

## Federal DBE Triennial Goal Methodology



Tri-County Metropolitan Transportation District of Oregon (TriMet)  
Proposed federally required DBE Triennial overall goal for Federal Fiscal Years 2026-2028

TriMet proposes an overall DBE goal for its Federal Transportation Administration (FTA) funded contracts of 15.51% for federal fiscal years (FFY) 2026-2028; this 15.51% will be a completely race neutral goal.

### DBE Utilization with Federal Funds

TriMet operates the Federal DBE program (49 CFR 26) to assist Disadvantaged Business Enterprises (DBE) on contracts that use U.S. Department of Transportation (USDOT) funds. Federal regulation 49 CFR 26.7 seeks to ensure non-discrimination in the award and administration of USDOT-funded contracts in the FTA's Transit programs and to create equal opportunities for which DBE's can compete fairly for USDOT funded contracts.

TriMet presents the DBE Goal Calculation documentation and methodology for the Federal Transportation Authority (FTA) assisted contracts anticipated for award from October 1, 2025, through September 30, 2028. This three-year goal calculation was prepared in accordance with 49 CFR Part 26 and relevant FTA goal-setting guidance. The FTA- assisted projects are summarized below.

**Table 1: TriMet FTA-Assisted Contracts by Year and Total Cost FFY 2026-2028**

Project	FFY26	
FFY26	Project Spend	% of Total
82nd Avenue Transit Project	\$13,372,000.00	22.13%
Beaverton TC	\$168,000.00	0.28%
Better Bus	\$6,400,000.00	10.59%
Better Red Project	\$6,663,000.00	11.03%
Blue Line 82nd Ave LRT Station Rehab	\$3,530,000.00	5.84%
Columbia Operations Facility	\$15,510,970.00	25.67%
Electric Vehicle Charging Infrastructure at Merlo	\$2,553,000.00	4.22%
Electric Vehicle Charging Infrastructure at Powell	\$2,230,089.00	3.69%
Upgrade Powell Maintenance Facility for FCEB	\$1,000,000.00	1.65%
Oregon City TC	\$1,626,459.00	2.69%
TV Highway Transit & Safety Project	\$7,375,000.00	12.20%
FFY27	Project Spend	% of Total
82nd Avenue Transit Project	\$67,711,000.00	59.96%
Beaverton TC	\$2,677,119.00	2.37%
Better Bus	\$1,600,000.00	1.42%
Better Red Project	\$1,078,501.00	0.95%
Blue Line 82nd Ave LRT Station Rehab	\$0.00	0.00%
Columbia Operations Facility	\$14,487,965.00	12.83%
Electric Vehicle Charging Infrastructure at Merlo	\$3,697,000.00	3.27%
Electric Vehicle Charging Infrastructure at Powell	\$31,000.00	0.03%
Upgrade Powell Maintenance Facility for FCEB	\$14,000,000.00	12.40%
Oregon City TC	\$800,000.00	0.71%

TV Highway Transit & Safety Project	\$6,850,000.00	6.07%
<b>FFY28</b>	<b>Project Spend</b>	<b>% of Total</b>
82nd Avenue Transit Project	\$108,304,000.00	83.80%
Beaverton TC	\$0.00	0.00%
Better Bus	\$0.00	0.00%
Better Red Project	\$0.00	0.00%
Blue Line 82nd Ave LRT Station Rehab	\$0.00	0.00%
Columbia Operations Facility	\$6,868,000.00	5.31%
Electric Vehicle Charging Infrastructure at Merlo	\$3,687,000.00	2.85%
Electric Vehicle Charging Infrastructure at Powell	\$0.00	0.00%
Upgrade Powell Maintenance Facility for FCEB	\$1,000,000.00	0.77%
Oregon City TC	\$0.00	0.00%
TV Highway Transit & Safety Project	\$9,384,000.00	7.26%
Total	\$302,604,103.00	100.00%

TriMet expects to award \$60 million in FTA-assisted contracts in FFY 2026, \$113 million in FFY 2027, and \$129 million in FFY 2028. Combined, this represents a three-year total of \$303 million in federally assisted contracts to be awarded during the goal-setting period.

**Table 2: TriMet Summary of DOT-Assisted Contracts FFY 2026- 2028**

Year	Total Projects (\$M)	TriMet Goal	DBE Potential (\$M)
<b>2026</b>	\$60	<b>15.51%</b>	\$9
<b>2027</b>	\$113	<b>15.51%</b>	\$18
<b>2028</b>	\$129	<b>15.51%</b>	\$20
<b>TOTAL</b>	<b>\$303</b>	<b>15.51%</b>	<b>\$47</b>

TriMet's three-year overall goal has been established at 15.51%, to be accomplished through all race-neutral means. The total dollars to be expended to DBEs is estimated to be \$47 million.

## Background

As a recipient of Federal Department of Transportation funds, TriMet is required to establish a DBE program in accordance with regulations of the U.S. Department of Transportation (USDOT) 49 CFR Part 26. Pursuant to USDOT guidelines, the DBE program is to be narrowly tailored to the specific market area to level the playing field disadvantaged businesses enterprises to participate in federally funded contracts. A DBE goal is calculated for a three-year period to reflect current market conditions and guide the implementation of the DBE program through race-neutral (RN) means.

The following analysis was prepared in accordance with 49 CFR Part 26 and the goal-setting guidance issued by USDOT and the Federal Transportation Authority

(FTA) to develop an overall DBE goal that is narrowly tailored to the specific market area. The two-step process begins with the calculation of a base figure which is composed of an analysis of the local market area data of the availability of ready, willing, and able DBE firms compared to all firms (certified and non-certified) in the market area. This base figure is then adjusted in the second step based on an analysis of other local area factors. After any necessary adjustments, the final proposed goal is calculated.

In developing the goal setting methodology, data was collected from past projects, historical accomplishments and local DBE certifying agencies. When considering methods of adjustments to the base figure, TriMet's historical accomplishments and consultation with stakeholders was held to provide a more detailed picture of the relevant market conditions.

## Market Area

49 CFR PART 26 prescribes that the market area “be identified as the area in which the substantial majority of the Agency's contractors and subcontractors that seek to do business with the Agency are located and the area in which the Agency spends the substantial majority of its contracting dollars.” The market area is usually the counties/parishes surrounding the Agency but can also extend to additional areas where contractors and/or subcontractors can be found to do the types of projects being awarded at the Agency. The vast majority of contracts awarded by TriMet were to contractors and service providers located within Oregon. These contractors primarily use our federal funds to procure goods and services from providers in our local area. Therefore, TriMet determined that the relevant market is the state of Oregon.

Further analysis to calculate the base figure for the overall goal will use this defined market area.

## Base Figure Calculation – Step 1

Based on information provided by TriMet concerning the proposed projects for FFY 2026-2028, the relative availability of DBEs to non-DBE firms was developed based on the specific North American Industry Classification System (NAICS) code and descriptions corresponding to the projects identified in Table 1.

The data sources used for this analysis include:

1. 2022 County Business Patterns (CBP), US Census Bureau
2. State Unified Certification Program (UCP) DBE Directories for the State of Oregon

Table 3b shows the Step 1 calculation with an average availability of DBE firms of 10.88%. Considering the TriMet defined Market Areas, the UCP Directory noted

above were used to identify the number of firms certified to perform work in each NAICS code, as represented in the column labeled “#DBE Firms.” The total number of all firms identified in the US Census Bureau County Business Patterns data base is represented in the column labeled “Total Firms.”

**Table 3a: Step 1 Calculation – Numerator**

Project	NAICS Code	Census - Oregon.Meaning of NAICS Code (NAICS2017_LABEL)	DBE Count	Total Firms	%
82nd Ave	237110	Water and sewer line and related structures construction	32	162	19.75%
	237130	Power and communication line and related structures construction	7	78	8.97%
	237310	Highway, street and bridge construction	70	194	36.08%
	237990	Other heavy and civil engineering construction	24	66	36.36%
	238110	Poured concrete foundation and structure contractors	40	347	11.53%
	238910	Site preparation contractors	66	831	7.94%
	336999	All other transportation equipment manufacturing	0	6	0.00%
	339950	Sign manufacturing	4	92	4.35%
	541330	Engineering services	83	815	10.18%
	541611	Administrative management and general management consulting services	233	974	23.92%
	561730	Landscaping services	24	1843	1.30%
BLSR	237990	Other heavy and civil engineering construction	24	66	36.36%
	541330	Engineering services	83	815	10.18%
	541611	Administrative management and general management consulting services	233	974	23.92%
Beaverton TC	236220	Commercial and institutional building construction	46	503	9.15%
	238110	Poured concrete foundation and structure contractors	40	347	11.53%
	238140	Masonry contractors	8	252	3.17%
	238320	Painting and wall covering contractors	32	1060	3.02%
	238910	Site preparation contractors	66	831	7.94%
	561730	Landscaping services	24	1843	1.30%
Better Bus	237990	Other heavy and civil engineering construction	24	66	36.36%
	541330	Engineering services	83	815	10.18%
	541611	Administrative management and general management consulting services	233	974	23.92%
Better Red	238910	Site preparation contractors	66	831	7.94%
	541611	Administrative management and general management consulting services	233	974	23.92%
COF	237110	Water and sewer line and related structures construction	32	162	19.75%
	237130	Power and communication line and related structures construction	7	78	8.97%
	237990	Other heavy and civil engineering construction	24	66	36.36%
	238110	Poured concrete foundation and structure contractors	40	347	11.53%
	238210	Electrical contractors and other wiring installation contractors	15	996	1.51%
	238910	Site preparation contractors	66	831	7.94%
	238990	All other specialty trade contractors	53	533	9.94%
	332312	Fabricated structural metal manufacturing	9	53	16.98%
	334290	Other communications equipment manufacturing	2	4	50.00%
	541310	Architectural services	17	369	4.61%
	541370	Surveying and mapping (except geophysical) services	18	125	14.40%
	541611	Administrative management and general management consulting services	233	974	23.92%
	561210	Facilities support services	7	54	12.96%
	561612	Security guards and patrol services	9	129	6.98%
	561720	Janitorial services	12	1245	0.96%
	561730	Landscaping services	24	1843	1.30%
	561990	All other support services	24	170	14.12%
EVCI-Powell	237130	Power and communication line and related structures construction	7	78	8.97%
	238210	Electrical contractors and other wiring installation contractors	15	996	1.51%
	238990	All other specialty trade contractors	53	533	9.94%
	334290	Other communications equipment manufacturing	2	4	50.00%
	541310	Architectural services	17	369	4.61%

	541611	Administrative management and general management consulting services	233	974	23.92%
	561210	Facilities support services	7	54	12.96%
	561990	All other support services	24	170	14.12%

**Table 3a: Step 1 Calculation – Numerator (CONTINUED)**

EVCI_Merlo	237130	Power and communication line and related structures construction	7	78	8.97%
EVCI_Merlo	238210	Electrical contractors and other wiring installation contractors	15	996	1.51%
EVCI_Merlo	238990	All other specialty trade contractors	53	533	9.94%
EVCI_Merlo	334290	Other communications equipment manufacturing	2	4	50.00%
EVCI_Merlo	541310	Architectural services	17	369	4.61%
EVCI_Merlo	561210	Facilities support services	7	54	12.96%
EVCI_Merlo	561990	All other support services	24	170	14.12%
FCEB	236220	Commercial and institutional building construction	46	503	9.15%
FCEB	237130	Power and communication line and related structures construction	7	78	8.97%
FCEB	237990	Other heavy and civil engineering construction	24	66	36.36%
FCEB	238110	Poured concrete foundation and structure contractors	40	347	11.53%
FCEB	238210	Electrical contractors and other wiring installation contractors	15	996	1.51%
FCEB	238220	Plumbing, heating, and air-conditioning contractors	7	1324	0.53%
FCEB	238320	Painting and wall covering contractors	32	1060	3.02%
FCEB	238910	Site preparation contractors	66	831	7.94%
FCEB	238990	All other specialty trade contractors	53	533	9.94%
FCEB	334290	Other communications equipment manufacturing	2	4	50.00%
FCEB	336999	All other transportation equipment manufacturing	0	6	0.00%
FCEB	541310	Architectural services	17	369	4.61%
FCEB	541611	Administrative management and general management consulting services	233	974	23.92%
FCEB	561210	Facilities support services	7	54	12.96%
FCEB	561720	Janitorial services	12	1245	0.96%
OC TC	236220	Commercial and institutional building construction	46	503	9.15%
OC TC	238110	Poured concrete foundation and structure contractors	40	347	11.53%
OC TC	238140	Masonry contractors	8	252	3.17%
OC TC	238320	Painting and wall covering contractors	32	1060	3.02%
OC TC	238910	Site preparation contractors	66	831	7.94%
OC TC	532490	Other commercial and industrial machinery and equipment rental and leasing	2	96	2.08%
OC TC	561730	Landscaping services	24	1843	1.30%
TV Hwy	237310	Highway, street and bridge construction	70	194	36.08%
TV Hwy	238910	Site preparation contractors	66	831	7.94%
TV Hwy	532490	Other commercial and industrial machinery and equipment rental and leasing	2	96	2.08%
TV Hwy	541330	Engineering services	83	815	10.18%
TV Hwy	541611	Administrative management and general management consulting services	233	974	23.92%

**Table 3b: Step 1 Calculation**

Average DBE Firms/OR Census				
Project	FFY26	FFY27	FFY28	
82nd Avenue Transit Project	2.39%	6.46%	9.03%	
Beaverton TC	0.01%	0.11%	0.00%	
Better Bus	1.94%	0.26%	0.00%	
Better Red Project	1.83%	0.16%	0.00%	
Blue Line 82nd Ave LRT Station Rehab	1.07%	0.00%	0.00%	
Columbia Operations Facility	1.90%	0.95%	0.39%	
Electric Vehicle Charging Infrastructure at Merlo	0.24%	0.19%	0.16%	
Electric Vehicle Charging Infrastructure at Powell	0.42%	0.00%	0.00%	
Upgrade Powell Maintenance Facility for FCEB	0.11%	0.83%	0.05%	
Oregon City TC	0.12%	0.03%	0.00%	
TV Highway BRT	1.90%	0.95%	1.13%	Step 1 Base Figure
	11.93%	9.93%	10.77%	<b>10.88%</b>

As suggested by the FTA goal-setting guidance, to further refine the availability, the “Relative Availability” calculation is weighted based on the percent of the total budget estimated ([DBE firms/total firms] \* % of total budget). Based upon the above calculation, the resulting weighted DBE base figure is 10.88%.

## Adjustment to the Base Figure – Step 2

All available research and data relevant to the market area were analyzed to identify appropriate and meaningful inputs to adjust the base figure for accuracy. The following available data were considered:

1. TriMet Uniform Reports
2. Meetings with TriMet Staff
3. Potential DBEs

Past Participation: After consideration of all inputs above, it was determined that TriMet's past DBE participation accomplishments would be the relevant data to adjust the Base Figure.

**Table 5: TriMet DBE Participation Goals and Accomplishments 2021-24**

	PRIME CONTRACTS AWARDED / COMMITTED THIS PERIOD	TOTAL TO DBES
FFY 2021	\$77,594,798	\$6,425,549.00
FFY 2022	\$2,098,088.00	\$3,845,584.00
FFY 2023	\$14,183,783.00	\$644,785.00
FFY 2024	\$23,509,914.00	\$5,144,237.00
<b>Commitments</b>		
<b>Fiscal Year Median</b>		<b>15.08%</b>

Source: TriMet Annual Uniform Report of DBE Awards / Commitments and Payments

As shown in the Table 5 above, TriMet had a fiscal year median of commitments of 15.08%. To calculate the adjustment to the base figure, this average was used.

In addition, as recommended in both 49 CFR Part 26 and the USDOT guidelines for Triennial Goal Setting, potential DBEs were added to the base in Step 2 as shown below in table 6 to given an adjust base of 20.58%

**Table 6: Including Potential DBEs**

Average DMWBE Firms/ OR Census			
Project	FFY26	FFY27	FFY28
82nd Avenue Transit Project	4.31%	11.69%	16.33%
Beaverton TC	0.02%	0.18%	0.00%
Better Bus	3.95%	0.53%	0.00%
Better Red Project	3.86%	0.33%	0.00%
Blue Line 82nd Ave LRT Station Rehab	2.18%	0.00%	0.00%
Columbia Operations Facility	3.75%	1.87%	0.78%



Electric Vehicle Charging Infrastructure at Merlo	0.51%	0.40%	0.35%	
Electric Vehicle Charging Infrastructure at Powell	0.93%	0.01%	0.00%	
Upgrade Powell Maintenance Facility for FCEB	0.23%	1.73%	0.11%	
Oregon City TC	0.20%	0.05%	0.00%	
TV Highway Transit & Safety Project	3.56%	1.77%	2.12%	
	23.51%	18.55%	19.68%	<b>20.58%</b>

\*Projects from CIP FFY2026-28 TriMet

**Table 7: Summary of Step 1 & 2 Adjustment**

Summary of Two-Step Process		
STEP 1	Base Figure	10.88%
STEP 2a	Revised base figure with Potential DBEs	20.58%
STEP 2b	Median Past Accomplishments (2023-2025)	15.08%
Final Goal Calculation		<b>15.51%</b>

Accordingly, the proposed TriMet overall DBE goal for FFY 2026-2028 is 15.51%.

### Estimated Race and Gender Neutral/Conscious Participation

Federal Regulation 49 CFR Part 26.51(a) states, "You must meet the maximum feasible portion of your overall goal by using race-neutral means of facilitating race-neutral DBE participation. Race-neutral DBE participation includes any time a DBE wins a prime contract through customary competitive procurement procedures or is awarded a subcontract on a prime contract that does not carry a DBE contract goal."

TriMet in the previous triennial period achieved all of their participation by race-neutral means and will continue for the 2026-28 Triennial Period to be race-neutral only

As established TriMet's FFY 26-28 Triennial Goal will be 15.51%. In an effort to improve the access to opportunities for all SBE subcontractors, including DBE contractors, TriMet will continue to promote race-neutral programming to build awareness and capacity.

Contract goals are established so that, over the period to which the overall goal applies, they will cumulatively result in meeting any portion of the TriMet overall goal that is not projected to be met through the use of race-neutral means.

Goals will be adapted to the circumstances of each contract including funding sources, subcontracting opportunities, the size of the contract including type of work, availability of DBEs to perform that work and necessary adjustments to account for market conditions.

## Consultation

TriMet will post the FFY 2026-2028 Triennial Goal update on its website [trimet.org/dbe](https://trimet.org/dbe)

Public Comment will be accepted through July 3, 2025.

Comments may be submitted online at [trimet.org/dbe](https://trimet.org/dbe), emailed to [DBE@trimet.org](mailto:DBE@trimet.org) or mailed to TriMet, Attn: Division of Public Access and Innovation DBE Program, 101 SW Main St., Suite 700, Portland, OR 97204.

A series of community discussions will be held at the NAMC General Meeting on June 4, 2025 and the PBDG membership meeting on June 18, 2025.

## Ongoing Race and Gender-Neutral Strategies

TriMet has a robust DBE program in place, including race and gender-neutral strategies to facilitate DBE participation. These RN strategies are summarized in the list below:

1. Implementing procurement policies that actively seek out small businesses, including DBEs and encourage their participation in contracting opportunities
2. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
3. Ensuring distribution of DBE directory, through print and electronic means to the widest feasible universe of potential prime contractors
4. Providing technical assistance, training and resources to help small businesses, including DBEs, navigate the contracting process and improve their competitiveness
5. Organizing networking events to connect small businesses with prime contractors, facilitating collaborations and potential partnerships