

ST JOHNS COUNTY BOARD OF COUNTY COMMISSIONERS

**Federal Transit Administration
Triennial DBE Goal-Setting
FFY 2018 – FFY 2020**

St. Johns County (SJC) is a recipient of US DOT Federal Transit Administration (FTA) funding in excess of \$250,000. As a condition of receiving this financial assistance, St Johns County has assured that it will comply with the FTA’s DBE requirements to develop and submit a Triennial Overall DBE goal for its DOT assisted projects.

The purpose of the DBE goal setting process is to ensure nondiscrimination in the award and administration of U.S. Department of Transportation (DOT)- assisted contracts, to create a level playing field on which DBEs can compete fairly for those contracts, and to ensure the DBE Program is narrowly tailored in accordance with applicable law.

Submitted in accordance with Title 49 Code of Federal Regulations Part 26 (49 CFR Part 26¹). Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs, St. Johns County sets forth its Triennial Disadvantaged Business Enterprise (DBE) Goal and corresponding goal-setting methodology for the three-year Federal Fiscal Year (FFY) goal period of 2019-2021. St Johns County has proposed a DBE goal of 2.2% and is proposing to achieve this goal using Race Neutral means. The Race Conscious split is 1%.

FTA Assisted Contracting Opportunities for FFY 2018-2020

Table 1 represents St Johns County’s DOT assisted contracting opportunities, which consist of projects considered in preparing this goal methodology.

NAICS CODE	DESCRIPTION
488490*	Other Support Activities for Road Transportation
3361**	Motor Vehicle Manufacturing and Supplies
423860	Transportation equipment and supplies
541690****	Other scientific and technical consulting services
561110***	Office Administrative Services
332312	Prefabricated metal building and component manufacturing
238110	Poured Concrete Foundation and Structure Contractors
561720	Janitorial Services
334220	Radio Broadcasting Equipment

Table 1

*NAICS Code 488490; No DBE vendor will be contracted. The funds under this code are for operating costs. The Council on Aging is the contracted transportation provider.

**NAICS Code 3361 all vehicles will be procured through the State of Florida contract.

*** NAICS Code 561110; No DBE vendor will be contracted. The funds are for administrative costs associated with the management and planning of transportation grants done by the recipient.

****NAICS Code 541690 Transit planning and analysis will be done through contracted vendors with the Regional Transportation Planning Organization or through a contract with the Center for Urban Transportation Research.

BASE GOAL METHODOLOGY

STEP 1A: Determination of a Base Figure (49 CFR 26.45)

To establish a base figure of the relative availability of DBEs to all comparable firms available to participate on the County’s DOT-assisted contracting opportunities, SJC utilized the Florida Department of Transportation Unified Certification Program Disadvantaged Business Enterprise (UCP DBE) directory and the U.S. Census Bureau County Business Patterns (NAICS) Database. This base figure expresses the availability of DBEs as a percentage of all firms for each NAICS code for which there will be contracting and subcontracting opportunities.

St Johns County’s market area includes St Johns County, the adjacent counties of Clay, Duval, Putnam, Volusia, and Nassau, and the city of Jacksonville. The majority of the contractors and subcontractors that seek to do business with St Johns County are located in the market area. The transportation operator spends the majority of its contracting dollars in the market area.

Table 2 illustrates the weight of each type of subcontracting opportunities for anticipated contracts, which are identified by the North American Industry Classification System (NAICS) code associated with each type of business establishment. The base figure is derived by dividing the number of ready, willing and able DBE firms for each category by the number of all firms, weighted by the project’s percentage of total budget.

NAICS Code	Project	Amount of DOT funds on project:	% of total DOT funds (weight)
488490	Other Support Activities for Transportation	\$1,860,000.00	55.42%
336120	Heavy Duty Truck Manufacturing	\$975,000.00	29.05%
423830	Industrial Machinery and equipment merchant wholesalers	\$75,000.00	2.23%
541690	All Other Professional Scientific and Technical Services	\$50,000.00	1.49%
561110	Office Admin. Services	\$216,000.00	6.44%
332312	Prefabricated metal building and component manufacturing	\$30,000.00	0.89%
238110	Poured concrete foundation and structure contractors	\$45,000.00	1.34%
561720	Janitorial Services	\$30,000.00	0.89%
334220	Radio Broadcasting Equipment	75,000	2.23%
Total DOT Assisted Contract Funds		\$3,356,000.00	100%

Table 2

STEP 1B: The relative availability of DBEs by NAICS Code is shown in Table 3:

NAICS Code	Project	Number of DBEs available to perform this work	Number of all firms available (including DBEs)	Relative Availability
488490	Other Support Activities for Transportation	0	0	
3361	Motor Vehicle Manufacturing and Supplies	0	0	
423830	Industrial Machinery and equipment merchant wholesalers	1	1	100.00%
541690	All Other Professional Scientific and Technical Services	0	0	
561110	Office Admin. Services	0	0	
23621	Industrial building construction	3	32	9.38%
238110	Poured concrete foundation and structure contractors	5	172	2.91%
561720	Janitorial Services	16	566	2.83%
334220	Radio Broadcasting Equipment	1	4	25.0%
Combined Totals		26	771	3.35%

Table 3

STEP 1C: The Weighted Base Figures (Weight) x (Availability) are shown in Table 4:

NAICS Code	Project	Weight	Availability	Weighted Base Figure
488490	Other Support Activities for Transportation	55.42%	0.00%	
3361	Motor Vehicle Manufacturing and Supplies	29.05%	0.00%	
423830	Industrial Machinery and equipment merchant wholesalers	2.23%	100.00%	2.23%
541690	All Other Professional Scientific and Technical Services	1.49%	0.00%	
561110	Office Admin. Services	6.44%	0.00%	
236210	Commercial and Institutional Building Construction	0.89%	9.38%	0.08%
238110	Poured concrete foundation and structure contractors	1.34%	2.91%	0.04%
561720	Janitorial services	0.89%	2.83%	0.03%
334220	Radio Broadcasting Equipment	0.89%	2.83%	0.03%
Total Rounded, Weighted Base Figure:				2.4%

Table 4

STEP 2: ADJUSTING THE BASE FIGURE

Past DBE Goal Attainment

Subsequent to establishing a base figure, historical evidence of past participation provided evidence of DBE capacity in determining the feasibility of adjusting the base figure. Table 5 reflects DBE goal achievement on contracts for the previous 11 years. Note that in years 2012 and 2013, the DBE achievement was 28.7% and 11.8% because the County purchased and installed bus shelters. It has been noted that the 28.7% goal attainment in 2012 may be skewed. Nonetheless, current contracting opportunities are similar to those in the majority of prior years. Upwards of 80% of annual expenditures are for operating and rolling stock. The balance of expenditures are for project administration managed by the County, and capital equipment such as shelters, bus stop signs and miscellaneous shop equipment. The one significant project this triennial period will be to replace obsolete communications equipment and radios with equipment that is suitable for use with the County’s 800 MHz emergency radio system.

Federal Fiscal Year	DBE Achievement
2007	0.0%
2008	0.0%
2009	0.0%
2010	0.0%
2011	1.5%
2012	28.7%
2013	11.8%
2014	9.9%
2015	0.0%
2016	0.0%
2017	0.0%

Table 5

The historical median for the last 5 to 11 years is zero, so eliminating the years that had no DBE participation leaves four years (2011-2014) with active participation rates, and produces a more accurate participation rate of 10.85%:

YR	Participation
2011	1.50%
2014	9.90%
2013	11.80%
<u>2012</u>	<u>28.70%</u>
Avg Med:	21.70%
Divided by 2:	10.85%

Using this adjusted historical median based on participation, results in an adjusted base figure of 6.60%:

Rounded Weighted Base Figure: 2.4 %
 Adjusted Historical Median: 10.85 %
 Sum: 13.2 %
 Divided by 2: 6.60 % = Adjusted Base Figure

Disparity Studies

There have been no recent disparity studies in the market area. There is no other available evidence that would have an impact on the current DBE goal assessment.

PROPOSED OVERALL GOAL

The final proposed overall DBE goal for FFY 2018-2020 is 6.60%. St. Johns County's historical DBE goal attainment has been 100% race neutral, but as a part of the prescribed goal setting methodology, we project the percentage of proposed overall goal that can be met utilizing race –neutral and race-conscious measures. In the past, we calculated the RC/RN split by rounding up the weighted base figure. Using this same method, the split is 2.4% rounded up to 3%, leaving a Race Neutral/Race Conscious split of 6.6%/3.0%, with per year goals (divided by 3):

FFY 18-20 Race Neutral Goal: 2.20%

FFY 18-20 Race Conscious Goal: 1.00%

RACE NEUTRAL IMPLEMENTATION MEASURES

St. Johns County is currently implementing remedies to promote DBE and minority participation using a web-based electronic procurement system that offers vendors access to all information needed to learn about and respond to requests for bids or proposals. Vendors may register to receive notification of solicitations for bids, proposals, and quotes from St. Johns County, free of charge. Additionally, the Transit division solicits DBE participation through the use of direct email solicitations to DBE vendors on FTA assisted contracting opportunities.

CONSULTATION EFFORTS

In accordance with the goal-setting and public participation regulatory requirements, the following activities were conducted to facilitate public participation in the overall DBE goal setting process:

- A notice of public meeting was published in the newspaper and the notice was published on the county website. (Attachment A)
- Advertised the proposed DBE goal, in a public format via the County's website. (Attachment B)
- Emailed the notice of public meeting directly to the DBE vendors developed from the UCP Directory. (Attachment C)
- Hosted a public consultation meeting on June 6, 2018. There were no attendees; therefore, no sign-in sheet is attached.