



## **Disadvantaged Business Enterprise (DBE) Program**

### **Overall Triennial Goal and Methodology**

**Federal Fiscal Years 2026 – 2028**

3331 North 1<sup>st</sup> Street, San Jose, CA 95134

## Summary

Santa Clara Valley Transportation Authority (VTA) follows the Code of Federal of Regulations Title 49 CFR Part §26.45 which states that recipients who anticipate awarding more than \$250,000 in federally assisted contracts must set an overall goal for Disadvantaged Business Enterprise (DBE) participation. VTA has completed its overall triennial DBE goal setting for Federal Fiscal Years (FFY) 2026 - 2028 for establishing its anticipated amount of DBE participation on contracting opportunities funded in whole or in part by the Federal Transit Administration (FTA). The percentage represents DBE participation absent the effects of current and past discrimination.

VTA's assessment of the FTA-assisted contracts projected for the triennial period includes a review of Census Bureau data, the California Unified Certification Program (CUCP) DBE database, and geographical markets relevant to VTA's contracting activities within the eleven counties: Alameda, Contra Costa, Marin, Napa, Sacramento, San Francisco, San Joaquin, San Mateo, Santa Clara, Solano, and Sonoma.

VTA proposes an overall Triennial DBE goal of 12% for FFY 2026 – 2028. As part of our triennial DBE goal-setting process for FTA-assisted projects, and in accordance with 49 CFR Part 26.51, VTA has determined that it will only use race-neutral measures to achieve its proposed DBE goal. This decision is based on a careful evaluation of past participation, current contracting practices, and the availability of DBEs in our local market.

## Goal Setting Methodology Section 26.45

VTA followed the two-step goal-setting methodology prescribed in the United States Department of Transportation (DOT) regulation Title 49 CFR Part § 26.45 (c)(d) to determine the recommended overall goal for FFY 2026 - 2028. The two steps for setting an overall goal are:

1. Establish a base figure for the relative availability of DBEs; and
2. Determine the base figure adjustment, if necessary.

## **Step One – Base Figure Determination - Section 26.45(c)**

Step one of the goal-setting process is to determine the base figure for the relative availability of DBEs based on evidence of ready, willing, and able DBEs in relationship to all comparable businesses known to be available to compete for FTA-assisted contracts that VTA anticipates awarding during this triennial goal period.

### **Identify Anticipated Federally Assisted Projects for FFYs 2026 - 2028**

VTA anticipated capital projects include Rail Rehabilitation and Replacement (Phase 8, 9, 9A and 9B), North 1st Street/Tasman Drive - EB Track Switch Modification - TSP Enhancement, Traction Power Substation Replacement Phase 4, Upgrade Highway Grade Crossing Control Equipment (Vasona), Signal Improvements – Guadalupe (Phase 1 and 2), Network Switch Replacement/Upgrade, Fiber Optics Replacement (between Whisman and Baypointe), Audio Frequency Train Activated Circuit (AFTAC), Signal Improvements - Tasman East-Capitol, San Carlos Woz Way TSP Project, Fiber Optics Replacement FY26-27, Bridge and Structures Repair, Rehab of Light Rail System Elevators/ Escalators, Light Rail Station Rehabilitation, Pedestrian Swing Gate Replacement, Track Intrusion Phase 5, Pedestrian Back Gate at Light Rail Crossing (Non-Vasona), Safety Enhancements at Grade Crossing (FY22) Phase 2, Transit Center - Park and Ride and Bus Stop Rehabilitation FY22-23, Obsolete Bus Stop Shelters Replacement, Better Bus Stops Cycle 4, Guadalupe Train Wash, Guadalupe Roll up Door Replacement, Guadalupe Steam Rack Improvements and Liner Replacement, Replace Fire Alarm at Guadalupe, Guadalupe Second Entrance – Design, Guadalupe Entrance Security Improvements, Expand Chaboya Yard for Electric Buses and Other Modifications - Phase 1, Fuel Dispenser Replacement, Expand Cerone Bus yard for electric and fuel cell vehicles - Phase 1A, Project management (PM)/ Construction Management (CM) Support (non-BVS II), Facilities Equipment Replacement Program, Non-Revenue Vehicle Replacements Program FY 22-23 and North Yard Tire Awning. These federal projects for FFY 2026 - 2028 have an anticipated \$127,043,109 contracting opportunities as shown in Table 1 Summary of FTA-assisted Contracts to be Expended.

Table 1 - Summary of FTA-Assisted Contracts to be Expended by the North American Industry Classification System (NAICS) Codes groups.

<b>TABLE - 1</b> <b>Summary of FTA-Assisted Contracts to Be Expended</b> <b>Contracting Opportunities by NAICS Codes, FFY 2026 - 2028</b>					
Contract Title	Budget Amount	NAICS Code	NAICS \$ portion of Contract	NAICS % of Contract	Contract % of Total Budget
Rail Rehabilitation and Replacement (Phase 8)	\$ 5,600,000	238910	\$448,000	8%	
		237310	\$336,000	6%	
		561990	\$112,000	2%	
		237130	\$560,000	10%	
		238210	\$1,848,000	33%	
		237990	\$2,296,000	41%	
		<b>Total</b>	<b>\$5,600,000</b>	<b>100%</b>	<b>4.4%</b>
Rail Rehabilitation and Replacement (Phase 9)	\$1,520,000	541330	\$1,261,600	20%	
		541370	\$197,600	52%	
		561110	\$30,400	6%	
		541990	\$30,400	6%	
		<b>Total</b>	<b>\$1,520,000</b>	<b>100%</b>	<b>1.2%</b>
Rail Rehabilitation and Replacement (Phase 9A)	\$8,000,000	238910	\$640,000	8%	
		237310	\$480,000	6%	
		561990	\$160,000	2%	
		237130	\$800,000	10%	
		238210	\$2,640,000	33%	
		237990	\$3,280,000	41%	
		<b>Total</b>	<b>\$8,000,000</b>	<b>100%</b>	<b>6.3%</b>
Rail Rehabilitation and Replacement (Phase 9B)	\$1,200,000	238910	\$96,000	8%	
		237310	\$72,000	6%	
		561990	\$24,000	2%	
		237130	\$120,000	10%	
		238210	\$396,000	33%	
		237990	\$492,000	41%	
		<b>Total</b>	<b>\$1,200,000</b>	<b>100%</b>	<b>0.9%</b>
North 1st Street/Tasman Drive - EB Track Switch Modification - TSP Enhancement	\$800,000	238910	\$8,000	1%	
		237310	\$88,000	11%	
		541330	\$56,000	7%	
		541611	\$16,000	2%	
		561990	\$16,000	2%	
		238210	\$536,000	67%	

Contract Title	Budget Amount	NAICS Code	NAICS \$ portion of Contract	NAICS % of Contract	Contract % of Total Budget
		334515	\$80,000	10%	
		<b>Total</b>	<b>\$800,000</b>	<b>100%</b>	<b>0.6%</b>
<b>Traction Power Substation Replacement Phase 4</b>	<b>\$12,800,000</b>	561990	\$256,000	2%	
		237130	\$2,560,000	20%	
		238210	\$7,680,000	60%	
		237990	\$2,304,000	18%	
		<b>Total</b>	<b>\$12,800,000</b>	<b>100%</b>	<b>10.1%</b>
<b>Upgrade Highway Grade Crossing Control Equipment (Vasona)</b>	<b>\$1,600,000</b>	541330	\$64,000	4%	
		335314	\$768,000	48%	
		238210	\$768,000	48%	
		<b>Total</b>	<b>\$1,600,000</b>	<b>100%</b>	<b>1.3%</b>
<b>Signal Improvements - Guadalupe Phase 1</b>	<b>\$8,000,000</b>	561990	\$400,000	5%	
		238210	\$5,200,000	65%	
		335314	\$1,200,000	15%	
		237310	\$1,200,000	15%	
		<b>Total</b>	<b>\$8,000,000</b>	<b>100%</b>	<b>6.3%</b>
<b>Signal Improvements - Guadalupe Phase 2</b>	<b>\$800,000</b>	561990	\$40,000	5%	
		238210	\$520,000	65%	
		335314	\$120,000	15%	
		237310	\$120,000	15%	
		<b>Total</b>	<b>\$800,000</b>	<b>100%</b>	<b>0.6%</b>
<b>Network Switch Replacement/Upgrade</b>	<b>\$800,000</b>	334515	\$800,000	100%	
		<b>Total</b>	<b>\$800,000</b>	<b>100%</b>	<b>0.6%</b>
<b>Fiber Optics Replacement (between Whisman and Baypointe)</b>	<b>\$6,400,000</b>	561990	\$320,000	5%	
		238210	\$4,800,000	75%	
		237310	\$1,280,000	20%	
		<b>Total</b>	<b>\$6,400,000</b>	<b>100%</b>	<b>5.0%</b>
<b>Audio Frequency Train Activated Circuit (AFTAC)</b>	<b>\$600,000</b>	541330	\$408,000	68%	
		335314	\$96,000	16%	
		238210	\$96,000	16%	
		<b>Total</b>	<b>\$600,000</b>	<b>100%</b>	<b>0.5%</b>
<b>Signal Improvements - Tasman East-Capitol</b>	<b>\$1,200,000</b>	541330	\$1,200,000	100%	
		<b>Total</b>	<b>\$1,200,000</b>	<b>100%</b>	<b>0.9%</b>
<b>San Carlos Woz Way TSP Project</b>	<b>\$400,000</b>	541330	\$400,000	100%	
		<b>Total</b>	<b>\$400,000</b>	<b>100%</b>	<b>0.3%</b>
<b>Fiber Optics Replacement FY26-27</b>	<b>\$1,600,000</b>	541330	\$800,000	50%	
		561990	40,000	2%	
		238210	600,000	38%	
		237310	160,000	10%	

Contract Title	Budget Amount	NAICS Code	NAICS \$ portion of Contract	NAICS % of Contract	Contract % of Total Budget
		<b>Total</b>	<b>\$1,600,000</b>	<b>100%</b>	<b>1.3%</b>
Bridge and Structures Repair FY16/20	\$320,000	238910	\$6,400	2%	
		238990	\$150,400	47%	
		238110	\$147,200	46%	
		237310	\$16,000	5%	
		<b>Total</b>	<b>\$320,000</b>	<b>100%</b>	<b>0.3%</b>
Bridge and Structures Repair FY22/24	\$560,000	541330	\$160,200	29%	
		238910	\$8,000	1%	
		238990	\$188,000	34%	
		238110	\$184,000	33%	
		237310	\$20,000	4%	
		<b>Total</b>	<b>\$560,000</b>	<b>100%</b>	<b>0.4%</b>
Rehab of Light Rail System Elevators/ Escalators	\$4,800,000	238290	\$4,800,000	100%	
		<b>Total</b>	<b>\$4,800,000</b>	<b>100%</b>	<b>3.8%</b>
Light Rail Station Rehabilitation	\$2,400,000	488210	\$1,680,000	70%	
		238150	\$360,000	15%	
		238320	\$120,000	5%	
		238910	\$240,000	10%	
		<b>Total</b>	<b>\$2,400,000</b>	<b>100%</b>	<b>1.9%</b>
Pedestrian Swing Gate Replacement	\$1,600,000	237310	\$176,000	11%	
		238910	\$96,000	6%	
		561990	\$128,000	8%	
		238110	\$224,000	14%	
		237310	\$144,00	9%	
		238990	\$816,000	51%	
		238210	\$16,000	1%	
		<b>Total</b>	<b>\$1,600,000</b>	<b>100%</b>	<b>1.3%</b>
Track Intrusion Phase 5	\$1,600,000	237310	\$176,000	11%	
		238910	\$96,000	6%	
		561990	\$128,000	8%	
		238110	\$224,000	14%	
		237310	\$144,00	9%	
		238990	\$816,000	51%	
		238210	\$16,000	1%	
		<b>Total</b>	<b>\$1,600,000</b>	<b>100%</b>	<b>1.5%</b>
Pedestrian Back Gate at Light Rail Crossing (Non-Vasona)	\$4,240,000	541330	\$1,766,400	42%	
		541370	\$73,600	2%	
		237990	\$312,000	7%	
		561990	\$72,000	2%	

Contract Title	Budget Amount	NAICS Code	NAICS \$ portion of Contract	NAICS % of Contract	Contract % of Total Budget
		237310	\$672,000	16%	
		237990	\$48,000	1%	
		238210	\$1,296,000	31%	
		<b>Total</b>	<b>\$4,240,000</b>	<b>100%</b>	<b>3.3%</b>
<b>Safety Enhancements at Grade Crossing (FY22) Phase 2</b>	<b>\$6,800,000</b>	541330	\$384,000	6%	
		541370	16,000	0%	
		237990	\$832,000	12%	
		561990	\$192,000	3%	
		237310	\$1,792,000	26%	
		237990	\$128,000	2%	
		238210	\$3,456,000	51%	
		<b>Total</b>	<b>\$6,800,000</b>	<b>100%</b>	<b>5.4%</b>
<b>Transit Center, Park and Ride, and Bus Stop Rehabilitation FY22-23</b>	<b>\$800,000</b>	237310	\$128,000	16%	
		238910	\$224,000	28%	
		561990	\$96,000	12%	
		237310	\$328,000	41%	
		238210	\$24,000	3%	
		<b>Total</b>	<b>\$800,000</b>	<b>100%</b>	<b>0.6%</b>
<b>Obsolete Bus Stop Shelters Replacement</b>	<b>\$1,200,000</b>	237310	\$192,536	16%	
		238910	\$216,000	18%	
		561990	\$144,000	12%	
		236220	\$156,000	13%	
		237310	\$456,000	38%	
		238210	\$36,000	3%	
		<b>Total</b>	<b>\$1,200,000</b>	<b>100%</b>	<b>0.9%</b>
<b>Better Bus Stops Cycle 4</b>	<b>\$1,200,000</b>	237310	\$192,000	16%	
		238910	\$216,000	18%	
		561990	\$144,000	12%	
		236220	\$156,000	13%	
		237310	\$456,000	38%	
		238210	\$36,000	3%	
		<b>Total</b>	<b>\$1,200,000</b>	<b>100%</b>	<b>0.9%</b>
<b>Guadalupe Train Wash</b>	<b>\$4,320,000</b>	237990	\$302,400	7%	
		238220	\$432,000	10%	
		238210	\$302,400	7%	
		238910	\$259,200	6%	
		238160	\$259,200	6%	
		236220	\$432,000	10%	
		238110	\$777,600	18%	

Contract Title	Budget Amount	NAICS Code	NAICS \$ portion of Contract	NAICS % of Contract	Contract % of Total Budget
		238290	\$259,200	6%	
		423850	\$1,296,000	30%	
		<b>Total</b>	<b>\$4,320,000</b>	<b>100%</b>	<b>3.4%</b>
<b>Guadalupe Roll-up Door Replacement</b>	<b>\$1,400,000</b>	238210	\$280,000	20%	
		238220	\$280,000	20%	
		811310	\$700,000	50%	
		238990	\$140,000	10%	
		<b>Total</b>	<b>\$1,400,000</b>	<b>100%</b>	<b>1.1%</b>
<b>Guadalupe Steam Rack Improvements and Liner Replacement</b>	<b>\$800,000</b>	238160	\$264,000	33%	
		238990	\$272,000	34%	
		811310	\$264,000	33%	
		<b>Total</b>	<b>\$800,000</b>	<b>100%</b>	<b>0.6%</b>
<b>Replace Fire Alarm at Guadalupe</b>	<b>\$800,000</b>	238210	\$800,000	100%	
		<b>Total</b>	<b>\$800,000</b>	<b>100%</b>	<b>0.6%</b>
<b>Guadalupe Second Entrance - Design</b>	<b>\$2,400,000</b>	541330	\$2,400,000	100%	
		<b>Total</b>	<b>\$2,400,000</b>	<b>100%</b>	<b>1.9%</b>
<b>Guadalupe Entrance Security Improvements</b>	<b>\$400,000</b>	238910	\$20,000	5%	
		238210	\$220,000	55%	
		238110	\$100,000	25%	
		237310	\$60,000	15%	
		<b>Total</b>	<b>\$400,000</b>	<b>100%</b>	<b>0.3%</b>
<b>Expand Chaboya Yard for Electric Buses and Other Modifications - Phase 1</b>	<b>\$6,400,000</b>	541330	\$2,400,000	38%	
		238910	\$600,000	9%	
		237310	\$360,000	6%	
		238110	\$400,000	6%	
		238210	\$2,640,000	41%	
		<b>Total</b>	<b>\$6,400,000</b>	<b>100%</b>	<b>5.0%</b>
<b>Fuel Dispenser Replacement</b>	<b>\$1,200,000</b>	238910	\$120,000	10%	
		238220	\$780,000	65%	
		541519	\$300,000	25%	
		<b>Total</b>	<b>\$1,200,000</b>	<b>100%</b>	<b>0.9%</b>
<b>Expand Cerone Bus yard for electric and fuel cell vehicles - Phase 1A</b>	<b>\$2,160,000</b>	541330	\$2,160,000	100%	
		<b>Total</b>	<b>\$2,160,000</b>	<b>100%</b>	<b>1.7%</b>
<b>New OCC</b>	<b>\$16,160,000</b>	541310	\$1,680,000	10%	
		541330	\$1,680,000	10%	
		238990	\$3,840,000	24%	
		238210	\$5,120,000	32%	
		238220	\$3,840,000	24%	



Contract Title	Budget Amount	NAICS Code	NAICS \$ portion of Contract	NAICS % of Contract	Contract % of Total Budget
		<b>Total</b>	<b>\$16,160,000</b>	<b>100%</b>	<b>12.7%</b>
Project Management (PM)/ Construction Management (CM) Support (non-BSVII)	\$10,500,000	541310	\$1,050,000	10%	
		541320	\$105,000	1%	
		541330	\$8,400,000	80%	
		541512	\$945,000	9%	
		<b>Total</b>	<b>\$10,500,000</b>	<b>100%</b>	<b>8.3%</b>
Non-Revenue Vehicle Replacements Program FY22-23	\$1,601,009	811198	\$1,601,009	100%	
		<b>Total</b>	<b>\$1,601,009</b>	<b>100%</b>	<b>1.3%</b>
North Yard Tire Awning	\$320,000	238190	\$320,000	100%	
		<b>Total</b>	<b>\$320,000</b>	<b>100%</b>	<b>0.3%</b>
Facilities Equipment Replacement Program	\$1,742,100	238290	\$1,742,100	100%	
		<b>Total</b>	<b>\$1,742,100</b>	<b>100%</b>	<b>1.4%</b>
<b>TOTAL ALL CONTRACTS</b>	<b>\$127,043,109</b>				<b>100%</b>

Table 2 - Summary of FTA-Assisted Contracts to be Expended by NAICS Code groups. All the contracts by NAICS code and percentages of total as shown below.

<b>Table - 2</b> <b>Summary of FTA-Assisted Contracts to Be Expended</b> <b>by NAICS Codes, FFY 2026 - 2028</b>			
NAICS Description	NAICS Code	Budget Amount	% of Total Budget
Shelter/ Bench	236220	\$744,000	0.6%
Power and Communication Line and Related Structures Construction	237130	\$4,040,000	3.2%
Support Activities for Rail Transportation	488210	\$1,680,000	1.3%
Highway, Street, and Bridge Construction	237310	\$9,048,000	7.1%
Other Heavy and Civil Engineering Construction	237990	\$9,994,400	7.9%
Concrete Structure	238110	\$2,056,800	1.6%
Glass and Glazing Contractors	238150	\$360,000	0.3%
Roofing	238160	\$523,200	0.4%
Electrical Contractors and Other Wiring Installation Contractors	238210	\$39,326,400	31.0%
Plumbing, Heating, and Air-Conditioning Contractors	238220	\$5,332,000	4.2%
Machinery and Equipment	238290	\$5,059,200	4.0%
Painting and wall Covering	238320	\$120,000	0.1%
Site Preparation	238910	\$3,293,600	2.6%
Fence and Gate	238990	\$6,222,400	4.9%

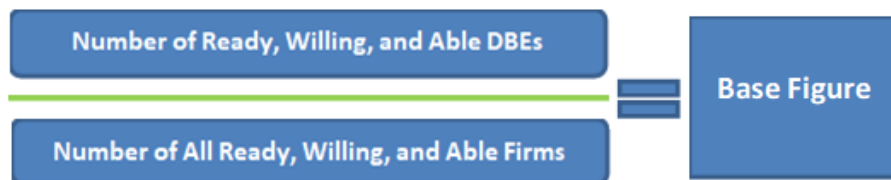
NAICS Description	NAICS Code	Budget Amount	% of Total Budget
Instruments and Related Products Manufacturing for Measuring, Displaying, and Controlling Industrial Process Variables	334515	\$880,000	0.7%
Other Communications Equipment Manufacturing	334290	\$2,184,000	1.7%
Car Wash equipment	423850	\$1,296,000	1.0%
Architectural Services	541310	\$2,730,000	2.1%
Landscape Architectural Services	541320	\$105,000	0.1%
Engineering Services	541330	\$23,540,000	18.5%
Survey	541370	\$287,200	0.2%
Computer Systems Design Services	541512	\$945,000	0.7%
Other Computer Related Services	541519	\$300,000	0.2%
Admin Management	541611	\$16,000	0.0%
Construction Estimation	541990	\$30,400	0.0%
Office Admin	561110	\$30,400	0.0%
All Other Support Services	561990	\$2,272,000	1.8%
Commercial and Industrial Machinery and Equipment	811310	\$964,000	0.8%
All Other Automotive Repair and Maintenance	811198	\$1,601,009	1.3%
Other Foundation, Structure, and Building Exterior Contractors	238190	\$320,000	0.3%
Other Building Equipment Contractors	238290	\$1,742,100	1.4%
<b>Total</b>		<b>\$127,043,109</b>	<b>100%</b>

Table 3 - Weighted Base Figures.

<b>TABLE – 3</b> <b>WEIGHTED – BASE FIGURES</b> <b>Applicable FTA-Assisted Contract Expenditures</b> <b>FFY 2026 – 2028</b>				
NAICS Code	NAICS Description	DBE Firms CUCP	All Firms Census Bureau	Weighted Base Figure
236220	Shelter/ Bench	43	1088	0.02%
237130	Power and Communication Line and Related Structures Construction	10	124	0.26%
488210	Support Activities for Rail Transportation	1	18	0.07%
237310	Highway, Street, and Bridge Construction	71	187	2.70%
237990	Other Heavy and Civil Engineering Construction	48	62	6.09%
238110	Concrete Structure	36	500	0.12%
238150	Glass and Glazing Contractors	4	246	0.00%
238160	Roofing	3	784	0.00%
238210	Electrical Contractors and Other Wiring Installation Contractors	42	2467	0.53%
238220	Plumbing, Heating, and Air-Conditioning Contractors	13	2705	0.02%

NAICS Code	NAICS Description	DBE Firms CUCP	All Firms Census Bureau	Weighted Base Figure
238290	Machinery and Equipment	3	188	0.06%
238320	Painting and wall Covering	13	1486	0.00%
238910	Site Preparation	43	617	0.18%
238990	Fence and Gate	59	794	0.36%
334515	Instruments and Related Products Manufacturing for Measuring, Displaying, and Controlling Industrial Process Variables	1	126	0.01%
334290	Other Communications Equipment Manufacturing	1	9	0.19%
423850	Car Wash equipment	5	114	0.04%
541310	Architectural Services	26	1148	0.05%
541320	Landscape Architectural Services	20	307	0.01%
541330	Engineering Services	128	2705	0.88%
541370	Survey	17	112	0.03%
541512	Computer Systems Design Services	72	3075	0.02%
541519	Other Computer Related Services	35	514	0.02%
541611	Admin Management	200	4208	0.00%
541990	Construction Estimation	45	694	0.00%
561110	Office Admin	33	1116	0.00%
561990	All Other Support Services	19	327	0.10%
811310	Commercial and Industrial Machinery and Equipment	5	390	0.01%
811198	All Other Automotive Repair and Maintenance	2	299	0.01%
238190	Other Foundation, Structure, and Building Exterior Contractors	12	145	0.02%
238290	Other Building Equipment Contractors	3	188	0.02%
<b>Total</b>		<b>1013</b>	<b>26743</b>	<b>11.83%</b>

The formula used to calculate the Base Figure is:



A base figure of **11.83% (rounded up to 12%)** was calculated based on the analysis of relative DBE availability as applied to anticipated FTA contract expenditure dollar weight.

### Step Two Adjustment – Section 26.45(d)

After establishing the base figure for our Disadvantaged Business Enterprise (DBE) triennial goal using Step 1, we conducted a thorough review to determine whether a Step 2 adjustment was necessary, as outlined

in 49 CFR Part 26.45(d). Based on the data and analysis described below, we concluded that no Step 2 adjustment is warranted.

### **1. Historical DBE Participation**

VTA reviewed the DBE participation achieved on FTA-assisted contracts over the past three fiscal years. Our historical DBE participation has been consistent with, or closely aligned to, the Step 1 base figure. The average past performance does not significantly deviate from the calculated base figure, indicating that our Step 1 methodology already reflects the actual capacity and availability of DBEs to perform work on our federally assisted contracts.

### **2. Evidence from Disparity Studies and Market Conditions**

VTA reviewed available disparity studies and other relevant evidence within our market area. There is no new or compelling evidence of significant disparities in contracting opportunities that would justify an upward or downward adjustment. Additionally, there have been no major shifts in market conditions or local contracting environment that would impact DBE availability beyond what is captured in the Step 1 data.

### **3. Race-Neutral Measures and Outreach**

VTA has implemented race-neutral strategies to ensure equal opportunity for DBE and non-DBE firms alike. We maintain consistent outreach efforts, provide technical assistance to small businesses, and monitor subcontracting activity to encourage DBE participation. These practices help ensure that the Step 1 figure already accounts for the effectiveness of race-neutral efforts and DBE capacity.

### **4. Public Participation and Stakeholder Input**

As part of the goal-setting process, VTA conducted consultations with targeted contracting and trade organizations, general contractor organizations, community groups, and other stakeholders. No substantive feedback was received that indicated the need for an adjustment to the base figure. Stakeholders generally affirmed that the calculated goal reasonably reflects the local market and the availability of ready, willing, and able DBE firms.

## **Conclusion**

Based on this comprehensive review, VTA determined that the Step 1 base figure accurately reflects the availability of DBEs in our market area and the expected participation level on FTA-assisted contracts. There is no compelling evidence from historical performance, market conditions, or public feedback to support a Step 2 adjustment. Therefore, we are adopting the Step 1 base figure of 12% as our final triennial DBE goal for FFY 2026-2028.

## **Race-Neutral Measures**

In calculating the overall DBE goal, VTA determined that it is reasonable to expect, based on current market condition and past performance, that the entire portion of the proposed 12% DBE goal can be achieved through neutral, non-preferential measures.

### **1. Historical DBE Participation Supports Race-Neutral Achievement**

Our analysis of DBE participation over the past three fiscal years indicates that DBEs have consistently achieved participation levels that meet or exceed their proposed contract goal. This consistent performance demonstrates that DBEs are effectively competing and winning contracts under race-neutral conditions, which include practices such as:

- Encouraging DBE participation during outreach and pre-bid meetings
- Promoting small business utilization in procurement
- Providing technical assistance and training opportunities
- Ensuring fair and open competition in all solicitation processes

### **2. Availability of DBEs Relative to Contracting Opportunities**

The Step 1 base figure and supporting data suggest that there is a sufficient number of ready, willing, and able DBE firms in our market to perform work on upcoming FTA-assisted projects. The scope, size, and nature of these projects are aligned with the capacity of existing DBE firms, further supporting the use of race-neutral measures to meet the goal.

### **3. Effective Race-Neutral Strategies Already in Place**

VTA has institutionalized a variety of race-neutral measures that are proving effective in promoting DBE participation:

- Outreach to DBEs during the early stages of project planning and procurement
- Publicly posting solicitations on accessible platforms
- Hosting small business engagement events and procurement fairs
- Conducting training sessions to improve small business readiness
- Offering technical support and assistance with solicitation preparation

These strategies are inclusive, sustainable, and align with FTA guidance for fostering a level playing field for all firms.

### **Planned Stakeholder Consultation**

As part of the upcoming stakeholder consultation process, VTA will engage DBE firms, prime contractors, trade associations, and community partners to gather input on the potential need for contract-specific DBE goals. While no formal feedback has been received to date suggesting such goals are necessary, preliminary discussions indicate general support for enhancing race-neutral program strategies and continuing investment in outreach and capacity-building efforts to support small and disadvantaged businesses.

Upon conclusion of the consultation process, VTA will compile and publish a summary of stakeholder comments and feedback received. This will ensure transparency and provide a record of the input considered in the development of VTA's triennial DBE goal.

### **Public Participation in Setting Overall Triennial Goals**

Pursuant to 49 CFR Part § 26.45(g), VTA participates in various professional services and/or construction outreach and assistance events throughout the year. VTA is a member of the Business Outreach Committee (BOC), a group of 23 transit and transportation agencies located in the Bay Area that includes San Francisco Bay Area Rapid Transit District (BART), San Francisco Municipal Transportation Agency (SFMTA), San Mateo County Transit District (SamTrans), California Department of Transportation (Caltrans) and more. VTA is also a member of the Caltrans Mentor-Protégé program that assists small and disadvantaged business enterprises.

This year, the BOC held both a consultation and a public participation meeting on May 7<sup>th</sup>, 2025. It also held an additional public participation meeting on May 13<sup>th</sup>, 2025.

All materials, including registration and attendee list can be found on the BOC webpage under BOC Events at: <https://www.goldengate.org/district/doing-business/business-outreach-committee/>

**PUBLIC PARTICIPATION  
CONSULTATION MEETING**

DBE Overall Triennial  
Goal Setting  
FFY 2025-2028

Join various public transit and transportation agencies share their proposed Federal Transit Administration (FTA) Triennial Overall Disadvantaged Business Enterprise (DBE) goal for upcoming Federal Fiscal Year (FFY) 2025-2028 contracting opportunities. Your input is valuable in this important process!

Questions, contact Artemisé Davenport, [adavenport@goldengate.org](mailto:adavenport@goldengate.org)

**VIRTUAL: Wednesday, May 7, 2025**  
10:00 a.m. - 11:00 a.m. (PST)

**ZOOM:**  
[https://goldengate-org.zoom.us/webinar/register/WN\\_1xK3uyRDRI6MsNqBFkaJtw](https://goldengate-org.zoom.us/webinar/register/WN_1xK3uyRDRI6MsNqBFkaJtw)

**DISCUSSION INCLUDES:**

- GOAL SETTING PROCESS
- AVAILABILITY OF DBEs/NON-DBEs
- ESTABLISH A LEVEL PLAYING FIELD

**REGISTER HERE**

Logos of participating agencies: AFT, Alameda, BART, California High-Speed Rail Authority, Caltrans, Delta, County Connection, Delta Air Lines, Marin Transit, MTA, NCTD, NCTD, Port of Oakland, San Francisco Bay Ferry, San Francisco County Transportation Authority, SFO, Metro, Golden Gate Transit, SolTrans, SMART, T, Tri Delta Transit, VTA, and West Coast.

VTA will also be attending the upcoming SamTrans-Caltrain DBE Outreach event on Tuesday, June 17<sup>th</sup>, 2025.

Please Join Us!

## TRIENNIAL GOAL CONSULTATION & OUTREACH EVENT

- Agency presentations of triennial DBE goals.
- Learn about upcoming contracting opportunities.
- Network with other small businesses.
- Expand your business with transit & government entities.

**Caltrain**  
**samTrans**

 **Tuesday, June 17th, 2025**  
**10:00am-1:00pm**  
**1250 San Carlos Ave,**  
**San Carlos, CA 94070**  
**(2<sup>nd</sup> Floor Auditorium)**

**REGISTER NOW** 

For any questions please send an email to  
[compliance@samtrans.com](mailto:compliance@samtrans.com)

Additionally, over the past two years, VTA has hosted and participated in various outreach initiatives aimed at:

- **Promoting Awareness:** By informing Disadvantaged Business Enterprise (DBE) and Small Business Enterprise (SBE) firms about upcoming contracting opportunities.
- **Encouraging Participation:** Increase the number of qualified DBE firms competing for public contracts by connecting them with prime contractors and procurement staff.
- **Building Capacity:** Provide technical assistance, training, and resources to help firms grow their capabilities and meet the requirements of public contracts.
- **Support Compliance:** Assist agencies and contractors in meeting federal and local requirements under programs such as 49 CFR Part 26 (DBE Program) and ensure documentation of good faith efforts.