



SAN JOAQUIN REGIONAL RAIL COMMISSION



FFY 2023-2025 DISADVANTAGED BUSINESS ENTERPRISE GOAL AND GOAL SETTING METHODOLOGY

AVAILABLE FOR PUBLIC REVIEW/COMMENT: JULY 1, 2022 – JULY 31, 2022

**SUBMITTED TO U.S. DEPARTMENT OF TRANSPORTATION FEDERAL TRANSIT
ADMINISTRATION:**

Table of Contents

Executive Summary	2
I. FTA-Assisted Contract Opportunities	3
Stockton Track Extension	4
Robert J. Cabral Station Expansion	5
Tracy ACE Station Improvements	6
II. Goal Methodology	10
1. Determining a Base Figure	10
2. Adjusting the Base Figure.....	12
III. Proposed Overall DBE Goal	16
IV. Race Neutral Means to Achieve DBE Annual Overall Goal	17
Attachments	
A - Community Engagement Letter	18
B - ACE Webpage Public Notice	19

EXECUTIVE SUMMARY

The San Joaquin Regional Rail Commission (“Rail Commission”) has completed its analysis for the annual overall Disadvantaged Business Enterprise (“DBE”) goal applicable to the Rail Commission’s contracting opportunities funded in whole or in part by the Federal Transit Administration (“FTA”) in Federal Fiscal Year (“FFY”) 2023-2025.

The annual overall DBE goal represents the percentage of DBE firms who are ready, willing, and able to participate in the Rail Commission’s FTA-assisted contracting opportunities each fiscal year. The goal is expressed as a percentage of all FTA funds the Rail Commission anticipates expending in the fiscal year.

The Rail Commission has chosen the following methodology to establish the annual overall goal in accordance with the Department of Transportation (“DOT”) federal regulations governing the DBE program and recent guidance from DOT.

STEP 1.

The Rail Commission determined a base figure for the relative availability of DBEs in the specific areas of expertise involved in the Rail Commission’s FTA-assisted contracting opportunities for FFY 2023-2025 by using the Caltrans Unified Certification Program (“CUCP”) database of DBE’s, the most recent national U.S. Census Bureau’s County Business Pattern database for the State of California (“CBP”) and then weighting each area of expertise according to the amount of FTA assistance that is projected to be spent in the area.

STEP 2.

The Rail Commission examined other evidence regarding DBE availability for the Rail Commission’s geographic and contracting market, past participation, and contracting opportunities to determine if any adjustments to the base figure were needed in order to arrive at a narrowly tailored annual overall goal.

Based upon this analysis, the Rail Commission proposes an **annual overall DBE race-neutral goal of 4.5% for FFY 2023-2025 for FTA-assisted contracts.**

I. FTA-ASSISTED CONTRACTING OPPORTUNITIES

The Rail Commission has identified and analyzed the FTA-assisted contracting opportunities for FFY 2023-2025 by federal dollar amounts and the North American Industry Classification Codes (NAICS) for the relevant types of work.

In Fiscal Years 2023-2025 The Rail Commission anticipates federal funding involvement on the following projects:

FTA Assisted Capital Projects	Est. Project Cost – Federal Portion Only
1. Capital Lease Program	\$9,727,548
2. Locomotive Purchase - Options	\$7,500,000
3. The Rail Academy of Central California (TRACC)	\$1,600,000
4. Manteca Station	\$1,516,000
5. Positive Train Control	\$1,681,304
6. Preventative Maintenance – including Capital Spares	\$15,000,000
7. Railcar Midlife Overhaul	\$15,000,000
8. Capitalized Maintenance	\$12,000,000
9. Robert J. Cabral Station Expansion	\$4,000,000
10. Track Extension from Cabral to RMF	\$2,600,000
11. Tracy ACE Station Improvements	\$1,343,750
TOTAL	\$71,968,602

1. Capital Lease Program

The Commission entered into a trackage agreement on August 11, 1997, with Union Pacific Railroad (Railroad) to secure the trackage rights from Stockton to San Jose for the initial commitment period of the ACE Service at a cost not to exceed \$15,143,000 for capital improvements. The trackage rights agreement with the Railroad granted the Commission trackage rights for a period of five years beginning on the service commencement date.

2. Locomotive Purchase

The locomotive purchase is for two (2) options Tier IV Siemens Charger locomotives. This purchase is an option on an existing contract The Rail Commission has with Siemens for the purchase of Tier IV locomotives. These two (2) new locomotives are to replace two (2) existing Tier 0 ACE locomotives currently in operation. The locomotives are scheduled to be delivered in late 2023.

3. TRACC

The Rail Academy of Central California (TRACC) will address the challenges of an aging, highly skilled workforce by creating opportunities for high-paying, skilled jobs for the

community, focusing on the historically disadvantaged members. TRACC will operate as a strategic partnership between Sacramento City College, Stockton Unified School District, and several transportation entities to prepare students for a career as a Conductor or Engineer.

4. Manteca Transit Station

The ACE Manteca Station will have a center loaded platform that is accessed via a tunnel from the parking lot. Standard passenger amenities and design details will be included consistent with the Station Design Guidelines and future Station Design Criteria. Some features will be unique to the ACE Manteca Station in order to match and blend into the existing Manteca Transit Center. The goal is to construct a station that is seamlessly integrated with the existing Manteca Transit Center in access, circulation and the overall passenger experience. The parking lot portion of the project will include a vehicle parking, a passenger drop-off/ride share area, bike storage and other multimodal features. Passengers arriving/departing by bus will access the bus transit platform to the north of the parking lot at the Manteca Transit Center.

5. Positive Train Control

Positive Train Control (PTC) (which automatically slows or stops the trains) continues to be a major initiative for the ACE service. The ACE PTC system was certified prior to the December 2020 deadline for full interoperability of all railroads in the country. Now, the Rail Industry is working to ensure all railroads are up to date with on-board and back-office software. The Rail Safety Improvement Act of 2008 (RSIA) requires extensive coordination of the ongoing software compatibility. Staff continues to work closely with Union Pacific Railroad (UPRR), Caltrain and the Rail Industry on software updates and improvements that ensure compliance and enhance the efficiency and reliability of the PTC system.

6. Preventive Maintenance

As part of the Rail Commission's commitment to maintaining assets in a state of good repair, improve reliability and extend the useful life of the assets, the Rail Commission's Contractor Maintainer has a very aggressive preventative maintenance program. Program and trend analytics is one of the tools used to identify potential component failure as well as components that are out living OEM useful life. All preventative work is completed by the Contract Maintainer. This includes Capital Spares purchases.

7. Railcar Midlife Overhaul

As part of the Rail Commission's commitment to maintaining assets in a State of Good Repair, work is underway to overhaul 30 ACE railcars. The Rail Commission's Transit Asset Management Plan (TAMP) identified midlife overhauls as a key initiative to ensure ACE's revenue fleet operates at maximum performance. The Project includes new seats, flooring, updated exterior paint scheme, and onboard information system including digital audio and LCD screens. These overhaul projects will improve passenger experience and reduce maintenance. This is a multi-year project started in FY19/20 and is scheduled to be completed in FY23/24.

8. Capitalized Maintenance

Track Safety Capital Projects. Track Maintenance ROW. The Rail Commission commits up to one million dollars per year per train per year (approx. \$4 million) to a capitalized maintenance fund for track improvements. Track improvement projects require executed contracts between UPRR and the Commission and are anticipated to be funded with a combination of Federal, State, and local grants. These projects include track maintenance and safety Capital Projects within the railroad right of way.

9. Robert J. Cabral Station Expansion

Construct park and ride lot and related on-street parking, sidewalks, lighting, security, and other passenger amenity improvements at the old Western Pacific Depot, near Robert J. Cabral Station in Stockton. Including a new building at the old WP location.

10. Track Extension from Cabral to RMF

This fully funded project will provide the final track extension between the Cabral Station and the Rail Maintenance Facility (RMF). Coordination with Union Pacific and the City of Stockton is ongoing, with final designs currently under review. Construction is anticipated to begin in Fall 2022

11. Tracy ACE Station Improvements

Based upon the ridership of the Tracy station, improvements and upgrades are needed for driveway access at Tracy Blvd., parking capacity, and improved circulation. Construction is anticipated to begin in Fall 2022.

Additional Factors

Due to operating on the Union Pacific Railroad (UPRR) and Burlington Northern and Santa Fe Railway (BNSF) owned lines, the Rail Commission is limited on bid opportunities as UPRR, and BNSF require all work done on or in conjunction with their lines be completed or reviewed by their workforce. Therefore, the Capital Lease Program and parts of the other projects on the railway were excluded from the DBE goal setting process. Furthermore, Herzog Transit Services, Inc. (Herzog), the Rail Commission's Contracted Operator and Maintainer, performs much of the Preventative Maintenance and Positive Train Control work and is anticipated to conduct the Railcar Midlife Overhaul in house. As a result, Railcar Midlife Overhaul, Preventative Maintenance, and Positive Train Control have been excluded from the DBE goal setting process.

The Rail Commission completed a non-federalized joint procurement process for the purchase of new passenger rail cars, with proposals submitted by non-DBE firms. Additionally, a contract for the purchase of four (4) new Tier IV Locomotives with option locomotives in the contract was awarded to Siemens in 2018, in December 2019 an option was exercised for the purchase of two (2) additional Locomotive. As a result, the Locomotive Purchase has been excluded from the DBE goal setting process.

The Rail Commission will work with vendors on potential subcontracted DBE participation for parts procurement, when possible, for those projects listed above. This leaves TRACC, the Manteca Station, Robert J. Cabral Station Expansion, Track Extension from Cabral to RMF, and the Tracy ACE Station Improvements projects.

Allocated FTA Dollars by NAICS Code

During Federal Fiscal Year 2023-2025, the Rail Commission anticipates having an estimated \$71,968,602 million in FTA funds available for expenditure. Of the total amount of FTA assistance available, the Rail Commission anticipates awarding \$11,653,750, or 16.20% (see Table 1) for the three projects outlined above in FFY 2023-2025. The Rail Commission has determined that the FTA-assisted contracting opportunities will involve work in (42) 2022 NAICS codes, which have been grouped into major three-digit NAICS classifications in Table 2.

Table 1			
NAICS Code	Industry Title	Total Estimated Cost (Federal Share)	% of Federal Funding
23	Construction	\$9,290,189	12.91%
33	Manufacturing	\$594,000	.83%
42	Wholesale Trade	\$331,793	.46%
48 - 49	Transportation and Warehousing	\$221,195	.31%
53	Real Estate Rental and Leasing	\$110,598	.15%
54	Professional, Scientific, and Technical Services	\$1,105,975	1.54%
	Total Allocated FTA Dollars by NAICS Code	\$11,653,750	
	Total FTA Funds	\$71,968,602	
	% of Allocated FTA Funds		16.20%

II. GOAL METHODOLOGY

1. Determining a Base Figure

The base figure was developed to express the relative availability of DBEs within the Rail Commission market area in the specific areas of expertise involved in the proposed FTA-assisted contracting opportunities. For this purpose, the Rail Commission has opted to include all of California as the Market Area in setting the DBE goal. Due to the size of the agency and the cost of the projects involved, it is unlikely that an out of state contractor will be submitting proposals.

Determining DBE availability was done by comparing data from the CUCP DBE database (comprised of the Caltrans maintained CUCP DBE database) and the U.S. Census Bureau's County Business Pattern (CBP) database. For each NAICS code, CBP data from the State of California was used to determine the total number of businesses. The total number of DBEs for each NAICS code was determined by using the most closely matched 2022 NAICS codes from the CUCP DBE database. The total number of DBEs was compared to the total number of all firms to show the percentage of DBEs available in each area of expertise. **(Table 2)**

$$\text{Base Figure} = \frac{\text{Number of DBEs registered in specialized category}}{\text{Number of all CBP firms by specialized category}}$$

Table 2**% of DBE Availability by NAICS**

NAICS	Description	DBE	CBP	Availability
236210	Industrial Building Construction	131	335	39%
236220	Commercial & Institutional Building Construction	255	4281	6%
237110	Water & Sewer Line & Related Structures Construction	156	843	19%
237120	Oil & Gas Pipeline & Related Structures Construction	29	104	28%
237130	Power & Communication Line & Related Structures Construction	60	474	13%
237210	Land Subdivision	25	603	4%
237310	Highway, Street, & Bridge Construction	339	759	45%
237990	Other Heavy & Civil Engineering Construction	206	336	61%
238110	Poured Concrete Foundation & Structure Contractors	169	1926	9%
238120	Structural Steel & Precast Concrete Contractors	102	482	21%
238130	Framing Contractors	39	901	4%
238140	Masonry Contractors	37	1303	3%
238150	Glass & Glazing Contractors	18	878	2%
238160	Roofing Contractors	18	2517	1%
238170	Siding Contractors	7	276	3%
238190	Other Foundation, Structure & Building Exterior Contractors	74	691	11%
238210	Electrical Contractors & Other Wiring Installation Contractors	207	9233	2%
238220	Plumbing, Heating, & Air-Conditioning Contractors	69	10716	1%
238290	Other Building Equipment Contractors	27	737	4%
238310	Drywall & Insulation Contractors	40	2274	2%
238320	Painting & Wall Covering Contractors	63	4561	1%
238330	Flooring Contractors	16	2053	1%
238340	Tile & Terrazzo Contractors	18	1672	1%
238350	Finish Carpentry Contractors	36	2779	1%
238390	Other Building Finishing Contractors	31	908	3%
238910	Site Preparation Contractors	217	2623	8%
238990	All Other Specialty Trade Contractors	266	3284	8%
339950	Sign Manufacturing	21	577	4%
423320	Brick, Stone, & Related Construction Material Merchant Wholesalers	47	328	14%
423390	Other Construction Material Merchant Wholesalers	32	410	8%

423510	Metal Service Centers & Other Metal Merchant Wholesalers	30	1043	3%
423610	Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	75	1831	4%
424950	Paint, Varnish, & Supplies Merchant Wholesalers	8	221	4%
488210	Support Activities for Rail Transportation	20	6127	0%
484110	General Freight Trucking, Local	232	4655	5%
484121	General Freight Trucking Long-Distance Truckload	53	669	8%
484122	General Freight Trucking Long-Distance Less than Truckload	22	101	22%
493190	Other Warehousing & Storage	1	301	0%
532490	Other Commercial & Industrial Machinery & Requirement Rental & Leasing	21	1434	1%
541310	Architectural Services	120	3527	3%
541330	Engineering Services	564	8893	6%
541620	Environmental Consulting	435	1572	28%
	Totals	4336	89238	5%

2. Adjusting the Base Figure

Key factors considered when adjusting the Base Figure were as follows:

a. Market Area:

In years past the Rail Commission limited the market area for DBE firms to within a 100-mile radius of the proposed project locations. With the list of available DBE firms already slim, the Rail Commission has opted to not eliminate any firms regardless of location or likelihood to bid, instead the entire state of California is included.

b. Past Participation:

Over the past three (3) years, the Rail Commission has maintained and/or awarded nine (9) prime contracts utilizing FTA funds. Of those prime contracts, five (5) had DBE participation, and one (1) was awarded to a DBE as the prime contractor. Weighing the participation percentage based on number of previously awarded is difficult as the projects identified in this program are different from the prior contracts. Additionally, the three (3) year period were during the COVID-19 pandemic which delayed projects and limited available vendors.

Below is a chart outlining DBE participation in FTA awarded contracts awarded by the Rail Commission withing the last three (3) Federal Fiscal Years:

Fiscal Year	FTA DBE Participation
FFY 2019	20.84%
FFY 2020	4.92%
FFY 2021	17.04%
Median Participation	14.27%

In reviewing past participation:

- The 2019 increase in DBE percentage was due to awarding to a DBE prime and paying more DBEs during that period.
- The 2020 decrease in DBE percentage was due to CARES funding being used for operating costs which did not include many DBEs.
- The 2021 increase in DBE percentage was due to awarding contracts for the Track Extension from Cabral to RMF and Tracy ACE Station Improvements projects.

While an analysis of the 2020-2022 Methodology was completed, the results were not relied on in the goal setting process. due to the following matters: the impact of the COVID-19 pandemic, Union Pacific Railroad’s (UPRR) continuance of contractually required projects that were included.

c. Project List:

As outlined in section I, four (4) of the proposed projects scheduled for DOT assistance in the upcoming triennial period are reasonably expected to receive DBE participation. These projects are the Manteca Station, Robert J. Cabral Station Expansion, Track Extension from Cabral to RMF and Tracy ACE Station Improvements projects. Past projects that are in progress are anticipated to be completed within this current three (3) year period. Therefore, a historic median of the past projects was not used to calculate the new goal

d. Bid opportunities:

Operating along the Union Pacific Railroad lines limits bid opportunities on the Rail Commission sponsored projects as UPRR requires all work done on or in conjunction with their lines be completed by their workforce. The largest project being proposed for the upcoming cycle is the Stockton Track Extension and falls directly under this restriction. However, there remains some opportunities for construction management and subcontractor work for the Stockton Track Extension project, as well as the Manteca Station, Robert J. Cabral Station Expansion and Tracy ACE Station Improvements projects.

e. Public Participation:

On July 20, 2022 the Rail Commission will host a DBE Community Engagement meeting to which invites were extended to Chambers of Commerce, local DBEs as identified on the State Database and Small Business Development Centers ranging from Sacramento to the Silicon Valley and Oakland to be distributed to their participants. At this meeting, the Rail Commission had the current proposed DBE Goal Setting Methodology available for review as well as project descriptions for proposed upcoming projects. The Rail Commission will have staff from the procurement, management, and project development teams, including bi-lingual staff available to engage the public and answer questions. See **Attachment A** for the public notice.

The Rail Commission requested the public review and comment on the draft methodology by placing public notices in the lobby of the Rail Commission Offices, located at 949 E. Channel St. Stockton, CA 95202, posted on the official website, released to local chambers, sent to local businesses, and posted on social media pages. See **Attachment B** for the public notice.

f. Weighted Percentage:

The Rail Commission adjusted the amount of FTA-assisted contracting opportunities available to DBEs based on the percentage of FTA funds projected to be used for specific NAICS categories, including Civil and Heavy Construction, Transportation and Warehousing, and Special Services, in completing the Manteca Station, Robert J. Cabral Station Expansion, Track Extension from Cabral to RMF, Tracy ACE Station Improvements projects. (**Table 3**)

With the list of available DBE firms already slim, the Rail Commission did not eliminate any firms regardless of location or likelihood to bid. Instead, the available DBE firms in each category were multiplied by the percentage of DOT funds allocated toward the related project, giving a total weighted DBE percentage of 4.93%. (**Table 3**)

$$\text{Weighted Base Figure} = \frac{\text{Number of DBEs registered in specialized category}}{\text{Number of all CBP firms by specialized category}} \times \text{weight} \times 100$$

In evaluating the two main components: the Base Figure and the Weighted DBE Availability, the weighted DBE Availability of 4.93% will be rounded down to **4.5%** and used as the DBE goal.

Table 3

DBE Availability by % of FTA Dollars

NAICS	Description	DBE	CBP	Availability	% of Total FTA Dollars	Weighted DBE %
23	Construction					
236210	Industrial Building Construction	131	335	39%		
236220	Commercial & Institutional Building Construction	255	4281	6%		
237110	Water & Sewer Line & Related Structures Construction	156	843	19%		
237120	Oil & Gas Pipeline & Related Structures Construction	29	104	28%		
237130	Power & Communication Line & Related Structures Construction	60	474	13%		
237210	Land Subdivision	25	603	4%		
237310	Highway, Street, & Bridge Construction	339	759	45%		
237990	Other Heavy & Civil Engineering Construction	206	336	61%		
238110	Poured Concrete Foundation & Structure Contractors	169	1926	9%		
238120	Structural Steel & Precast Concrete Contractors	102	482	21%		
238130	Framing Contractors	39	901	4%		
238140	Masonry Contractors	37	1303	3%		
238150	Glass & Glazing Contractors	18	878	2%		
238160	Roofing Contractors	18	2517	1%		
238170	Siding Contractors	7	276	3%		
238190	Other Foundation, Structure & Building Exterior Contractors	74	691	11%		
238210	Electrical Contractors & Other Wiring Installation Contractors	207	9233	2%		
238220	Plumbing, Heating, & Air-Conditioning Contractors	69	10716	1%		
238290	Other Building Equipment Contractors	27	737	4%		
238310	Drywall & Insulation Contractors	40	2274	2%		
238320	Painting & Wall Covering Contractors	63	4561	1%		
238330	Flooring Contractors	16	2053	1%		
238340	Tile & Terrazzo Contractors	18	1672	1%		
238350	Finish Carpentry Contractors	36	2779	1%		
238390	Other Building Finishing Contractors	31	908	3%		
238910	Site Preparation Contractors	217	2623	8%		
238990	All Other Specialty Trade Contractors	266	3284	8%		
		2655	57549	5%	80%	3.7%

33	Manufacturing					
339950	Sign Manufacturing	21	577	4%		
		21	577	4%	5%	0.18%
42	Wholesale Trade					
423320	Brick, Stone, & Related Construction Material Merchant Wholesalers	47	328	14%		
423390	Other Construction Material Merchant Wholesalers	32	410	8%		
423510	Metal Service Centers & Other Metal Merchant Wholesalers	30	1043	3%		
423610	Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	75	1831	4%		
424950	Paint, Varnish, & Supplies Merchant Wholesalers	8	221	4%		
		213	4410	5%	3%	.15%
48-49	Transportation and Warehousing					
488210	Support Activities for Rail Transportation	20	6127	0%		
484110	General Freight Trucking, Local	232	4655	5%		
484121	General Freight Trucking Long-Distance Truckload	53	669	8%		
484122	General Freight Trucking Long-Distance Less than Truckload	22	101	22%		
493190	Other Warehousing & Storage	1	301	0%		
		328	11853	3%	2%	0.05%
53	Real Estate Rental and Leasing					
532490	Other Commercial & Industrial Machinery & Requirement Rental & Leasing	21	1434	1%		
		21	1434	1%	1%	0.15%
54	Professional, Scientific, and Technical Services					
541310	Architectural Services	120	3527	3%		
541330	Engineering Services	564	8893	6%		
541620	Environmental Consulting	435	1572	28%		
		1119	13992	8%	9%	0.072%
	Totals	4336	89238	5%	100%	4.93%

III. PROPOSED OVERALL DBE GOAL

Taking all the information into consideration and weighing heavily on the DOT assisted contract opportunities anticipated to be available in this triennial period, Rail Commission proposes to use the weighted DBE Availability figure and set an annual overall DBE goal of 4.5% for FFY 2023-2025 for FTA-assisted contracts.

As part of the prescribed goal-setting methodology, Rail Commission must project the percentage of its Proposed Overall DBE Goal that can be met utilizing race-neutral and race-conscious measures. Because of the emphasis placed on race-neutral methods and the types of contracting opportunities, Rail Commission proposes that the FFY 2023-2025 goal will be met by race-neutral measures.

IV. RACE NEUTRAL MEANS TO ACHIEVE THE DBE ANNUAL OVERALL GOAL

The Rail Commission plans to continue or implement the following race neutral measures to maximize bidding and contracting opportunities to DBE and Small Business firms:

- A. Publicly announce all bid opportunities
- B. Invite DBE firms to bid based on past participation
- C. Unbundling large contracts to make them more accessible
- D. Encouraging prime contractors to subcontract portions of the work
- E. Participate in outreach and communications programs

In years past the Rail Commission has had a difficult time meeting DBE goals on a consistent year to year basis because contract opportunities tend to be very restrictive as described in Section I. The COVID -19 Pandemic also affected contract opportunities and delayed projects.

The Rail Commission will carefully monitor its progress during the course of the year and may establish appropriate contract-specific goals if race-neutral methods do not appear sufficient to achieve the overall annual DBE participation for FFY 2023-2025. At such time Rail Commission will consult local disparity studies to assist in the new determination.

V. PUBLIC PARTICIPATION

1. Consultation

Due to the COVID-19 pandemic, in-person outreach events were not done in 2020, 2021, and early 2022. As a small agency qualified under the provisions in FTA Circular 4702.1B Section IV the Rail Commission is not required to develop a formal Public Participation Plan and is instead represented by the San Joaquin Council of Governments.

The Rail Commission will be hosting a community outreach event on July 20, 2022 to establish contacts and relationships with the DBE community, share a bit of who Rail Commission is and the contract opportunities coming available in the next few years. Comments were collected on the proposed goals set out for the prior period of FFY 2020–2022. The Rail Commission anticipated to then review all comments received and evaluate discussions held during the engagement and determine if there should be a change to the FFY 2023-2025 goal setting methodology.

2. Publication of Proposed Goal

The proposed FFY 2023-2025 DBE goal was made available to the public on the official website at <https://www.sjrrc.com/dbe-sbe-and-title-vi/>. **Attachment C** documents the location of the goals on the website.

ATTACHMENT A

[insert copy of flier sent to DBE's and Chambers]

ATTACHMENT B

[Insert copy Public Notice]

ATTACHMENT C

[insert screenshot from website once posted]