

**FY 2024- FY 2026**

**PROPOSED FTA DBE TRIENNIAL  
GOAL  
FFYs 2024-2026**



**City of Tucson  
Disadvantaged Business  
Enterprise Program**

**July 18, 2023**

# PROPOSED OVERALL DBE TRIENNIAL GOAL 49 CFR PART 26

In accordance with 49 CFR part 26 and FTA Guidance, the City of Tucson proposes a DBE triennial goal of **5%** for all FTA-funded contracts projected to be awarded in FFYs 2024-2026.

The DBE triennial goal was calculated utilizing the 6 digit NAICS codes to determine firms that would most likely bid on contracts as either a prime or a subcontractor for the anticipated FTA funds during this time period. The goal is based upon current analysis of ready, willing and able DBEs relative to all available ready, willing and able businesses in the relevant market area.

## DBE TRIENNIAL GOAL METHODOLOGY

### **1. FTA-Assisted Contracts for FFY 2024 - 2026**

Table 1 below provides a listing of FTA-assisted contracts projected to be awarded in FFYs 2024-2026.

<b>Table 1</b>			
<b>Construction Projects</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Streetcar Power Switch Installation	\$609,048		
4 <sup>th</sup> Avenue Underpass Rework	\$1,399,999		
Repairs to HVAC System/Structures in Substations			\$300,000
Bus Wash Station Sun Tran	\$600,000		
CNG Plant NW	\$6,500,000	\$6,500,000	
Electric Charging Stations		\$907,500	
Alternate Fuel Generator MW – Backup Power to EV Charging	\$7,000,000	\$7,000,000	
Paving Parking Lot NW		\$1,500,000	
Tohono Transit Center Design & Renovations	\$3,750,000		
Laos Transit Center Design & Renovations		\$4,000,000	
Bus Wash Station Sun Van	\$600,000		
Replace Above Ground Fuel Tanks (Gasoline)		\$500,000	
Underground Lifts for Revenue Vehicles Maintenance	\$1,200,000		

Grease Distribution Lines in Vehicle Maintenance	\$300,000		
Pressure Washer System Design & Renovations	\$300,000		
<b>Total</b>	\$22,259,047	\$20,407,500	\$300,000
<b>3 Year FTA Total</b>	\$42,966,547		

Table 2 below provides a summary of the trade categories, NAICS Codes, number of DBE firms, a total of all available firms and estimated FTA funding per NAICS code for all FTA-assisted contracts projected to be awarded in FFYs 2024-2026.

<b>Table 2: Projected Scopes of Work, Available Firms and Contracting Opportunities</b>				
<b>Trade Category</b>	<b>NAICS Code</b>	<b>DBE Firms</b>	<b>All Firms</b>	<b>Contracting Dollars</b>
Utilities Construction: Oil and Gas Pipeline	237120	1	10	\$3,280,550
Utilities Construction: Power and Communication Line	237130	1	14	\$3,915,800
Commercial and Institutional Building Construction	236220	0	26	\$3,640,000
Other Heavy and Civil Engineering Construction	237990	11	119	\$560,000
Poured Concrete Foundation and Structure Contractors	238110	10	36	\$65,000
Masonry Contractors	238140	7	18	\$91,000
Other Foundation, Structure and Building Exterior Contractors	238190	2	22	\$494,000
Electrical Contractors and Other Wiring Installation Contractors	238210	8	91	\$9,996,964
Plumbing, Heating and Air-Conditioning Contractors	238220	4	109	\$961,000
Other Building Equipment Contractors	238290	0	4	\$26,000
Other Building Finishing Contractors	238390	0	10	\$65,000
Site Preparation Contractors	238910	8	33	\$65,000
All Other Specialty Trade Contractors	238990	15	36	\$450,000
Metal Tank (Heavy Gauge) Manufacturing	332420	1	4	\$350,000

All Other Miscellaneous Fabricated Metal Product Manufacturing	332999	1	20	\$3,900
Air and Gas Compressor Manufacturing	333912	0	6	\$180,000
Elevator and Moving Stairway Manufacturing	333921	0	10	\$720,000
Asphalt Paving Mixture and Block Manufacturing	324121	0	8	\$1,050,000
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	334220	0	41	\$26,000
Other Communications Equipment Manufacturing	334290	0	18	\$91,000
Motor and Generator Manufacturing	335312	0	5	\$9,800,000
Switchgear and Switchboard Apparatus Manufacturing	335313	0	4	\$426,334
Railroad Rolling Stock Manufacturing	336510	0	4	\$839,999
Roofing, Siding, and Insulation Material Merchant Wholesalers	423330	0	18	\$65,000
Metal Service Centers and Other Metal Merchant Wholesalers	423510	0	22	\$104,000
Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers	423720	1	34	\$180,000
Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers	423730	1	16	\$210,000
Other Building Material Dealers	444180	0	3	\$4,650,000
Car Washes	811192	1	4	\$660,000
<b>Totals</b>		<b>72</b>	<b>748</b>	<b>\$42,966,547</b>

## 2. Local Market Area

The local market area is the area in which the substantial majority of the contractors and subcontractors with whom the City of Tucson does business are located, and the area in which the City of Tucson spends the substantial majority of its contracting dollars. An analysis of the 11 FTA-assisted contracts completed between October 1, 2019 and September 30, 2022 revealed that all but (1) one of those contracts were awarded to prime contractors located in Pima County. That one contract was for providing specialized equipment and installation services for a transit bus wash system. Therefore, the relevant market for City of Tucson federally funded projects would include the Pima County boundaries.

### 3. Methodology

#### Step One: Determine Weighted Base Figure

The City of Tucson followed the prescribed federal methodology to determine the base figure of the available DBE firms relative to all firms in the same work category (DBE and Non-DBE) that are ready, willing and able to bid on FTA-assisted contracts.

To establish the base figure, research was conducted to determine the firms available to perform the scopes of work detailed in each contract scheduled. Certified DBEs were found using the Arizona Unified Certification Program listing from the Arizona Department of Transportation, AZUTRAC website at <https://utracs.azdot.gov/Search>. To determine the “all ready, willing and able businesses in work category”, the City of Tucson’s Department of Procurement vendor database was utilized.

Vendor reports were created searching for all vendors registered under these NIGP Class Codes:

- 02543 – Compressor, High Pressure, All Sizes and Models
- 02585 – Motors, Air Compressor
- 03121 – Compressors, Air Conditioning: Industrial Type and Parts
- 03167 – HVAC Equipment, Accessories and Supplies
- 05579 – Sirens, Horns and Backup Alarms
- 07502 – Alarm Systems, Visual and Audio
- 07596 – Vehicle Washing Systems, Automatic and Stationary
- 14560 - Roofing
- 28539 – Generators, Stationary Type (Not Automobile)
- 29500 – Elevators, Escalators and Moving Walks (Building Type)
- 34016 – Fire Alarm Systems, Power Sirens and Controls
- 34020 – Fire Detecting Equipment
- 34080 – Smoke Detecting Equipment
- 40513 – Gas, Natural Gas
- 40547 – Oil, Compressor
- 45062 – Pads, Equipment Foundation (All Types)
- 54512 – Compressors, Gas (All Types)
- 54528 – Industrial Compressors, All Types
- 55770 – Tanks: Air, Fuel, Water
- 55800 – Mass Transportation – Rail Vehicles and System
- 55900 – Mass Transportation – Rail Vehicle Parts and Accessories
- 57000 – Metals: Bard, Plates, Rods, Sheets, Strips, Structural Shapes, Tubing and Fabricated Items
- 68032 – Burglar Alarms
- 69043 – Generators
- 72019 – Compressors, Compressed Natural Gas
- 72033 – Gasoline, CNG, LPG and Diesel Pumps
- 74500 – Road and Highway Building Materials (Asphaltic)
- 77000 – Roofing Materials and Supplies

83031 – Fiberglass Tanks, Gasoline  
83055 – Steel Tanks, Overhead Type (Gasoline)  
83069 – Steel Tanks, Storage Type (Gasoline)  
83070 -Steel Tanks, Surface and Underground Type (Gasoline)  
83800 – Telecommunication Equipment, Accessories and Supplies  
83833 – Communications: Networking, Linking, Fiber Modems, Power Over Ethernet,  
Wireless  
83834 – Communication Security Systems  
83835 – Communication Systems, Integrated  
83839 – Consoles and Racks, Security  
83840 – Controllers, Remote, Wireless, Infrared/Radio Frequency  
83896 – Wire and Cable, Telecommunication  
90921 - Building Construction, Industrial  
90924 – Building Construction, Commercial and Institutional  
90930 – Building Construction – General  
90945 – Finishes: Flooring, Wall and Ceiling  
90977 – Special Construction  
90900 – Building Construction Services, New  
90921 – Building Construction, Industrial  
90924 – Building Construction, Commercial and Institutional  
91013 – Elevator Installation, Maintenance, Repair and Inspection  
91051 – Masonry, Concrete and Stucco Maintenance, Finishing and Repair  
91060 – Plumbing Maintenance and Repair  
91075 – Wall and Ceiling Repair and Replacement  
91086 - Siding Installation and Repair Services  
91115 – C.I.P. Construction/Rehabilitation  
91116 - C.I.P. Construction/Rehabilitation, Buildings  
91132 – C.I.P., Fire Alarm System  
91200 – Construction Services, General  
91223 – Construction, General  
91244 – Excavation Services  
91300 – Construction Services, Heavy  
91313 – Construction, Bridge and Drawbridge  
91340 - Construction, Pipeline  
91341 – Construction, Power Line  
91344 – Construction, Railroad  
91348 – Construction, Special Foundation  
91356 – Construction, Utility/Underground Projects  
91361 – Construction, Vertical, Concrete, Pour-in-Place  
91427 – Carpentry  
91450 – Heating, Ventilating and Air Conditioning  
91455 - Masonry  
91461 – Painting and Wallpapering  
91468 – Plumbing  
91473 – Roofing and Siding  
92517 – Civil Engineering  
91576 – Telephone Service Include Installation  
94000 – Equipment Maintenance, Repair, Construction and Related Services

- 94034 – Construction, Transit, Facility, Other
- 94067 – Railroad Switching and Terminal Services
- 94088 – Track Construction and Inspection
- 94155 – HVAC Systems Maintenance and Repair
- 95115 – Infrastructure & Infrastructure Improvements
- 96702 – Air Conditioning, Heating and Ventilating Equipment
- 96749 – Metals and Metal Products
- 98832 – Grading of Parking Lots
- 99050 – Installation of Security and Alarm Equipment

$$\text{Relative Base Figure} = \frac{\text{Ready, willing and able DBEs in work category}}{\text{All ready, willing and able businesses in work category}}$$

An initial Base Figure of 9.63 percent was calculated by dividing the total number of DBEs certified in all work categories (72) by the total number of available firms in all work categories (748) inherent in the contracts projected to be awarded with FTA funding.

$$9.63\% = \frac{72}{748}$$

To ensure that the Base Figure is as accurate as possible, the City then used the recommended methodology of weighting to determine the Rounded Weighted Base Figure by calculating the relative availability of DBEs by each NAICS code (Table 3), calculating the percentage weight by contract dollars for each NAICS code (Table 4), and calculating the percentage weighted base figure by NAICS Codes (Table 5).

**Table 3: Relative Availability of DBEs by NAICS Code**

Trade Category	NAICS Code	DBE Firms	All Firms	Contracting Dollars	Percentage DBEs NAICS
Utilities Construction: Oil and Gas Pipeline	237120	1	16	\$3,280,550	6.25%
Utilities Construction: Power and Communication Line	237130	1	10	\$3,915,800	10.00%
Commercial and Institutional Building Construction	236220	0	26	\$3,640,000	0.00%
Other Heavy and Civil Engineering Construction	237990	11	119	\$560,000	9.17%
Poured Concrete Foundation and Structure Contractors	238110	10	36	\$65,000	27.78%
Masonry Contractors	238140	7	18	\$91,000	38.89%
Other Foundation, Structure	238190	2	22	\$494,000	9.09%

and Building Exterior Contractors					
Electrical Contractors and Other Wiring Installation Contractors	238210	8	91	\$9,996,964	8.79%
Plumbing, Heating and Air-Conditioning Contractors	238220	4	109	\$961,000	3.67%
Other Building Equipment Contractors	238290	0	4	\$26,000	0.00%
Other Building Finishing Contractors	238390	0	10	\$65,000	0.00%
Site Preparation Contractors	238910	8	33	\$65,000	24.24%
All Other Specialty Trade Contractors	238990	15	36	\$450,000	41.67%
Metal Tank (Heavy Gauge) Manufacturing	332420	1	4	\$350,000	25.00%
All Other Miscellaneous Fabricated Metal Product Manufacturing	332999	1	20	\$3,900	5.00%
Air and Gas Compressor Manufacturing	333912	0	6	\$180,000	0.00%
Elevator and Moving Stairway Manufacturing	333921	0	10	\$720,000	0.00%
Asphalt Paving Mixture and Block Manufacturing	324121	0	8	\$1,050,000	0.00%
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	334220	0	41	\$26,000	0.00%
Other Communications Equipment Manufacturing	334290	0	18	\$91,000	0.00%
Motor and Generator Manufacturing	335312	0	5	\$9,800,000	0.00%
Switchgear and Switchboard Apparatus Manufacturing	335313	0	4	\$426,334	0.00%
Railroad Rolling Stock Manufacturing	336510	0	4	\$839,999	0.00%
Roofing, Siding, and Insulation Material Merchant Wholesalers	423330	0	18	\$65,000	0.00%
Metal Service Centers and Other Metal Merchant Wholesalers	423510	0	22	\$104,000	0.00%
Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers	423720	1	34	\$180,000	2.94%



Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers	423730	1	16	\$210,000	6.25%
Other Building Material Dealers	444180	0	3	\$4,650,000	0.00%
Car Washes	811192	1	4	\$660,000	25.00%
<b>Totals</b>		<b>72</b>	<b>748</b>	<b>\$42,966,547</b>	

**Table 4: Weight by Contract Dollars per NAICS Code**

Trade Category	NAICS Code	DBE Firms	All Firms	Contracting Dollars	Percentage Weight by Contract Dollars
Utilities Construction: Oil and Gas Pipeline	237120	1	16	\$3,280,550	7.64%
Utilities Construction: Power and Communication Line	237130	1	10	\$3,915,800	9.11%
Commercial and Institutional Building Construction	236220	0	26	\$3,640,000	8.47%
Other Heavy and Civil Engineering Construction	237990	11	119	\$560,000	1.30%
Poured Concrete Foundation and Structure Contractors	238110	10	36	\$65,000	.15%
Masonry Contractors	238140	7	18	\$91,000	.21%
Other Foundation, Structure and Building Exterior Contractors	238190	2	22	\$494,000	1.15%
Electrical Contractors and Other Wiring Installation Contractors	238210	8	91	\$9,996,964	23.27%
Plumbing, Heating and Air-Conditioning Contractors	238220	4	109	\$961,000	2.24%
Other Building Equipment Contractors	238290	0	4	\$26,000	.06%
Other Building Finishing Contractors	238390	0	10	\$65,000	.15%
Site Preparation Contractors	238910	8	33	\$65,000	.15%
All Other Specialty Trade Contractors	238990	15	36	\$450,000	1.05%
Metal Tank (Heavy Gauge) Manufacturing	332420	1	4	\$350,000	.81%

All Other Miscellaneous Fabricated Metal Product Manufacturing	332999	1	20	\$3,900	.01%
Air and Gas Compressor Manufacturing	333912	0	6	\$180,000	.42%
Elevator and Moving Stairway Manufacturing	333921	0	10	\$720,000	1.68%
Asphalt Paving Mixture and Block Manufacturing	324121	0	8	\$1,050,000	2.44%
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	334220	0	41	\$26,000	.06%
Other Communications Equipment Manufacturing	334290	0	18	\$91,000	.21%
Motor and Generator Manufacturing	335312	0	5	\$9,800,000	22.81%
Switchgear and Switchboard Apparatus Manufacturing	335313	0	4	\$426,334	.99%
Railroad Rolling Stock Manufacturing	336510	0	4	\$839,999	1.96%
Roofing, Siding, and Insulation Material Merchant Wholesalers	423330	0	18	\$65,000	.15%
Metal Service Centers and Other Metal Merchant Wholesalers	423510	0	22	\$104,000	.24%
Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers	423720	1	34	\$180,000	.42%
Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers	423730	1	16	\$210,000	.49%
Other Building Material Dealers	444180	0	3	\$4,650,000	10.82%
Car Washes	811192	1	4	\$660,000	1.54%
<b>Totals</b>		<b>72</b>	<b>748</b>	<b>\$42,966,547</b>	

**Table 5: Determine the weighted base figure using the data results from Table 2 and Table 3.  
(DBE Availability) x (Weight by Contract Dollars) = Weighted Base Figure**

<b>Trade Category</b>	<b>NAICS Code</b>	<b>Percentage DBEs NAICS</b>	<b>Percentage Weight by Contract Dollars</b>	<b>Percentage Weighted Base Figure</b>
Utilities Construction: Oil and Gas Pipeline	237120	6.25%	7.64%	.48%
Utilities Construction: Power and Communication Line	237130	10.00%	9.11%	.91%
Commercial and Institutional Building Construction	236220	0.00%	8.47%	0.00%
Other Heavy and Civil Engineering Construction	237990	9.17%	1.30%	.12%
Poured Concrete Foundation and Structure Contractors	238110	27.78%	.15%	.04%
Masonry Contractors	238140	38.89%	.21%	.08%
Other Foundation, Structure and Building Exterior Contractors	238190	9.09%	1.15%	.10%
Electrical Contractors and Other Wiring Installation Contractors	238210	8.79%	23.27%	2.05%
Plumbing, Heating and Air-Conditioning Contractors	238220	3.67%	2.24%	.08%
Other Building Equipment Contractors	238290	0.00%	.06%	0.00%
Other Building Finishing Contractors	238390	0.00%	.15%	0.00%
Site Preparation Contractors	238910	24.24%	.15%	.04%
All Other Specialty Trade Contractors	238990	41.67%	1.05%	.44%
Metal Tank (Heavy Gauge) Manufacturing	332420	25.00%	.81%	.20%
All Other Miscellaneous Fabricated Metal Product Manufacturing	332999	5.00%	.01%	0.00%
Air and Gas Compressor Manufacturing	333912	0.00%	.42%	0.00%
Elevator and Moving Stairway Manufacturing	333921	0.00%	1.68%	0.00%
Asphalt Paving Mixture and Block Manufacturing	324121	0.00%	2.44%	0.00%
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	334220	0.00%	.06%	0.00%

Other Communications Equipment Manufacturing	334290	0.00%	.21%	0.00%
Motor and Generator Manufacturing	335312	0.00%	22.81%	0.00%
Switchgear and Switchboard Apparatus Manufacturing	335313	0.00%	.99%	0.00%
Railroad Rolling Stock Manufacturing	336510	0.00%	1.96%	0.00%
Roofing, Siding, and Insulation Material Merchant Wholesalers	423330	0.00%	.15%	0.00%
Metal Service Centers and Other Metal Merchant Wholesalers	423510	0.00%	.24%	0.00%
Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers	423720	2.94%	.42%	.01%
Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers	423730	6.25%	.49%	.03%
Other Building Material Dealers	444180	0.00%	10.82%	0.00%
Car Washes	811192	25.00%	1.54%	.39%
	<b>Total</b>			<b>4.97%</b>
	<b>Rounded Weighted Base Figure</b>			<b>5.00%</b>

Therefore, the City’s Rounded Weighted Base Figure of **5.00%** accurately reflects where the dollars will be spent for the work to be performed.

**Step Two: Adjusting the Base Figure**

The City of Tucson examined the following criteria for possible Step 2 adjustment to the goal. The City managed a race-and-gender neutral program beginning in FY17–FY19 to establish contract goals for all FTA funded projects.

In accordance with regulatory guidance, the City of Tucson considered the following factors to determine if adjustment to the Weighted Base Figure was necessary to reflect other known factors in the relevant market area.

1. Historical Participation of DBEs on FTA Assisted Contracts: The City of Tucson conducted an analysis of the historical participation based upon the actual DBE Goal attained during FFYs 20 - 22. The DBE participation during this time period is summarized in Table 6.

<b>Table 6</b>		
<b>Federal Fiscal Year</b>	<b>FTA DBE Goal Attainment Percent</b>	<b>FTA DBE Goal Attainment Percent After Contract Removal</b>
2019-2020	41.07	0.00
2020-2021	40.41	0.00
2021-2022	8.75	0.00
<b>Median</b>	<b>40.41</b>	<b>0.00%</b>

**The median DBE participation for this period was 40.41 percent adjusted to 0.00 percent after removing all (11) eleven projects.**

The City of Tucson compared the types of contracts completed during the FFYs 2021-2023 DBE Plan to the upcoming projects projected during the FYs 2024-2026 DBE Plan. The exceedingly high DBE goal percentage attained in FFY 2019-2020 was due to having to having the full value of (1) FTA-assisted contract being awarded to a DBE prime contractor who self-performed 100% of the work to demolish the existing bus wash and install a new bus wash and (1) contract where a DBE firm was awarded a subcontract for 46% of the contract value by performing the asphalt and concrete work to install ADA Sidewalks.

The exceedingly high DBE goal percentage attained in FFY 2020-2021 was solely due to having only (1) FTA-assisted contract completed for the fiscal year awarded to the prime who self-performed 40% of the work to effect repairs and maintenance on Sun Van parking lots.

The low DBE goal percentage attained in FFY 2021-2022 was due to (1) one contract where a DBE subcontractor performed the HVAC duct work for the chiller which represented 64% of the total scope and (1) one contract where little opportunity was available for DBEs based upon the scope of work which was confirmed by the (4) four bids that were submitted. The (3) unsuccessful bidders proposed DBE participation of 0.4%, 0.22% and 0.15% while the low bidder proposed 2.29%. After change orders, the final DBE participation increased to 4.10%.

Finally, the scopes of work for these projects are predominately not similar to the projected contracts for FFY 2024-2026. Therefore, it is reasonable to remove these contracts from the median calculation rendering 7.76% FTA DBE Goal Attainment Percentage for FFY 2017-2018 and 2018-2019.

Further analysis showed that (9) nine of the (11) eleven FTA-assisted projects were horizontal construction projects for parking lots, drainage and sidewalks. Only two (2) of the (15) projected projects for FFY 2024-2026 contain similar, but not identical, horizontal construction scopes. Therefore, it is reasonable to remove all projects from the median calculation leaving a median of 0.00%.

For the reasons listed above, an adjustment was not made based upon historical participation, nor is there a relevant median to apply.

2. DBE Prime Awarded FTA Assisted Contracts: In FFY 2019-2020, FFY 2020-2021 and FFY 2021-2022, (2) two certified DBE firms were awarded a total of (3) three contracts as a Prime contractor; therefore, their participation would be counted as race neutral. Due to the availability of DBE firms as prime contractors, no adjustment was made for past participation.
3. Bidders List: The City of Tucson's bidder's lists from past procurements does match the bidder's lists for the scopes of work in upcoming FTA-assisted contracts. The names of firms that showed interest in city procurement efforts were included in the calculations of base availability. Therefore, no adjustment was made based upon the bidder's list from past procurements.
4. Disparity Study: The City of Tucson does not have a current disparity study. The last disparity study conducted in Pima County was in 2008. The City of Tucson reviewed the disparity study conducted by the Arizona Department of Transportation (ADOT) in 2022. However, it was determined that ADOT's disparity study was not applicable due to the differences in the relative markets (State of Arizona vs Pima County) and the drastic difference in the type of FTA-assisted contracts. Therefore, no adjustment was made based upon ADOT's disparity study information.

### **Step Three: Calculate the Race- and Gender-Neutral and Race- and Gender-Conscious portion of the overall Goal**

The City will achieve its triennial goal for FFYs 2024-2026 entirely through race- and gender-neutral measures. Because there is no current disparity study applicable to the City of Tucson, there is no factual predicate to justify race-and gender-conscious component.

### **Proposed Overall DBE Triennial Goal**

The City of Tucson proposes a DBE triennial goal of **5%** for all FTA funded contracts during FFYs 2024-2026, was established pursuant to 49 CFR Part 26.45 and FTA guidance. The triennial goal, which will be achieved through race-and gender-neutral measures, was established pursuant to 49 CFR Part 26.45 and FTA guidance. The goal is based upon current analysis of ready, willing and able DBEs relative to all ready, willing and able businesses in the relevant market area.

## GOAL ADVERTISEMENT AND PUBLIC PARTICIPATION 49 CFR PART 26.45(g)(1)(2)

The City of Tucson submits its overall goal to DOT on August 1st of every third year as required. The City will begin using its overall goal on October 1st of each year, unless other instructions are received from DOT. The City of Tucson was placed on a 3-year cycle effective August 1, 2011.

In accordance with the goal-setting and public participation regulatory requirements, the City of Tucson conducted the following activities to facilitate and encourage public participation in the overall DBE goal-setting process.

- ❖ The City of Tucson is hosting three (3) public participation virtual meetings on July 20, 2023, July 24, 2023 and July 26, 2023.
  - Notification of the meetings were published on the City of Tucson’s Department of Procurement website on the Disadvantaged Business Enterprise webpage, <https://www.tucsonaz.gov/Departments/Business-Services-Department/Procurement/Contract-Compliance-DBE-SBE-DBRA/Disadvantaged-Business-Enterprise?transfer=387be380-ac48-46c4-a373-1fa229d12ebf>
  -
- ❖ The FTA DBE Plan and Goal Proposal for FFY 2024-2026 was advertised in a public format on the City of Tucson’s Department of Procurement’s website. The public notice advertised of the 45-day comment period with instructions on how and where to submit comments and/or questions. Lloyd Windle, Contract Administration Manager who oversees the program, was designated as the point of contact for comments and questions. The public was instructed to email comments and questions to [Lloyd.Windle@tucsonaz.gov](mailto:Lloyd.Windle@tucsonaz.gov) with the email subject as “City of Tucson Draft FTA DBE Goal & Plan 2024-2026. A rule was established within Microsoft Outlook to filter incoming emails and distribute them into a uniquely named folder titled “FTA DBE Goal and Plan”.
- ❖ Notification of the public participation meetings and a copy of the FTA DBE Plan and Goal Proposal were emailed to the following stakeholder groups. In addition, the City offered to present the proposed DBE Plan and Goal to the specific small business stakeholders groups.
  1. Arizona Builders Alliance
  2. Arizona Construction Trades
  3. Arizona Transportation Builders Association
  4. Arizona Small Business Association
  5. Arizona Small Business Development Center – Pima Community College
  6. Minority & Small Business Alliance of Southern Arizona
  7. Tucson Hispanic Chamber of Commerce
  8. YWCA Women’s Business Center

## RACE AND GENDER NEUTRAL IMPLEMENTATION MEASURES

The City of Tucson conducts race-and gender-neutral outreach and promotes the participation of DBEs, Small Business Concerns (SBCs) and Small Business Enterprise (City of Tucson certified) in the City of Tucson FTA-assisted contracts. The City of Tucson will continue to implement the following race- and gender-neutral measures in FFY 2024-2026:

- Partner with other city and state agencies in hosting events to reach out to the largest number of contractors possible;
- Host and participate in workshops for DBEs, SBCs, and SBEs;
- Provide pre-bid/pre-submittal conferences to explain solicitation requirements as well as to offer a networking opportunity for primes and subcontractors;
- Participate in pre-construction conferences to explain the contractual DBE requirements;
- Continue active efforts to unbundle contracts to encourage small business participation.
- Continue to be a resource to small businesses and assist them in the certification process;
- Reach out to small business contracting community to promote the value of DBE certification;
- Educate the contracting community on the best way to find DBE contractors. <https://utracs.azdot.gov/Search>);
- Partner with economic development organizations to provide small businesses access to capital, management and technical assistance, and business consulting services;
- Continue to promote the participation of DBEs, SBCs and SBEs at conferences and expos.



# APPENDIX A

## Appendix A - Median Goal Attainment

FY	Contract Number	Contractor	Base Bid	DBE Goal	Actual DBE Payments	DBE Goal %	DBE Actual Goal Attained Actual DBE Payments/Base Bid	Actual DBE Goal minus the DBE Actual	Total Bidders	Adjusted DBE	
										Payments	Adjusted Actual DBE Goal
19-20  Prime	120530	Kittle Construction	82,496.00	0.00	10,701.00				1	10,701.00	
	120530	Sellers & Sons	33,412.00	0.00	8,354.00				2	8,354.00	
	192166	Air & Lube Systems	526,788.36	0.00	526,788.36				2	526,788.36	
	171729	Granite Construction	667,883.51	0.00	14,211.00				3	14,211.00	
	171729	KE&G Construction	914,850.72	0.00	508,174.62				3	508,174.62	
	120530	Kittle Construction	534,013.00	0.00	65,066.00				1	65,066.00	
<b>Total</b>			<b>2,759,443.59</b>	<b>0.00</b>	<b>1,133,294.98</b>	<b>12.00%</b>	<b>41.07%</b>	<b>29.07%</b>	<b>12</b>	<b>1,133,294.98</b>	<b>41.07%</b>
20-21 Prime	120530	Durazo Construction	123,706.00	0.00	49,984.00				1	49,984.00	
	<b>Total</b>			<b>123,706.00</b>	<b>0.00</b>	<b>49,984.00</b>	<b>12.00%</b>	<b>40.41%</b>	<b>28.41%</b>	<b>1</b>	<b>49,984.00</b>
21-22  Prime	171729	Granite Construction	182,281.00	0.00	16,326.00				4	16,326.00	
	120530	Kittle Construction	211,438.00	0.00	134,245.00				3	134,245.00	
	120530	Durazo Construction	324,806.00	0.00	55,673.63				2	55,673.63	
	202336	KE&G Construction	3,168,996.00	0.00	134,061.00				3	134,061.00	
	<b>Total</b>			<b>3,887,521.00</b>	<b>0.00</b>	<b>340,305.63</b>	<b>12.00%</b>	<b>8.75%</b>	<b>-3.25%</b>	<b>3</b>	<b>340,305.63</b>
			6,770,670.59		1,523,584.61		22.50%				