GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT



REVISED DISADVANTAGED BUSINESS ENTERPRISE (DBE) GOAL METHODOLOGY FEDERAL FISCAL YEARS 2027 – 2028

Contracts Assisted by the Federal Transit Administration

REVISED REPORT: November 10, 2026

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SUMMARY

The Golden Gate Bridge, Highway and Transportation District (District) developed a 1.1% overall Disadvantaged Business Enterprise (DBE) goal applicable to Federal Fiscal Year (FFY) 2025/2026 – 2027/2028 contracting opportunities assisted by the Federal Transit Administration (FTA) in accordance with revisions to 49 Code of Federal Regulations (C.F.R.) Part 26, effective May 9, 2024. The District's DBE goal methodology was submitted on July 31, 2025 for FTA approval and was applicable to a total of $27,520,000 of FTA dollars budgeted for 16 maritime contracts anticipated to be awarded from October 1, 2025, through September 30, 2028. It is understood that in the event of changed circumstances, the District will evaluate such changes to determine whether the present goal continues to be realistic or whether a mid-course adjustment would be necessary. Based on the updated analysis presented in this report, the District proposes a **0.4% DBE-Neutral and 0% DBE-Conscious** split overall goal.

On September 25, 2026, the United States Department of Transportation (USDOT) published a Final Rule adopting, with limited modifications, the Interim Final Rule (IFR) issued on October 3, 2025. The revised regulations eliminate race- and sex-based presumptions of social and economic disadvantage for DBE certification and require individualized determinations of disadvantage under 49 C.F.R. §26.67. Eligibility must be established through evidence of the individual owner's experiences and circumstances, without reliance on race or sex. Under 49 C.F.R. §26.111, each state's Unified Certification Program (UCP) must reevaluate DBE firms under the revised certification standards and notify USDOT when the process is complete. Pursuant to §26.45(h), recipients are not required to update their overall DBE goals until their respective UCP completes that process.

On July 20, 2026, the California Unified Certification Program (CUCP) notified USDOT that it had completed the reevaluation of DBE firms that submitted the required documentation by the April 16, 2026 deadline, under the revised federal certification standards. DBE firms meeting those standards are identified in the updated CUCP DBE Directory.

Due to these regulatory changes, the District is required to review its overall DBE goal for FFY 2027 and FFY 2028 and adjust the goal, if necessary, based on the relative availability of ready, willing, and able DBEs certified under the new standards. Accordingly, the District has reviewed the current certification directory, anticipated contract scopes of work, and relevant and realistic evidence of DBE availability and capacity to determine whether an adjustment to the 1.1% goal is warranted. This methodology documents the proposed adjustments and their supporting rationale, including the availability and capacity considerations associated with specialized contracts.

The steps taken in the development of the District's DBE goal reassessment are in accordance with 49 C.F.R. Part 26. A narrative description accompanied by tables and calculations is contained in this report to provide a clear explanation of how the District developed its mid-course reassessment of the overall DBE goal for FFY 2027 and FFY 2028.

RELEVANT AVAILABLE EVIDENCE

The District examined all evidence in its jurisdiction to determine which sources might be considered for its DBE goal-setting methodology in the Step One and Step Two process:

DATA CONSULTED

- ***California Unified Certification Program (CUCP) Database***

  The District used the CUCP database to determine the number of certified DBEs in the District's nine county local market area. This data is used in Step One of the goal-setting process.

- ***Census Bureau's County Business Pattern (CBP) Database***

  The District used the Census Bureau's County Business Pattern (CBP) database, updated as of June 26, 2025, to obtain the number of all firms (DBEs and non-DBEs) ready, willing and able to bid for the District's FTA-assisted contracts. This data is used in Step One of the goal-setting process.

- ***Current Capacity of DBEs***

  The District evaluated DBE availability and capacity for all maritime contracts included in the proposed overall DBE goal. Consistent with USDOT guidance, the District did not use past participation rates of firms certified under the former standards to make a Step Two adjustment. Historical information concerning marine construction market conditions was included solely as background and was not used to predict certification eligibility or substitute for current capacity evidence. The District relied on current certification status, DBE availability, and documented capacity to perform anticipated prime contracting and subcontracting scopes to determine whether a Step Two adjustment to the Step One base figure is warranted. **Exhibit 4.1** presents this analysis and the supporting rationale for the adjustments.

- ***Data from Disparity Studies Performed by Other Agencies***

  In accordance with ***Frequently Asked Questions (FAQs) on the U.S. Department of Transportation Disadvantaged Business Enterprise Program (DBE) and Disadvantaged Business Enterprise in Airport Concessions (ACDBE) Program Implementation Modifications, September 25, 2026 Final Rule***, recipients are advised when updating goal methodologies, disparity studies that were based on presumptions regarding race or sex or are otherwise based on generalized assertions of systemic discrimination may not be used. The District has not identified a disparity study or availability study conducted by an agency with similar maritime contracting opportunities in its shared market area after the issuance of the September 25, 2026, FAQs. Therefore, the District did not consider any disparity studies in performing the mid-course adjustment.

- ***Bidders List***

  The District maintains a bidders' list of DBE and non-DBE firms seeking work on District contracts, as required under 49 C.F.R. §26.11(c). In light of the revised DBE certification standards adopted by USDOT's Final Rule, staff determined its bidders' list data is not sufficiently comprehensive to serve as the sole basis for determining the relative availability of eligible DBEs in the District's local market area. The District will therefore consider this data as supplemental evidence, alongside the current CUCP DBE Directory and other relevant availability and capacity information, in developing its revised overall DBE goal.

- ***Goals of Other U.S. DOT Recipients***

  At the time this methodology was developed, staff's review of publicly available materials did not identify a proposed triennial DBE goal or mid-course adjustment by another recipient with a substantially similar local market area and comparable contracting opportunities. Accordingly, the District did not consider the use of another recipient's goal as the basis for its mid-course adjustment.

DETERMINING LOCAL MARKET AREA

The following areas were considered in determining the District's local market area: 1) the area in which the substantial majority of the contractors and subcontractors with which the District does business are located, and 2) the area in which the District spends the substantial majority of its contracting dollars.

The District identified the locations of all its contractors and subcontractors by examining its Diversity Compliance Management System, which includes successful bidder's and subcontractor's business addresses and award amounts. In addition, the District examined its bidder's list for successful and unsuccessful contractors and subcontractors. It has been determined that the majority of the contractors and subcontractors which the District does business are located in the counties of Alameda, Contra Costa, Marin, Sacramento, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma.

The District is composed of four divisions: District, Bridge, Bus, and Ferry. Its facilities are located in the counties of San Francisco, Marin, and Sonoma. The District determined for FFY 2027-2028, substantial contracting dollars will be allocated in its Ferry division located in Marin county.

CONTRACTS ASSISTED BY FTA

A total of $40,088,000 of FTA dollars is budgeted for 12 contracts to be awarded during FFY 2027-2028. See **Exhibit 1** below. A two-step process is used to determine the overall goal for these remaining contracts.

EXHIBIT 1: Contracts subject to mid-course adjusted DBE goal

DIVISION	A. DESCRIPTION OF CONTRACT	B. FTA DOLLARS
	Anticipated for award in FFY 2027 - 2028	
Ferry	Dry Docking and Capital Improvements for *M.V. Golden Gate* (2027)	$520,000
Ferry	Dry Docking and Capital Improvements for *M.V. Napa* (2027)	$520,000
Ferry	Dry Docking and Capital Improvements for *M.S. Sonoma* (2027)	$480,000
Ferry	Dry Docking and Capital Improvements for *M.S. Marin* (2028)	$800,000
Ferry	Dry Docking and Capital Improvements for *M.V. Mendocino* (2028)	$520,000
Ferry	Larkspur Ferry Terminal Drainage Culvert Rehabilitation (Professional Services)	$384,000

DIVISION	A. DESCRIPTION OF CONTRACT	B. FTA DOLLARS
	Anticipated for award in FFY 2027 - 2028	
Ferry	Larkspur Ferry Terminal Drainage Culvert Rehabilitation (Construction)	$560,000
Ferry	Larkspur Berths 1&2 Mooring Camels Restoration (Professional Services)	$120,000
Ferry	Larkspur Berths 1&2 Mooring Camels Restoration (Construction)	$2,456,000
Ferry	Larkspur Ferry Terminal Diesel Exhaust Fluid (DEF) Storage Tank and Transfer Infrastructure Construction	$1,200,000
Ferry	Larkspur Ferry Terminal Berths and Channel Dredging Construction	$11,200,000
Ferry	Gangways & Piers Sausalito Construction	$21,328,000

Total FTA Funds: $40,088,000

Step One. Determining Base Figure

Base figures were calculated for contracts budgeted for award to determine the relative availability of DBEs in specific areas of expertise using the North American Industrial Classification System (NAICS) codes. The District identified 17 NAICS codes as pertinent areas of expertise for these contracts. The NAICS codes and descriptions are identified in **Exhibit 2, Columns A and B on page FTA-5**.

Number of DBEs: To determine the number of DBEs in the District's nine-county market area, staff searched the CUCP database for DBEs that are certified in the NAICS codes identified for prime contracts and subcontracts. The numbers of DBEs identified are displayed in **Column C of Exhibit 2**.

Number of All Firms (DBEs and non-DBEs): To determine the number of all firms (DBEs and non-DBEs) in the District's nine-county market area, the District searched the Census Bureau's most recent CBP database, 2023 data table, for all firms specializing in the NAICS codes identified for prime contracts and subcontracts. Numbers of all firms identified are displayed in **Column D of Exhibit 2**. The District included the number of DBE firms identified in the CUCP database (**Column C of Exhibit 2**) in the denominator shown in **Column E** of **Exhibit 2**. This approach is consistent with materials the DOT provided regarding counting census data.

Relative Availability of DBE Firms: Relative availability is derived by dividing the number of DBEs available in a particular NAICS code by the number of all firms in that NAICS code. **Exhibit 2** shows this equation carried out for the CUCP/CBP databases. The resulting relative availability figures are displayed in **Column F of Exhibit 2**.

EXHIBIT 2: DBE Availability by NAICS Code

A. NAICS CODE NUMBER	B. NAICS DESCRIPTION	C. CUCP DBEs	D. ALL FIRMS IN LOCAL MARKET AREA	E. ALL FIRMS (INCLUDING DBES)	F. RELATIVE DBE AVAIL.
237110	Water and Sewer Line and Related Structures Construction	9	167	176	5.1%
237120	Oil and Gas Pipeline and Related Structures Construction	1	18	19	5.3%
237310	Highway, Street, and Bridge Construction	22	171	193	11.4%
237990	Other Heavy and Civil Engineering Construction	12	56	68	17.6%
238110	Poured Concrete Foundation and Structure Contractors	15	481	496	3.0%
238120	Structural Steel and Precast Concrete Contractors	7	82	89	7.9%
238210	Electrical Contractors and Other Wiring Installation Contractors	4	2332	2336	0.2%
238220	Plumbing, Heating, and Air-Conditioning Contractors	3	2537	2540	0.1%
238990	All Other Specialty Trade Contractors	18	742	760	2.4%
331222	Steel Wire Drawing	0	0	0	0.0%
336611	Ship Building and Repairing	0	0	0	0.0%
483211	Inland Water Freight Transportation	0	0	0	0.0%
488330	Navigational Services to Shipping	0	10	10	0.0%
541330	Engineering Services	47	2602	2649	1.8%
541370	Surveying and Mapping (except Geophysical) Services	5	98	103	4.9%
541620	Environmental Consulting Services	20	428	448	4.5%
561990	All Other Support Services	7	270	277	2.5%

FTA Funds to be Expended in Each Specific Area and Calculating Base Figure: To determine the FTA dollars that will be expended for each specific area of expertise, the FTA-assisted contracts and subcontracts identified by project managers were categorized according to their NAICS industry classifications. **See Exhibit 3, Column B, in the below table**. Contract dollars of each industry classification were divided by the total contract dollars **($40,088,000**) resulting in percentage of total dollars per contract and classification, called the "weighted" percentage. The result is shown in **Exhibit 3, Column D**.

EXHIBIT 3: Calculating Weighted FTA Dollars and Base Figures

- **Column C ÷ Total FTA Dollars = Column D, Weighted Percentage**
- **Column D x Column E = Base Figure per NAICS, Column F**

A. NAICS CODE	B. NAICS DESCRIPTION AND ASSOCIATED CONTRACTS	C. FTA DOLLARS	D. WEIGHTED % OF TOTAL FTA DOLLARS	E. DBE AVAIL.	F. BASE FIGURE
237110	**Water and Sewer Line and Related Structures Construction**				
	LFT Culvert Rehab Construction	**$404,000**	0.0111	5.1%	**0.06%**
237120	**Oil and Gas Pipeline and Related Structures Construction**				
	DEF Storage Tank Construction (Prime)	**$768,000**	0.0211	5.3%	**0.11%**
237310	**Highway, Street, and Bridge Construction**				

A. NAICS CODE	B. NAICS DESCRIPTION AND ASSOCIATED CONTRACTS	C. FTA DOLLARS	D. WEIGHTED % OF TOTAL FTA DOLLARS	E. DBE AVAIL.	F. BASE FIGURE
	DEF Storage Tank Construction	**$28,000**	0.0008	11.4%	**0.01%**
237990	**Other Heavy and Civil Engineering Construction**				
	Gangway and Pier - Sausalito Construction (Prime)	**$8,024,000**	0.2002	17.6%	**3.53%**
	Gangway and Pier - Sausalito Construction (Pile Driving)	**$2,400,000**	0.0599	17.6%	**1.06%**
	LFT Dredging Construction (Prime)	**$10,000,000**	0.2744	17.6%	**4.84%**
238110	**Poured Concrete Foundation and Structure Contractors**				
	Gangways and Piers - Sausalito Construction (Concrete)	**$576,000**	0.0144	3.0%	**0.04%**
	LFT Culvert Rehab (Concrete)	**$80,000**	0.0022	3.0%	**0.01%**
	LFT Culvert Rehab (Grouting)	**$28,000**	0.0008	3.0%	**0.00%**
	DEF Storage Tank Construction (Concrete)	**$160,000**	0.0044	3.0%	**0.01%**
238120	**Structural Steel and Precast Concrete Contractors**				
	Gangways and Piers - Sausalito Construction (Precast Concrete)	**$3,880,000**	0.0968	7.9%	**0.76%**
	Gangways and Piers - Sausalito Construction (Rebar Reinforcing)	**$488,000**	0.0122	7.9%	**0.10%**
	DEF Storage Tank Construction (Reinforcing Steel)	**$40,000**	0.0011	7.9%	**0.01%**
238210	**Electrical Contractors and Other Wiring Installation Contractors**				
	Dry Docking and Capital Improvements – *M.S. Sonoma* (2027)	**$8,000**	0.0002	0.2%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Napa* (2027)	**$8,000**	0.0002	0.2%	**0.00%**
	Dry Docking and Capital Improvements - *M.V. Golden Gate* (2027)	**$8,000**	0.0002	0.2%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Mendocino* (2028)	**$8,000**	0.0002	0.2%	**0.00%**
	Dry Docking and Capital Improvements – *M.S. Marin* (2028)	**$8,000**	0.0002	0.2%	**0.00%**
	DEF Storage Tank Construction	**$160,000**	0.0044	0.2%	**0.00%**
	Gangway and Pier - Sausalito Construction	**$960,000**	0.0239	0.2%	**0.00%**
238220	**Plumbing, Heating, and Air-Conditioning Contractors**				
	Dry Docking and Capital Improvements – *M.S. Sonoma* (2027)	**$4,000**	0.0001	0.1%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Napa* (2027)	**$4,000**	0.0001	0.1%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Golden Gate* (2027)	**$4,000**	0.0001	0.1%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Mendocino* (2028)	**$4,000**	0.0001	0.1%	**0.00%**
	Dry Docking and Capital Improvements – *M.S. Marin* (2028)	**$4,000**	0.0001	0.1%	**0.00%**
	Gangways and Piers - Sausalito Construction	**$3,880,000**	0.0968	0.1%	**0.01%**
238990	**All Other Specialty Trade Contractors**				
	DEF Storage Tank Construction (Fencing)	**$24,000**	0.0007	2.4%	**0.00%**
331222	**Steel Wire Drawing**				
	LFT Culvert Rehab Construction	**$48,000**	0.0013	0.0%	**0.00%**
336611	**Ship Building and Repairing**				

A. NAICS CODE	B. NAICS DESCRIPTION AND ASSOCIATED CONTRACTS	C. FTA DOLLARS	D. WEIGHTED % OF TOTAL FTA DOLLARS	E. DBE AVAIL.	F. BASE FIGURE
	Dry Docking and Capital Improvements – *M.S. Sonoma* (2027)	**$468,000**	0.0128	0.0%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Napa* (2027)	**$508,000**	0.0139	0.0%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Golden Gate* (2027)	**$508,000**	0.0139	0.0%	**0.00%**
	Dry Docking and Capital Improvements – *M.V. Mendocino* (2028)	**$508,000**	0.0139	0.0%	**0.00%**
	Dry Docking and Capital Improvements – *M.S. Marin* (2028)	**$764,000**	0.0210	0.0%	**0.00%**
	Dry Docking and Capital Improvements – *M.S. Marin* (2028) - Support Labor	**$24,000**	0.0007	0.0%	**0.00%**
	Larkspur Mooning Camels Restoration Construction	**$2,456,000**	0.0674	0.0%	**0.00%**
488330	**Navigational Services to Shipping**				
	Gangway and Pier - Sausalito Construction	**$960,000**	0.0239	0.0%	**0.00%**
	LFT Dredging Construction (Tug-boat Services)	**$1,120,000**	0.0307	0.0%	**0.00%**
541330	**Engineering Services**				
	LFT Culvert Rehab Professional Services (Prime)	**$280,000**	0.0077	1.8%	**0.01%**
	Larkspur Mooning Camels Restoration Professional Services	**$120,000**	0.0033	1.8%	**0.01%**
541370	**Surveying and Mapping (except Geophysical Services)**				
	LFT Culvert Rehab (Land Surveying)	**$24,000**	0.0007	4.9%	**0.00%**
	LFT Dredging Construction (Bathometric Surveying)	**$80,000**	0.0022	4.9%	**0.01%**
	Gangway and Pier - Sausalito Construction	**$160,000**	0.0044	4.9%	**0.02%**
541620	**Environmental Consulting Services**				
	LFT Culvert Rehab (Environmental Permitting)	**$80,000**	0.0022	4.5%	**0.01%**
561990	**All Other Support Services**				
	DEF Storage Tank Construction (Traffic Control)	**$20,000**	0.0005	2.5%	**0.00%**
	TOTAL FTA-ASSISTED CONTRACTS	**$40,088,000**	**100.0%**	**OVERALL BASE FIGURE**	**10.2%**

Next, Base Figure for the Overall Goal was calculated by multiplying the weighted percentage of funds to be expended for each NAICS (**Exhibit 3, Column D**) by DBE relative availability for each NAICS (carried forward from Exhibit 2 and shown in **Exhibit 3, Column E**). Base Figure per NAICS is shown in **Exhibit 3, Column F**. Finally, Base Figures for all NAICS were totaled, resulting in a **10.2% Step One Base Figure**.

Calculating Base Figure per Individual Contract: To determine the base figure for each contract, the percentage of work (prime and subcontractor) identified by project managers was multiplied by the DBE relative availability (carried forward from **Exhibit 2**) and totaled for each contract. See **Exhibit 4** below.

EXHIBIT 4: Base Figure Breakdown Per Individual Contract

Description of Contract	NAICS Code and Description for Prime and Subcontracting Opportunities	% of Individual Contract Dollars	Relative DBE Availability	Base Figure Per Contract
Dry Docking and Capital Improvements for *M.S. Sonoma* (2027)	Prime: 336611, Ship Building and Repairing	97.5%	0.00%	0.00%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	1.7%	0.17%	0.00%
	Sub: 238220, Plumbing, Heating, and Air-Conditioning Contractors	0.8%	0.12%	0.00%
	Contract Total	100%		**0.00%**
Dry Docking and Capital Improvements for *M.V. Napa* (2027)	Prime: 336611, Ship Building and Repairing	97.7%	0.00%	0.00%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	1.7%	0.17%	0.00%
	Sub: 238220, Plumbing, Heating, and Air-Conditioning Contractors	0.8%	0.12%	0.00%
	Contract Total	100%		**0.00%**
Dry Docking and Capital Improvements for *M.V. Golden Gate* (2027)	Prime: 336611, Ship Building and Repairing	97.7%	0.00%	0.00%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	1.5%	0.17%	0.00%
	Sub: 238220, Plumbing, Heating, and Air-Conditioning Contractors	0.8%	0.12%	0.00%
	Contract Total	100%		**0.00%**
Dry Docking and Capital Improvements for *M.V. Mendocino* (2028)	Prime: 336611, Ship Building and Repairing	97.7%	0.00%	0.00%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	1.7%	0.17%	0.00%
	Sub: 238220, Plumbing, Heating, and Air-Conditioning Contractors	0.8%	0.12%	0.00%
	Contract Total	100%		**0.00%**
Dry Docking and Capital Improvements for *M.S. Marin* (2028)	Prime: 336611, Ship Building and Repairing	95.5%	0.00%	0.00%
	Sub: 336611, Ship Building and Repairing	3.0%	0.00%	0.00%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	1.0%	0.17%	0.00%
	Sub: 238220, Plumbing, Heating, and Air-Conditioning Contractors	0.5%	0.12%	0.00%
	Contract Total	100%		**0.00%**
Larkspur Ferry Terminal Drainage Culvert Rehabilitation (Professional Service)	Prime: 541330, Engineering Services	62%	1.77%	1.10%
	Sub: 541370, Surveying and Mapping (except Geophysical) Services	9%	4.85%	0.44%
	Sub: 541620, Environmental Consulting Services	29%	4.46%	1.29%
	Contract Total	100%		**2.83%**
Larkspur Ferry Terminal Drainage Culvert Rehabilitation (Construction)	Prime: 237110, Water and Sewer Line and Related Structures Construction	71%	5.11%	3.63%
	Sub: 238110, Poured Concrete Foundation and Structure Contractors	15%	3.02%	0.45%
	Sub: 238110, Poured Concrete Foundation and Structure Contractors	5%	3.02%	0.15%
	Sub: 331222, Steel Wire Drawing	9%	0.00%	0.00%
	Contract Total	100%		**4.24%**

Description of Contract	NAICS Code and Description for Prime and Subcontracting Opportunities	% of Individual Contract Dollars	Relative DBE Availability	Base Figure Per Contract
Larkspur Mooring Camels Restoration - Professional Services	Prime: 541330, Engineering Services	100.0%	1.77%	1.77%
	Contract Total	100%		**1.77%**
Larkspur Mooring Camels Restoration - Construction	Prime: 336611, Ship Building and Repairing	100.0%	0.00%	0.00%
	Contract Total	100%		**0.00%**
Larkspur Ferry Terminal Diesel Exhaust Fluid (DEF) Storage Tank and Transfer Infrastructure Construction	Prime: 237120, Oil and Gas Pipeline and Related Structures Construction	64%	5.26%	3.37%
	Sub: 237310, Highway, Street, and Bridge Construction	2%	11.40%	
	Sub: 238110, Poured Concrete Foundation and Structure Contractors	13%	3.02%	0.40%
	Sub: 238120, Structural Steel and Precast Concrete Contractors	3%	7.87%	0.27%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	13%	0.17%	
	Sub: 238990, All Other Specialty Trade Contractors	2%	2.37%	
	Sub: 561990, All Other Support Services	2%	2.53%	0.04%
	Contract Total	100%		**4.08%**
Larkspur Ferry Terminal Berths and Channel Dredging Construction	Prime: 237990, Other Heavy and Civil Engineering Construction	89%	17.65%	15.76%
	Sub:488330, Navigational Services to Shipping	10%	0.00%	0.00%
	Sub: 541370, Surveying and Mapping (except Geophysical) Services	1%	4.85%	0.03%
	Contract Total	100%		**15.79%**
Gangways and Piers - Sausalito Construction	Prime: 237990, Other Heavy and Civil Engineering Construction	37.6%	17.6%	6.64%
	Sub: 237990, Other Heavy and Civil Engineering Construction (Pile Driving)	11.3%	17.6%	1.99%
	Sub: 238110, Poured Concrete Foundation and Structure Contractors	2.7%	3.0%	0.08%
	Sub: 238120, Structural Steel and Precast Concrete Contractors (Precast)	18.2%	7.9%	1.43%
	Sub: 238120, Structural Steel and Precast Concrete Contractors (Bar Reinforcing)	2.3%	7.9%	0.18%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	4.5%	0.2%	0.01%
	Sub: 238220, Plumbing and HVAC Contractors	18.2%	0.1%	0.02%
	Sub: 488330, Navigational Services to Shipping	4.5%	0.0%	0.00%
	Sub: 541370, Surveying and Mapping (except Geophysical) Services	0.7%	4.9%	0.03%
	Contract Total	100%		**10.39%**

Step Two. Adjusting Step One Base Figure

In adjusting the District's Step One Base Figure of **10.2%**, the District examined considerable evidence of the current capacity and availability of DBE participation on marine construction contracts as prime and subcontractors in the Step One Base Figure.

Considered Information

The District evaluated the specific nature of the contracts budgeted for award in 2027-2028 and found that further refinements were warranted to two contracts to measure plausible relative availability and capacity of DBEs to perform the types of work as a prime and/or subcontractor.

LARKSPUR FERRY TERMINAL BERTHS AND CHANNEL DREDGING CONSTRUCTION

The federal share of the Larkspur Ferry Terminal Berths and Channel Dredging Construction contract is budgeted at $11.2 million. The scope of work consists of removing sediment using mechanical methods and placing the material into a dredge barge (scow) and transporting the material to a disposal site. DBE firms performing as a prime will need barges with dredging equipment attached, typically large cranes with dredge buckets and large excavators, and scows into which the material is placed. The District's experience with prior dredging construction solicitations indicates that only a limited number of companies compete for this specialized work due to the equipment needed.

On October 7, 2026, staff sent an e-mail followed-up by telephone calls to the 12 DBE firms certified under NAICS code 237990, the classification applicable to the prime contracting scope, to assess DBE availability and capacity to perform as prime contractors and determine whether they maintained the required marine insurance. Findings indicated the scope of work fall outside these firms' customary capabilities. Based on these findings, the District assigned a DBE availability figure of zero to the prime scope of work. See **Exhibit 4.1**.

GANGWAYS AND PIERS – SAUSALITO CONSTRUCTION PROJECT

The federal share of the Gangways and Piers - Sausalito Construction contract is budgeted at $21.3 million. Due to the size of this contract, the bonding requirements and financial requirements will likely limit the prospective prime contractors for the work to companies that exceed the DBE size standards. Unbundling this contract is not practical and would severely impact the efficiency of the District's transit operations and would result in overly complicated procurement and contract administration activities associated with having multiple construction contracts. In addition, the geographic area will not accommodate independent access for multiple contractors.

The prime scope of work for this contract includes, but is not limited to, constructing a temporary steel and timber pier supported on steel piles, removing and relocating an existing 43 foot by 110 foot steel float, installing steel piling for the temporary float, constructing at an off-site facility and transporting to the site a new 46 foot by 145 foot pre-cast concrete float, demolishing an existing concrete pier, constructing a new steel pile supported concrete pier, removing numerous existing utility lines, installing new utility lines, installing a new hydraulic lift system and electrical control system, lighting and other associated work. The prime must coordinate multiple suppliers, vendors, fabricators and subcontractors, develop extensive and detailed work plans, traffic control plans, water pollution prevention plans and monitoring plans, and must stage the work during restrictive environmental work windows and local city restrictive work timeframes. The prime must also coordinate all the work and subcontractors to minimize impacts to the District's transit operations. The work will take place primarily on the water requiring specialized marine vessels, barges, and

equipment. The duration of the project is estimated at approximately 3 years, which will require the prime contractor to have adequate cash flow and resources.

District staff researched available websites for the 12 DBE firms certified in NAICS code 237990, the classification applicable to the prime contracting scope, to review DBE capabilities to perform as a prime on this project. On October 7, 2026, staff sent e-mails to all 12 firms to inquire if their firm was experienced in marine construction, and their ability to perform prime duties described above. Research findings suggest this type of work is outside the normal scope of work DBE firms provide and bonding requirements are beyond DBE firm's capacity. Based on these findings, the District assigned a DBE availability figure of zero to the prime scope of work.

Engineering staff also reviewed the list of 12 DBE firms in the District's local market area certified in NAICS code 237990, for pile driving services and 7 DBE firms certified in NAICS code 238120, for pre-cast concrete. Staff also researched the firms' websites and the capabilities noted in their certification profiles to determine if the firms could potentially perform the scope of services required. On October 8, 2026, staff sent an inquiry e-mail requesting if DBE firms have the availability and capacity to perform the subcontractor work described. After further discussion with Engineering staff, and feedback from some of the firms, staff determined that DBE firms were unlikely to perform the subcontractor work on this particular contract. Therefore, the District's Step Two adjustment for this contract is based on an assessment of DBE availability and capacity solely for selected subcontracting opportunities, and excludes the prime work in NAICS code 237990, subcontract work for pile driving, and pre-cast concrete work, resulting in an adjustment of the individual contract base figure from 10.39% to 0.33%. See below **Exhibit 4.1** to make the necessary adjustments for realistic DBE participation for this contract.

EXHIBIT 4.1: Adjusted Base Figure Breakdown Per Individual Contract

Description of Contract	NAICS Code and Description for Prime and Subcontracting Opportunities	% of Individual Contract Dollars	Relative DBE Availability	Adjusted Base Figure Per Contract
Larkspur Ferry Terminal Berths and Channel Dredging Construction	Prime: 237990, Other Heavy and Civil Engineering Construction	89%	0.00%	0.00%
	Sub:488330, Navigational Services to Shipping	10%	0.00%	0.00%
	Sub: 541370, Surveying and Mapping (except Geophysical) Services	1%	4.85%	0.03%
	Contract Total	100%		**0.03%**
Gangways and Piers - Sausalito Construction	Prime: 237990, Other Heavy and Civil Engineering Construction	37.6%	0.0%	0.00%
	Sub: 237990, Other Heavy and Civil Engineering Construction (Pile Driving)	11.3%	0.0%	0.00%
	Sub: 238110, Poured Concrete Foundation and Structure Contractors	2.7%	3.0%	0.08%
	Sub: 238120, Structural Steel and Precast Concrete Contractors (Precast)	18.2%	0.0%	0.00%
	Sub: 238120, Structural Steel and Precast Concrete Contractors (Bar Reinforcing)	2.3%	7.9%	0.18%
	Sub: 238210, Electrical Contractors and Other Wiring Installation Contractors	4.5%	0.2%	0.01%
	Sub: 238220, Plumbing and HVAC Contractors	18.2%	0.1%	0.02%
	Sub: 488330, Navigational Services to Shipping	4.5%	0.0%	0.00%
	Sub: 541370, Surveying and Mapping (except Geophysical) Services	0.7%	4.9%	0.03%
	Contract Total	100%		**0.33%**

Overall Proposed Goal

The District updated its contracting forecast provided in its original DBE goal methodology submission to remove contracts that have been awarded and added the dredging construction contract, DEF storage tank replacement contract, and unbundled the Larkspur Mooring Camels Restoration project into separate design and construction contracting opportunities. The latter project was previously solicited on June 1, 2026, but received no proposals.

Following review of the updated forecast and the Step Two analysis, which yielded a calculated DBE goal of **0.4%**, District staff proposes to establish the overall goal of 0.4%, to be met entirely through DBE-Neutral measures, with a 0.0% DBE-Conscious split. The Step Two adjustment is shown in **Exhibit 5** below.

EXHIBIT 5: Step Two Adjustment

DIVISION	A. DESCRIPTION OF CONTRACT	B. FTA DOLLARS	C. DBE AVAILABILITY PER CONTRACT	FTA $ Projected for DBEs
	Anticipated for award in FFY 2027 - 2028			
Ferry	Dry Docking and Capital Improvements for *M.V. Golden Gate* (2027)	$520,000	0.00%	$0
Ferry	Dry Docking and Capital Improvements for *M.V. Napa* (2027)	$520,000	0.00%	$0
Ferry	Dry Docking and Capital Improvements for *M.S. Sonoma* (2027)	$480,000	0.00%	$0
Ferry	Dry Docking and Capital Improvements for *M.S. Marin* (2028)	$800,000	0.00%	$0
Ferry	Dry Docking and Capital Improvements for *M.V. Mendocino* (2028)	$520,000	0.00%	$0
Ferry	Larkspur Ferry Terminal Drainage Culvert Rehabilitation (Professional Services)	$384,000	2.80%	$10,752
Ferry	Larkspur Ferry Terminal Drainage Culvert Rehabilitation (Construction)	$560,000	4.20%	$23,520
Ferry	Larkspur Berths 1&2 Mooring Camels Restoration (Professional Services)	$120,000	1.80%	$2,160
Ferry	Larkspur Berths 1&2 Mooring Camels Restoration (Construction)	$2,456,000	0.00%	$0
Ferry	Larkspur Ferry Terminal Diesel Exhaust Fluid (DEF) Storage Tank and Transfer Infrastructure Construction	$1,200,000	4.10%	$49,200
Ferry	Larkspur Ferry Terminal Berths and Channel Dredging Construction	$11,200,000	0.03%	$3,360
Ferry	Gangways & Piers Sausalito Construction	$21,328,000	0.33%	$70,382
	Total FTA Funds:	**$40,088,000**		**$159,374**
		Step Two Adjustment= 0.4%		

DBE-Neutral Measures

Summary of DBE-Neutral Methods of Achieving DBE Participation

The District continues to expand its DBE-neutral efforts to connect small businesses with contracting and procurement opportunities. As part of this effort, a guide for doing business with the District is published on the District's website to inform DBEs and all businesses about how to engage with the District. The guide includes details on procurement methods, vendor registration, and key staff contact information.

The District's procurement portal allows vendors to register, create firm profiles, identify their certification status as a DBE or SBE, and express interest in participating as subcontractors on selected solicitations. District staff actively use its portal to identify registered DBE firms with relevant NAICS codes aligned with posted solicitations.

Additionally, the District leverages its SBE Program by setting contract-specific SBE goals on FTA-assisted contracts to promote both DBE and small business participation. This program has been successful in securing DBE and small business involvement on construction and professional services contracts across the District, Bridge, and Bus divisions.

Another DBE-neutral method practiced by District staff is the encouragement of DBE/SBE participation through extensive outreach. The District is an active participant in the Business Outreach Committee (BOC), a consortium of 31 Bay Area transit and transportation agencies dedicated to assisting DBEs and small businesses grow their presence with public agencies and the prime contracting community. Through the BOC, the District is able to publicize its contracting opportunities to a wide array of construction and engineering firms, as well as product suppliers and manufacturers. The BOC also helps promote vendor registration, coordinate DBE/SBE meet and greet sessions with prime contractors/consultants, offer DBE/SBE certification workshops, and provide technical assistance trainings. The BOC serves as a conduit for building lasting relationships between small businesses and public agencies, expanding access to procurement

opportunities, and fostering a more inclusive and competitive contracting environment throughout the Bay Area.

In addition to outreach events, the BOC publishes a quarterly newsletter that highlights upcoming contracting opportunities from participating agencies, provides key contact information, announces Bay Area public meetings and events, and shares other relevant updates for the DBE/SBE community. The District hosts the BOC webpage on its official website at https://www.goldengate.org/district/doing-business/business-outreach-committee/ which serves as a central resource for small businesses. The page includes contact information, access to current and archived newsletters, details about upcoming and past events, and links to procurement portals for multiple public agencies all in one convenient location.

The following is a sampling of BOC and other agencies outreach events the District has participated or hosted in past federal fiscal years:

- Small Business Showcase;
- Procurement and Resource Fair;
- Latinos In Transit (LIT) Procurement Series: West Coast Small Business Academy;
- Annual 2 Day DBE/ACDBE certification workshops presented by certifying CUCP agencies;
- Meet the Buyers Procurement Forum;
- Meet the Primes Panel Discussion and Business Networking – Construction and Professional Services; and
- How to do Business with Public Agencies

The BOC also collaborates with Norcal Apex Accelerators, and Caltrans Mentor Protégé program for Architectural and Engineering firms. The following is a sample of events the District has participated in:

- Caltrans Quarterly Joint Professional Liaison Meeting and Networking and Matchmaking
- Caltrans Annual Calmentor Luncheon – Panel Discussions
- Caltrans Annual DBE Summit
- Santa Clara Valley Transportation Authority (VTA) Contracts and Contacts
- San Francisco International Airport (SFO) Annual Resource Fair
- California High Speed Rail (HSR) Small Business Summit
- Bay Area Rapid Transit District (BART) DBE Small Business Summit

Upcoming BOC outreach events planned for the remainder of 2026 include a DBE/ACDBE and SBE Certification workshop, Business Networking Mixer – Construction/Professional Services, and other technical assistance workshops.

The District will continue its regular DBE-neutral activities, including:

- Ensuring that bidding and contract requirements facilitate participation by DBEs and other small businesses by including DBE language throughout District bid documents:
  - ✓ The District's DBE Program policy.

- ✓ A nondiscrimination assurance from the contractor (and each subcontract the prime contractor signs with a subcontractor).
- ✓ A statement that encourages prime contractors to use financial institutions owned and controlled by socially and economically disadvantaged individuals in the community.
- ✓ The website address for the DBE directory identifying all firms eligible to participate as DBEs in the District's program.
- ✓ A section that provides the DBE certification standards.
- ✓ A section providing areas for possible subcontracting, and of the availability of ready, willing and able subcontractors, including DBE firms, to perform such work.

- ➢ Ensuring contracts are accessible to small businesses, and if not, making efforts to unbundle large contracts to make them more accessible.

- ➢ Encouraging prime contractors to subcontract portions of the work that they might otherwise perform themselves.

- ➢ Providing technical assistance and other support services to facilitate consideration of DBEs and other small businesses.

- ➢ Advertising contracts in the *Small Business Exchange*, a small business focused publication.

- ➢ At pre-bid conferences, providing prospective contractors/consultants with the following:
  - ✓ Applicable small business/DBE requirements.
  - ✓ Areas for possible subcontracting opportunities.
  - ✓ A helpful guide to navigate through the CUCP, California Department of General Services, and U.S. Small Business Administration databases to create lists of the ready, willing and able small businesses, including DBE firms, to perform such work.
  - ✓ Bidder's request for small business/DBE assistance form.
  - ✓ Guidance to identify firms interested in subcontracting opportunities on the District's procurement portal viewable to potential bidders/proposers.
  - ✓ Small business/DBE database websites.

- ➢ Providing the link to the District procurement portal and encouraging all firms to register as vendors to be informed of newly-posted contracting opportunities that match their products/services.

- ➢ Regularly notifying certified DBEs and non-DBEs about networking events and newly posted contracting opportunities on the District procurement portal.

- ➢ Encouraging DBEs and non-DBEs to sign up on the "Interest in Subcontracting" list for applicable solicitations and download the planholders list to market their firm to potential bidders or proposers.

- ➢ On a quarterly basis, reminding and encouraging officers, division managers, department heads, purchasers and buyers to utilize DBE firms.

Public Participation

Consultation with Various Groups, Organizations and Officials

Although the regulations do not require a public participation meeting for a mid-course adjustment goal, the District chose to host virtual participation meetings on October 28, 2026, and November 4, 2026. The meetings presented the District's revised proposed 0.4% DBE-Neutral goal, the goal-setting process, and Step Two adjustment. Community-based organizations, general contractor groups, DBEs and non-DBEs, and stakeholders were invited to both meetings to receive feedback that might warrant further consideration or revision of the proposed goal.

A link to a 10-day comment period, which began during the October 28 meeting, was included in the presentation and posted on the District's website. The event flyer was also posted on the District's website, in the Small Business Exchange, and on LinkedIn. The flyer, presentation, and registration lists for both meetings are available at, https://www.goldengate.org/district/doing-business/dbe-sbe/.

The federal funds included in the proposed goal are allocated to the District's Ferry Division and support marine construction and professional services contracting opportunities. Because the two contracts that were included in the Step Two adjustment based on DBE availability and capacity account for 97% of the federal funds the District anticipates receiving, staff focused the discussion portion of the meetings on the availability of DBEs and non-DBEs to perform marine construction and professional services work. Below is a recap of the questions the District proposed and comments and questions received from the public.

October 28, 2026 1:00 p.m. – 2:00 p.m.

District proposed questions:

Efforts to level the playing field for DBEs
• How to break barriers to marine professional services and construction?
• What can the District do differently beyond current efforts?
• Any other suggestion or comments to the proposed 0.4% DBE-Neutral goal?

Public questions and comments:

- A commenter thanked the District for its presentation and its efforts to create opportunities for small, local, and minority businesses. They noted that much of the discussion focused on lowering goals and asked what the District is doing, beyond adjusting goals, to ensure these businesses are included. He urged the District to consider:
    a. Certification pathways and incentives, such as discounts, for prime contractors willing to joint venture or enter mentor-protégé relationships with small and local businesses, since bonding is a barrier.
    b. Opportunities for primes and subs to meet, so that once bonding is secured, a joint venture can be formed and the prime can help the small firm grow into a prime itself.

    c. Bond-backing programs paired with risk management, along with lower insurance requirements.
    d. Prompt payment practices.
- A commentor asked if they could get in touch with the marine construction and professional service primes that were mentioned during the call.
- A commentor stated they are recertified as DBE by BART and asked if they have to do anything else to get new task orders or work with the District.
- A commenter noted that the District identified Inland Water Freight Transportation as a NAICS code included in the scope of work. The commenter asked whether trucking is also involved, since demolished pier material would be loaded onto barges, and asked whether that debris is ever transferred to trucks to be hauled away.
- A prime contractor for the District's Larkspur dredging work noted that inland freight and trucking are distinct, and recommended that small businesses contact the primes to learn which means and methods they plan to use, since that will determine whether trucking is considered.
- A prime marine contractor stated that they search the CUCP database for firms at the time of estimating. They explained that USL&H insurance is very expensive and non-negotiable, and that it is a significant barrier to entering the marine market. The contractor encouraged firms to research the market carefully and register as small businesses.
- A commenter asked if goals are based on good faith efforts or are mandatory, how can the District ensure that primes meet the goals and that the goals are not overlooked.
- A marine contractor described the efforts they make to contact DBEs, noting that their outreach often goes unread or unanswered. Out of 20 firms contacted, they may receive one response or none at all. The contractor encouraged DBEs to be proactive in reviewing bid opportunities and to respond to outreach.
- A marine contractor explained that subcontracting opportunities depend heavily on the scopes of work included in the contract. For dredging work, the prime typically self-performs most of the work because it owns the necessary equipment, and many small firms cannot afford the equipment needed to handle that volume of work.

November 4, 2028, 11: a.m. – 12:00 p.m.

The District proposed the same questions as the October 28, 2026 meeting. Below is a recap of comments and questions received from the public:

- Does any of your construction work include an electrical scope?
- A commenter who identified as a DBE union electrical contractor stated that their firm has performed $10-$12 million in electrical work in some of its busier years. The commenter asked how the 0.4% goal was calculated, noting that electrical work typically makes up as much as 20% of a construction contract. On a $40 million contract, that would be roughly $7-$8 million in electrical work and ask why none of the DBEs qualified to do that work? The commenter also acknowledged that work on a vessel can be specialized, but explained that, as a union shop, their firm can contact the union hall to obtain a journeyman with the specific skills needed to perform that work.

- A District Board member stated that they can attest to the amount of work involved in this process, and that they were impressed with the presentation and found it easy to understand and follow.
- A DBE firm asked how long the goal will be in effect, whether one year or three years, and what is the plan to keep the numbers where they are?
- A firm stated they are a DVBE.
- Questions were asked about past DBE goals and current SBE goals, including the past DBE goals and current SBE goals for professional services.

One question was received through the public participation comment form asking how to become certified as a DBE with the District. No other comments were received.

District staff also participated in a public participation meeting hosted by the San Francisco Bay Area Rapid Transit District on the morning of October 28, 2026, to announce the District's proposed goal and receive feedback from interested parties. Participants were also invited to attend the District's own public participation meetings. No comments were received that warranted an adjustment to the District's proposed goal.

Conclusion

No comments were received that warrant further adjustment to the District's proposed revised overall DBE goal. Therefore, the District proposes a revised goal of **0.4% DBE-Neutral and 0% DBE-Conscious** for FTA-assisted contracts for FFY 2027-2028.