



**DISADVANTAGED BUSINESS ENTERPRISE (DBE)
GOAL SETTING METHODOLOGY**

**FEDERAL TRANSIT ADMINISTRATION (FTA)
FEDERAL FISCAL YEAR (FFY) 2026-2028**

October 1, 2025

Submitted in fulfillment of:
Title 49 Code of Federal Regulations Part 26

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DBE GOAL METHODOLOGY

I. INTRODUCTION

Lane Transit District (LTD) sets forth its overall Disadvantaged Business Enterprise (DBE) goal and corresponding federally prescribed goal-setting methodology for the three-year Federal Fiscal Year (FFY) goal period of 2026-2028 (October 1, 2025 through September 30, 2028), pursuant to Title 49 Code of Federal Regulations (CFR) Part 26 “Participation by Disadvantaged Business Enterprises in U.S. Department of Transportation Programs.” Overall DBE goals are expressed as a percentage of the total amount of U.S. DOT funds LTD anticipates expending within a given three-year period. The overall DBE goal is based upon all budgeted contracts anticipated to utilize the U.S. DOT federal financial assistance, provided that the anticipated expenditures have viable opportunities for subcontracting possibilities and corresponding DBE availability.

II. BACKGROUND

LTD is a recipient of U.S. Department of Transportation (USDOT), Federal Transit Administration (FTA), funding. As a condition of receiving this assistance, LTD have signed assurances that it will comply with FTA DBE requirements. In accordance with Title 49 CFR Part 26 provisions: Participation by DBEs in USDOT Programs, LTD is required to develop and submit an overall DBE Goal for its FTA-assisted projects.

LTD herein presents its overall DBE Goal Methodology for FFY 2026-2028.

III. FTA-ASSISTED CONTRACTING PROGRAM FOR FFY 2026-2028

Market Area

The Federal DBE Program requires agencies to implement the DBE Program based on information from the relevant geographic market area—the area in which the agency spends the substantial majority of its contracting dollars.

LTD’s local market for contracts consists of a geographic market area that is:

- Where a large majority of contracting dollars is expended, and
- Where a substantial number of contractors and subcontractors are located and available to submit bids, quotes, or proposals.

LTD’s bidder’s list was reviewed and analyzed to determine where LTD spends the substantial majority of its contracting dollars. This analysis confirms our geographic market area is the State of Oregon.

Anticipated Projects

LTD has 18 FTA-community investment projects that are anticipated to be awarded during the triennial period and which were considered in preparing this goal methodology. These projects and their federal share are listed in Table 1.

- Column A: Lists the name and brief description of each project.
- Column B: Lists the total estimated cost of each project.
- Column C: Lists the estimated FTA dollar share for each project.
- Column D: Lists the estimated FTA percentage ratio for each project.

	Project Name/Description	Total Estimated Project Costs (FY26-28)	Estimated FTA \$ Share	Estimated FTA % Share
1	Glenwood Admin Roof Replacement - The Glenwood Administrative Facility roof is in need of replacement to protect the structure and assets inside the building. This project will replace the existing metal roofing with new materials improving the life cycle cost.	\$ 850,000	\$ 680,000	80%
2	Eugene State Modernization - This infrastructure project will improve the building and exterior features of the station, enhancing both the customer and employee experience while updating the station for enhanced safety and efficiency.	\$ 130,000	\$ 104,000	80%
3	Glenwood Mechanical & Electrical Rehabilitation - The Glenwood Administration Building was constructed in the early '90s. This project will consist of mechanical and electrical upgrades. The project will take corrective measures on electrical safety issues, installation/code deficiencies, and equipment deficiencies. The work also includes increasing the capacity of the electrical systems on the Glenwood	\$ 1,975,000	\$ 1,580,000	80%
4	Eugene Station Sitework Upgrades - This project will address sitework needs throughout the station. Project will include items like paver replacement, concrete repairs, crosswalk alignment adjustments, site lighting, roofing replacement, shelter painting. This investment will ensure that our main hub of our transit system will continue to serve the community as required.	\$ 3,680,000	\$ 2,944,000	80%
5	Fixed Route Infrastructure Rehabilitation - This project will be a comprehensive infrastructure rehabilitation, as needed, across all of our stops within the community. This project will be phased to first allow a review of all stops that will then lead to infrastructure rehabilitation needs to meet updated standards/best practices. Upgrades will focus on accessibility at the bus stop, flag pole & sign updates, shelter rebalancing.	\$ 2,000,000	\$ 1,600,000	80%
6	Glenwood Site Rehabilitation - The Glenwood Site, our main campus, has been in continuous operation for over 35 years, requiring critical rehabilitation to address aging infrastructure and enhance overall functionality. This project involves repaving parking lots, establishing a secure employee entrance, preserving a dedicated visitor parking area near the main entrance, increasing parking capacity, installing energy-efficient lighting, and creating dedicated accessible walkways. Additionally, revitalizing the landscape and hardscape features will significantly improve accessibility, safety, operational efficiency, and support our sustainability initiatives.	\$ 1,250,000	\$ 1,000,000	80%
7	RideSource Facility Expansion - LTD's RideSource ADA paratransit service provides vital origin-to-destination transportation for people who are unable to use the bus due to a disability. This project will allow LTD to increase parking capacity for paratransit and employee vehicles and expand the RideSource operational/administrative building to better meet the needs of the community.	\$ 300,000	\$ 240,000	80%
8	Major Bus Components - This program will allow LTD to leverage capital funds for the replacement of major bus components (hybrid systems, engine overhauls) needing to be replaced prior to the end of the vehicle's useful life. This will help increase reliability while reducing operational costs in repairing these components.	\$ 932,989	\$ 746,391	80%
9	Fleet Crane and Fall Protection - This project will provide for a safe working environment on top of the bus and provide for safely lifting components that are located anywhere on top of a bus and removing/replacing them.	\$ 1,000,000	\$ 800,000	80%
10	Trip Planner / Mobile Wallet - This project includes acquisition of a regional trip-planning and mobile payment application that integrates the variety of transportation options available (including transit, cycling, pedestrian, bike share, etc.). It will also include necessary governance agreements, project testing, and marketing/communications associated with the project.	\$ 600,000	\$ 600,000	100%
11	Fare Systems - Project would be for a unified fare system throughout our network of LTD services. The goal is to modernize and enhance transit fare to improve operational efficiency, accessibility and customer experience. This will include updated fare policy, validation and payment infrastructure.	\$ 6,100,000	\$ 4,880,000	80%
12	Franklin & Gateway EmX Corridors - EmX platforms and busways along the Franklin and Gateway EmX lines will be updated to increase passenger safety, comfort, and accessibility. Improvements might include repainting structures, installing new signage, repairs and replacement to hardscapes, and rehabilitating furniture and shelters.	\$ 500,000	\$ 200,000	40%
13	Gateway & UO North Site Rehab - Gateway & UO North are core elements to our overall system. By keeping these stations in good working order, repainting structures, installing signage, and other minor upgrades, we continue to provide a safe environment for passengers.	\$ 485,000	\$ 388,000	80%
14	ITS Video Systems Replacement - Project will be to update our mobile video system throughout our fleet to provide a singular mobile video system.	\$ 3,600,000	\$ 1,296,000	36%
15	ERP - An overhaul to the LTD enterprise software solution including core financial work flows and key department integrations. This project will impact all LTD departments and can lead to significant process improvement focus through design assessment and implementation.	\$ 100,000	\$ 80,000	80%
16	IT Hardware/Software Replacement - Replacement/upgrades of various LTD information technology systems software utilized throughout the District	\$ 3,375,000	\$ 2,025,000	60%
17	Operations Software/Midas Replacement - This project is to replace the current operations scheduling/bid software. LTD will be able to better serve the community with updated software allowing staff to do their jobs more smoothly, creating new efficiencies for staff, and better service for our Operators who are at the core of delivering service to the community.	\$ 1,031,015	\$ 824,812	80%
18	OCC / Training / Lounge - Improvements to LTD's Operations Department, including but not limited to modern operations dispatch, monitoring of cameras and transit systems, operator report/rest area, training classrooms, restrooms/showers, employee lounge and wellness center	\$ 3,880,000	\$ 3,104,000	80%
Totals		\$ 31,789,004	\$ 23,092,203	

Subrecipients

LTD does not have any subrecipients.

Categories of Work

LTD reviewed each project anticipated to be awarded during the respective three-year period and determined the applicable categories of work for each project using the North American Industry Classification System (NAICS) codes. The corresponding dollar values for each NAICS code by project were summarized for purposes of weighting the categories of work based on the staff estimates. Table 2 provides a summary of the categories of work with estimated dollars for each.

- Column A: Lists the category of work (NAICS) code and title.
- Column B: Lists the estimated FTA dollar share for each NAICS code.
- Column C: Lists the estimated percentage of each NAICS code (the estimated FTA dollars for each NAICS code divided by the grand total of all estimated FTA dollars).

Table 2

A		B	C
NAICS	NAICS Code Category of Work	Estimated FTA \$ by NAICS	Estimated FTA % by NAICS
238160	Roofing Contractors	\$ 680,000	2.9%
238190	Building Exterior Contractors	\$ 104,000	0.5%
238210	Electrical Contractors	\$ 1,580,000	6.8%
238910	Site Preparation Contractors	\$ 5,784,000	25.0%
333618	Other Engine Equipment Manufacturing	\$ 746,391	3.2%
333923	Overhead Traveling Crane, Hoist System Manufacturing	\$ 800,000	3.5%
334220	Mobile communications equipment manufacturing	\$ 600,000	2.6%
334514	Fare collection equipment manufacturing	\$ 4,880,000	21.1%
339950	Sign Manufacturing	\$ 588,000	2.5%
518210	Computing Infrastructure Providers	\$ 1,296,000	5.6%
541511	Custom Computer Programming Service	\$ 6,033,812	26.1%
Totals		\$ 23,092,203	100.0%

IV. GOAL METHODOLOGY

In accordance with 49 CFR Part 26, Section 26.45, LTD will submit its triennial overall DBE goal to the FTA on August 1 of the year specified by the FTA for each three (3) year period. The process used by LTD to establish overall DBE goals is as follows:

- Review LTD's **Community Investment Plan (CIP)** and identify projects, for the three-year federal fiscal year (ex: October 1, 2025 thru September 30, 2028) goal setting period. Include the Project Description, Total Estimated Project Cost over the three-year period, Estimated FTA Dollar Share, and Estimated FTA Percentage Share. Exclude projected contract expenditures with transit vehicle manufacturers, as they are exempt from the program.

- Once the projects have been identified, identify the [NAICS codes](#) for each category of work related to the projects and apply the appropriate dollar amounts.
- **Market Area:** LTD's market area is the State of Oregon.

Step 1: Determination of a Base Figure (26.45)

To establish LTD's Base Figure of the relative availability of DBEs relative to all comparable firms (DBE and non-DBE) available to bid or submit proposals on LTD FTA-assisted contracting opportunities projected to be solicited during the triennial goal period, LTD followed the prescribed federal methodology to determine the relative availability. This was accomplished by assessing:

1. Certification Office for Business Inclusion and Diversity (COBID) Certification Management System: [COBID](#) and
2. 2022 U.S. Census Bureau County Business Patterns Database: [U.S. Census Bureau data](#), within LTD's market area for each of the categories of work defined in Table 2.

In accordance with the formula listed below, the Base Figure is derived by:

- Dividing the number of ready, willing and able DBE firms identified for each NAICS work category by the number of all firms identified within the LTD market area for each corresponding work category (*relative availability*),
- Weighting the relative availability for each work category by the corresponding work category weight from Table 2 (*weighted ratio*), and
- Adding the weighted ratio figures together.

$$\text{Base Figure} = \sum \frac{(\text{Number of Ready, Willing and Able DBEs})}{(\text{Number of All Ready, Willing and Able Firms})} \times \text{Weighted Ratio}$$

⇒ For the numerator: COBID DBE Database of Certified Firms

⇒ For the denominator: 2022 U.S. Census Bureau County Business Patterns Database

A concerted effort was made to ensure that the scope of businesses included in the numerator was as close as possible to the scope included in the denominator. The result of the Base Figure calculation is shown in Table 3.

- Column A: Lists the category of work (NAICS) code and title.
- Column B: Lists the estimated percentage of each NAICS code (the estimated FTA dollars for each NAICS code divided by the grand total of all estimated FTA dollars) from Table 2.
- Column C: Lists the number of DBEs in the market area for each NAICS code from the Certification Office for Business Inclusion and Diversity (COBID) DBE Database of Certified Firms.
- Column D: Lists number of all firms (DBE and non-DBE) in the supplier market area for each NAICS code from the 2022 U.S. Census Bureau County Business Patterns Database.
- Column E: Lists the relative availability of DBEs for each NAICS code (the number of DBEs divided by the number of all firms).
- Column F: Lists the weighted base figure is the sum of the Estimated FTA% by NAICS in Column B multiplied by the Relative Availability of DBEs in Column E.

Table 3					
A	B	C	D	E	F
NAICS Code Category of Work	Estimated FTA % by NAICS	DBEs	All firms	Relative Availability of DBEs	Weighted Ratio
238160 Roofing Contractors	2.94%	11	515	2.14%	0.06%
238190 Building Exterior Contractors	0.45%	13	47	27.66%	0.12%
238210 Electrical Contractors	6.84%	15	996	1.51%	0.10%
238910 Site Preparation Contractors	25.05%	66	3324	1.99%	0.50%
333618 Other Engine Equipment Manufacturing	3.23%	0	7	0.00%	0.00%
333923 Overhead Traveling Crane, Hoist System Manufacturing	3.46%	0	3	0.00%	0.00%
334220 Mobile communications equipment manufacturing	2.60%	0	15	0.00%	0.00%
334514 Fare collection equipment manufacturing	21.13%	0	3	0.00%	0.00%
339950 Sign Manufacturing	2.55%	4	184	2.17%	0.06%
518210 Computing Infrastructure Providers	5.61%	12	231	5.19%	0.29%
541511 Custom Computer Programming Service	26.13%	49	2559	1.91%	0.50%
Totals	100.0%	170	7884	2.16%	
Step 1 Weighted Base Figure					1.64%

Step 2: Adjusting the Base Figure

Upon establishing the Base Figure, LTD reviewed and assessed other known evidence potentially impacting the relative availability of DBEs within the market area, in accordance with prescribed narrow tailoring provisions as set forth under 49 CFR Part 26.45: Step 2, DBE Goal Adjustment Guideline. Evidence considered in adjusting the Base Figure included Past DBE Goal Attainments and Other Evidence, as follows:

1. Past DBE Goal Attainments

Historical DBE participation attainments provide demonstrable evidence of DBE availability and capacity to perform on LTD projects that are substantially similar to previous years. LTD proceeded to calculate past DBE participation attainments for the three (3) federal fiscal years, for which DBE attainment data is available. The table below reflects the demonstrated capacity of DBEs (measured by actual historical DBE participation attainments) on FTA-assisted contracts awarded by LTD within the last three (3) federal fiscal years.

Table 4

Federal Fiscal Year (FFY)	Attainment %
2022	0.89%
2023	0.00%
2024	0.01%
Median DBE Attainment past 3 years	0.01%

The median established for the past three years is lower than the Base Figure derived from Step 1; therefore, an adjustment to the Base Figure based on LTD past DBE goal attainments has been made. The adjustment is calculated in accordance with FTA guidance by averaging the Base Figure with the median DBE Past Attainment, as shown below.

Step 1 Base figure (A)	1.64%
Median past participation (B)	0.01%
Step 2 Adjustment Figure (A+B) / 2	0.82%

2. Disparity Studies

LTD has reviewed the ODOT 2023 DBE Disparity Study Update ([2023 State of Oregon Disparity Study](#)) and has determined that the type of work is significantly different from LTD projects; therefore, LTD will not be making adjustments to the base figure based on the ODOT Disparity Study Update.

LTD uses a strictly race-neutral DBE program since the Western States decision. If LTD fails to reach its goal for a complete federal fiscal year, LTD will re-evaluate its DBE program to determine whether contract goals are necessary to achieve the overall goal. If after re-evaluation LTD believes a race-conscious program is necessary, as required by the Western States, LTD will gather evidence to determine if discrimination in the transportation contracting industry is present. LTD will make a determination at that time what type of evidence gathering is appropriate, based on DOT regulations and case law.

3. Other Available Evidence

LTD is not in possession of other information that would have an impact on the DBE goal assessment.

V. PROPOSED OVERALL DBE GOAL

The Proposed Overall DBE Goal for FFY 2026-2028 for LTD FTA-assisted contracts is 0.82%

LTD will implement race neutral measures to achieve this goal, as generally described in the following section. As a part of the prescribed goal-setting methodology, LTD must project the percentage of its Proposed Overall DBE Goal that can be met utilizing race-neutral and race-conscious measures.

Race-Conscious & Race-Neutral Projection

The United States Department of Transportation (USDOT) regulations require that race-neutral methods be used to the maximum extent feasible to reach the DBE overall goal. As LTD is located in the 9th Circuit, the agency cannot implement a race-conscious program without a disparity study that shows evidence of disparity. Therefore, LTD is unable to set a race-conscious projection and intends to continue to use race-neutral methods to meet the overall DBE goal of 0.82% for FFY 2026-2028 in accordance with Title 49 CFR Part 26.51.

LTD projects that all of the 0.82% DBE goal will be achieved through race-neutral means and that 0% will be achieved through race-conscious means.

Race-Conscious & Race-Neutral Projections	
Step 2 Adjustment Figure	0.82%
Race-Neutral Component	0.82%
Race-Conscious Component	0.00%

Due to the emphasis on race-neutral methods, LTD will increase the use the race-neutral measures listed below. LTD will carefully monitor participation during the course of the goal period. At the conclusion of each year during the goal period, LTD will re-evaluate the effectiveness of the race-neutral measures and determine if it is necessary to institute additional race-neutral measures to achieve the goal or if race-conscious methods should be considered.

VI. RACE-NEUTRAL IMPLEMENTATION MEASURES

LTD is currently implementing a number of race and gender-neutral remedies. In order to promote the participation of DBEs and small businesses in LTD's FTA-assisted contracting program and to increase the effectiveness of established measures, LTD will continue to explore options for consideration based on the agency's success in meeting its overall DBE goals.

LTD will:

- Encourage DBE and other small business contracting community to register and receive solicitation notices through its on-line procurement website: <https://ltd.gob2g.com/>.
- Host and/or participate in workshops for the DBE and small business contracting community. LTD will attend and participate in vendor fairs hosted by unrepresented groups and other public agencies.
- Unbundle solicitations, provide pre-bid/pre-proposal conferences to afford networking opportunities for primes and subcontractors. LTD will promote and encourage teaming opportunities between prospective prime contractors and the DBE and small business contracting community. Arrange solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate DBE and other small business participation.
- Structure solicitations to remove barriers such as the inability to obtain bonding or financing (e.g., by such means as simplifying the bonding process, reducing bonding requirements, eliminating the impact of surety costs from bids, and providing services to help DBEs, and other small businesses, obtain bonding and financing).
- Solicit DBEs and other small businesses participation by carrying out information programs through use of advertisement and other communication methods on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists of bidders; ensuring the dissemination to bidders on prime contracts of lists of potential subcontractors; provision of information in languages other than English, where appropriate).
- Actively promote the small business conferences, programs, and support services offered by other agencies that have established DBE and other small business programs as a supportive service to help develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs and other small businesses. LTD will also begin conducting "How to do Business with LTD" and DBE workshops.
- Advise its contracting community of the online directory of certified DBEs, found at the Certification Office for Business Inclusion and Diversity Certification Management System website: <https://oregon4biz.diversitysoftware.com/>.
- Advise the DBE and small business community to participate in ODOT's related bidding/proposal opportunities at <https://www.oregon.gov/ODOT/Business/Procurement/Pages/HowTo.aspx>. LTD will also encourage DBEs and small businesses to seek the assistance and training through the U.S. Small Business Administration at www.sba.gov and the Oregon Government Contract Assistance Program (GCAP) at www.gcap.org.

In addition to the measures specified above, LTD has also implemented strategies to foster *Small Business Participation* in its contracting process. These include the following:

- Conducting “How to do Business with LTD” and DBE workshops.
- On larger prime contracts requiring the prime contractor to consider subcontracting opportunities of a size that small businesses, including DBEs, can reasonably perform, rather than self-performing all the work involved.
- Identifying alternative acquisition strategies and structuring procurements to facilitate the ability of consortia or joint ventures consisting of small businesses, including DBEs, to compete for and perform prime contracts.
- Ensuring that a reasonable number of prime contracts are of a size that small businesses, including DBEs, can reasonably perform.
- Provide outreach to current LTD contractors or past LTD contractors who may qualify for DBE-certification by encouraging them to seek and obtain DBE-certification.

VII. CONSULTATION AND PUBLICATION

Consultation

Before establishing the overall goal, LTD conducted virtual meeting consultation with minority, women’s, general contractor groups, on May 1, 2025. In addition, LTD seeks input from community organizations, and other officials or organizations.

Public Notice and Public Comment

Following the public consultation and outreach efforts, LTD published a notice of the proposed overall goal methodology on their website. As required, this notice informed the public that:

- Inform the public that the proposed overall goal and its rationale are available for inspection on their website at www.ltd.org.
- LTD would accept comments on the goals for 30 days from the date of the notice published at the address above or at: compliance@ltd.org.

Summary of Comments & Responses

No comments were received by the June 30, 2025 deadline.