

SAN DIEGO ASSOCIATION OF GOVERNMENTS



Overall DBE Project Goal Methodology for the Mid-Coast Corridor Transit Project

Submitted in fulfillment of:

Title 49 Code of Federal Regulations Part 26

OVERALL DBE PROJECT GOAL METHODOLOGY FOR MID-COAST CORRIDOR TRANSIT PROJECT

I. INTRODUCTION

The Mid-Coast Corridor Transit Project will extend Trolley service from Santa Fe Depot in Downtown San Diego to the University City community, serving major activity centers such as Old Town, the University of California, San Diego (UCSD), and Westfield UTC. The project is funded in partnership by SANDAG (utilizing the *TransNet* half-cent sales tax) and the Federal Transit Administration (FTA) New Starts Program. Construction is anticipated to begin in 2015, with service starting in 2018.

The Trolley extension project and route - known as the Locally Preferred Alternative (LPA) - was approved by the SANDAG Board in July 2010. It begins just north of the Old Town Transit Center, and travels in existing railroad right-of-way and alongside Interstate 5 to Gilman Drive, then crosses to the west side of I-5 just south of Nobel Drive and continues on to the UCSD campus, crosses back over I-5 near Voigt Drive to the UCSD east campus and medical centers on the east side of I-5, transitions into the median of Genesee Avenue, and continues down Genesee Avenue to the Westfield UTC transit center.

Eight stations are proposed as part of the project at Tecolote Road, Clairemont Drive, Balboa Avenue, Nobel Drive, Pepper Canyon (serving UCSD west campus), Voigt Drive (serving UCSD east campus), Executive Drive, and the Terminus Station (at the Westfield UTC transit center). A station at the VA Medical Center also is included as an option in the project's environmental document.

The project will connect corridor residents with other Trolley lines serving Mission Valley, East County, and South County. As an extension of the existing Blue Line, it will offer a one-seat (no transfer) ride from the international border and communities south of Downtown San Diego all the way to University City. This new service will enhance direct public access to other regional activity centers and improve travel options to employment, education, medical, and retail centers for corridor residents, commuters, and visitors.

Freeways and arterials in the Mid-Coast Corridor are generally congested and traffic congestion is projected to increase more as the region grows. The population along the corridor is predicted to increase 19 percent by the year 2030 while employment is predicted to increase 12 percent. The Mid-Coast Corridor Transit Project will expand transportation capacity in the corridor to accommodate existing and future travel demand, particularly for peak-period commute trips. The project will provide an effective alternative to congested freeways and roadways for travelers and will reduce vehicle miles traveled.

The University City area has developed as a major employment and high density residential area, similar to downtown San Diego. Although University City is considered San Diego's second downtown and UCSD is one of the region's largest trip generators, neither is directly served by regional transit. The Mid-Coast Corridor Transit Project will provide efficient transit connections to University City, UCSD, and reliable, higher speed trolley service throughout the

corridor. Effective transit that is competitive with the automobile will attract riders to transit, improve regional mobility, and help maintain and enhance San Diego's quality of life.

SANDAG seeks concurrence from FTA to express the overall DBE goal as a project goal (hereinafter Overall DBE Project Goal) for the Construction Manager/General Contractor (CM/GC) Project, in accordance with 25.45 (e) of the DBE Program regulations. SANDAG herein sets forth its proposed Overall DBE Project Goal and corresponding methodology for the Project, in accordance with Title 49 CFR Part 26 requirements.

As a direct recipient of FTA funding, SANDAG commissioned a Disparity Study to be conducted as a member and funding partner of the Southern California Regional Disparity Study Consortium in order to assess whether or not discrimination exists within SANDAG's marketplace and the effects therein. The Disparity Study was finalized in late January 2010 and accepted by SANDAG's Board of Directors in March 2010. The Disparity Study suggests that there are certain barriers affecting entry of minorities and women into the Southern California construction and engineering industries. SANDAG relied on this Disparity Study in order to adopt an Overall DBE Project Goal that includes both Race-Neutral and Race-Conscious components, in accordance with DOT's guidance following the Western States Paving Company case. The proposed Overall DBE Project Goal is separate and apart from SANDAG's other FTA-assisted contracts.

The Proposed Overall DBE Project Goal for the CM/GC Project is 11.3% of the total project amount, which includes both pre-construction and construction phases. The goal is representative of the relative availability of DBEs based on evidence of ready, willing and able DBEs with offices located within SANDAG's defined market area (Imperial, Riverside, and San Diego counties), to all comparable businesses which are known to be available to compete for the contracting opportunities associated with this project. Additionally, the methodology also took into consideration SANDAG's past DBE goal attainments/commitments to the extent applicable, Bidders List, other similar Agencies' DBE goals, and attainments within SANDAG's jurisdiction and other relevant evidence. Sections II and III delineate the methodology undertaken to establish the proposed Overall DBE Project Goal and the race-neutral and race-conscious components.

The selected CM/GC firm will be required to develop a DBE and Small Business subcontracting plan to utilize DBE firms. Implementation of the race-conscious element will be accomplished through the use of contract specific DBE goals on the Project and the requirement for on-going Good Faith Efforts by the CM/GC firm.

II. FTA-ASSISTED CONTRACTING PROGRAM: MID-COAST CORRIDOR TRANSIT PROJECT

This CM/GC Project is grouped by categories of work utilizing comparable North American Industry Classification System (NAICS) codes for purposes of weighting the categories of work based on the engineer’s estimate¹. Table 1 provides a summary of the categories of work with estimated cost breakdown for each.

TABLE 1

NAICS CODE	NAICS CATEGORY OF WORK	ESTIMATED FUNDING	% OF FUNDING BY CATEGORY
236220	Commercial and Institutional Building Construction	\$39,854,000	3.2%
237110	Water and Sewer Line and Related Structures Construction	\$58,840,000	4.7%
237120	Oil and Gas Pipeline and Related Structures Construction	\$5,000,000	0.4%
237130	Power and Communication Line and Related Structures Construction	\$55,027,000	4.4%
237210	Land Subdivision	\$142,589,000	11.4%
237310	Highway, Street, and Bridge Construction	\$215,516,000	17.2%
237990	Other Heavy and Civil Engineering Construction	\$625,911,000	49.9%
238210	Electrical Contractors and Other Wiring Installation Contractors	\$57,835,000	4.6%
238290	Other Building Equipment Contractors	\$4,633,000	0.4%
238910	Site Preparation Contractors	\$1,366,000	0.1%
423420	Office Equipment Merchant Wholesalers	\$30,000	0.0%
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	\$52,000	0.0%
423830	Industrial Machinery and Equipment Merchant Wholesalers	\$4,000,000	0.3%
454390	Other Direct Selling Establishments	\$1,500	0.0%
492110	Couriers and Express Delivery Services	\$6,000	0.0%
511130	Book Publishers	\$8,000	0.0%

¹ See NAIC Cost Categories for Mid-Coast LRT-Rev 12013.05.16

511210	Software Publishers	\$30,000	0.0%
517210	Wireless Telecommunications Carriers (except Satellite)	\$35,000	0.0%
517919	All Other Telecommunications	\$7,000	0.0%
531120	Lessors of Nonresidential Buildings (except Mini warehouses)	\$150,000	0.0%
541611	Administrative Management and General Management Consulting Services	\$1,000,000	0.1%
541614	Process, Physical Distribution, and Logistics Consulting Services	\$30,000,000	2.4%
541618	Other Management Consulting Services	\$1,200,000	0.1%
541620	Environmental Consulting Services	\$100,000	0.0%
811212	Computer and Office Machine Repair and Maintenance	\$10,000	0.0%
812930	Parking Lots and Garages	\$10,430,000	0.8%
TOTAL ESTIMATED PROJECT COST		\$1,253,630,500	100.0%

DRAFT

III. PROPOSED OVERALL DBE PROJECT GOAL - METHODOLOGY

Step 1: Determination of a Base Figure (26.45)²

To establish the Base Figure for this Project, SANDAG followed one of the five prescribed federal methodologies to determine relative availability of DBEs to all comparable firms available to bid or propose on the Project. This was accomplished by accessing the California Unified Certification Program (CUCP) DBE Directory of Certified Firms and the 2011 U.S. Census Bureau County Business Patterns (CBP) Database by corresponding counties within SANDAG's market area (defined as Imperial, Riverside, and San Diego counties) for each of the identified work scopes for the project compiled by NAICS Codes. SANDAG's defined market area represents where the Project will be built and where the substantial majority of SANDAG's funding dollars are intended to be expended.

SANDAG made a concerted effort to ensure that the type of businesses included in the numerator was as close as possible to the types of businesses included in the denominator. For corresponding detail of all work category classifications grouped, refer to Attachments I and II.

- ⇒ For the numerator: CUCP Directory of Certified DBE Firms*
- ⇒ For the denominator: 2011 U.S. Census Bureau CBP Database of Firms*
*located in SANDAG's market area

To determine the relative availability of DBEs, SANDAG divided the numerator representing the number of ready, willing and able DBE firms by NAICS code (work category) that are located within SANDAG's defined market area, by the denominator representing all firms (DBEs and Non-DBEs) available within the defined market area by each NAICS code. SANDAG further refined its analysis by weighting each individual work category (from Table 1 above) relative to the independent cost estimate and corresponding work categories.

The proposed Overall DBE Project Goal Base Figure resulting from this weighted calculation is as follows:

$$\sum \left(\frac{\text{Number of Ready, Willing, and Able DBEs}}{\text{Number of All Available Firms}} \times \text{Weight of NAICS} \right) \times 100 = \text{Proposed DBE Base Figure}$$

Table 2 shows the proposed Overall DBE Project Goal Base Figure weighted by type of work to be performed (NAICS Categories) based on their estimated funding:

² 26.45 represents Title 49 CFR Part 26 regulatory goal setting methodology reference.

TABLE 2

NAICS CODES	NAICS CATEGORY OF WORK	ALL FIRMS ¹	DBE FIRMS ²	WEIGHT*	DBE GOAL
236220	Commercial and institutional building construction	697	21	3.2%	0.10%
237110	Water and sewer line and related structures construction	140	5	4.7%	0.17%
237120	Oil and gas pipeline and related structures construction	26	1	0.4%	0.02%
237130	Power and communication line and related structures construction	83	0	4.4%	0.00%
237210	Land subdivision	157	2	11.4%	0.14%
237310	Highway, street, and bridge construction	139	23	17.2%	2.84%
237990	Other heavy and civil engineering construction	71	11	49.9%	7.74%
238210	Electrical contractors and other wiring installation contractors	1,045	26	4.6%	0.11%
238290	Other building equipment contractors	77	2	0.4%	0.01%
238910	Site preparation contractors	408	15	0.1%	0.00%
423420	Office Equipment Merchant Wholesalers	99	0	0.0%	0.00%
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	143	0	0.0%	0.00%
423830	Industrial machinery and equipment merchant wholesalers	269	1	0.3%	0.00%
454390	Other Direct Selling Establishments	302	0	0.0%	0.00%
492110	Couriers and Express Delivery Services	139	0	0.0%	0.00%
511130	Book Publishers	56	1	0.0%	0.00%
511210	Software Publishers	148	2	0.0%	0.00%
517210	Wireless Telecommunications Carriers (except Satellite)	166	1	0.0%	0.00%
517919	All Other Telecommunications	62	1	0.0%	0.00%
531120	Lessors of Nonresidential Buildings (except Mini warehouses)	442	1	0.0%	0.00%
541611	Administrative management and general management consulting services	1,059	31	0.1%	0.00%
541614	Process, physical distribution, and logistics consulting services	123	5	2.4%	0.10%

541618	Other management consulting services	101	71	0.1%	0.07%
541620	Environmental Consulting Services	169	34	0.0%	0.00%
811212	Computer and Office Machine Repair and Maintenance	90	0	0.0%	0.00%
812930	Parking lots and garages	304	0	0.8%	0.00%
Step 1 Base Figure					11.3%

* from Table 1

Step 2: Adjusting the Base Figure

Upon establishing the Base Figure, SANDAG reviewed and assessed other known evidence potentially impacting the relative availability of DBEs within SANDAG’s market area, in accordance with prescribed narrow tailoring provisions set forth under 49 CFR, Part 26.45 Step 2 DBE Goal Adjustment guidelines.

Evidence considered in making an adjustment to the Base Figure included SANDAG’s past DBE goal attainments/commitments as applicable, the Southern California Regional Disparity Study Consortium’s Disparity Study, other agencies’ DBE goals and attainments within SANDAG’s jurisdiction and other relevant evidence. A summary of these considerations follows:

A. Past SANDAG DBE Goal Attainments/Commitments

Historical DBE goal attainments provide a viable means of determining DBEs availability to bid and capacity to perform on DOT-assisted contracts, based on prior SANDAG contracts of similar types of work. Table 3 below serves to identify DBE commitments and/or attainments of federal-assisted contracts let and awarded by SANDAG from recent contracts:

TABLE 3

PROJECT	PROJECT AWARD AMOUNT	CONTRACT GOAL	DBE GOAL COMMITMENT	DBE GOAL ATTAINMENT
Mid Coast A&E Design	\$26,271,813	3.3%	12%	Ongoing
Downtown Station Platform Modifications	\$8,313,557	4.6%	3.12%	Ongoing
Traction Power Substation	\$12,946,533	3.85%	8.51%	Ongoing
Coastal Rail Trail	\$1,179,403	9.6%	0%	Ongoing

As SANDAG does not have comparable projects of similar size and scope to the CM/GC Project, no adjustment to the Base Figure resulted from this consideration.

B. Evidence from Disparity Studies

SANDAG has considered the Southern California Regional Disparity Study Consortium Disparity Study. Based on the options to consider, the disparity study found that DBE participation on FTA-funded contracts for the disparity study period was 12.2% (see Section VI of the report). SANDAG’s proposed Overall DBE Project Goal of 11.3% is comparable to the disparity study participation amount, therefore an adjustment was not made.

C. Other Agencies DBE Project Goals

SANDAG surveyed other DOT-recipient CM/GC and other construction projects both within and outside of SANDAG’s market area, to assess their DBE goals toward making an adjustment to the Step 1 Base Figure. Although these were contract specific goals that were reviewed, because the SANDAG Overall DBE Goal is a project specific goal that is applicable only to the Mid-Coast Corridor Transit Project, we believe these contract goals are representative of the DBE availability expected for SANDAG’s Overall DBE Project Goal. Southern California agencies that were included in the survey were City of Los Angeles, Port of Long Beach and Riverside County Transportation Commission. Other agencies were also reviewed and are included in Table 4 below.

TABLE 4

AGENCY	PROJECT	OVERALL GOAL
Alaska Industrial Dev. & Export Authority	Ketchikan Shipyard Improvements	6.77%
Denver International Airport	Pena Bridge Preconstruction	8%
Denver Regional Transit District (RTD)	RTD – Fastracks – West Corridor – Preconstruction	13%
Denver Regional Transit District (RTD)	RTD – Fastracks – West Corridor - Construction	18%
Mass., Bay Transit Authority (MBTA)	Green Line Extension (GLX) – overall goal	13.5%
Michigan DOT	M-1 Rail – overall goal	11%
Tri - Met	MAX – Light Rail Project – overall goal	16%
AVERAGE GOAL		12.3%

*Goal figures have been rounded

The calculated average contract-specific DBE goal amounted to 12.3%, which was found to be in alignment with SANDAG's Base Figure of 11.3%. Therefore, no further adjustment to the Base Figure was recommended to be taken.

D. Other Evidence

SANDAG has not received any anecdotal evidence nor is aware of any other factors or adverse considerations that would have a material effect on DBEs availability within SANDAG's market place, or on DBEs ability to participate (meeting bonding, insurance and financial requirements) in SANDAG's Project at this time. However, the public facilitation process may result in the identification of evidence that may have a material effect on the proposed DBE goal's Base Figure which would require an adjustment. Prior to finalizing this goal-setting process and establishing the Overall DBE Project Goal this factor will once again be considered if new evidence is identified. SANDAG will continue to explore and consider all available evidence that materially would affect the opportunities for DBEs to form, grow, and compete in developing this and future Overall DBE Project goals, as applicable.

IV. GOAL APPLICATION

The information SANDAG reviewed in Step 2 does not merit an adjustment, therefore we propose an overall DBE project goal of 11.3%.

The proposed Overall DBE Project Goal includes both race-conscious and race-neutral elements. SANDAG and the CM/GC firm will implement race-conscious and race-neutral measures to achieve this goal. The race-neutral measures are described in the following section. Additionally SANDAG will require the CM/GC firm to develop a DBE and Small business subcontracting plan that will specify their approach to implementing these race-conscious and race-neutral measures. The subcontracting plan will also require the CM/GC firm to be responsible for establishing subsequent contract goals, as appropriate, for the subcontracts it lets, in conformance with 49 CFR Section 26.53(e).

RACE-NEUTRAL/RACE-CONSCIOUS PROJECTIONS

SANDAG participated in the Southern California Regional Disparity Study Consortium Disparity Study and possesses first-hand evidence of discrimination in its transportation contracting program. As such, and in accordance with guidance issued by the US DOT in response to the Western States Paving Company case, SANDAG projects to meet the overall DBE project goal through the use of both race-neutral and race-conscious elements.

In establishing the race-conscious component of the Overall DBE Project Goal, SANDAG applied a method consistent to that performed for similar FTA-funded projects (see Table 4 above). Based on the availability of DBE firms that are ready, willing and able to perform on the Project, SANDAG projects that 10.2% of the 11.3% goal would be met by utilizing race-conscious measures, by utilizing contract specific UDBE numeric goals, as necessary to achieve the race-conscious component of the Overall DBE goal. SANDAG will prescribe a contract

specific UDBE goal for the pre-construction phase and separate contract-specific UDBE goals for the construction phase. Associated Good Faith Efforts requirements will be included in the Project Request for Proposal (RFP). Under the Good Faith Efforts requirements, the CM/GC firm will be responsible for establishing subsequent contract goals, as appropriate, for the subcontracts it lets, in conformance with 49 CFR Section 26.53(e). SANDAG will maintain oversight of the CM/GC firm’s Good Faith Efforts activities during the duration of the Project to ensure compliance with the DBE Program requirements of 49 CFR Part 26.

The remaining 1.1% of the 11.3% goal is projected to be achieved utilizing race-neutral methods in accordance with Title 49 CFR Part 26.51. The application of race-conscious goals on the Project would continue to be used only to the extent necessary to achieve SANDAG’s Overall DBE Project Goal.

TABLE 5

RACE-CONSCIOUS & RACE-NEUTRAL PROJECTIONS	
Overall DBE Project Goal	11.3%
Race-Conscious Component	10.2%
Race-Neutral Component	1.1%

Projection of DBE Participation Anticipated by Fiscal Year

The following table shows the anticipated level of DBE participation through the life of the project.

TABLE 6

Fiscal Year	Anticipated DBE Participation
Year 1	0.5%
Year 2	2.0%
Year 3	4.0%
Year 4	3.5%
Year 5	1.3%
Total Overall DBE Goal	11.3%

V. RACE-NEUTRAL IMPLEMENTATION MEASURES

In accordance with Title 49 CFR Part 26.51, SANDAG plans to require full implementation of the following race-neutral measures in conjunction with others necessary to meet DOT's DBE program objectives and SANDAG's race-neutral component of its Overall DBE Project goal for the Project, including but not limited to:

- SANDAG will structure and present the PROJECT solicitation and schedules in ways that facilitate DBE and other small business participation with prospective CM/GC firms. SANDAG will also facilitate Small Business conferences for the PROJECT, which includes a networking component to promote teaming opportunities between prospective CM/GC firms and the DBE and Small Business contracting community.
- SANDAG will require the CM/GC firm to provide assistance to Small Business including DBEs in overcoming limitations such as inability to obtain bonding or financing. SANDAG will additionally refer the DBE and Small Business contracting community to the SBA Bonding Assistance Program.
- SANDAG will carry out a communications effort to inform DBEs and other Small Businesses of opportunities that may be available with the CM/GC firm on the PROJECT.
- SANDAG will assist the CM/GC firm with identifying work areas by trade for DBE and Small Business subcontracting.
- SANDAG will consider pre-qualifying DBE and Small Business subcontractors early in the procurement phase and provide technical assistance to increase the pre-qualification of DBE and Small Business firms.
- 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, SANDAG will actively promote Small Business conferences, programs and supportive services currently offered by peer agencies which have mature DBE and Small Business Programs and are seeking increased DBE and Small Business participation in their programs.

SANDAG will advise the CM/GC firm and other contractors seeking to participate on the PROJECT to utilize the online directory of certified DBEs, found at the California Unified Certification Program website: www.CaliforniaUCP.com as well as the DGS database: www.pd.dgs.ca.gov.

VI. PUBLIC PARTICIPATION AND FACILITATION

In accordance with Public Participation Regulatory Requirements of 49 CFR Part 26, minority, women, local business chambers, and community organizations within SANDAG's market area will be consulted and provided an opportunity to review this goal analysis. SANDAG will prepare an Outreach documents advising the aforementioned business community of the DBE goal analysis and its availability for review and input.

SANDAG will also issue a Public Notice of the proposed Overall DBE Project Goal for the Project in the San Diego Union-Tribune, a general circulation media and consider all or most of the following small business and minority focused media and trade publications: Compliance News, DBE Goodfaith, Minority Proposer/Bidders Bulletin & Construction Update, Small Business Exchange, W/M/S/DVBE Contract & Construction News & Thomas Bid Register and Construction Bid Source. Such Notice will inform the public that the goal and its rationale is available for inspection at SANDAG's offices (from 8:00 a.m. to 4:30 p.m., Pacific Standard Time, Monday through Friday), for 30 days following the date of the Public Notice and that SANDAG will accept comments on the goal analysis for 45 days from the date of the Public Notice. The Notice will also include, as required, the FTA's point of contact information, as follows:

FTA Point of Contact Information for the DBE Program

- Derrin Jourdan, Civil Rights Officer
201 Mission, Suite 1650, San Francisco, CA 94105;
(415) 744-2729

The notice shall additionally include the address to which comments may be sent and phone number for questions.

VII. Prompt Payment Mechanisms

SANDAG will include the following clause in the CM/GC contract, which includes flow down provisions:

PROMPT PAYMENT

CM/GC firm agrees to pay each subcontractor under this contract for satisfactory performance of its contract no later than 10 days from the receipt of each payment the CM/GC firm receives from SANDAG. Any delay or postponement of payment from the above referenced time frame may occur only for good cause following written approval from SANDAG. This clause applies to all (DBE and non-DBE) subcontractors and subconsultants.

PROMPT PAYMENT OF FUNDS WITHHELD TO SUBCONTRACTORS

SANDAG shall hold retainage from the CM/GC firm and shall make prompt and regular incremental acceptances of portions, as determined by SANDAG, of the contract work, and pay retainage to the CM/GC firm based on these acceptances. The CM/GC firm, or subcontractor, shall return all monies withheld in retention from a subcontractor within 30 days after receiving payment for work satisfactorily completed and accepted including incremental acceptances of portions of the contract work by SANDAG. Federal law (49CFR26.29) requires that any delay or postponement of payment over 30 days may take place only for good cause and with the agency's prior written approval. Any violation of this provision shall subject the violating CM/GC firm or subcontractor to the penalties, sanctions and other remedies specified in Section 7108.5 of the Business and Professions Code. These requirements shall not be construed to limit or impair any contractual, administrative, or judicial remedies otherwise available to the CM/GC firm or subcontractor in the event of a

dispute involving late payment or nonpayment by the CM/GC firm, deficient subcontract performance, or noncompliance by a subcontractor.

DRAFT

**ATTACHMENT I
ESTABLISHMENT OF THE NUMERATOR:**

Number of established DBE firms by NAICS work categories within SANDAG's market area
(Defined as Imperial, Riverside, and San Diego counties) ¹

WORK CATEGORIES		NUMBER OF FIRMS BY COUNTY			
NAICS CODES	NAICS CATEGORY OF WORK	IMPERIAL	RIVERSIDE	SAN DIEGO	TOTAL
236220	Commercial and institutional building construction	0	2	19	21
237110	Water and sewer line and related structures construction	0	2	3	5
237120	Oil and gas pipeline and related structures construction	0	1	0	1
237130	Power and communication line and related structures construction	0	0	0	0
237210	Land subdivision	0	1	1	2
237310	Highway, street, and bridge construction	0	10	13	23
237990	Other heavy and civil engineering construction	0	2	9	11
238210	Electrical contractors and other wiring installation contractors	1	10	15	26
238290	Other building equipment contractors	0	0	2	2
238910	Site preparation contractors	0	5	10	15
423420	Office Equipment Merchant Wholesalers	0	0	0	0
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	0	0	0	0
423830	Industrial machinery and equipment merchant wholesalers	0	0	1	1
454390	Other Direct Selling Establishments	0	0	0	0
492110	Couriers and Express Delivery Services	0	0	0	0
511130	Book Publishers	0	0	1	1
511210	Software Publishers	0	0	2	2
517210	Wireless Telecommunications Carriers (except Satellite)	0	0	1	1
517919	All Other Telecommunications	0	0	1	1
531120	Lessors of Nonresidential Buildings (except Mini warehouses)	0	0	1	1

541611	Administrative management and general management consulting services	0	7	24	31
541614	Process, physical distribution, and logistics consulting services	0	1	4	5
541618	Other management consulting services	2	11	58	71
541620	Environmental Consulting Services	0	5	29	34
811212	Computer and Office Machine Repair and Maintenance	0	0	0	0
812930	Parking lots and garages	0	0	0	0
TOTAL NUMBER OF DBE FIRMS		3	57	194	254

¹ **DATA SOURCE:** California UCP DBE Database of Certified Firms.

DRAFT

**ATTACHMENT II
 ESTABLISHMENT OF THE DENOMINATOR:**

Number of ALL established firms (DBE and Non-DBE) by NAICS work categories within
 SANDAG's market area
 (Defined as Imperial, Riverside, and San Diego counties) ¹

WORK CATEGORIES		NUMBER OF FIRMS BY COUNTY			
NAICS CODES	NAICS CATEGORY OF WORK	IMPERIAL	RIVERSIDE	SAN DIEGO	TOTAL
236220	Commercial and institutional building construction	11	242	444	697
237110	Water and sewer line and related structures construction	4	72	64	140
237120	Oil and gas pipeline and related structures construction	0	16	10	26
237130	Power and communication line and related structures construction	2	39	42	83
237210	Land subdivision	0	46	111	157
237310	Highway, street, and bridge construction	3	52	84	139
237990	Other heavy and civil engineering construction	3	31	37	71
238210	Electrical contractors and other wiring installation contractors	16	406	623	1,045
238290	Other building equipment contractors	0	29	48	77
238910	Site preparation contractors	14	177	217	408
423420	Office Equipment Merchant Wholesalers	2	12	85	99
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	3	23	117	143
423830	Industrial machinery and equipment merchant wholesalers	11	74	184	269
454390	Other Direct Selling Establishments	11	96	195	302
492110	Couriers and Express Delivery Services	5	42	92	139
511130	Book Publishers	0	5	51	56
511210	Software Publishers	0	9	139	148
517210	Wireless Telecommunications Carriers (except Satellite)	6	50	110	166
517919	All Other Telecommunications	0	15	47	62
531120	Lessors of Nonresidential Buildings	11	97	334	442

(except Mini warehouses)					
541611	Administrative management and general management consulting services	6	194	859	1,059
541614	Process, physical distribution, and logistics consulting services	6	27	90	123
541618	Other management consulting services	1	19	81	101
541620	Environmental Consulting Services	1	46	122	169
811212	Computer and Office Machine Repair and Maintenance	5	25	60	90
812930	Parking lots and garages	6	35	263	304
TOTAL NUMBER OF ALL FIRMS		127	1,879	4,509	6,515

¹ **DATA SOURCE:** 2011 U.S. Census Bureau: County Business Patterns Database

DRAFT