



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION 10  
Alaska, Idaho, Oregon,  
and Washington

915 Second Avenue, Suite 3142  
Seattle, WA 98174

October 1, 2021

Kunjan Dayal  
Snohomish County Public Transportation Benefit Area Corp, Recipient ID: 2578  
7100 HARDESON RD  
EVERETT, WA 98203

Re: 2022-2023 (previous goal extended one year)

Dear Kunjan Dayal,

The Federal Transit Administration (FTA) has received and reviewed Snohomish County Public Transportation Benefit Area Corp's Disadvantaged Business Enterprise (DBE) triennial goal setting methodology for Federal Fiscal Years (FFY) 2022-2024. This DBE goal will be effective October 1, 2021 through September 30, 2024. This submission is required by the Department of Transportation DBE regulations found at 49 C.F.R. Part 26. Your proposed overall goal is 4.4%, with a proposed race-conscious/race-neutral split of % RC / 4.4% RN.

Our review considered all elements required by the Department of Transportation regulations found at 49 C.F.R. § 26.45, including the descriptions of the evidence and methods used to calculate, adjust and establish the overall goal. The review assessment attached to this letter identifies the specific areas reviewed, any concerns, and relevant reviewer comments. You must address and correct any identified concerns to assure you are implementing the goal in accordance with the regulations. Your goal status is now *Concur*, and your next triennial goal is due to FTA on August 1, 2024. FTA will verify corrections have been made and implemented at the next oversight opportunity.

You are expected to make a good faith effort to meet your goal each year during the three-year period for which it is in effect. You must document your DBE attainment on FTA-funded contracts and purchases by submitting a semi-annual report via TrAMS on June 1 and December 1 of each year. If you fall short of your overall DBE goal in any given year, you must develop a shortfall analysis and corrective action plan following the guidance in 49 C.F.R. § 26.47(c). Transit vehicles must be purchased from a DBE-certified transit vehicle manufacturer (TVM) and reported to FTA within 30 days of purchase. The current list of DBE-certified TVMs and the **online reporting tool can be found on the DBE portion of FTA's website at [www.transit.dot.gov](http://www.transit.dot.gov)**. Finally, any mid-cycle adjustment to your goal to reflect changed circumstances must be submitted to FTA.

FTA is committed to providing technical assistance to help correct your DBE goal and to implement your program consistent with the regulations and guidance. In order to preserve paper, we are issuing this letter electronically via email and it is attached to your profile in

TrAMS. Please do not hesitate to contact me directly at 206-220-4462 or at christopher.macneith@dot.gov if you have any questions.

Sincerely,

Christopher Macneith/s/  
Civil Rights Officer, Region 10

cc: Linda Gehrke, FTA Region 10, Regional Administrator  
Monica McCallum, FTA Civil Rights, Director of Regional Operations

## **DBE Goal Review Assessment:**

Items below identified as “YES” are included in the DBE goal, and no changes are needed. Items identified as “NO” were not included or were insufficient and must be corrected. Carefully address all insufficient items, as indicated in this review letter, to ensure you are implementing a goal in accordance with the regulations.

### **Overall Goal Methodology and Submission**

1. Does the overall goal reflect the percentage of DBE participation you expect to have on FTA-funded contracts in the upcoming three years (excludes transit vehicles purchases)?  
*Yes*
2. The overall goal, as stated in the submission is: *4.4%*
3. Is there a description of how much of the goal you anticipate meeting using race/gender conscious (RC) measures (i.e. contract-specific DBE goals), versus race/gender neutral (RN) measures? *N/A - All RN*
4. The RC portion of the goal, as stated in the submission, is: *%*.
5. The RN portion of the goal, as stated in the submission, is: *4.4%*.
6. **Is there a sufficient description of the consultation with minority, women’s and general contractor groups?** *Yes*
7. Does the methodology summarize the comments received during consultation with the public and what changes, if any, were made to the goal as a result? *Yes*
8. Was the proposed overall goal posted on your official agency website before the August 1<sup>st</sup> submission date? *Yes*
9. Does the methodology include your data sources and the assumptions and calculations used to establish the overall goal? *Yes*

### **Step 1 – Developing the Base Figure**

10. Is there a description of the FTA-funded projects or contracts you project for the next three years? *Yes*
11. Are larger projects broken down or described to evaluate possible sub-contracting opportunities? *Yes*
12. If applicable, are all of the prime and sub-contracting opportunities included for sub-recipients? *Yes*
13. **Did you “show your work” when calculating the percentage of DBE availability as compared to all available firms?** *Yes*
14. FTA identified that the following strategies were used to narrowly tailor this goal:  
*The most refined data (such as 6-digit NAICS) is used to focus the goal on firms that are most likely to bid on contracts as either a prime contractor or sub-contractor,*

*Contracting opportunities are associated with the correct and appropriate NAICS codes,*

*NAICS codes or projects or contracts are associated with the amount of anticipated FTA funds,*

## **DBE Goal Review Assessment (continued):**

*The number of ready willing and able DBEs is included for each NAICS code or project or contract,*

*The number of all firms (DBE and non-DBE) is included for each NAICS code or project or contract,*

*The data source(s) used to find the number of available DBE and non-DBE firms is relevant and verifiable,*

*The local market area (the area where a substantial majority of the contractors you do business with are) is described,*

*Weighting was used to ensure the Step 1 Base Figure is as accurate as possible*

15. Does the data, evidence, and methodology presented clearly describe and verify how you arrived at the Step 1 Base Figure? *Yes*

### **Step 2 – Adjusting the Base Figure**

16. Is the Step 1 Base Figure adjusted? *Yes*
17. Was past participation used to adjust the goal? *Yes*
18. The following was considered when adjusting the goal with Past participation:  
*Upcoming contracting opportunities are the same as - or substantially similar to - the recent past,*

*Used the historical median (not average) to measure past participation*

19. Does the methodology suggest that all available evidence was considered to determine what, if any, adjustments to the Base Figure were needed? *Yes*
20. The evidence considered in Step 2 was:  
*Recent disparity studies conducted in the market area*
21. Does the goal appear to be narrowly tailored? *Yes*

### **Calculating the Race and Gender-Neutral Projection for the Goal, Which Determines the Portion of the Goal that Can Be Achieved Through Race-Neutral Measures (i.e. contracts with no DBE goals.)**

22. Did you calculate the portion of the goal you project to meet using only RN means of facilitating DBE participation? *Yes*
23. FTA verified the following elements were included when projecting the RC and RN participation:  
*No Race/Gender-Neutral or Race/Gender-Conscious calculation elements were included in the submission*
24. Does the evidence presented suggest you can meet the RN portion of your goal without the use of contract specific DBE goals? *Yes*

## **DBE Goal Review Assessment (continued):**

### **FTA Reviewer Comments:**

*The addition of the worksheet that identifies NAICS and weighting was critical in the concurrence of this goal.*

**Also, please visit the FTA Civil Rights webpage for more information:**

<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/civil-rightsada>

July 1, 2021

# Federal Fiscal Years 2021-23 Disadvantaged Business Enterprise (DBE) Goal Setting Report

Point of Contact:

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DBELO

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## Introduction

Snohomish County Public Transportation Benefit Area Corporation doing business as Community Transit, submits its Disadvantaged Business Enterprise (DBE) Triennial Goal Setting Methodology Report for the period of federal fiscal years 2021, 2022 and 2023 to the United States Department of Transportation Federal Transit Administration’s Region 10 for review and approval.

The report has been prepared in compliance with DBE regulations, 49 CFR Part 26.45 – “How do recipients set overall goals?” as amended, and the General Counsel of the United States Department of Transportation’s “Tips for Goal-Setting” (USDOT Tips).

The regulations require that the overall goal be prepared using a two-step process. According to the USDOT Tips, the recipient must first determine a base figure for the relative availability of DBEs in the relevant market area. This data is further weighted with fund allocation for each NAICS code applicable to the anticipated work.

Next, the recipient must examine all relevant evidence to determine what adjustment to the base figure, if any, is needed in order to arrive at an overall goal. The final adjusted figure is the recipient’s overall goal, and represents the proportion of federal transportation funding the recipient is expected to allocate to DBEs during the period. Once the adjusted overall goal is determined, the process requires establishment of the portion of the goal to be met by race and gender-neutral measures.

If a recipient purports it can meet its overall goal with race and gender-neutral measures, those measures must be utilized. In contrast, if the recipient determines it cannot achieve the entire overall goal using only race and gender-neutral measures, it must establish a race and gender-conscious portion of the overall goal.

## Proposed Overall Goal

Based upon the requirement set forth in 49 CFR Part 26, and the USDOT Tips, Community Transit has determined a **four and four-tenths (4.4) percent Race Neutral DBE goal for Federal Fiscal Years 2021-23.**

## Overall Goal-Setting Methodology

As previously established, the two-step goal setting process required by 49 CFR Part 26 and the USDOT Tips have been used to determine the overall goals for the Federal Fiscal years 2021-23. The two steps for setting an overall goal are:

- Establishing a base figure for the relative availability of DBEs and weighting it with federal funding allocation
- Adjustment of the base figure

The base figure is intended to be a measurement of the current ready, willing, and able DBEs as a percentage of all businesses available to perform the recipient’s anticipated work. The regulations present five options for establishing a base figure for relative availability of DBEs. The five options as set forth in the regulations are shown in Table 1.

*Table 1: Methods to Determine Base Figure*

<b>BASELINE FIGURE METHODS</b>
Bidders List
DBE Directories and Census Data
Other Recipient’s Base Figure
Disparity Study
Alternative Method

1) *Bidders List Method*

This method for calculating a base figure requires Community Transit to have a comprehensive bidders list which include potential prime contractors and subcontractors classified by industry, ethnicity, and gender. The regulations require the Bidder List to be in existence for 3 years.

Community Transit recently purchased a software (B2Gnow) to meet this requirement. The software was implemented in March 2017 but we have had only one federal project processed using the software, hence our database is not yet reliable and robust.

2) *DBE Directories and Census Data Method*

Washington State's agency for Unified Certification Program for DBEs is The Office of Minority, Women and Disadvantaged Business Enterprises (OMWBE).

Community Transit has established a partnership with OMWBE to obtain data regarding Small and Disadvantaged Business Enterprises. This is a standard practice in the State of Washington.

Community Transit's report is based on this method of determination of base figure.

3) *Other Recipients' Base Figure Methods*

This method uses the goal of another USDOT recipient as the base figure. Community Transit can only use another recipient's goal if the goal-setting is done in accordance with the DBE regulation and Community Transit has performed similar contracting in similar market area. This method presumes that there is another USDOT recipient that does the same or similar type of contracting in the same geographic market area.

While Everett Transit and Community Transit are headquartered in the same city the nature of transit services provided by each is substantially unique. Everett Transit provides circulator bus services within the City of Everett whereas Community Transit provides commuter and Bus Rapid Transit services within Snohomish County and to King County.

4) *Disparity Study Methodology*

The disparity study is the most comprehensive method for calculating the base figure. A disparity study identifies the businesses that have bid or could bid as either a prime or subcontractor, and enumerates DBEs and non-DBEs that are willing and able to work on Community Transit contracts. A disparity study has not been conducted by Community Transit, and therefore cannot be considered.

5) *Alternative Method*

Alternative methods may be used to determine a base figure for the overall goal. Any methodology used to determine a base figure must be based on demonstrable evidence of the local market conditions, and be designated to ultimately attain a goal that is related to the relative availability of DBEs and potential DBEs in the recipient's market area. The alternative method provides the most flexibility, but it is also subject to a higher level of scrutiny.

## Step One Base Figure Calculation

The initial phase of the Step One analysis required the compilation of data regarding projects anticipated to be funded with USDOT grants. The areas considered for the Step One analysis include the following:

- Identifying federal funding and its application
- Identifying appropriate NAICS codes for the Project
- Defining the market area for the Project
- Developing the base figure of DBE participation

1) *Identify federal funding and its application.*

Community Transit establishes DBE goals for USDOT/FTA funded contracts only. Washington State’s Initiative 200 prohibits the use of race and gender based preferences in public contracting unless required for federally funded contracts.

a) Sources of federal funding during the period FFY 2021-23:

- i) **Formula Funds:** Community Transit is the direct recipient of Federal Transit Administration’s (FTA) Section 5307, 5337 and 5339 annual apportionments for the Seattle-Tacoma-Everett and Marysville Urbanized Areas. These apportionments, referred to as formula funds, are used for operational costs of employee wages and benefits, transit vehicle purchases, and capitalized preventative maintenance. FTA formula funding is administered by the Puget Sound Regional Council (PSRC). Community Transit receives an earned share of the annual apportionment to the two Urbanized Areas through PSRC based on performance data submitted to the National Transit Database in an annual report.
- ii) **Discretionary Funds:** Additional funds are available through discretionary 5309 & competitive federal grant programs. Currently, Community Transit is awaiting the appropriation of funding and execution of a Small Starts Grant Agreement for its *SWIFT* BRT Orange Line project.
- iii) **COVID Recovery Funds:** Community Transit is the direct recipient of Federal Transit Administration’s (FTA) Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) and American Rescue Plan Act (ARPA) funds as apportioned to the Seattle-Tacoma-Everett and Marysville Urbanized Areas and split between area transit agencies through the Puget Sound Regional Council (PSRC). These apportionments, referred to as COVID Recovery Funds, are used for operational costs of employee wages and benefits, and transit vehicle replacement purchases.

b) Application of federal funding during the period FFY 2021-23:

- i) **Formula Funds:** This triennial DBE goal period is within Community Transit’s current 2020-2025 Transit Development Plan. The Plan includes a mix of uncertain increase in transit service forecast by 2022, primarily due to COVID-19. Fleet plans call for both major replacements and expansions to maintain quality and meet higher service levels.
  - (1) Regular fleet replacement is a high priority for Community Transit to provide the best possible service as well as a cost-effective vehicle maintenance program. Our plans include the purchase of 81 replacement buses, of various capacities/sizes, during federal fiscal years 2021-23.
  - (2) Planned service expansion will require significant growth in the bus fleet. By 2022, Community Transit’s fleet will grow by 47 buses over 2016 levels. A portion of this growth reflects vehicle purchases initiated in 2016 that will enter service in 2017. New purchases to be initiated during the 2017-2022 period include 26 expansion buses of various capacities/sizes, 11 of which will be purchased during federal fiscal years 2018-20.

Overall, Community Transit estimates to receive \$41,672,206 in formula funds during federal fiscal years 2021-23. The full amount of funding during these periods will be applied to:

Wages and Benefits	\$	6,431,278
Transit Vehicles	\$	35,240,928
Total non-contracting opportunities:	<u>\$</u>	<u>41,672,206</u>
<b>Federal Grant Formula Funding available for contracting in FFY 2021-23:</b>	<u>\$</u>	<u>0</u>

ii) Discretionary Funds:

- (1) Community Transit expects to receive \$9,088,240 in FFYs 2021-22 section 5307 funds (\$5,000,000 for Stations and \$4,088,240 for Edmonds Community College Station (terminus to Swift Orange Line)).
- (2) Community Transit expects to execute a Single Year Grant Agreement for \$37,000,000 (FTA portion) in FFY 2021 for the BRT Orange Line project.

Contracts for the BRT Orange Line project will be awarded during FFY 2022-2023, but will be expensed during the Federal Fiscal Years 2022, 2023, 2024 and 2025.

Single Year Grant Agreement for BRT Orange Line	\$	37,000,000
Section 5307 funds for BRT Orange Line Stations	\$	5,000,000
Section 5307 funds for BRT Orange Line Edmonds Community College Station	\$	4,088,240
<b>Total</b>	<b>\$</b>	<b>46,088,240</b>
Transit Vehicles	\$	2,000,000
<b>Federal Grant Discretionary Funding available for contracting in FFY 2021-23</b>	<b>\$</b>	<b>44,088,240</b>

- iii) COVID Recovery Funds: Community Transit has or will expend all COVID Recovery funds on Operations or Bus Replacements. We received \$39,171,800 in FY20 CARES Act funds which was expended on Operations and Replacement Buses. During FY21 and FY22 we expect to receive \$35,417,280 in CRRSA Act funds and up to \$40,000,000 in ARP Act funds which will be expended entirely on Operations.

**Federal COVID Recovery Funding available for contracting in FFY 2021-23** **\$ 0**

2) Identify appropriate NAICS Codes and Project Cost Allocation

Based on the scope of project development work for the SWIFT BRT Orange Line project, Community Transit identified the associated NAICS Codes.

Table 2: Applicable NAICS Title and Industry

NAICS Code	Industry	Description
237110	Engineering & Construction Services	Water / Sewer / Storm Construction Services
237310		Construction Mgmt. (Hwy), Asphalt & Concrete Paving, Concrete Curb, Gutter, Sidewalk, Striping, Markings
238110		Concrete Pouring / Ret. Walls
238210		Electrical & Lighting, Traffic Signals, Security Cameras
238220		Gas Supply, HVAC, Plumbing
238910		Earthwork, Demolition, Excavation, Clearing, Grubbing, Grading
238990		Fencing (Chain link)
332312		Mfg. Structural (incl. Painting) & Misc. Steel & Install
484220		Trucking - Soils, Gravel, Rock
541330		Engineering Services

561730		Landscaping
561990		Flagging - Traffic Control

Community Transit’s long-range plan contemplates establishment of several Bus Rapid Transit lines. The federal funding anticipated during FFY 2021-23 is \$44,088,240 and is planned to be applied to project construction work for our next BRT Line – the *SWIFT* Orange Line.

Based on our experience with construction of our *SWIFT* BRT Green line, we have allocated the \$44,088,240 Federal Funding as shown in Table 3 below.

*Table 3: Project Cost Allocation*

Description	Amount of DOT Assisted Funds for Project element:	Percentage of total DOT funds
Water / Sewer / Storm Construction	\$1,039,922	2.36%
Construction Mgmt. (Hwy), Asphalt & Concrete Paving, Concrete Curb, Gutter, Sidewalk, Striping, Markings	\$7,430,962	16.85%
Concrete Pouring / Ret. Walls	\$236,376	0.54%
Electrical & Lighting, Traffic Signals, Security Cameras	\$3,203,175	7.27%
Gas Supply, HVAC, Plumbing	\$1,039,922	2.36%
Earthwork, Demolition, Excavation, Clearing, Grubbing, Grading	\$787,691	1.79%
Fencing (Chain link)	\$2,413,781	5.47%
Mfg. Structural (incl. Painting) & Misc. Steel & Install	\$15,810,752	35.86%
Trucking - Soils, Gravel, Rock	\$787,691	1.79%
Engineering Services	\$6,192,682	14.05%
Landscaping	\$2,499,939	5.67%
Flagging - Traffic Control	\$2,413,781	5.47%
Government fees	\$231,565	0.53%
<b>Total FTA Assisted Contracts</b>	<b>\$44,088,240</b>	<b>100.00%</b>

1) *Determine Appropriate Market Area*

For the projects to be covered with federal grants during FFY 2021-23, Community Transit determined the nearby counties from where we obtain most of our vendor base to be an accurate representation of the market area. The counties are identified in Table 4:

*Table 4: Identification of Market Area*

Snohomish County	Whatcom County
King County	Chelan County
Pierce County	Island County
Skagit County	Kitsap County



We have considered the following items to define our market area for collection of DBE data.

- Past and current procurements
- Utilization of local market
- Availability of product, and services for immediate needs
- Impact of small business outreach

2) *Base Figure Determination*

The base figure is intended to be a measurement of the relative percentage of ready, willing, and able businesses that are DBEs. The recipient is required to measure willing and able businesses in its marketplace, using the best available evidence, to derive a fair and accurate base figure that represents the percentage of available DBEs. According to Section 26.45(c) and USDOT Tips, the overall goal must be based on demonstrable evidence of available ready, willing, and able DBEs relative to all ready, willing, and able non DBEs to participate on the Project.

a) *Relative Base Figure*

USDOT Tips requires the calculation of the relative base figure by dividing the number of market area DBEs by all market area businesses (DBEs and non-DBEs), which produces a relative base figure of **1.7 percent** for construction as shown in Table 5.

*Table 5: Design & Project Development Relative Availability Base Figure*

Description	All Firms in Market Area (Including DBEs)	DBE's Available in Market Area	Relative Availability
Water / Sewer / Storm	171	2	1.17%
Construction Mgmt. (Hwy), Asphalt & Concrete Paving, Concrete Curb, Gutter, Sidewalk, Striping, Markings	131	14	10.69%
Concrete Pouring / Ret. Walls	448	0	0.00%
Electrical & Lighting, Traffic Signals, Security Cameras	1247	19	1.52%
Gas Supply, HVAC, Plumbing	1323	3	0.23%

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Earthwork, Demolition, Excavation, Clearing, Grubbing, Grading	732	19	2.60%
Fencing (Chain link)	473	4	0.85%
Mfg. Structural (incl. Painting) & Misc. Steel & Install	48	2	4.17%
Trucking - Soils, Gravel, Rock	311	20	6.43%
Engineering Services	1165	39	3.35%
Landscaping	1909	10	0.52%
Flagging - Traffic Control	214	9	4.21%
<b>Total</b>	<b>8172</b>	<b>141</b>	<b>1.73%</b>

Weighting the data for relative availability with project fund allocation provides a base weighted DBE goal for the period. The calculations are shown in Table 6.

Table 6: Combined Weighted Base Figure

Description of Work	Percentage Availability of DBEs		Percentage of total DOT funds	Weighted Figure
Water / Sewer / Storm	1.17%	X	2.36%	0.03%
Construction Mgmt. (Hwy), Asphalt & Concrete Paving, Concrete Curb, Gutter, Sidewalk, Striping, Markings	10.69%	X	16.85%	1.80%
Concrete Pouring / Ret. Walls	0.00%	X	0.54%	0.00%
Electrical & Lighting, Traffic Signals, Security Cameras	1.52%	X	7.27%	0.11%
Gas Supply, HVAC, Plumbing	0.23%	X	2.36%	0.01%
Earthwork, Demolition, Excavation, Clearing, Grubbing, Grading	2.60%	X	1.79%	0.05%
Fencing (Chain link)	0.85%	X	5.47%	0.05%
Mfg. Structural (incl. Painting) & Misc. Steel & Install	4.17%	X	35.86%	1.49%
Trucking - Soils, Gravel, Rock	6.43%	X	1.79%	0.11%
Engineering Services	3.35%	X	14.05%	0.47%
Landscaping	0.52%	X	5.67%	0.03%
Flagging - Traffic Control	4.21%	X	5.47%	0.23%
<b>Total</b>				<b>4.38%</b>

The step one base figure for DBE goal is 4.38%.

## Step Two Base Figure Adjustment

The Step Two base figure adjustment, as recommended in USDOT Tips, requires examining relevant and reliable data in the recipient's market area to determine if an adjustment to the base figure is warranted. The consideration of an adjustment is intended to account for any impact the relevant factors may have on DBE's seeking contracting opportunities with Community Transit.

This step is intended to adjust the "base figure" percentage from Step 1 so it reflects, as accurately as possible, the DBE participation the recipient would expect in the absence of discrimination. This step involves obtaining the median of the past (e.g. triennial) period and then obtaining an average with the results of Step 1.

As Community Transit was in a Conciliation Agreement with the FTA during FFY 2015-17, the DBE participation of those periods are not being included. This is advised by FTA in its tips for DBE goal setting: <https://www.transportation.gov/osdbu/disadvantaged-business-enterprise/tips-goal-setting-disadvantaged-business-enterprise>

During FFY 2018-20, Community Transit applied FTA funds to project development of BRT Orange line, which covers A&E and consulting services, which is not applicable in this period. At this time, Community Transit had a race neutral goal of 4.7%.

Further in FFY 2021, Community Transit self-disclosed being under the threshold for a DBE goal during the period October 2020 - September 2021.

### Summary of Steps 1 & 2:

1. During FFY 2021-23, Community Transit expects to receive \$44,088,240 for construction work for *SWIFT* BRT Orange Line, as shown in Table 3. No additional funding is anticipated at this time.

These funds will be used to contract for engineering and construction services, which are expected to be completed by FFY 2025.

2. Using the base DBE figure of 4.38% shown in Table 6, the rounded DBE goal for FFY 2021-23 is 4.4%.
3. Our DBE goal calculation of 4.4% for FFY 2021-23 is consistent with our 4.7% DBE goal during 2018-20.

## Race and Gender-Neutral Goal

The final requirement of the goal-setting process is to determine the portion of the overall goal that will be achieved by race and gender-neutral means. As required by 49 CFR 26.51, the maximum feasible portion of the overall DBE goal should be achieved using race and gender-neutral means. During FFY 2018-20, Community Transit successfully achieved its DBE goal of 4.7% by race neutral means. As such, Community Transit projects it shall meet its FFY 2021-23 DBE goals through race and gender-neutral measures.

## Public Comment and Notice of Proposed Goals

In accordance with 49 CFR 26.45(g), Community Transit provided an opportunity for public participation in establishing its overall DBE goal. This process involved:

- To consult with minority, women and general contractor groups; community organizations; and other officials that could be expected to have information concerning DBE and non-DBE availability, the effects of discrimination of opportunities for DBEs, and Community Transit's efforts to establish a level playing field for the participation of DBEs.

- To provide public notice of the proposed overall goal by making the goal setting methodology and rationale available for public inspection.

1) *Consultation with minority, women and general contractors; community organizations etc.*

Community Transit established a DBE committee consisting of minority, women, and general contractor groups; and community organizations in Dec 2015. The committee met several times in the periods before FFY 2021 and before COVID-19 pandemic. During these meetings, the committee members were provided information about Community Transit, its DBE program and goal setting regulations and tips. The members advised Community Transit on SBE/DBE program matters.

The DBE committee consists of six members:

a) Community organizations:

- i) Lily Keeffe - Project Director, Northwest Small Business Transportation Resource Center

b) Minority contractors or consultants:

- i) Russell Meeds – DBE, Meko Construction and Meeds Environmental
- ii) Young-Sang Song – DBE, Song Consulting

c) Women owned small business:

- i) Cara Buckingham – DBE, Birch Equipment
- ii) Kara Skinner – WBE, Integrity Surety

d) General contractor:

- i) Andrew Thompson - Granite Construction Company

The committee deliberated and supported Community Transit's process of determination of DBE goal for FFY 2021-23.

2) *Public Notice*

Community Transit also published its DBE goal in its newspaper of record, The Everett Herald, and in the minority newspaper, The Skanner, to obtain general public input.

No comments were received and no changes were made to the goal as calculated. Community Transit encourages SBE/DBE participation in all procurements. This is stated on our website and encouraged through outreach, unbundling and other strategies.