



Public Notice
City of Nashua, New Hampshire
(DBE) Participation Goal 2022, 2023 and 2024

The City of Nashua Transit System established a Disadvantaged Business Enterprise (DBE) Program and Policy (DBE Program) in accordance with the regulations of the Federal Transit Administration of the U.S. Department of Transportation (DOT), 49 CFR Part 26. Nashua Transit System (NTS) receives Federal financial assistance for the operation of its public bus transit system from the Federal Transit Administration (FTA), and has established its Disadvantaged Business Enterprise (DBE) participation Goal for Federal Fiscal Years 2022, 2023, and 2024. The DBE goal is 7% for the goal period on all funds that Nashua will expend on (non-rolling stock) projects funded by the Department of Transportation.

A description of the goal methodology is available for public inspection for 30 days following the date of this notice between the hours of 9:00 am – 4:00 pm, Monday through Friday at the Nashua Transit Administration Building located at 11 Riverside St. To view an electronic copy of the DBE goal visit www.ridebigblue.com. The DBE goal and goal revisions may be found on the NTS website at www.ridebigblue.com through September 30, 2024.

Nashua Transit System will accept public comment on the proposed goal for a period of 45 days from the date of this notice. NTS will submit the DBE goal to the FTA on August 1, 2021. Comments may be directed to Camille Correa, NTS Transit Administrator:

By phone: 603-821-2035
By email: correac@nashuanh.gov
By mail: 11 Riverside Street, Nashua, NH 03062



Noticia pública
Ciudad de Nashua, New Hampshire
(DBE) Meta de participación 2022, 2023 y 2024

El Sistema de Tránsito de la Ciudad de Nashua estableció un Programa y Política (Programa DBE) de Empresas Comerciales Desventajadas (DBE) de acuerdo con las regulaciones de la Administración Federal de Tránsito del Departamento de Transporte de los Estados Unidos (DOT), 49 CFR Parte 26. Sistema de Tránsito de Nashua (NTS) recibe asistencia financiera federal para el funcionamiento de su sistema de transporte público de autobuses de la Administración Federal de Tránsito (FTA), y ha establecido su Meta de participación de empresas comerciales en desventaja (DBE) para los años fiscales federales 2022, 2023 y 2024. La meta de DBE es el 7% para el período de la meta de todos los fondos que Nashua gastará en proyectos (material no rodante) financiados por el Departamento de Transporte.

Una descripción de la metodología de metas está disponible para inspección pública durante los 30 días posteriores a la fecha de este aviso entre las 9:00 am y las 4:00 pm, de lunes a viernes en el Edificio de Administración de Tránsito de Nashua ubicado en 11 Riverside St. Para ver una copia electrónica de la meta de DBE visite www.ridebigblue.com. Las metas de DBE y las revisiones de las metas se pueden encontrar en el sitio web de NTS en www.ridebigblue.com hasta el 30 de septiembre de 2024.

Nashua Transit System aceptará comentarios públicos sobre la meta propuesta por un período de 45 días a partir de la fecha de este aviso. NTS enviará la meta de DBE al FTA el 1 de agosto de 2021. Los comentarios pueden dirigirse a Camille Correa, administradora de tránsito de NTS:

Por teléfono: 603-821-2035

Por correo electrónico: correac@nashuanh.gov

Por correo: 11 Riverside Street, Nashua, NH 03062



NASHUA TRANSIT SYSTEM FTA DBE Goal for FY2022 – FY2024

Overall Goals (§26.45)

The City of Nashua's overall goal for FY 2022 – FY 2024 is to expend 22% during FY22 and .04% during FY2023 and .04% during FY2024 of the amounts received from Federal financial assistance in DOT-assisted contracts (exclusive of FTA funds to be used for the purchase of transit vehicles) with small business concerns owned and controlled by socially and economically disadvantaged individuals (DBEs). It is the intent that the expenditure be obtained through a race-neutral program method.

Given the amount of DOT assisted contracts Nashua Transit System expects to let during FY2022-FY2024 fiscal years/projects, which is approximately \$11,200,000 we have set a goal of expending \$1,152,640 with DBEs during these fiscal years/projects.

Nashua Transit System plans include the following:

- Transit Center Retrofit Project during FY22 awarded to a DBE Firm.
- Labor and other direct costs from First Transit all three years

Race-Conscious / Race-Neutral

Nashua Transit System's goals have not been met during the last three (3) years. During this period, Nashua Transit System was purposeful in trying to meet the goal of .7% on a race-neutral basis.

The current capacity of DBE's to undertake work required by the transit system is deemed to be inadequate do to the nature of Nashua Transit System's relatively small procurements. The exception to this will be FY22 with our Transit Center Retrofit Project.

NTS will not set DBE race-conscious goals due to the limitation of projects.

Methodology

The methodology used to establish the goal is selected from those considered reasonable by the Federal Transit Administration (see 49 CFR Section 26.45). Nashua Transit will utilize the State of New Hampshire's DBE directory and Census Bureau Data. Nashua Transit's determination will be based on a level of DBE participation relative to all businesses, ready willing and able to participate on federally assisted contracts. The calculations are based on the following:

Step 1. Base Figure

Data Sources: The DBE goal was found by determining the number of businesses listed by the 2019 US Census Bureau in the County Business Pattern and filtered for firms in the North American Industry Classification System (NAICS) Subsectors. The market area includes Hillsborough County and Rockingham County as well as Middlesex County in MA. This includes the surrounding regions to the north, west and east in NH, and the largest cities in the state, as well as the area to the south in MA.

The US Census Bureau County Business Pattern database may be used for determining the number of businesses that exist and with which Nashua Transit may do business, including General Contractors, Electrical, Ventilation, Printing and Related Support Activities, Sign Manufacturing, Motor Vehicle Supplies, Office Equipment, Computer Equipment/Software, Petroleum and Petroleum Products, Commercial Janitorial Supplies, Tires, Fuel, Motor Vehicle Towing, and Advertising Agencies.

Comparing our types of procurement with the Industry Code description, we counted those classifications for vendors with whom we might do business. Those industry NAICS Codes are four, five or six digit codes, so as to derive a number that is as realistic as possible. The total number of vendors thus identified is 1391. This number will be used as the denominator. The numerator was found by determining the number of ready, willing and able NH DBE certified firms within the same NAICS Sub sectors, which Nashua Transit System identified as 5 utilizing the State of NH DBE Directory.

The annual operating, planning and capital maintenance costs which will also include the estimated associated costs of our Transit Center Retrofit project, which is being done with a Prime DBE vendor, NTS anticipates a 22% yield in FY22.

Dividing the DBE number of 5 by the total of available firms 1,391 yields .4% during FY23 and FY24.

Prime Contractors that Nashua Transit System intends to let in the upcoming 3 Federal Fiscal Years include construction; advertising; operations and direct labor; and scheduling software. Nashua Transit System does expect to contract with a DBE direct vendor for our construction project in year one of the next three years.

The current capacity of DBE's to undertake work required, during a normal year, by the transit system is deemed to be inadequate do to the nature of Nashua Transit System's relatively small procurements. Because NTS has a relatively small procurement base we did not use weighting in establishing the Base Figure.

**FY2022-2024 DBE WORKSHEET - NEW HAMPSHIRE 2019 COUNTY
BUSINESS PATTERNS (NAICS)**

NAICS CODES	INDUSTRY DESCRIPTION	MIDDLESEX COUNTY, MA	HILLSBOROUGH COUNTY NH	ROCKINGHAM COUNTY NH	LISTED DBE IN NH DOT Directory October 2019	BASE FIGURE
323111	<i>Printing - Commercial</i>	102	25	15	1	
423120	<i>Motor Vehicle Supplies</i>	42	15	17	0	
423420	<i>Office Equipment</i>	72	17	9	1	
424710	<i>Petroleum and Petroleum Products</i>	5	0	3	1	
424990	<i>Commercial Janitorial Supplies - other misc nondurable goods</i>	43	18	17	1	
441320	<i>Tire Dealers</i>	65	32	34	0	
454310	<i>Fuel</i>	71	23	23	1	
488410	<i>Motor Vehicle Towing</i>	50	19	13	0	
561720	<i>Janitorial Services</i>	412	121	86	0	
561740	<i>Carpet Cleaning</i>	26	6	5	0	
	TOTALS	888	276	222	5	0.4%

Step 2: Adjustment to base figure

Section 26.45 requires examination of other factors to determine if the base figure should be adjusted. NTS determined that because we did not meet our DBE goal during the last several years that we will not need to adjust our base figure.

Agency Actions to Encourage DBE Participation

Nashua Transit System plans to provide notice of bidding opportunities in the categories listed in the table on page 3 to the DBE firms included on that table as well as any DBE firms added to NHDOT's DBE list during the period of FY2022 through FY2024.

Nashua Transit System will also pursue partnership with the following organizations to encourage participation:

- Souhegan Valley Chamber of Commerce
- Nashua Chamber of Commerce
- NH Small Business Development Center – Nashua Branch
- City of Nashua Economic Development Division
- CWE New Hampshire Center - Women Business Center
- Local Colleges and Universities
- Greater New England Minority Supplier Development Council
- State of New Hampshire Department of Transportation

Consultative Process

NTS conducted outreach with organizations and the feedback is summarized below:

Cheryl Anderson, Fuel Media 5/18/21

City of Tallahassee and the County has a certification process for DBEs to become verified as responsive and responsible bidders and will receive automatic updates on bid releases.

Are there options to receive extra points on Bids if they are a DBE or a subcontractor is a DBE? Sometimes the lowest price bid options are not viable for DBEs to be competitive.

Tim Cummings, City of Nashua Economic Development Director 5/25/21

The procurement process needs to be simple to work with minority and small businesses. Being sensitive to this is key, and ensuring the procurement process is not too onerous is key to attracting DBEs. Working to build relationships, so small and minority businesses will feel more comfortable and confident bidding on the work is extremely important.

He has received feedback from small and disadvantaged businesses that the DBE Certification process is too much of a challenge with little perceived value, as there is no guarantee of an increase in business.

Travis Toner

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Continue to partner with NH DOT External EEO Coordinator to market and educate interested groups on the DBE certification process.

Nashua Transit System maintains the current DBE Goal and Program on the Nashua Transit System website. The FY 2022 - FY 2024 goal expires on September 30th, 2024.