

COUNCIL MEETING
July 24, 2007

Honorable Mayor and Members
of the City Council
City Hall
Torrance, California

Members of the Council:

SUBJECT: Transit – Adoption of Torrance Transit’s Overall Annual Disadvantaged Business Enterprises (DBE) Goal of 4% for Federal Fiscal Year (FFY) 2007/2008

Expenditure: N/A

RECOMMENDATION

Recommendation of the Transit Director that City Council approve the Overall Annual Disadvantaged Business Enterprises (DBE) Goal of 4% for FFY 2007/2008, for submission to the Federal Transit Administration (FTA).

FUNDING

City Council approval of the Overall Annual DBE Goal for FFY 2007/2008 is required to ensure compliance with Department of Transportation (DOT) funding agreements. Failure to do so will compromise Torrance Transit’s DOT financial assistance.

BACKGROUND AND ANALYSIS

Torrance Transit System is required to develop and submit an Overall Annual Goal for DBE participation on U.S. DOT – (FTA) assisted contracts, as a condition of federal financial assistance, pursuant to recently revised regulations set forth under Title 49 CFR Part 26; Participation by Disadvantaged Business Enterprises in Torrance Transit System’s Programs. In accordance with these DBE regulations, the Torrance Transit System has established an Overall Annual DBE Goal for Federal Fiscal Year 2008, to ensure full compliance with relevant regulatory requirements.

The Established Overall Annual DBE Goal of 4% for FFY 2007/08 DOT- (FTA) assisted contracts addresses critical components and fulfills specific requirements for narrow tailoring in accordance with Title 49 CFR Part 26. Torrance Transit System’s Established Overall Annual DBE Goal was developed utilizing the federal prescribed two-step goal setting methodology. Step I included establishing a Base Figure utilizing quantifiable evidence to determine the relative availability of DBEs within specified industries identified as a part of

the Agency's DOT- (FTA) assisted contracting projects anticipated to be awarded by the Torrance Transit System within FFY 2008. The Agency utilized the Caltrans Calcert Directory of Certified DBE firms and the 2001 U.S. Census Bureau County Business Patterns database to complete this step. Upon establishing the Base Figure, the Agency surveyed and assessed other known relevant evidence to determine what additional adjustments, if any, were needed to narrowly tailor the Base Figure to the Torrance Transit System's market area. Factors considered in the adjustment of the Base Figure included the historical and current capacity of DBEs measured by actual attainments on similar projects. Following the Council's approval of Established Overall Annual Goal for FFY 2008, staff will submit to FTA for their final review.

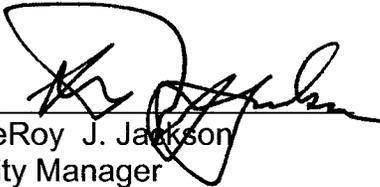
Since April of 2006, Torrance Transit implemented a wholly race-neutral Disadvantaged Business Enterprise (DBE) program in accordance with directives issued by the DOT, and plans to continue this practice. The Established Overall Annual Goal for Federal Fiscal Year 2008 will be updated annually, to maintain relevancy to local market conditions and factors impacting DBE availability.

Additionally, Public Outreach was initiated on July 12, 2007, with a series of letters that included a copy of the proposed goal and goal setting methodology being sent to DBE community leaders. In addition, Public Notice of the proposed goal will be published in two area publications (the Daily Breeze and La Opinion).

Respectfully submitted,


 Kim Turner
 Transit Director

CONCUR:


 LeRoy J. Jackson
 City Manager

Attachment: Overall Annual DBE Goal for FFY 2007/08

**TORRANCE TRANSIT
DISADVANTAGED BUSINESS ENTERPRISE (DBE)
OVERALL ANNUAL DBE GOAL AND METHODOLOGY
FOR
FEDERAL FISCAL YEAR (FFY) 2007/08
(Covering the period of October 1, 2007 to September 30, 2008)**

I. INTRODUCTION

Torrance Transit is required to develop and submit a Disadvantaged Business Enterprise (DBE) Overall Annual Goal for DBE participation as a condition of receiving federal assistance, pursuant to Section 1101 of the Transportation Equity Act for the 21st Century; 49 CFR Part 26 “Participation by Disadvantaged Business Enterprises in U.S. Department of Transportation Programs”; and the Federal Transportation Administration (FTA) Master Agreement.

II. BACKGROUND

Effective April 24, 2006, Torrance Transit implemented a wholly race-neutral Disadvantaged Business Enterprise (DBE) program in accordance with directives issued by the Department of Transportation. As a result of the Ninth Circuit U.S. Court of Appeals decision in the Western States Paving Co. v. United States & Washington State Department of Transportation, the Federal Transit Administration (FTA) issued a NOTICE (guidance) (Docket No. FTA-2006-24063) on March 23, 2006 stipulating a Notice of New Policy implementation and requests for comments to Public Transportation Providers regarding DOT’s DBE Program.

PERTINENT ASPECTS OF THE GUIDANCE (NOTICE):

- If a recipient does not currently have sufficient evidence of discrimination or its effects, then the recipient would submit an all race-neutral overall DBE goal for FFY 2007 and forward.
- The recipient submission shall include a statement concerning the absence of adequate evidence of discrimination and its effects and a description of plans to either conduct a disparity/availability study or other appropriate evidence gathering process to determine the existence of discrimination or its effects on the recipient’s marketplace.
- An action plan describing the study and timeline for its completion should also be included.

- Effective April 24, 2006, FTA recipients, are required to implement a race-neutral DBE Program to ensure compliance with the Ninth Circuit Court's decision in the Western States v. United States & Washington State DOT ruling.
- Recipients will be required to continue to monitor, collect and report participation and utilization of DBEs on Federal-aid contracts.
- All DOT Federal-Aid procurements shall contain Race-Neutral DBE solicitation and contract language.

Accordingly, Torrance Transit hereby presents its Overall Annual DBE Goal Methodology for FFY 2007/08.

III. DOT-ASSISTED CONTRACTING PROGRAM FOR FFY 2007/08

Table 1 represents Torrance Transit's DOT-assisted contracting program that was considered in preparing its *Overall Annual DBE Goal-Setting Methodology*. The fiscal year's contracting program includes four (4) applicable DOT- (FTA) assisted projects, which were assessed in preparing the Agency's *Overall Annual DBE Goal-Setting Analysis*. All projects listed have viable contracting and subcontracting possibilities and are anticipated to be awarded with the given federal fiscal year 2007/08.

Table 1

PROJECT	Total Estimated Project Cost	Estimated Federal Dollar Share of Construction	Estimated Federal Dollar Share of Professional Services	Estimated Federal Dollar Share of Materials & Supplies
Office/Admin Remodel	\$200,000	\$80,000	\$60,000	\$20,000
Transit Enhancements	\$182,500	-0-	\$30,000 *	\$116,000
Bus Washer System	\$150,000	-0-	\$20,000*	\$30,000
Heavy Duty Bus Cleaning System	\$150,000	-0-	\$20,000*	\$30,000
Supervisor Vehicle (4) Enhancements	\$100,000	-0-	-0-	\$80,000
Relief (3) Vehicle	\$56,250	-0-	-0-	\$45,000

Bus Replacement (3) (TVM Procurement)	\$1,850,000	-0-	\$50,000 *	\$1,656,000
TOTAL EXEMPT		-0-	\$120,000	\$1,781,000
TOTAL NON-EXEMPT		\$80,000	\$60,000	\$196,000

Pursuant to 49 CFR Part 26.45 (e)(2) and 29 CFR Part 26.49 (a), contracts for the purchase of transit vehicles are excluded from recipients Overall Annual Goal Setting consideration as these purchases are addressed under the Transit Vehicle Manufacturer (TVM) Provisions of the regulations. Accordingly, the "Supervisor Vehicle (4) Enhancements", "Relief (3) Vehicle" and the "Bus Replacement (3)" Projects noted in Table 1 (shaded in gray) have been excluded from this analysis.

Additionally, the Professional Services components for all Projects noted in Table 1 (illustrated with an asterisk) were exempted from this analysis as the work will be performed internally by the Agency with its own personnel.

Table 2 provides a summary of work grouped into three (3) primary categories: Materials and Supplies, Professional Services and Construction, utilizing the North American Industry Classification System (NAICS) work categories and comparable 2005 Census Business Patterns NAICS Work Codes. *Table 2* also serves to identify the estimated Federal Dollar Share and Percent of Federal Funding, as follows:

Table 2

CONTRACT CATEGORY	CUCP DATABASE ¹	CENSUS BUSINESS PATTERN DATABASE ¹	ESTIMATED FEDERAL DOLLAR SHARE	% OF FEDERAL FUNDING
Materials & Supplies	325510	325510	\$196,000	58 %
Professional Services	541310	541310	\$60,000	18 %
Construction	239290	239290	\$80,000	24 %
TOTAL			\$336,000.00	100%

IV. GOAL METHODOLOGY

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

¹ Refer to Attachments I and II for corresponding detail of all work trades grouped under the primary NAICS Codes.

² §26.45 represents Title 49 CFR Part 26 regulatory referenced section.

To establish Torrance Transit's Base Figure of the relative availability of DBEs to all comparable firms (DBE and Non-DBEs) available to propose on Torrance Transit's FFY 2007/08 DOT-assisted contracting opportunities projected to be solicited; Torrance Transit followed one of the five prescribed federal goal-setting methodologies in accordance with Title 49 CFR Part 26 regulations. This was accomplished by accessing the *California Unified Certification Program (CUCP) Directory of Certified DBE Firms* and the *2005 U.S. Census Bureau County Business Patterns (CPB) Database*. Comparisons were made within Torrance Transit's market area (defined as Los Angeles County) and by specified industries and types of businesses identified in Table 2. Torrance Transit's local market area represents where the substantial majority of Torrance Transit's contracting dollars are expended and/or where the substantial majority of contractors and subcontractors bids or quotes are received.

Torrance Transit made a concerted effort to ensure that the scope of businesses included in the numerator was as close as possible to the scope 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: Census Bureau's Business Pattern Database

To determine the relative availability of DBEs, Torrance Transit divided the numerator³ representing the ratio of ready, willing and able DBE firms, by the denominator⁴ representing all firms (DBE and Non-DBEs) available in each work category. Application of this formula yielded the following baseline information:

$$\frac{\text{Number of Ready, Willing and Able DBEs}}{\text{Number of All Available Firms}} = \text{BASE FIGURE}$$

(including DBEs and Non-DBEs)

The Base Figure was further adjusted by weighting the relative availability of DBEs grouped within the primary work category. The Base Figure resulting from this weighted calculation is as follows:

³ Numerator represents all DBE firms established within Torrance Transit's market area.

⁴ Denominator represents all comparable available established firms.

Step 1: Base Figure: weighted by type of work to be performed and corresponding contracting dollars

Material & Supplies Services	Professional Services
Base Figure = 58% (<u>DBEs in NAICS 325510 *</u>) (CBPs in NAICS 325510 **)	Base Figure = 18% (<u>DBEs in NAICS 541310 *</u>) (CBPs in NAICS 541310 **)
Base Figure = $\left[\frac{.58 (7)}{114} \right]$	Base Figure = $\left[\frac{.18 (36)}{1003} \right]$
Base Figure = $\left[.58 (.0614) \right]$	Base Figure = $\left[.18 (.0359) \right]$
Base Figure = $\left[.0356 \right]$	Base Figure = $\left[.0065 \right]$

Construction Services	Total Weighting
Base Figure = 24% (<u>DBEs in NAICS 239290 *</u>) (CBPs in NAICS 239290 **)	Base Figure = .0356 + .0065 + .0013
Base Figure = $\left[\frac{.24 (40)}{7280} \right]$	Base Figure = (.0434) 100 = 4.34 = 4% (rounded)
Base Figure = $\left[.24 (.0055) \right]$	* For additional NAICS Codes from the California UCP DBE Database of Certified Firms, refer to Attachment I.
Base Figure = $\left[.0013 \right]$	** For additional NAICS Codes, refer to Attachment II

Step 2: Adjusting the Base Figure

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

Evidence considered in making an adjustment to the Base Figure included Torrance Transit's *Past DBE Goal Attainments, Bidders List, Disparity Studies, and other Local Agencies' DBE Goals and Attainments within Torrance Transit's jurisdiction and Other Evidence*. A summary of these considered follows:

A. Past DBE Goal Attainments

The following table reflects the demonstrated capacity of DBEs (measured by actual historical DBE participation attainments) on DOT-assisted contracts awarded by Torrance Transit within the last three fiscal years:

Table 3

PROJECT	DBE CONTRACT GOAL	DBE GOAL COMMITMENT	DBE GOAL ATTAINMENT
Automatic Vehicle Locator	2 %	2%	DBE Attainment Data Not Yet Available
HVAC	2 %	2%	DBE Attainment Data Not Yet Available
Automatic Vehicle Locator- Eiger Tech (non- DOT funded)			DBE Attainment Data Not Yet Available

Torrance Transit considered an adjustment to the Base Figure based on historical DBE goal attainments on similar contracts to those contracting opportunities identified and considered in the Overall Annual DBE Goal Analysis for this federal fiscal year 2007/08. Three (3) projects are listed in Table 3 above, however no DBE Goal attainment data is available at this time for these Projects as they are currently in progress. As such, this data did not merit an adjustment to the Base Figure.

Torrance Transit will utilize past participation data on future Overall Annual DBE Goal Analysis as data becomes available.

B. TORRANCE TRANSIT 's Bidders List

Although Torrance Transit has established a Bidders List for former years' Federally-Aided projects, the scope of work anticipated to be awarded under the current fiscal year was not represented in the list, therefore an adjustment to the Base Figure was not warranted. Torrance Transit will continue to capture such information from all bidders at the time of bid/proposal submission and will utilize such information in future goal-setting analysis.

C. Evidence from Disparity Studies

Torrance Transit is not aware of any current disparity study results available within Torrance Transit's market area to consider any further adjustment to the Step 1 Base Figure. However, Torrance Transit will participate in disparity studies to assess the existence of discrimination and its effects in the corresponding marketplace. Torrance Transit will utilize all relevant results in its application of future goal setting analysis.

D. Other Cities DBE Goals

Torrance Transit surveyed other FTA-recipients (local agencies) within its jurisdiction, with similar contracting programs to assess their DBE goals and attainments toward making an adjustment. However, no other Agencies DBE Goals (with similar contracting programs) have been posted within Torrance Transit's jurisdiction at this time, therefore, the Agency cannot compare other Agencies DBE Goals to make an adjustment. As there are no other comparable DBE Goals available, the City will not make an adjustment based on this factor.

E. Other Evidence

Torrance Transit did not receive any anecdotal evidence nor is aware of any other factors or adverse considerations that would have had a material affect on DBEs availability within Torrance Transit's market place, or on DBEs ability to participate (meeting bonding, insurance and financial requirements) in Torrance Transit's FTA-assisted contracting programs. Therefore, no goal adjustment was made in consideration of this factor. However, Torrance Transit will continue to explore and consider all available evidence that would materially affect the opportunities for DBEs to form, grow, and compete in Torrance Transit's FTA-assisted contracting programs.

OVERALL RESULTANT GOAL ADJUSTMENTS:

After careful consideration of the above and other relevant factors, the Step 1 Base Figure of 4% was not adjusted, resulting in Torrance Transit's Overall Annual DBE Goal of 4%.

V. RACE-NEUTRAL MEASURES

The Overall Annual DBE Goal for FFY 2007/08 for the Torrance Transit's DOT-assisted contracts is 4%. Torrance Transit will strictly implement race-neutral measures to meet its Overall Annual DBE Goal objectives, including but not limited to:

- Arranging timely solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate DBEs and other small business firms' participation.
- Unbundling large contracts to make them more accessible to small businesses, requiring or encouraging Service Providers to subcontract portions of work that they might otherwise perform with their own work forces.
- Providing information and communications programs on contracting procedures and specific contract opportunities.

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- Providing assistance to interested DBEs in obtaining bonding, lines of credit, and/or insurance requirements.

VI. PUBLIC PARTICIPATION AND FACILITATION

In accordance with Public Participation Regulatory Requirements of Title 49 CFR Part 26, minority, women, local business chambers, and community organizations within Torrance Transit's market area will be provided an opportunity to review the goal analysis. Torrance Transit will prepare Outreach Consultation Letters advising the aforementioned business community of the proposed DBE goals analysis and its availability for review.

Torrance Transit will also issue a Public Notice in a general circulation media and in at least one other minority/trade focused media publishing Torrance Transit's proposed Race-Neutral Overall Annual DBE Goal for the FFY 2007/08 DOT-assisted contracts. Such Notice will inform the public that the proposed goal and its rationale are available for inspection at Torrance Transit's principal office during normal business hours for 30 days following the date of the Public Notice and that Torrance Transit will accept comments on the goal analysis for 45 days from the date of the Public Notice. Additionally, Torrance Transit has published the Public Notice of the proposed Overall Annual DBE goal in two area publications on July 18, 2007. Upon completion of the required Public Facilitation Process, any revisions to our proposed goal resulting from this process will be forwarded to your attention.

**TORRANCE TRANSIT SYSTEM
DBE PARTICIPATION LEVEL
FOR FEDERAL FISCAL YEAR 2007/08**

ATTACHMENT I

ESTABLISHMENT OF THE NUMERATOR:

OF ESTABLISHED DBE FIRMS BY WORK CATEGORIES (CONSTRUCTION, PROFESSIONAL SERVICES AND MATERIALS & SUPPLIES) AND CORRESPONDING NAICS WITHIN TORRANCE TRANSIT SYSTEM'S MARKET AREA (DEFINED AS LOS ANGELES COUNTY)¹

MATERIALS & SUPPLIES:		BY CORRESPONDING ZIP CODE																	
325510	Paint and Coating Manufacturing	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	0	2	
327991	Cut Stone & Stone Product Manufacturing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
333319	Other Commercial and Service Industry Machinery Manufacturing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
334419	Other Electrical Component Manufacturing	0	0	0	0	0	0	2	0	0	0	0	1	0	0	0	0	3	
337124	Office Furniture (except wood) manufacturing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
337127	Institutional Furniture Manufacturing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
424950	Paint, Varnish, and Supplies Merchant Wholesalers	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	2	
		0	0	1	0	0	0	3	0	0	0	0	1	1	0	0	1	0	7

CONSTRUCTION:		BY CORRESPONDING ZIP CODE																
		7	2	2	0	1	2	1	0	2	0	0	2	2	0	5	0	26
238350	Finish Carpentry Contractors	7	2	2	0	1	2	1	0	2	0	0	2	2	0	5	0	26
239290	Other Building Equipment Contractors	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
238330	Flooring Contractors	6	2	0	1	1	0	0	0	1	0	0	2	0	0	1	0	14
		13	4	2	1	2	2	1	0	3	0	0	4	2	0	6	0	40

PROFFESIONAL SERVICES		BY CORRESPONDING ZIP CODE															
		22	6	1	2	0	0	0	0	2	1	0	2	0	0	0	36
541310	Architectoral, Engineering, and Related Services	22	6	1	2	0	0	0	0	2	1	0	2	0	0	0	36

1: DATA SOURCE: California UCP Directory of Certified DBE Firms.

**TORRANCE TRANSIT SYSTEM
DBE PARTICIPATION LEVEL
FOR FEDERAL FISCAL YEAR 2007/08**

ESTABLISHMENT OF THE DENOMINATOR

OF ESTABLISHED FIRMS (DBE's AND NON-DBE's) BY
WORK CATEGORIES (MATERIALS & SUPPLIES, CONSTRUCTION AND PROFESSIONAL SERVICES)
AND CORRESPONDING NAICS WITHIN TORRANCE TRANSIT SYSTEM'S MARKET AREA
(DEFINED AS LOS ANGELES COUNTY)¹

MATERIALS & SUPPLIES:			
Major Category:	NAICS CODE	NAICS DESCRIPTION	
	239290	Other Building Equipment Contractors	0 0
	325510	Paint and Coating Manufacturing	65 65
	327991	Cut Stone & Stone Product Manufacturing	35 35
	333319	Other Commercial and Service Industry Machinery Manufacturing	0 0
	334419	Other Electrical Component Manufacturing	64 64
	337124	Office Furniture (except wood) manufacturing	34 34
	337127	Institutional Furniture Manufacturing	35 35
	424950	Paint, Varnish, and Supplies Merchant Wholesalers	79 79
			114 114

CONSTRUCTION:			
Major Category:	NAICS CODE	NAICS DESCRIPTION	
	238350	Finish Carpentry Contractors	3421
	238330	Flooring Contractors	3859
			7280

PROFESSIONAL SERVICES			
Major Category:	NAICS CODE	NAICS DESCRIPTION	
	541310	Architectural, Engineering, and Related Services	1,003
			1,003

1: DATA SOURCE: 2005 U.S. Census Bureau: County Business Patterns, NAICS Work Category Codes

Construction:		Professional Services:		Materials & Supplies:		
	<u>40</u>		<u>36</u>		<u>7</u>	
	7280		1003		114	
0.24	0.0055	0.18	0.0359	0.58	0.061404	100%
	0.0013		0.0065		0.035614	
	0.0434		4.34% BASE FIGURE			



CITY OF
TORRANCE

TRANSIT DEPARTMENT

Kim Turner
Transit Director

310-618-6245
kturner@torrnet.com

RE: Request for Public Participation Review of Roseville's Proposed Disadvantaged Business Enterprise (DBE) Race Neutral Participation Goal for Federal Fiscal Year 2007/08 (FTA)

Dear Community Member:

As a direct recipient of federal funds, Torrance Transit has developed its Overall Annual Goal for Disadvantaged Business Enterprise (DBE) participation in its Federal Fiscal Year 2007/08 DOT-assisted contracts (FTA). However, in response to new policy race neutral directives issued by the Department of Transportation, Torrance Transit will implement its DBE Overall Annual Goal race neutrally. In a wholly race-neutral program, the recipient does not set race conscious contract goals on any of its U.S. DOT-assisted contracts for which DBE subcontracting possibilities exist. Torrance Transit will actively participate in availability/disparity studies designed to assess the existence of discrimination or its effects within the regions marketplace and will utilize these studies in future goal setting applications.

Therefore, effective April 24, 2006, Roseville has implemented a wholly race-neutral DBE program in direct response to the Ninth Circuit U.S. Court of Appeals decision in the Western States Paving Co. v. United States & Washington State Department of Transportation.

As a part of the goal-setting public facilitation process, the City is required to solicit public comment, relative to the goal calculation and rationale. Accordingly, for your review and that of your memberships, Torrance Transit has enclosed the **Public Notice** advising businesses of its goal, and the availability to review the goal calculation, rationale and to provide input and comments. Raul Cervantes, DBE Liaison Officer, will serve as the contact person for coordinating the review of the goal-setting process and can be contacted at 916-746-1300.

Torrance Transit is fully committed to fulfilling the spirit and intent of the U.S. DOT DBE Rule, Title 49 CFR Part 26 in all of Torrance's DOT-assisted contracts. Your support of these efforts is greatly appreciated.

Sincerely,

Kim Turner
Transit Director

Enclosure: Public Notice



PUBLIC NOTICE

TORRANCE TRANSIT SYSTEM

NOTICE IS HEREBY GIVEN, that the Torrance Transit System (Herein after referred to as the Agency), has established a Proposed Race-Neutral Overall Annual Disadvantaged Business Enterprise (DBE) Goal of **4%**, for Federal Fiscal Year 2007/08. The DBE Goal is applicable to DOT-(FTA) assisted contracting opportunities scheduled to be awarded during the period of October 1, 2007 through September 30, 2008. The Agency's Proposed Overall Annual Goal and its rationale (developed in response to U.S. Department of Transportation's Disadvantaged Business Enterprise Program Regulations published under Title 49 CFR Part 26) are available for inspection for thirty (30) days following the date of this Notice, from 8:30 a.m. to 4:30 p.m., Pacific Standard Time, Monday through Friday at the Agency located at:

Torrance Transit System
20500 Madrona Avenue
Torrance, CA 90503
Attn: Mr. Jim Mills
Telephone: (310) 618-6291

Comments will be accepted on the Goal for forty-five (45) days from the date of this Notice. Comments can be forwarded to Mr. Jim Mills at the Torrance Transit System, at the above stated address, or to Mr. Derrin Jourdan, Civil Rights Officer, U.S. Department of Transportation, Federal Transit Administration, 201 Mission Street, Suite 2210, San Francisco, CA, 94105.

Dated at Torrance, California, this 1st day of August, 2007.


FOR Jim Mills
Transit Administration Manager

Carson Chamber of Commerce
530 E. Del Amo Blvd
Carson, CA 90746
Mr. John Wogan, Executive Director

Latin Business Association
120 South San Pedro Street, Suite 530
Los Angeles, Ca 90012
Mr. Ray Durazo

Greater L.A. African American C/C
3910 West Martin Luther King, Jr. Blvd
Los Angeles, California 90008
Rae Jones, Executive Director

Japanese Chamber of Commerce of
Southern California
244 S. San Pedro St. #504
Los Angeles, Ca 90012
Attn: Shinji Abe

Hermosa Beach Chamber of
Commerce
1007 Hermosa Avenue
Hermosa Beach, CA 90254-3717
Ms. Carla Merriman, Executive Director

Korean American Chamber of
Commerce of Los Angeles
3440 Wilshire Blvd. #520
Los Angeles, CA 90010

Lawndale Chamber of Commerce
15424 S. Hawthorne Blvd. #102
Lawndale, CA 90260-2176
Ms. Kathleen Zuhde, Executive Director

American Indian Chamber of
Commerce of California
11138 Valley Mall Ste. 200
El Monte, CA 91731
Ms. Tracy Stanhoff, President

Manhattan Beach Chamber of
Commerce
425 Fifteenth Street
Manhattan Beach, CA 90266
Ms. Helen Duncan, Executive Director

National Association of Women
Business Owners
900 Wilshire Blvd. Suite 404
Los Angeles, CA 90017
Ms. Helen Han, Executive Director

Palos Verdes Peninsula Chamber of
Commerce
707 Silver Spur Road, Suite 100
Rolling Hills Estates, CA 90274
Mr. Jerry Jeffe, President/CEO

Redondo Beach Chamber of
Commerce
200 N. Pacific Coast Highway
Redondo Beach, CA 90277
Ms. Marna Smeltzer

Torrance Chamber of Commerce
3400 Torrance Blvd., Ste. 100
Torrance, California 90503
Ms. Barbara Glennie, President/CEO

Asian Business Association
1111 Corporate Center Dr
Monterey Park, CA 91754

Chinese Chamber of Commerce
977 N. Broadway, G/F., #E
Los Angeles, CA 90012

July 25, 2007

Mr. Derrin Jourdan
Civil Rights Officer, Region IX
U.S. Department of Transportation
Federal Transit Administration
201 Mission Street, Suite 2210
San Francisco, CA 94105

**SUBJECT: Submission Torrance Transit's Overall Annual Disadvantaged
Business Enterprise (DBE) Goal for FFY 2007/08 and**

Dear Mr. Jourdan:

As a condition of federal funding requirements under Title 49 CFR Part 26; *Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs*, Torrance Transit hereby submits for your review and approval its Overall Annual Goal for DBE participation in Torrance Transit's federally-assisted contracts. Torrance Transit's Overall Annual DBE Goal for Federal Fiscal Year 2007/2008 is **4%**.

Additionally Torrance Transit has published the Public Notice of the proposed goal in two area publications during the period of August 1, 2007 to September 15, 2007. Upon completion of the required Public Facilitation Process, any amendments to our proposed goal methodology resulting from this process will be forwarded to your attention.

Should you have any questions regarding these submissions, please contact Raul Cervantes, DBE Liaison Officer at (916) 746-1300, or our DBE Consultant, Patricia K. Padilla by phone at (714) 577-5340, or by email at ppadilla@padillainc.com. We appreciate your consideration and look forward to FTA's approval of the enclosed documents.

Sincerely,

Kim Turner, Transit Director
Torrance Transit System

Enclosures: 1) Torrance Transit Overall Annual DBE Goal Methodology for FFY 2007/08 (including Attachment I & II), 2) Public Notice, 3) Proof of Publications, 4) Outreach Letter, 5) Outreach Organizations List