were interested in attending.
 - MTD published an “MTD News” item on the agency’s website regarding the virtual meeting (see Attachment 3).
 - MTD also prepared a press release regarding the virtual meeting (see Attachment 4). The press release was circulated to a wide range of contacts (see Attachment 5).
- Throughout the goal-setting process, to date, no comments were received regarding the methodology or the proposed goal.

- Staff will continue to reach out to appropriate groups to present MTD's DBE program and solicit their input into the agency's goal-setting process.
- Staff will continue to work with existing and potential vendors that may be eligible to become certified DBE firms to encourage them to apply for certification.

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