

City of Greeley
Transit Services Division
GET: Greeley-Evans Transit
Federal Fiscal Years 2016-2018
DBE Goal
1.3%

DISADVANTAGED BUSINESS ENTERPRISE POLICY STATEMENT

Section 26.1, 26.23 Objectives/Policy Statement

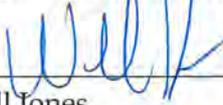
The City of Greeley Transit Services Division, doing business as Greeley-Evans Transit (GET), has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation (FTA/DOT), 49 CFR Part 26. The City of Greeley dba GET has received Federal financial assistance from the Department of Transportation, and as a condition of receiving this assistance, the City of Greeley dba GET has signed an assurance that it will comply with 49 CFR Part 26.

It is the policy of the City of Greeley dba GET to ensure that DBEs as defined in 49 CFR Part 26 have an equal opportunity to receive and participate in FTA/DOT-assisted contracts. It is also our policy:

1. To ensure nondiscrimination in the award and administration of FTA/DOT assisted contracts;
2. To create a level playing field on which DBEs can compete fairly for FTA/DOT assisted contracts;
3. To ensure that the DBE Program is narrowly tailored in accordance with applicable law;
4. To ensure that only firms that fully meet 49 CFR Part 26 eligibility standards are permitted to participate as DBEs;
5. To help remove barriers to the participation of DBEs in FTA/DOT assisted contracts;
6. To assist the development of firms that can compete successfully in the market place outside the DBE Program.

The City of Greeley Transit Specialist has been delegated as the DBE Liaison Officer. In that capacity, the Transit Specialist is responsible for implementing all aspects of the DBE program. Implementation of the DBE program is accorded the same priority as compliance with all other legal obligations incurred by the City of Greeley dba GET in its financial assistance agreements with the Colorado Department of Transportation.

We will distribute this statement to DBE and non-DBE businesses that perform work for us on FTA/DOT-assisted contracts by placing ads in the local newspaper and on the City's Transit Services web site.



Will Jones
City of Greeley Transit Manager

11-11-16
Date

Section 26.45: Overall Goal Calculation - Amount of Goal

1. GET's overall DBE goal for FFY 2016-2018 is the following: 1.3% of the Federal financial assistance budgeted to be expended in FTA/DOT-assisted contracts exclusive of FTA funds to be used for the purchase of transit vehicles.
2. \$1,039,283 is the dollar amount of FTA/DOT-assisted contracts and commitments that GET expects to award during FFY 2016-2018. The dollar amount was derived by reviewing an analysis of budgeted expenditures and the types of contracting opportunities most available for utilization. The data collected was a micro-level evaluation of what specific contracting opportunities GET would be purchasing and seeking reimbursement from FTA for.

This means that GET has set a goal of expending \$13,511 with DBE's during FFY 2016-2018.

| NAICS Category | 2016 Federal Share | 2017 Federal Share | 2018 Federal Share |
|--|-----------------------|-----------------------|-----------------------|
| Administrative and Support Services | \$0 | \$28,566 | \$35,465 |
| Chemical Manufacturing | \$12,000 | \$19,280 | \$19,280 |
| Fabricated Metal Product Manufacturing | \$17,840 | \$15,360 | \$15,360 |
| Manufactures | \$3,538 | \$3,538 | \$3,538 |
| Other Professional Services | \$4,260 | \$17,478 | \$17,478 |
| Printing and Related Support Activities | \$12,375 | \$10,981 | \$10,981 |
| Regular Dealers | \$350 | \$125 | \$125 |
| Repair and Maintenance | \$150,400 | \$207,969 | \$222,526 |
| Specialty Trade Contractors | \$5,606 | \$4,456 | \$4,456 |
| Support Activities for Transportation | \$0 | \$10,000 | \$10,000 |
| Transportation Equipment Manufacturing | \$15,200 | \$79,228 | \$79,874 |
| Waste Management and Remediation Services | \$450 | \$600 | \$600 |
| Total Federal Share Per Year (5307) | \$222,019 | \$397,581 | \$419,683 |
| Total Federal Share Overall | | | \$1,039,283 |
| Total expenditures with DBE's | | | \$13,511 |

Step 1: 26.45(c)

Determine the base figure for the relative availability of DBE's.

The base figure for the relative availability of DBE's was calculated as follows:

$$\text{Base figure} = \frac{\text{Ready, willing, and able DBE's (39)}}{\text{All firms ready, willing and able (1,468)}} = 2.66\%$$

The data source used to derive the numerator was the CDOT Unified Certification Program (UCP) On-Line Directory at <http://www.coloradodbe.org/>, which included listings from the existing DBE programs for certified DBEs in the following CDOT DBE Eligible Work Codes in and around Weld County, Colorado:

| UCP/DBE Work Codes | UCP/DBE Work Code Description | CDOT Certified DBE |
|--------------------|-------------------------------|--------------------|
| 10500 | Electrical | 13 |
| 10902 | Trash Pick-up | 7 |
| 30000 | Auto Body Repair | 7 |
| 30600 | Towing | 0 |
| 51200 | Printing Service | 2 |
| 51900 | Upholstery Cleaning | 1 |
| 52700 | Uniform Cleaning Services | 0 |
| 60304 | Auto Parts | 1 |
| 63503 | Cleaning Supplies | 0 |
| 64300 | Measuring Tools | 0 |
| 64500 | Medical Supplies | 5 |
| 65700 | Promotional Products | 2 |
| 66201 | Eyewear | 0 |
| 67504 | Bus Parts | 1 |
| 67800 | Uniforms/Clothing | 0 |
| | | 39 |

This website contains a list of firms certified by the Colorado Unified Certification Program. The firms listed have been certified in accordance with 49 CFR Part 23 and Part 26. The businesses have undergone a certification process and are bona fide DBEs. The list is published in accordance with 49 CFR Part 26. 81 (g).

The data source or demonstrable evidence used to derive the denominator was data from the U.S. Census Bureau Industry Statistics Portal (ISP) utilizing the 2014 County Business Patterns (CBP) data tables per relative NAICS Code for Weld and the surrounding. This provides the number of overall applicable businesses available for

use in the following Colorado Counties: Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Elbert, Jefferson, Larimer, Morgan and Weld.

The categories from NAICS are highlighted below, along with the individual NAICS cods and the number of establishments in the areas surveyed.

| 2012 NAICS CODE | NUMBER OF ESTABLISHMENTS | MEANING of 2012 NAICS CODE |
|--|--------------------------|--|
| Administrative and Support Services | | |
| 561431 | 93 | Parcel Mailing Services, Private |
| 561740 | 170 | Upholstery Cleaning Services |
| Chemical Manufacturing | | |
| 325612 | 11 | Floor Polishes and Waxes Manufacturing |
| Fabricated Metal Product Manufacturing | | |
| 332212 | 10 | Measuring Tools, Machinist's (except optical), Manufacturing |
| Manufactures | | |
| 336312 | 8 | Engines and parts (except diesel), Automotive and Truck, Manufacturing |
| 339115 | 11 | Goggles (e.g., industrial, safety, sun, underwater) Manufacturing |
| 339999 | 38 | All Other Miscellaneous Manufacturing |
| Other Professional Services | | |
| 315211 | 5 | Uniforms, Non-tailored, Men's and Boys', Cut and Sew Apparel Contractors |
| 812332 | 16 | Industrial Launderers |
| Printing and Related Support Activities | | |
| 323110 | 122 | Printing, Lithographic (except books, grey goods, manifold business forms, quick printing) |
| Regular Dealers | | |
| 423450 | 148 | Medical Equipment Merchant Wholesalers |
| Repair and Maintenance | | |
| 811111 | 113 | Automotive Repair (General) |
| 811121 | 414 | Automotive Body Shops |
| Specialty Trade Contractors | | |

| | | |
|--|-----|---|
| 238210 | 206 | Electrical Contractors |
| Support Activities for Transportation | | |
| 488410 | 80 | Motor Vehicle Towing Services |
| Transportation Equipment Manufacturing | | |
| 336350 | 5 | Motor Vehicle Transmission and Power Train Parts Manufacturing |
| 336399 | 13 | Racks (e.g., bicycle, luggage, ski, tire), Automotive, Truck, and Buses Manufacturing |
| Waste Management and Remediation Services | | |
| 562111 | 111 | Trash Collection Services |

In addition, searches of online yellow pages listings for businesses providing contractible services and goods and a review of the City of Greeley's bid list were conducted to complete the representative sample.

When we divided the numerator by the denominator we arrived at the base figure for our overall goal and that number was 2.66%.

Following the FTA recommendations from the "Tips for Goal Setting," the relative availability was weighted based on the dollar amount projected to be spent on each NAICS code. This part of the process allows the City to emphasize contracting opportunities based on relative importance to the City needs.

A weight was calculated based on the projected dollars assigned to each NAICS code. Then, for each NAICS code, the percentage of relative DBE availability was multiplied by the corresponding weight. Finally, the resulting weighted percentages were added up as shown the table below. The weighted DBE availability is 1.3 percent.

| NAICS Code | FTA Funds | WEIGHT % Federal Fund | COLORADO UCP DBE Firms | CENSUS (CBP) All Firms | DBE % (Relative Availability) | % Weighted Base Figure |
|------------|-----------|-----------------------|------------------------|------------------------|-------------------------------|------------------------|
| 238210 | \$14,518 | 1.4% | 13 | 206 | 6.3% | 0.1% |
| 315211 | \$4,700 | 0.5% | 0 | 5 | 0.0% | 0.0% |
| 323110 | \$34,337 | 3.3% | 2 | 122 | 1.6% | 0.1% |
| 325612 | \$50,560 | 4.9% | 0 | 11 | 0.0% | 0.0% |
| 332212 | \$48,560 | 4.7% | 0 | 10 | 0.0% | 0.0% |
| 336312 | \$3,550 | 0.3% | 1 | 8 | 12.5% | 0.0% |
| 336350 | \$34,302 | 3.3% | 1 | 5 | 20.0% | 0.7% |
| 339115 | \$300 | 0.0% | 0 | 11 | 0.0% | 0.0% |
| 339999 | \$6,763 | 0.7% | 2 | 38 | 5.3% | 0.0% |
| 423450 | \$600 | 0.1% | 5 | 148 | 3.4% | 0.0% |

| | | | | | | |
|--------------|--------------------|---------------|---|-----|------|-------------|
| 488410 | \$20,000 | 1.9% | 0 | 80 | 0.0% | 0.0% |
| 561740 | \$204,030 | 19.6% | 1 | 170 | 0.6% | 0.1% |
| 562111 | \$1,650 | 0.2% | 7 | 111 | 6.3% | 0.0% |
| 811111 | \$431,309 | 41.5% | 0 | 113 | 0.0% | 0.0% |
| 811121 | \$149,586 | 14.4% | 7 | 414 | 1.7% | 0.2% |
| 812332 | \$34,516 | 3.3% | 0 | 16 | 0.0% | 0.0% |
| Total | \$1,039,283 | 100.0% | | | | 1.3% |

Based on weighting, the base figure for step one is decreased to 1.3%. This goal is to be met by race neutral means.

Step 2: 26.45(d)

Based on FTA guidance for DBE goal setting (<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/dbe-training>), the past performance of DBE certified firms to perform work is a good way to adjust the figure determined in step one.

Also per FTA guidance from the same website, if the contracting opportunities are different from previous years contracting opportunities determined in step one, then past participation cannot be used accurately.

Due to an increase in the City's Transit budget to include the Fleet Maintenance division the opportunity to use DBE's has increased. The geographic locations of DBE and CBP firms were increased as well to give any firm within in a 2 hour radius of Greeley, CO to be given the opportunity to bid on contracts and commitments. Therefore the contracting opportunities are enough different from the previous goal to not be relevant.

Therefore, the methodology in step one stands. **GET's overall DBE goal for Federal transit funds for FFY 2016-2018 is 1.3%**

Other factors influencing goal setting process:

1. Public Participation: As a sub-recipient of the Colorado Department of Transportation (CDOT), we rely in part on CDOT DBE public participation efforts. The CDOT Business Programs Office holds orientation sessions with new DBE firms, emerging small businesses, and other small businesses during the year, with separate orientations for contractors, consultants, and vendors. At these sessions, the CDOT DBE Program Manager discusses with the business representatives the CDOT DBE

program, federal regulations, goals, and goal setting. The City of Greeley notified certified DBE's and potential DBE companies in the local market area that this DBE Goal Setting Report is available and will be provided upon request. The Report was also forwarded to various interested groups with an offer to meet and discuss the proposed goal and rationale used to develop the goal.

2. Public Notice: The City of Greeley Transit Services Division will publish our FFY 2016-2018 DBE goal information in the Greeley Tribune and La Tribuna newspapers in November 2016. The advertisement will read as follows:

Public Notice
Greeley-Evans Transit

In accordance with the requirements of the U.S. Department of Transportation as set forth in 49 C.F.R. Part 26, as amended, Greeley-Evans Transit hereby notifies the public that it is recommending the following Disadvantaged Business Enterprise (DBE) goal for applicable professional services and construction procurement contract during federal fiscal years 2016-2018, beginning October 1, 2016 and ending September 31, 2018. The overall total DBE goal for federal fiscal years 2016-2018 is 1.3%.

Information pertaining to this goal and a description of how it was selected is available for inspection from 8:00 A.M. to 4:00 P.M. MST at the City of Greeley Transit Services Division Office, 1200 A Street, Greeley, CO.

Written comments on this goal will be accepted for 45 days from the date of this notice. The comments are for informational purposes only and may be sent to Greeley-Evans Transit, 1200 A Street, Greeley, Colorado 80631 or to the Regional Civil Rights Officer, Federal Transit Administration, Region VIII, 12300 West Dakota Avenue, Suite 310, Lakewood, CO 80228-2583.

4. Race-Neutral Participation

GET does not have any data upon which to base a conclusion that there will be any DBE participation in any of the projects funded by the FTA funding sources that will qualify as race-conscious according to the description of "race-conscious participation" found in 49 CFR Part 26. Therefore, GET anticipates meeting the 1.3% FFY 2016-2018 DBE goal entirely with race-neutral DBE participation.

Conclusion:

The City of Greeley Transit Service Division FFY 2016-2018 DBE goal for FTA Section 5307 funds is 1.3%.