



# City of Montebello

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## Proposed DBE Goal-Setting Methodology for FFY's 2019/21

*Submitted in fulfillment of:*

*Section 1101 of the Transportation Equity Act for the 21<sup>st</sup> Century  
and 49 Code of Federal Regulations Part 26*

\* This analysis is prepared exclusively for the City of Montebello, it is non-transferable and is not to be duplicated

**City of Montebello**  
**DISADVANTAGED BUSINESS ENTERPRISE (DBE)**  
**OVERALL DBE GOAL AND METHODOLOGY**  
**FOR**  
**FEDERAL FISCAL YEAR (FFY) 2019/21**  
**(Covering the period of October 1, 2018 to September 30, 2021)**

**I. INTRODUCTION**

City of Montebello herein sets forth its Proposed Overall Disadvantaged Business Enterprise (DBE) Goal and corresponding federally prescribed goal-setting methodology for the three-year Federal Fiscal Year (FFY) goal period of 2019/21, pursuant to Title 49, Code of Federal Regulations (CFR), Part 26 “Participation by Disadvantaged Business Enterprises in U.S. Department of Transportation Financial Assistance Programs”; and the Federal Transportation Administration (FTA) Master Agreement.

**II. BACKGROUND**

Effective March 3, 2010, the United States Department of Transportation (“DOT”) issued a final rule affecting the implementation and management of the Department’s Disadvantaged Business Enterprise (“DBE”) program. The final rule, effectively amended the provision requiring annual submission of DBE goals and methodology, requiring submission of a goal-setting methodology on a three-year cycle. Pursuant to this final rule, the City of Montebello is still required to conduct an annual review to account for changes that may warrant an adjustment to the overall goal or make an adjustment based on changed circumstances (i.e. significant change in the legal standards governing the DBE program, new contracting opportunities presented by the availability of new or different grant opportunities, etc.) to ensure the goal and program as a whole are narrowly tailored throughout the goal period.

**The City of Montebello herein presents its Proposed Overall DBE Goal Methodology for FFY 2019/21 goal period.**

**III. FTA-ASSISTED CONTRACTING PROGRAM FOR FFY 2019/21**

**Table 1** represents the City of Montebello’s U.S. DOT-assisted (FTA) defined contracting program, which includes eleven (11) projects considered in preparing its **Proposed Overall DBE Goal-Setting Methodology**. The 11 projects have viable subcontracting possibilities and corresponding availability of DBEs, a required criterion for Overall Goal consideration, and are anticipated to be awarded within the respective goal period:

**Table 1**

<b>PROJECT</b>	<b>Total Estimated Cost (Federal Share)</b>
Tire Lease-FY 2019	\$240,000

Tire Lease-FY 2020	\$240,000
Tire Lease-FY 2021	\$240,000
Associated Capital Maintenance (Spare parts)-FY 2019	\$400,000
Associated Capital Maintenance (Spare parts)-FY 2020	\$400,000
Associated Capital Maintenance (Spare parts)-FY 2021	\$400,000
Preventive Maintenance-FY 2019	\$1,665,500
Preventive Maintenance-FY 2020	\$1,665,500
Preventive Maintenance-FY 2021	\$1,665,500
Radio System Upgrade-FY 2019	\$732,000
Surveillance System, Phase 2-FY 2019	\$2,540,000
<b>TOTAL</b>	<b>\$10,188,500</b>

**Table 2** provides a summary of work grouped by three (3) primary categories: Construction Services, Professional Services, and Materials & Supplies utilizing the North American Industry Classification System (NAICS) primary work categories. Table 2 also serves to identify the estimated Federal Dollar Share and the Percent of Federal funding, as follows:

**Table 2**

<b>CONTRACT CATEGORY</b>	<b>NAICS WORK CATEGORIES<sup>1</sup></b>	<b>ESTIMATED FEDERAL DOLLAR SHARE</b>	<b>% OF FEDERAL FUNDING (Rounded)</b>
<b>Construction</b>	238110, 238210, 238910, 238990	\$660,400	6.5%
<b>Professional Services</b>	488490, 541380, 541512, 61621, 811111, 811112, 811113, 811118, 811121, 811198	\$5,389,800	52.9%
<b>Materials</b>	423120, 423130, 423410, 23610, 423690, 423860, 424720, 441310, 441320	\$4,138,300	40.6%
<b>TOTAL</b>		<b>\$10,188,500</b>	<b>100%</b>

#### **IV. GOAL METHODOLOGY**

***Step 1: Determination of a Base Figure (26.45)<sup>2</sup>***

To establish the City of Montebello’s Base Figure of the relative availability of DBEs to all comparable firms (DBE and Non-DBEs) available to propose on the City of Montebello’s FFY 2019/21 FTA-assisted contracting opportunities projected to be solicited during the respective goal period, the City of Montebello followed one of the five prescribed federal goal-setting methodologies in accordance with 49 CFR Part 26 regulations. This was accomplished by accessing the *California Unified Certification Program (CUCP) Directory of Certified DBE Firms* and the *2016 U.S. Census Bureau County Business Patterns (CBP) Database*. Comparisons were made within the City of Montebello’s market area (defined as Los Angeles County and Orange County, Riverside and San Bernardino) and by specified industries and types of businesses identified in Table 2. The City of Montebello’s local market area

<sup>2</sup> 26.45 represents Title 49 CFR Part 26 regulatory goal setting methodology reference.

represents where the substantial majority of the City of Montebello’s contracting dollars are expended and/or where the substantial majority of contractors and subcontractors bids or quotes are received.

The Base Figure was further weighted by contract type and corresponding contract value. The Base Figure resulting from this weighted calculation is as follows:

The City of Montebello 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 *Table 3 Below*.

- ⇒ **For the numerator:** *California UCP DBE Database of Certified Firms*
- ⇒ **For the denominator:** *2016 U.S. Census Bureau’s Business Pattern Database (CBP)*

To determine the relative availability of DBEs, the City of Montebello divided the numerator<sup>3</sup> representing the ratio of ready, willing and able DBE firms, by the denominator<sup>4</sup> representing all firms (DBE and Non-DBEs) available in each work category. Application of this formula yielded the following baseline information:

$$\frac{\text{Number of Ready, Willing and Able DBEs}}{\text{Number of All Available Firms (including DBEs and Non-DBEs)}} = \text{DBE Availability \%}$$

To determine the appropriate weighting percent by NAICS, the estimated dollar value by NAICS was divided by the total estimated federal dollars for FFY 2019/21. The weighting percent by NAICS was then multiplied by the DBE Availability % to determine the Base Figure % by NAICS, see below:

$$\text{Weighting} \times \text{DBE Availability \%} = \text{Base Figure \% by NAICS}$$

To determine the Step 1 Base Figure, the City of Montebello added together all Base Figure % by NAICS in Table 3

**Table 3**

CATEGORY OF WORK	NAICS CODES	Weighting*	DBE Availability %	Base Figure % by NAICS
Poured Concrete Foundation and Structure Contractors	238110	0.249%	14.68%	0.037%
Electrical Contractors and Other Wiring Installation Contractors	238210	2.493%	4.08%	0.102%
Site Preparation Contractors	238910	1.247%	14.54%	0.181%
All Other Specialty Trade Contractors	238990	2.493%	12.53%	0.312%
Motor Vehicle Supplies and New Parts Merchant Wholesalers	423120	6.248%	0.63%	0.039%
Tire and Tube Merchant Wholesalers	423130	3.533%	1.15%	0.041%
Photographic Equipment and Supplies Merchant Wholesalers	423410	12.465%	3.33%	0.416%
Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	423610	4.278%	5.64%	0.241%
Other Electronic Parts and Equipment Merchant Wholesalers	423690	3.592%	9.05%	0.325%
Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers	423860	2.844%	9.47%	0.269%

Numerator represents all DBE firms established within the City of Montebello’s market area.  
 Denominator represents all comparable available established firms.

Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)	424720	2.944%	10.53%	0.310%
Automotive Parts and Accessories Stores	441310	1.178%	0.28%	0.003%
Tire Dealers	441320	3.533%	0.42%	0.015%
Other Support Activities for Road Transportation	488490	2.452%	15.66%	0.384%
Testing Laboratories	541380	0.374%	17.47%	0.065%
Computer Systems Design Services	541512	0.803%	9.63%	0.077%
Security Systems Services (except Locksmiths)	561621	1.247%	5.01%	0.062%
General Automotive Repair	811111	24.520%	0.15%	0.037%
Automotive Exhaust System Repair	811112	2.452%	0.00%	0.000%
Automotive Transmission Repair	811113	4.904%	0.36%	0.018%
Other Automotive Mechanical and Electrical Repair and Maintenance	811118	8.793%	1.83%	0.161%
Automotive Body, Paint, and Interior Repair and Maintenance	811121	4.904%	0.33%	0.016%
All Other Automotive Repair and Maintenance	811198	2.452%	1.39%	0.034%
Total:		100%		3.15%

Base Figure 3.15% \*70% (30% reduction to the percent Prime contractors are likely to Perform) = 2.18%  
 2% (Rounded to the nearest whole number)

*\*Weighting based on estimated value per NAICS.*

**Step 2: Adjusting the Base Figure**

Upon establishing the Base Figure, the City of Montebello reviewed and assessed other known evidence potentially impacting the relative availability of DBEs within the City of Montebello’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 the City of Montebello’s Past DBE Goal Attainments, other Local Agencies’ *Disparity Studies within the City of Montebello’s market area and Other Evidence, as follows:*

**A. Past DBE Goal Attainments**

The following table below reflects the demonstrated capacity of DBEs (measured by historical DBE participation) on FTA-assisted contracts awarded by the City of Montebello within the last three (3) Federal Fiscal Years:

**Table 4**

Year	Attainment
FFY 2015*	77%
FFY 2016	0%
FFY 2017	3%
Median of Past Awards = 0%, <b>3%</b> , 77% = % Median Past Participation	

*\*FFY 2018 still in progress as of the date of methodology preparation, so FFY 2015 was used in lieu of FFY 2018*

The City of Montebello considered an adjustment to the Base Figure based on the median DBE participation on DOT-assisted contracts completed within the past three FFYs (2015/17). As three years of DBE Participation data was reviewed and the years reviewed included projects with a similar variety in scope to the scopes projected for the 2019/21 period, the City of Montebello can reasonably assume that the rates of DBE participation reflected are an accurate reflection of DBE capacity to perform in the

2019/21 overall goal period. The adjustment is calculated in accordance with FTA guidance by averaging the Base Figure with the Median DBE Past participation, as shown below.

$$\begin{aligned} 2\% \text{ Base Figure} + 3\% \text{ Median Past Participation} &= 5\% \\ 5/2 &= 2.5\% \\ \text{Adjusted Base Figure: } &\mathbf{3\%} \text{ (Rounded to the nearest whole number)} \end{aligned}$$

***B. Evidence from Disparity Studies***

***Barriers to Entry: Employment, Self Employment, Education and Training, Business Ownership Rates and Access to Capital***

The City of Montebello did not find it feasible to conduct an independent availability/disparity study; however, the City of Montebello identified two (2) disparity studies, inclusive of market areas similar to the City of Montebello's, to consider whether a Race-Conscious DBE Program should continue to be implemented. The 2 identified Disparity Studies were the Caltrans Disparity Study and The Los Angeles County Metropolitan Transportation Authority (Metro) Disparity Study.

The first Disparity Study considered was that of the California Department of Transportation (Caltrans), completed in 2016 due to the timeliness of the contracts reviewed. The Caltrans Disparity Study reviewed Construction and Engineering contracts state-wide between the years January 1, 2011 to December 31, 2014. As the Caltrans' Disparity Study included thousands of contracts from areas outside of the City of Montebello's market area as well as projects that had no relation to the scopes included in the upcoming goal period, the City of Montebello opted to not utilize this Disparity Study to apply an adjustment to their current race-neutral/race-conscious DBE application measures.

The second Disparity Study taken into consideration was Metro's Disparity Study due to the similarities in market area and timeliness of the contracts reviewed. Where the Caltrans Study market area included the entire state of California, the Metro Study focused on Los Angeles County which is more aligned with the City of Montebello's market area. The Metro Disparity Study was initiated in November 2016 and included a five-year study period (January 1, 2011 through December 31, 2015) to determine any differences between the participation of minority- and woman-owned businesses in relevant contracts and the availability of those businesses to perform that work (referred to as *disparities*). Disparity analysis results indicated that most racial/ethnic and gender groups showed disparities on contracts where race- and gender-conscious measures were not in place during the study period. As a result, the Disparity Study recommended the use of contract DBE goals.

As Metro's Disparity Study satisfies the legal standards established by the Ninth Circuit Court of Appeals in *Western States Paving Co., Inc. v. Washington State Department of Transportation*, and guidance from the U.S. Department of Transportation/Federal Transit Administration (FTA) concerning the implementation of race-conscious application, the City of Montebello has elected to utilize this study as a basis for continuing to implement the race-conscious component of their

Overall DBE goal. The City of Montebello will ensure that the use of race-conscious goals is narrowly tailored and consistent with other relevant legal standards.

The City of Montebello will continue to review applicable Disparity Studies as they become available and apply the appropriate adjustments to their Race-neutral/Race-Conscious DBE goal application.

### ***C. Other Evidence***

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

### **PROPOSED OVERALL DBE GOAL:**

**The Overall DBE Goal for FFY 2019/21 goal period for the City of Montebello’s FTA-assisted contracts is 3%.**

The proposed goal further serves to identify the relative availability of DBEs based on evidence of ready, willing, and able DBEs to all comparable firms, which are known to be available to compete for and perform on the City of Montebello’s FTA-assisted contracts. The proposed goal reflects a determination of the level of DBE participation, which would be expected absent the effects of discrimination.

## **V. RACE-NEUTRAL MEASURES**

**The Overall DBE Goal for FFY’s 2019/21 for the City of Montebello’s DOT-assisted contract is 3%.** The City of Montebello will implement race conscious measures, coupled with race-neutral measures based on the results received from the Southern California Regional Disparity Study, the City of Montebello’s analysis of its past utilization data and an examination of similar market area Disparity Studies.

### **A. Consideration of the Amount by which City Has Exceeded Goals in the Past**

DOT has identified the amount a recipient has exceeded their overall goals in the past years as a useful tool in projecting the race/gender-neutral participation one can expect in future Federal Fiscal Years.

The following table reflects the demonstrated capacity of DBEs on FTA-assisted contracts completed by the City within the last three (3) Federal Fiscal Years:

***Table 5***

Overall DBE Goal by Period	Federal Fiscal Year	DBE Attainment	% Goal Exceeded
% 3	FFY 2015*	77%	74%
% 3	FFY 2016	0%	0%
% 6	FFY 2017	3%	0%

Median % Goals Exceeded by = 0%, **0%**, 74% = 0%  
**%\*\* Median Participation above**

*\*FFY 2018 still in progress as of the date of methodology preparation, so FFY 2015 was used in lieu of FFY 2018*  
*\*\*Rounded to the nearest whole number*

The City’s Historical Past Participation above the DBE goal produced a median of 0% DBE Participation (as illustrated in the table above). As the City’s historical DBE Participation did not exceed the projected DBE goal valid during the attainment periods, it is not reasonable to conclude that the FFY 2019/21 goal can be met race-neutrally based on this factor.

**B. Past Participation by DBE Prime Contractors**

DOT has identified that the amount of past participation obtained through the use of DBE primes should be considered achieved race/gender-neutrally and that those attainments can be used as a basis for estimating a similar level of race/gender-neutral participation in the next overall goal period.

Therefore, the City considered the amount of past DBE participation (based on awards) obtained through the use of DBE primes in FFYs 2015, 2016 and 2017 below:

**Table 6**

FFY	Total Dollar Value Awarded to DBE Prime	Reporting Period	Total Dollar Value of Awarded Contracts
2017	\$ 54,570	04/1/17-09/30/17	\$ 1,843,295
	\$0	10/1/16-03/31/17	\$ 0
2016	\$ 0	04/1/16-09/30/16	\$ 0
	\$ 0	10/1/15-03/31/16	\$ 4,025,000
2015	\$ 0	04/1/15-09/30/15	\$ 0
	\$ 49,874	10/1/14-03/31/15	\$ 64,981
Total:	\$		\$
% DBE Prime Participation	Total Dollar Value Awarded to DBE Prime (\$104,444) / Total Dollar Value of Awarded Contracts (\$5,933,276 ) = 1.76%		2%*

\*Rounded to nearest whole number

The City found that 2% of the DBE participation during FFYs 2015 through 2017 was produced by the utilization of DBE primes. This value was developed by dividing the total dollars awarded to DBE Primes (\$104,444) by the total dollars awarded on all Primes contracts (\$5,933,276) within FFYs 2015 through 2017, as displayed in the table above. The City confirmed that the projects completed during FFYs 2015 through 2017 were similar to the types of projects being procured in the upcoming overall goal period, a required criterion for consideration in utilizing DBE prime participation to validate race-neutral application. As 2% DBE participation was achieved on like-projects during the attainment period reviewed the City concluded that this rate of DBE participation would be an accurate reflection of DBE prime capacity in the primary types of work projected to be performed in the coming overall goal period.

**C. Consider Past Participation by DBE Subcontractors on Contracts without Goals**

DOT has identified that the amount of past participation obtained through the use of DBE subcontractors on contracts without DBE goals should be considered achieved race/gender-neutrally and that those attainments can be used as a basis for estimating a similar level of race/gender-neutral participation in the



next overall goal period. Therefore, the City considered the amount of past DBE subcontractor participation on contracts without DBE goals in FFYs 2015, 2016 and 2017 below:

**Table 7**

FFY	Total Dollar Value Awarded to DBE Subcontractors on RN Contracts	Reporting Period	Total Dollar Value of Awarded Contracts
2017	\$ 0	04/1/17-09/30/17	\$ 1,843,295
	\$ 0	10/1/16-03/31/17	\$ 0
2016	\$ 0	04/1/16-09/30/16	\$ 0
	\$ 0	10/1/15-03/31/16	\$ 4,025,000
2015	\$ 0	04/1/15-09/30/15	\$ 0
	\$ 0	10/1/14-03/31/15	\$ 49,784
<b>Total:</b>	<b>\$</b>		<b>\$</b>
Total Dollar Value Awarded to DBE Subs (\$0) / Total Dollar Value Awarded on RN Contracts (\$5,933,276) = 0%			<b>0%* RN DBE Subcontract Participation</b>

*\*Rounded to the nearest whole number*

A DBE participation value of 0% was derived by the utilization of DBE subcontractors in the Race-Neutral (RN) periods above.

As 0% DBE subcontractor participation was achieved on like-projects during the attainment period reviewed the City concluded that this rate of DBE participation would be an accurate reflection of DBE subcontractor capacity in the primary types of work projected to be performed in the coming overall goal period.

**D. Consider MBE/WBE/DBE Participation Pursuant to Race/Gender-Neutral State or Local Programs.**

The City monitors Small Business participation but does not currently track MBE/WBE/DBE participation on Race/Gender-Neutral or Local Programs. The City will consider methods of tracking this information in the future for use in considering the proper race/gender-neutral application.

**E. Past History of Inability to Achieve Goals**

DOT has identified that a recipient’s past inability to meet their goals in the past years as a powerful indicator that the recipient may be justified in applying race-/gender-conscious measures to achieve their goals in future Federal Fiscal Years. The following table below reflects the demonstrated capacity of DBEs (measured by historical DBE participation) on FTA-assisted contracts awarded by the City within the last three (3) Federal Fiscal Years:

**Table 8**

Overall DBE Goal by Period	FFY	DBE Attainment	% Below DBE Goal
3%	FFY 2015*	77%	0%
3%	FFY 2016	0%	3%
6%	FFY 2017	3%	3%

\*FFY 2018 still in progress as of the date of methodology preparation, so FFY 2015 was used in lieu of FFY 2018

The City’s historical DBE participation produced a shortfall in the City’s ability to meet goals in Federal Fiscal Years 2016 and 2017 but did not produce a shortfall in Federal Fiscal Year 2015. Overall the

median percent the City demonstrated in its inability to meet goals was 3%, which further supports the need for race/gender-conscious measures.

As three years of DBE Participation data was reviewed for projects with similar scopes and values to the projects in the upcoming goal period, the City can reasonably assume that the rates of race-neutral DBE participation reflected in the areas above are an accurate reflection of DBE capacity to perform race-neutrally in the 2019/21 overall goal period. Considering that the City’s median rate for exceeding the DBE goal is 0% that the city was able to achieve 2% in race-neutral participation from DBE Primes on like projects and unable to achieve any participation from DBE subs on like projects, the City added the three race-neutral percentages together and divided that number by three to find the average race-neutral participation.

The City has applied this to the proposed DBE Goal to project the necessary race-conscious/race-neutral breakout, as illustrated below:

<p style="text-align: center;">% Goals Exceeded in Past = 0% RN DBE Prime Participation = 2% RN DBE Sub Participation = 0%</p> <p style="text-align: center;"><math>0\% + 2\% + 0\% = 2\%</math> <math>2\% / 3 = .67\%</math> (Average RN Participation)</p> <p style="text-align: center;"><b>1% RN Projection (Rounded to the nearest whole number)</b></p> <p style="text-align: center;"><b>DBE Goal: 3%</b> <b>RN Application 1% / RC Application 2 %</b></p>
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Consistent with the FTA guidance provided and the reasons delineated above the City has found it advisable to implement the race-neutral/race-conscious breakout illustrated above to meet the proposed Overall DBE Goal (3%) in accordance with 49 CFR Part 26.51.

**F. Monitor DBE Participation to Determine Whether an Adjustment to the Use of Race/Gender-Conscious Measures is Necessary**

The City will continue to monitor its DBE participation during the overall goal period to determine whether the application of the City’s race-neutral/race-conscious measures to meet the proposed Overall DBE Goal (3%) remains on target. The City will adjust the application of race/gender-neutral and race/gender-conscious measures, as necessary to ensure the City meets the maximum feasible portion the overall goal by using race/gender-neutral means of facilitating DBE participation.

**VI. PUBLIC PARTICIPATION AND FACILITATION**

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

The City of Montebello published a Public Notice on their website, informing the public that the proposed goal and rationale are available for inspection on the City of Montebello's website and that the City of Montebello will accept comments on the goal analysis for 30 days from the date of the Public Notice. The City of Montebello will give full consideration to all comments and input and assess its impact on the proposed Overall DBE Goal. If no impact and/or comments are received during the public participation process the Goal will be considered final.

To further ensure that the City's contracting community and stakeholders had in-person opportunities to communicate any feedback they had regarding effects of discrimination or barriers to DBE participation the City attended the local stakeholder meetings captured below:

Asian Business Association  
767 North Hill Street, Suite 308  
Los Angeles, CA 90012  
Minority Business Opportunity Day, May 12, 2018

Los Angeles Area Chamber of Commerce  
350 S. Bixel Street  
Los Angeles, CA 90017  
BIZ Con SoCal June 20, 2018

Southern California Minority Business Development Council  
800 W 6th St #850  
Los Angeles, CA 90017  
MBE 2 MBE Meeting, May 23, 2018

Furthermore, the City consults and will continue to consult with minority groups and organizations year round via event attendance and facilitation to directly solicit the public in-person regarding input they have on DBE opportunities and any real and/or perceived barriers to DBE participation. Comments received from the City's on-going consultation were reviewed and considered in determining whether an adjustment to the 3% Overall Goal (RN Application 1% / RC Application 2%) was necessary. Comment review produced the conclusion that the substantial bulk of input received involved procurement and contract monitoring procedures rather than numeric goal values or race-conscious/race-neutral breakouts, therefore an adjustment to the goal was not necessary. The City has incorporated input regarding procurement and monitoring procedures into their current procedures and will continue to consider all relevant input received moving forward.