

**NORWALK TRANSIT SYSTEM
DISADVANTAGED BUSINESS ENTERPRISE (DBE)
OVERALL DBE GOAL AND METHODOLOGY
FOR
FEDERAL FISCAL YEARS (FFY) 2024-25 through 2026-2027**



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(Covering the period of October 1, 2024, to September 30, 2027)

I. INTRODUCTION

The Norwalk Transit System (hereinafter referred to as “NTS”) is required to develop and submit a Disadvantaged Business Enterprise (DBE) Overall Goal for DBE participation as a condition of receiving federal assistance, pursuant to 49 CFR Part 26 “Participation by Disadvantaged Business Enterprises in U.S. Department of Transportation Programs” and the Federal Transit Administration (FTA) Master Funding Agreement.

II. BACKGROUND

NTS is a recipient of USDOT, Federal Transit Administration (FTA), funding. As a condition of receiving this assistance, NTS signed an assurance that it will comply with FTA DBE requirements. In accordance with Title 49 CFR Part 26 provisions, NTS is required to develop and submit an overall Triennial DBE Goal for its FTA-assisted projects.

NTS herein presents its Proposed Overall DBE Goal Methodology for FFY 2025-27 goal period, which resulted in a 3% Overall DBE Goal (.91% Race Neutral/ 2.09% Race Conscious).

III. DOT-ASSISTED CONTRACTING PROGRAM FOR FFY 2025-2027

Market Area

The Federal DBE Program requires agencies to implement the DBE Program based on information from the relevant geographic market area—the area in which the agency spends the substantial majority of its contracting dollars. NTS’s local market for contracts consists of a geographic area that is:

- Where a large majority of contracting dollars is expended, and
- Where a substantial number of contractors and subcontractors are located and available to submit bids, quotes, or proposals.

NTS’s bidder’s list was also reviewed and analyzed to determine where NTS spends the substantial majority of its contracting dollars. This analysis confirmed that the previously recognized market area of Los Angeles, Orange and San Bernardino counties is still valid.

Anticipated Projects

NTS has sixteen (16) FTA assisted procurements that are anticipated to be awarded during the triennial period and were considered in preparing this goal methodology. These projects and their federal share of funding are listed in Table 1. The project scopes vary and include Transit Facility, Tenant and Security Improvements, Maintenance Agreements for NTS Buses and Vehicles, Software and Hardware procurements. All of NTS’s Projects have been grouped by North American Industry Classification System (NAICS) primary categories.

Projects with codes

Table 1

Projected Procure Date	Type of Contract	NAICS Code	NAICS Code Description	Contract Description	Estimated Project Cost	Estimated FTA \$ Share
FY 24/25	Contractual Agreement: Rolling Stock Replacement (Dial a Ride)	423110	Automobile and Other Motor Vehicle Merchant Wholesalers	Purchase Order/Agreement with Creative Bus Sales for acquisition of (1) Dial A Ride Van.	\$130,000	\$104,000
FY 24/25	Associated Capital Maintenance				\$236,800	\$189,440
FY 24/25		336310	Assembly line rebuilding of automotive and truck gasoline engines	Purchase Orders or Agreements: Engine Re-build Units	\$33,828	\$27,063
		336350	Transmissions and parts, automotive, truck, and bus, manufacturing	Purchase Orders or Agreements: Transmission rebuild units	\$33,829	\$27,063
		335312	Motor and Generator Manufacturing	Purchase Orders or Agreements: Generator	\$33,829	\$27,063
		336350	Axle bearings, automotive, truck, and bus, manufacturing	Purchase Orders or Agreements: Axle Assembly	\$33,829	\$27,063
		333912	Air and Gas Compressor Manufacturing	Purchase Orders or Agreements: Compressor	\$33,829	\$27,063
		335312	Inverters, rotating electrical, manufacturing	Purchase Orders or Agreements: Inverters	\$33,828	\$27,063
		334419	Other Electronic Component Manufacturing	Purchase Orders or Agreements: Ultra-capacitors	\$33,828	\$27,062
FY 24/25	Tires Lease	441340	Tire dealers, automotive	Purchase Order/Agreement with Goodyear Tires	\$88,000	\$70,400
FY 24/25	Contractual Agreements for Transit Facility Improvement Project				\$3,867,910	\$1,901,591
FY 24/25		236220	Commercial and Institutional Building Construction	Various Agreements: Phase III (Tenant Improvements)	\$1,289,303	\$633,864
FY 24/25		238290	Other Building Equipment	Various Agreements: Phase III (Facility	\$1,289,303	\$633,864

			Contractors	Improvements)		
FY 24/25		238390	Other Building Finishing Contractors	Various Agreements: Phase III (Security Improvements)	\$1,289,303	\$633,864
FY 24/25	Contractual Agreements for Bus Stop Social Equity Improvements Project				\$5,251,341	\$3,769,220
FY 24/25		238210	Solar panel installation	solar panels	\$840,215	\$603,075
		236220	Bus shelter construction	Bus Shelters	\$1,050,268	\$753,844
		334413	LED (light emitting diode) manufacturing	LED display	\$840,215	\$603,075
		488330	Radio beacon	call-stop beacons	\$840,215	\$603,075
		337127	Benches, public building-type, manufacturing	benches	\$840,215	\$603,075
		339999	Umbrellas manufacturing	shade umbrellas	\$840,216	\$603,076
FY 24/25	Radio Lease	335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing	Purchase Order/Agreement with Mobile Relay Systems	\$80,000	\$64,000
FY 24/25	Office Equipment	423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	Purchase Order with various vendors to acquire Computer Hardware, Software, Peripheral replacements.	\$100,000	\$80,000
FY 25/26	Associated Capital Maintenance				\$236,800	\$189,440
FY 25/26		336310	Assembly line rebuilding of automotive and truck gasoline engines	Purchase Orders or Agreements: Engine Re-build Units	\$33,828	\$27,063
		336350	Axle bearings, automotive, truck, and bus, manufacturing	Purchase Orders or Agreements: Transmission rebuild units	\$33,829	\$27,063
		335312	Motor and Generator Manufacturing	Purchase Orders or Agreements: Generator	\$33,829	\$27,063
		336350	Axle bearings, automotive, truck, and bus, manufacturing	Purchase Orders or Agreements: Axle Assembly	\$33,829	\$27,063
		333912	Air and Gas Compressor	Purchase Orders or Agreements:	\$33,829	\$27,063

			Manufacturing	Compressor		
		335312	Inverters, rotating electrical, manufacturing	Purchase Orders or Agreements: Inverters	\$33,828	\$27,063
		334419	Other Electronic Component Manufacturing	Purchase Orders or Agreements: Ultra-capacitors	\$33,828	\$27,062
FY 25/26	Contractual Agreement: E-Charging Stations	457120	Other Gasoline Stations	Purchase Order/Agreement with Gillig LLC for acquisition of (6) Electric Charging Stations.	\$600,000	\$480,000
FY 25/26	Tires Lease	441340	Tire dealers, automotive	Purchase Order/Agreement with Goodyear Tires	\$88,000	\$70,400
FY 25/26	Radio Lease	335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing	Purchase Order/Agreement with Mobile Relay Systems	\$80,000	\$64,000
FY 25/26	Office Equipment	423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	Purchase Order with various vendors to acquire Computer Hardware, Software, Peripheral replacements.	\$100,000	\$80,000
FY 26/27	Associated Capital Maintenance				\$300,000	\$240,000
FY 26/27		336310	Assembly line rebuilding of automotive and truck gasoline engines	Purchase Orders or Agreements: Engine Re-build Units	\$42,857	\$34,286
		336350	Axle bearings, automotive, truck, and bus, manufacturing	Purchase Orders or Agreements: Transmission rebuild units	\$42,857	\$34,286
		335312	Motor and Generator Manufacturing	Purchase Orders or Agreements: Generator	\$42,857	\$34,286
		336350	Axle bearings, automotive, truck, and bus, manufacturing	Purchase Orders or Agreements: Axle Assembly	\$42,857	\$34,286
		333912	Air and Gas Compressor Manufacturing	Purchase Orders or Agreements: Compressor	\$42,857	\$34,286
		335312	Inverters, rotating electrical, manufacturing	Purchase Orders or Agreements: Inverters	\$42,857	\$34,285

		334419	Other Electronic Component Manufacturing	Purchase Orders or Agreements: Ultra-capacitors	\$42,857	\$34,285
FY 26/27	Tires Lease	441340	Tire dealers, automotive	Purchase Order/Agreement with Goodyear Tires	\$90,000	\$72,000
FY 26/27	Radio Lease	335999	Relay and Industrial Control Manufacturing	Purchase Order/Agreement with Mobile Relay Systems	\$82,000	\$65,600
FY 26/27	Office Equipment	423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	Purchase Order with various vendors to acquire Computer Hardware, Software, Peripheral replacements.	\$100,000	\$80,000
Totals					\$11,430,851	\$7,520,091

IV. CATEGORIES OF WORK

NTS reviewed each project anticipated to be awarded in the triennial period and determine the applicable categories of work related for each project using North American Industry Classification System (NAICS) codes. The corresponding dollar values for each NAICS code for every procurement has been summarized for purposes of weighting the categories of work based on NTS staff estimates.

Table 2 below provides a summary of the work categories with estimated dollar value for each category and the percentage of FTA funding for each NAICS code category to the overall FTA funding within the goal period.

Table 2

NAICS Code	NAICS Code Description	Estimated FTA Dollars by NAICS	FTA % by NAICS
236220	Commercial and Institutional Building Construction	\$1,387,708	18%
238210	Solar panel installation	\$603,075	8%
238290	Other Building Equipment Contractors	\$633,864	8%
238390	Other Building Finishing Contractors	\$633,864	8%
333912	Air and Gas Compressor Manufacturing	\$88,412	1%
334413	LED (light emitting diode) manufacturing	\$603,075	8%
334419	Other Electronic Component Manufacturing	\$88,409	1%
335312	Motor and Generator Manufacturing	\$176,823	2%
335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing	\$193,600	3%
336310	Assembly line rebuilding of automotive and truck gasoline engines	\$88,412	1%
336350	Transmissions and parts, automotive, truck, and bus, manufacturing	\$176,824	2%
337127	Benches, public building-type, manufacturing	\$603,075	8%

339999	Umbrellas manufacturing	\$603,076	8%
423110	Automobile and Other Motor Vehicle Merchant Wholesalers	\$104,000	1%
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	\$240,000	3%
441340	Tire dealers, automotive	\$212,800	3%
457120	Other Gasoline Stations	\$480,000	6%
488330	Radio beacon	\$603,075	8%
		\$7,520,091	100%

V. GOAL METHODOLOGY

Step 1: Determination of a Base Figure (49 CFR Part 26.45)

To establish NTS’s Base Figure of the relative availability of DBEs to all comparable firms (DBE and Non-DBEs) available to propose on NTS’s FFYs 2025-2027 DOT-assisted contracting opportunities projected to be solicited; NTS followed one of the five prescribed federal goal-setting methodologies in accordance with 49 CFR Part 26 regulations. This was accomplished by accessing the **California Unified Certification Program (CUCP) Directory of Certified DBE Firms** and the **2021 U.S. Census Bureau County Business Patterns (CBP) Database**. Comparisons were made within the NTS geographical market area (defined as Los Angeles County, Orange County, and San Bernardino County) and by specified industries and types of businesses identified in Table 1.

NTS made a concerted effort to ensure that the scope of businesses included in the numerator was as close as possible to the scope included in the denominator.

- ⇒ **For the numerator: California UCP DBE Database of Certified Firms**
- ⇒ **For the denominator: 2021 U.S. Census Bureau’s Business Pattern Database (CBP)**

To determine the relative availability of DBEs, NTS divided the numerator¹ representing the ratio of ready, willing and able DBE firms, by the denominator² representing all firms (DBE and Non-DBEs) available in each work category. Application of this formula yielded the following baseline information:

$$\frac{\text{Number of Ready, Willing and Able DBEs}}{\text{Number of All Available Firms (including DBEs and Non-DBEs)}} = \text{DBE Availability \%}$$

To determine the appropriate weighting percent by NAICS, the estimated dollar value by NAICS was divided by the total estimated federal dollars for FFY 2025-27. The weighting percent by NAICS was then multiplied by the DBE Availability % to determine the Base Figure % by NAICS, see below:

¹ Numerator represents all DBE firms established within the County’s market area.

² Denominator represents all comparable available established firms.

$$\text{Weighting} \quad \times \quad \text{DBE Availability \%} \quad = \quad \text{Base Figure \% by NAICS}$$

To determine the Step 1 Base Figure, NTS added together all Base Figure percentages by NAICS code reflected in Table 3 on page 8, resulting in a 5.8% Step 1 Base Figure.

Table 3

NAICS Code	NAICS Code Description	Value of FTA funding	Weighted (% of total DOT funding)	# of DBEs available to perform work	# of all firms available (including DBE's)	Relative Availability	Base Figure
236220	Commercial and Institutional Building Construction	\$1,387,708	18%	86	313	27.48%	5.07%
238210	Solar panel installation	\$603,075	8%	70	3536	1.98%	0.16%
238290	Other Building Equipment Contractors	\$633,864	8%	5	313	1.60%	0.13%
238390	Other Building Finishing Contractors	\$633,864	8%	4	360	1.11%	0.09%
333912	Air and Gas Compressor Manufacturing	\$88,412	1%	0	14	0.00%	0.00%
334413	LED (light emitting diode) manufacturing	\$603,075	8%	0	54	0.00%	0.00%
334419	Other Electronic Component Manufacturing	\$88,409	1%	1	102	0.98%	0.01%
335312	Motor and Generator Manufacturing	\$176,823	2%	0	22	0.00%	0.00%
335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing	\$193,600	3%	1	50	2.00%	0.05%
336310	Assembly line rebuilding of automotive and truck gasoline engines	\$88,412	1%	0	53	0.00%	0.00%
336350	Transmissions and parts, automotive, truck, and bus, manufacturing	\$176,824	2%	0	29	0.00%	0.00%
337127	Benches, public building-type, manufacturing	\$603,075	8%	1	42	2.38%	0.19%
339999	Umbrellas manufacturing	\$603,076	8%	1	187	0.53%	0.04%
423110	Automobile and Other Motor Vehicle Merchant Wholesalers	\$104,000	1%	0	412	0.00%	0.00%
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	\$240,000	3%	0	679	0.00%	0.00%
441340	Tire dealers, automotive	\$212,800	3%	0	774	0.00%	0.00%
457120	Other Gasoline Stations	\$480,000	6%	0	0	0.00%	0.00%
488330	Radio beacon	\$603,075	8%	0	7	0.00%	0.00%
		\$7,520,091	100%	169	6947	38%	5.8%

Step 2: Adjusting the Base Figure

Upon establishing the Base Figure, NTS reviewed and assessed other known evidence potentially impacting the relative availability of DBEs within the NTS market area, in accordance with prescribed narrow tailoring provisions set forth under 49 CFR Part 26.45 Step 2; DBE Goal Adjustment guidelines.

Evidence considered in making an adjustment to the Base Figure included the NTS Past DBE Goal Attainments, NTS’s Bidders list, Disparity Studies, and other Local Agencies Goal & Methodologies.

VI. PAST DBE GOAL ATTAINMENT

Historical DBE participation provides demonstrable evidence of DBE availability and capacity to perform on NTS’s projects which are similar to previous years projects. The following table, Table 4 reflects the demonstrated capacity of DBEs (measured by historical DBE participation) on FTA-assisted contracts awarded by NTS within the last three (3) completed Federal Fiscal Years:

Table 4A

Federal Fiscal Year	Attainment
2021 (10/1/2020-9/30/21)	2.43%
2022 (10/1/2021-9/30/22)	0.91%
2023 (10/1/2022-9/30/23)	0%
2024 (10/1/2023-3/31/24) *	100%
0%, .91% , 2.43%; Median = 0.91%	

**As only a portion of the attainment data from FFY 2024 was available at the time of this goal methodology preparation, it was not included in the past attainment calculation.*

NTS considered an adjustment to the Base Figure based on the median DBE participation on DOT-assisted contracts completed within the past three FFYs (2021-23). The median goal attainment for the past three years is less than the Base Figure derived from Step 1; therefore, a downward adjustment to the Base Figure based on NTS’s past DBE goal participation has been applied.

As three years of DBE Participation data was reviewed and the years reviewed included projects with a similar variety in scope to the scopes projected for the 2025-27 goal period, NTS can reasonably assume that the rates of DBE participation reflected are an accurate reflection of DBE capacity to perform in the 2025-27 overall goal period. The adjustment is calculated in accordance with FTA guidance by averaging the Base Figure with the Median DBE Past participation, as shown below.

<p>5.8% Base Figure + .91% Median Past Participation = 6.71%</p> <p>6.71/2 = 3.36%</p> <p>Adjusted Base Figure: 3.0% (Rounded to the nearest whole number)</p>

The formula resulted in a downward adjustment to the Base Figure from 5.8% to 3.0%.

VII. NTS BIDDERS LIST

NTS maintains a bidders list for each project. NTS's bidders list demonstrates efforts in seeking qualified DBE firms to perform work on NTS projects, similar to projects within the 2025-27 goal period. There was no evidence from NTS's bidder's list that would warrant an adjustment to NTS base figure.

VIII. EVIDENCE FROM STUDIES

NTS did not find it feasible to conduct a its own independent availability/disparity study; however, Orange County Transportation Authority (OCTA) identified two disparity studies, inclusive of market areas like NTS', to consider whether a Race-Conscious DBE Program should continue to be implemented. The two identified disparity studies were the Caltrans Disparity Study and the Los Angeles County Metropolitan Transportation Authority (Metro) Disparity Study.

Caltrans FTA disparity study was completed in August 2022. This study focused on professional services and goods, non-professional service contracts and procurements that Caltrans awarded between October 1st, 2017, through September 30th, 2020. The overall FTA DBE Goal for the relative availability of DBEs in Caltrans FTA 2022 Disparity Study was 6.3 percent (6.3%). Caltrans' FTA Disparity Study included thousands of contracts from areas outside of the NTS market area as well as projects that had minimal relation to the contract scopes included for NTS and therefore NTS opted to not utilize Caltrans FTA Disparity Study when considering an adjustment to their base figure or their current race-neutral DBE application measures.

The second disparity study taken into consideration was Metro's Disparity Study due to the similarities in the market area and timeliness of the contracts reviewed. Where the Caltrans Study market area included the entire state of California, the Metro Disparity Study focused on Los Angeles County which is more aligned with NTS's market area. The Metro Disparity Study included a five-year study period (January 1, 2016 through December 31, 2021) to determine any differences between the participation of minority- and woman-owned businesses in relevant contracts and the availability of those businesses to perform that work (referred to as disparities). Disparity analysis results indicated that most racial/ethnic and gender groups showed disparities on contracts where race- and gender-conscious measures were not in place during the study period. As a result, the disparity study recommended the use of contract DBE goals.

As Metro's Disparity Study satisfies the legal standards established by the Ninth Circuit Court of Appeals in *Western States Paving Co., Inc. v. Washington State Department of Transportation*, and guidance from the U.S. DOT/FTA concerning the implementation of race-conscious application, NTS has elected to utilize this study as a basis for continuing to implement the race-conscious component of their Overall DBE goal. NTS will ensure that the use of Race-Conscious goals is narrowly tailored and consistent with other relevant legal standards.

NTS will continue to review applicable disparity studies as they become available and apply the appropriate adjustments to their Race-Neutral/Race-Conscious DBE goal application.

IX. OTHER EVIDENCE

NTS did not receive any anecdotal evidence nor is aware of any other factors or adverse considerations that would have had a material affect on DBEs availability within the NTS marketplace, or on DBEs' ability to participate (meeting bonding, insurance and financial requirements) in the NTS FTA-assisted contracting program. Therefore, no goal adjustment was made in consideration of this factor. However, NTS will continue to explore and consider all available evidence that materially would affect the opportunities for DBEs to form, grow, and compete in NTS FTA-assisted contracting programs.

X. OVERALL DBE GOAL AND PROJECTION OF RACE-NEUTRAL AND RACE CONSCIOUS PARTICIPATION

A. Consider the Amount by Which You Exceeded Your Goals in the Past.

DOT has identified the amount a recipient has exceeded their overall goals in the past years as a useful tool in projecting the race/gender-neutral participation one can expect in future Federal Fiscal Years. NTS has not met nor exceeded their DBE goal in prior FFY's (2021-23) and therefore cannot consider an adjustment to the base figure, based on prior years attainment.

Table 4B

FFY	DBE Goal in Period	% Exceeded
23	8%	0%
22	8%	0%
21	3%	0%

B. Consider Past Participation by DBE Prime Contractors.

DOT has identified that the amount of past participation obtained using DBE primes should be considered achieved race/gender-neutrally and that those attainments can be used as a basis for estimating a similar level of race/gender-neutral participation in the next overall goal period. NTS considered the amount of past DBE participation (based on awards) obtained through the use of DBE primes in FFY's 21-23 shown in Table 5 below. NTS did not award any DBE prime contractors during the last 3 FFY's and therefore cannot consider an adjustment to the base figure based on prior year awards to DBE prime contractors.

Table 5

FFY	DBE Goal in Period	DBE Prime Participation
23	8%	0%
22	8%	0%
21	3%	0%

C. Consider Past Participation by DBE Subcontractors on Contracts Without Goals.

DOT has identified that the amount of past participation obtained using DBE subcontractors on contracts without DBE goals should be considered achieved race/gender-neutrally and that those attainments can be used as a basis for estimating a similar level of race/gender-neutral participation in the next overall goal period. NTS considered the amount of past DBE subcontractor participation on contracts without DBE goals in FFY's 2021-23 shown in the Table 6 below:

Table 6

Federal Fiscal Year	Attainment
2021 (10/1/2020-9/30/21)	2.43%
2022 (10/1/2021-9/30/22)	0.91%
2023 (10/1/2022-9/30/23)	0%
2024 (10/1/2023-3/31/24) *	100%
0%, .91% , 2.43%; Median = 0.91%	

**As only a portion of the attainment data from FFY 2024 was available at the time of this goal methodology preparation, it was not included in the past attainment calculation*

A median DBE sub participation value of .91% was derived by the utilization of DBE firms in the Race-Neutral (RN) periods above. NTS confirmed that the projects completed during FFYs 2018 through 2020 were similar to the types of projects being procured in the upcoming overall goal period, a required criterion for consideration in utilizing DBE prime participation to validate race-neutral application. As .91% DBE participation was achieved on like-projects during the attainment period reviewed NTS concluded that this rate of DBE participation would be an accurate reflection of DBE subcontractor's capacity to perform race-neutrally in the 2025/27 overall goal period.

D. Consider MBE/WBE/DBE Participation Pursuant to Race/Gender-Neutral State or Local Programs.

NTS monitors DBE participation but does not currently track MBE/WBE/SB participation on their race/gender-neutral program. NTS will consider methods of tracking this information in the future for use in considering the proper race/gender-neutral

E. Consider Concrete Plans to Implement New Race-Neutral Methods.

NTS is not aware of any concrete plans to implement new Race-Neutral measures in the upcoming goal period.

F. Consider Past History of Inability to Achieve Goals.

DOT has identified that a recipient's past inability to meet their goals in the past years as a powerful indicator that the recipient may be justified in applying race/gender conscious measures to achieve their goals in future FFY. NTS has demonstrated an inability to meet their overall DBE goal in the last three fiscal years.

FFY	DBE Goal in Period	DBE Participation	Variance
2023	8%	0%	-8%
2022	8%	0%	-8%
2021	3%	2.43%	-.57%

As part of the prescribed goal-setting methodology and consistent with 49 CFR part 26.51 (c), NTS projected the percentage of its proposed overall DBE Goal that can be met utilizing race-neutral measures. Additionally, per 49 CFR Part 26.51(d) NTS will establish contract goals to meet any portion of their overall goal they do not project to meet utilizing Race Neutral means.

As three years of DBE Participation data was reviewed for projects with similar scopes and values to the projects in the upcoming goal period, NTS can reasonably assume that the rates of DBE participation reflected are an accurate reflection of DBE capacity to perform race-neutrally in the 2025-27 overall goal period. NTS has applied this to the proposed DBE Goal to project the necessary race-conscious/race-neutral breakout, as illustrated below:

<p>% Goals Exceeded in Past = 0% DBE</p> <p>Prime Participation= 0%</p> <p>RN DBE Sub Participation = .91%</p> <p>0% (% Goals Exceeded in Past) + 0% (RN DBE Prime Participation) + .91% (RN DBE Sub Participation) = .91%</p> <p>.3% Adjusted Base Figure - .91% RN Projection</p> <p style="text-align: center;">=</p> <p>2.09% RC Participation Necessary to Meet Goal</p>
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Consistent with the FTA guidance provided and the reasons delineated above NTS projects to implement a combination of race-conscious and race-neutral breakout to achieve the 3% DBE goal for FFY 2025-27:

Race-Conscious & Race-Neutral Projections	
Race-Conscious Component	2.09%
Race-Neutral Component	0.91%

This race-neutral/race-conscious projection is in conformance with Title 49 CFR Part 26.51 (c) and (d); “What means do recipients use to meet overall goals”.

NTS’ inability to meet its DBE goals in FY21 thru FY23 were largely due to the COVID-19 Pandemic. NTS was registered for various Business Networking Groups, DBE Forums and Summits. However, these events were cancelled due to the COVID-19 restrictions. Additionally, the majority of items procured during this period were bus purchases and major bus components which were Original Equipment Manufacturer (OEM) specific. Nonetheless, NTS will strive to meet its DBE goals by focusing on advertising procurements in minority focused publications, utilize the City of Norwalk’s Planetbids vendor list to seek DBE vendors, reaching out to large public agencies to add NTS to future outreach events, reaching out to the City’s Chamber of Commerce, and explore the possibility of using the City’s social media platforms (Facebook/Instagram).

NTS will continue to monitor its participation and apply the appropriate adjustments to their DBE Program goal application as necessary.

Race-Neutral Implementation Measures

NTS plans to continue utilizing existing remedies and will continue to explore other options for consideration in meeting its overall DBE goal. NTS will:

- Encourage DBE and other small business contracting community to register and receive solicitation notices through its on-line procurement website:

[PlanetBids Vendor Portal](#)

[Bids and RFPs | City of Norwalk, CA](#)

- Host and/or participate in workshops for the DBE and small business contracting community. NTS will attend and participate in vendor fairs hosted by unrepresented groups and other public agencies.
- Structure solicitations to remove barriers such as the inability to obtain bonding or financing (e.g., by such means as simplifying the bonding process, reducing bonding requirements, eliminating the impact of surety costs from bids, and providing services to help DBEs, and other small businesses, obtain bonding and financing).
- Solicit DBEs and other small businesses participation by carrying out information programs through use of advertisement and other communication methods on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists of bidders; ensuring the dissemination to bidders on prime contracts of lists of potential subcontractors; provision of information in languages other than English, where appropriate).
- Actively promote the small business conferences, programs, and support services offered by other agencies that have established DBE and other small business programs as a supportive service to help develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs and other small businesses. NTS will also begin conducting “How to do Business with NTS” and DBE workshops.
- Ensuring that a reasonable number of prime contracts are of a size that small businesses, including DBEs, can reasonably perform.
- Provide outreach to current NTS contractors or past NTS contractors who may currently be small business certified and encourage them to seek and obtain a DBE-certification.

Race-Conscious Implementation Measures

NTS' Overall DBE goal represents the amount of ready, willing and able DBEs that are available to participate in contracting opportunities and is reflective of the amount of DBE participation NTS would expect, absent the effects of discrimination. NTS intends to meet those goals to the maximum extent feasible through the race neutral measures described herein. Where race-

neutral measures are inadequate to meet the overall goals, NTS will establish DBE goals on contracts with subcontracting opportunities and relative DBE availability.

NTS may establish a DBE contract goal that is higher or lower than its overall goal, depending on such factors as the type of work involved, the location of the work, and the availability of DBEs for the work of the particular contract. NTS' contract goals will provide for participation by all certified DBEs and will not be subdivided into group-specific goals.

XI. PUBLIC PARTICIPATION AND FACILITATION

In accordance with Public Participation Regulatory Requirements of Title 49 CFR Part 26, minority, women, local business chambers, and community organizations within the NTS market area were consulted and provided an opportunity to review the goal analysis and provide input. NTS and its research team prepared Outreach Consultation Letters advising the aforementioned business community of the proposed DBE goal analysis and its availability for review and comment on the NTS website. NTS and its research team invited the public as well as identified minority, women and general contractor groups and organizations within the NTS market area to share their valuable experience and input regarding effects of discrimination on opportunities for DBEs in the NTS market area.

NTS issued a Public Notice publishing the NTS Proposed Overall Goal for the FFY 2025-27 FTA-assisted contracts on their website. The Notice informed the public that the proposed goal and rationale were available for inspection on the NTS website and that NTS would accept comments on the goal analysis for 30 days from the date of the Public Notice. The public was informed that NTS would give full consideration to all comments and input received as a part of the consultation process and would assess its impact on the Proposed Overall DBE Goal. The final Overall Goal submitted to FTA for approval will remain on the NTS website through the life of the goal period.

To further support the public participation process, NTS and its research team hosted a virtual Public Consultation Meeting. This meeting was designed to facilitate receiving input from NTS's contracting community, stakeholders, which include minority and women business groups, community organizations, trade associations and other officials or organizations that may have information concerning the availability of disadvantaged businesses and comments on the Owner's proposed DBE overall goal and corresponding methodology.

Access to NTS's Public Consultation Meeting can be found at the following website address:

<https://www.norwalk.org/city-hall/departments/norwalk-transit-system-nts/title-vi/disadvantaged-business-enterprise-program>

Following completion of the public participation process, staff will consider any feedback as a factor in making a further adjustment to the goal. If the goal percentage changes from the proposed 3% staff will return to the City Council for approval of the adjusted goal and will then submit the goal and methodology to the FTA.