



COLORADO
Department of
Transportation

Overall Annual DBE Goal for Transit

Federal Fiscal Years 2026 – 2028

US DOT Federal Transit Administration

CDOT Environmental Justice & Equity Branch

Table of Contents

EXECUTIVE SUMMARY.....	3
FTA FUNDING ALLOCATION.....	3
Data Collection.....	4
DBE Contracting Opportunities.....	4
DBE GOAL METHODOLOGY.....	5
Market Area Determination.....	5
Availability Data.....	5
Weighted Data.....	6
STEP 1: DEVELOP A BASE FIGURE.....	7
STEP 2: ADJUSTMENTS TO THE BASE FIGURE.....	10
Past DBE Participation.....	10
FTA Region 8 Comparison.....	10
Regional Transit Agency Comparison.....	11
Large Transit Projects, Building Construction, and Competitive Grants.....	12
BREAKOUT OF RACE NEUTRAL / RACE CONSCIOUS PARTICIPATION.....	12
Race-Neutral Methods.....	13
PUBLIC PARTICIPATION & FEEDBACK.....	14
Public Comments.....	14

EXECUTIVE SUMMARY

This document details the methodology used by the Colorado Department of Transportation (CDOT) to establish its three-year (FFY 2026-2028) overall annual Disadvantaged Business Enterprise (DBE) goal for contracts that contain funding assistance from the U.S. Department of Transportation (USDOT) Federal Transit Administration (FTA). This goal is established and tracked separately from CDOT's Federal Highway Administration (FHWA) overall goal. It applies primarily to CDOT's Division of Transit and Rail (DTR), which receives, distributes, and oversees the use of federal funds received by FTA. Most DTR FTA funds are granted to transit providers in rural areas. These grantees (or subrecipients) then contract for goods and services creating indirect FTA-assisted contracting opportunities for DBE firms.

CDOT established this goal in accordance with Part 26, Title 49 of the Code of Federal Regulations (49 CFR Part 26.45). As described below, CDOT evaluated potential contracting opportunities to be offered using FTA funds, as well as the number of ready, willing and able DBEs to participate in such opportunities. As a result, **CDOT is proposing an FTA DBE goal of 2.67%** for the period of October 1, 2026 through September 30, 2028 (FFY 2026-2028). CDOT expects to meet the full 100% with race-neutral measures.

CDOT is committed to monitoring DBE participation for all federal-aid transit projects to ensure the overall goal is being met. DBE achievements will be evaluated annually to determine whether market conditions warrant adjustments to the overall DBE goal, or the fully race-neutral approach. CDOT will also assist with race-neutral methods to encourage DBE participation on large transit projects awarded through the competitive process.

FTA FUNDING ALLOCATION

CDOT DTR has forecasted the following FTA funding for state fiscal years (SFY) 2026-2028 (July 1, 2026 – June 30, 2028). This forecast was used to determine future contract opportunities for FFY 2026 – 2028.

Table 1. FTA Funding Forecast (SFY 2026-2028)

Program	Description	SFY 2026	SFY 2027	SFY 2028	3-Yr Total
FTA-5304	Transit technical assistance, planning, demonstration projects, training, etc.	\$623,804	\$623,803	\$642,517	\$1,890,124
FTA-5310	Transportation for elderly and disabled	\$3,286,282	\$3,384,870	\$3,486,417	\$10,157,569
FTA-5311	Transportation for rural and small urbanized areas, general public	\$18,887,304	\$19,433,624	\$20,026,932	\$58,347,860
FTA-5311 RTAP	Technical assistance, training, and support to rural transit agencies	\$252,338	\$259,908	\$267,705	\$779,950
FTA-5339	Transit capital investment for rolling stock, bus shelters, fare boxes, etc.	\$14,325,683	\$14,635,454	\$14,954,517	\$43,915,654
FTA Subtotal		\$37,337,643	\$38,317,472	\$39,357,297	\$115,091,157

CDOT DTR expects a total of more than \$115 million in FTA funding over the next three fiscal years. Projected funding for 5303 was excluded from the DBE methodology because those funds are granted to Metropolitan Planning Organizations (MPO's) through the CDOT Division of Transportation Development (DTD) and do not represent contracting opportunities.

Data Collection

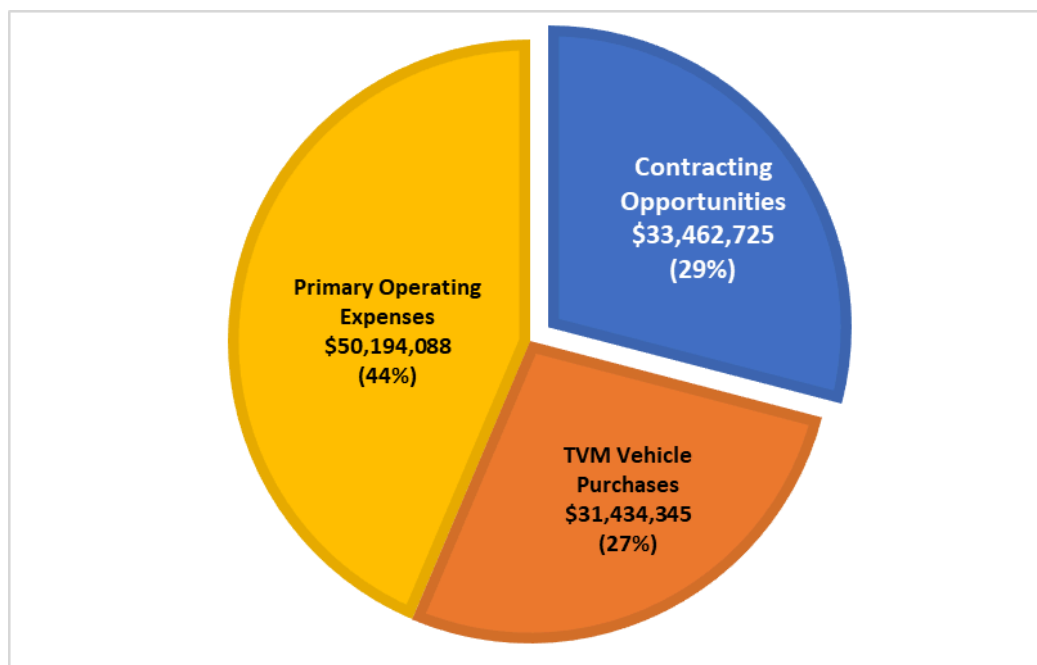
CDOT and its grant subrecipients use FTA funds for operations, administration, and capital purchases. Subrecipients may contract for goods and services from external vendors creating indirect FTA-assisted contracting opportunities for DBE firms. To evaluate these contracting opportunities, CDOT conducted an analysis of procurements and reimbursement requests during FFY 2022 – 2024. CDOT determined that this period is representative of future contracting activity for FFY 2026 – 2028.

DBE Contracting Opportunities

For FFY 2026 – 2028, CDOT expects to receive approximately \$115 million from FTA, most of which will pass directly through to subrecipients. However, not all of this funding represents eligible contracting opportunities for DBE firms. As mentioned previously, 5304 funding does not include contracting opportunities. Additionally, expenses for Primary Operating Expenses (e.g., licenses, leases, insurance, employees salaries and benefits), as well as TVM Vehicle Purchases (FTA approved manufacturers) are not available for DBE contracts and are excluded from the DBE goal calculation. Of the \$115 million, actual contract opportunities are limited to approximately one-third (29%) of the total funding forecasted from FTA.

The following chart shows a breakdown of the anticipated FTA funds allocation and potential DBE contracting opportunities used as the basis for the goal setting methodology:

Chart 1. Forecasted FTA Funding Allocations (FFY 2026-2028)



Because subrecipients draw down CDOT-provided FTA funds over multiple years, there is not always a direct correlation between funds received from FTA and contracting opportunities in the same year. Therefore, CDOT sought to obtain average expenditures of grantees in various contracting categories by evaluating reimbursement requests over the past three federal fiscal years. This is shown in Table 2.

DBE GOAL METHODOLOGY

The following goal calculations are based on projected contracting opportunities using potential FTA funding allocations for FFY 2026-2028, as well as historical contracting activities of CDOT and subrecipients. CDOT used the two-step goal setting methodology specified in *49 CFR Section 26.45(c)*:

- Step 1: Develop a base figure for relative availability of DBEs
- Step 2: Adjust base figure, as needed, to arrive at an overall goal

Market Area Determination

Prior to calculating the base figure, CDOT determined the relevant market area for the analysis. As defined by the *USDOT Goal Setting Tips*, the local market area is the area in which the substantial majority of the contractors and subcontractors with which CDOT and its grant partners do business are located, and the area in which CDOT and its grant partners spend the substantial majority of its contracting dollars.

All grants awarded by CDOT were to transit providers located within Colorado. These grant partners primarily use federal funds to procure goods and services from providers in their local areas. Many subrecipients are in rural communities not serviced by out-of-state vendors. Therefore, CDOT determined that the relevant market is the state of Colorado.

Availability Data

The relative availability of DBEs is defined as the total number of DBE firms that are ready, willing and able to perform the types of contracts CDOT anticipates awarding. CDOT used the approach suggested in *49 CFR 26.45(c)(1)* to compare the number of available DBEs to all firms in the industry.

The total number of firms within each industry in Colorado was identified from the most recent *U.S. Census Bureau 2022 County Business Patterns (CPB)*. This was determined to be the most current data available on all Colorado businesses (DBE and non-DBE). The CBP assigns a single primary industry (NAICS code) to each business. The total headcount of firms is shown in Table 4.

The number of available DBE firms was derived from the *CDOT Unified Certification Program (UCP) DBE Directory*. The guidance in Section II.E of the [US DOT Tips for Goal Setting in the DBE Program](#) states that “whenever you are calculating ratios, make absolutely certain that the DBE firms in the numerator and denominator are as similar as possible to the DBEs and non-DBE firms in the denominator.”

To ensure an “apples to apples” comparison between the Census and DBE Directory, CDOT used primary NAICS codes and only firms located in the market area of Colorado. The DBE Directory does not currently record primary NAICS for DBE firms, so CDOT evaluated all NAICS assigned to DBE firms and assigned one primary NAICS that best correlated with the firm’s primary area of work. This was determined using information from the CDOT Contractor Directory (B2G), CDOT FHWA DBE Overall Goal Methodology for FFY 2025 – 2027 and the company’s website. Also consistent with DOT guidance, CDOT only considered DBE firms located in Colorado and did not consider out-of-state firms to ensure the numerator and denominator used the same criteria.

Weighted Data

CDOT determined the relative weight of contracting opportunities by NAICS and type of work using historical data. All reimbursements under 5310 and 5311 fund types were evaluated over the period of FFY 2022 – 2024. Each reimbursement category was calculated as a percentage of the total amount reimbursed during those years. Those percentages were then applied to the amount projected to be eligible for contracting opportunities over the next three federal fiscal years, as shown below. The forecasted weight shows the percentage that each work type represents of the total contracting dollars.

Table 2. Projected SFY 2026 – 2028 funding for contracted services using FTA Funds

	Projected Contracting Opportunities (FFY 2026-2028)	Forecasted Weight
Advertising & Marketing	\$641,139	1.92%
Attorney	\$26,113	.08%
Audit	\$14,686	.04%
Communications	\$14,840	.04%
Consultant Services	\$693,569	2.07%
Contracted Services	\$1,208,675	3.61%
Facility Maintenance	\$1,567,709	4.68%
Fuel	\$5,911,029	17.66%
Materials & Supplies	\$8,114	.02%
Other Expenses	\$726,720	2.17%
Planning	\$756,050	2.26%
Software & Hardware	\$136,516	.41%
Transit Services	\$6,191,526	18.50%
Training	\$70,864	.21%
Vehicle Maintenance	\$6,949,831	20.77%
Building Construction	\$8,545,346	25.54%
Total	\$33,462,725	100%

The combined total of projected contracting activities using FTA funds is **\$33,462,725** which is equivalent to the 29% indicated in Chart 1 as potential contracting opportunities.

STEP 1: DEVELOP A BASE FIGURE

In accordance with Section F of the *USDOT Tips for Goal Setting*, CDOT used the following formulas to determine the relative availability of DBE firms and subsequently the base figure for DBE participation.

Relative Availability of DBEs = # of DBE Firms in the Industry / All Available Firms in the Market Area

Forecast Weight = Amount in Contracting Area / Total Contract Opportunities

Weighted Availability = Relative Availability of DBEs x Forecast Weight

Base Figure = Relative Availability x Forecast Weight

Each contracting area was correlated to a NAICS code so CDOT could determine the relative availability of DBE firms located in Colorado compared to all firms in Colorado. The forecast weight is the percentage that each contracting opportunity represents of the total estimated FTA-assisted contracting opportunities. The relative availability of DBEs was determined by dividing the total number of DBE firms by the total number of firms in each contracting opportunity category. The weighted availability is the relative availability in each category multiplied by the forecast weight.

The resulting base figure is 2.21% which is the total of all weighted availability in all work categories. The table below shows the NAICS that were used for each type of potential contracting opportunity and the weighted availability of DBE firms to perform the work.

Table 3. Weighted Availability Calculation

Contracting Opportunity	NAICS Code	NAICS Description	# of DBEs	Total Firms	Relative Availability	Forecast Weight	Weighted Availability
Advertising and Marketing	541810	Advertising Agencies	9	393			
	541430	Graphic Design	24	518			
	541840	Media Representatives	1	11			
		Subtotal	34	922	3.69%	1.92%	0.07%
Attorney	541110	Attorneys	4	3547			
		Subtotal	4	5,547	.11%	.08%	0.00%
Audit	541211	Auditor/CPA	3	1537			
		Subtotal	3	1,537	.20%	.04%	0.00%
Communications	541613	Marketing Consulting Services	29	1787			
	541820	Public Relations Agencies	25	261			
		Subtotal	54	2,411	2.64%	.04%	0.00%
Consultant Services	541611	Management Consulting	75	3120			
	541614	Transportation Consulting	4	194			
	541620	Environmental Consulting	30	472			
	541690	Other/Safety Consulting	4	940			
		Subtotal	113	4726	2.39%	2.07%	.05%

Contracting Opportunity	NAICS Code	NAICS Description	# of DBEs	Total Firms	Relative Availability	Forecast Weight	Weighted Availability
Contracted Services	323111	Printing	11	286			
	488410	Motor Vehicle Towing	2	202			
	532120	Bus Rental or Leasing	1	114			
	541511	Computer Programming (IT)	10	2196			
	541512	Computer Design (Audio/Visual)	16	1701			
	561320	Temporary Staffing	24	940			
	561611	Background Check Services	1	98			
	621999	Drug and Alcohol Testing	5	178			
		Subtotal	70	5715	1.22%	3.61%	.04%
Facility Maintenance	561720	Janitorial Services	36	1595			
	561730	Landscaping	28	2448			
	561790	Exterior Cleaning	2	319			
		Subtotal	66	4362	1.51%	4.68%	.07%
Building Construction	236220	Commercial and Institutional Building Construction	46	767			
	237110	Sewer, Water, Utility Line Construction	9	288			
	238110	Poured Concrete Foundation and Structure Contractors	25	602			
	238120	Structural Steel Contractors	9	130			
	238140	Masonry Contractors	8	433			
	238160	Roofing Contractors	10	878			
	238190	Other Foundation, Structure, and Building Exterior Contractors	6	197			
	238210	Electrical Contractors and Other Wiring Installation Contractors	57	2169			
	238220	Plumbing, Heating, and Air-Conditioning Contractors	26	2577			
	238290	Other Building Equipment Contractors	5	168			
	238310	Drywall and Insulation Contractors	13	566			
	238320	Painting and Wall Covering Contractors	18	1051			
	238330	Flooring Contractors	7	483			
	238390	Other Building Finishing Contractors	6	236			
	238910	Site Preparation Contractors	17	999			
	238990	All Other Specialty Trade Contractors	28	1017			
	339950	Sign Manufacturing	7	143			
	484220	Dump Trucking, Hauling	143	645			
	561990	Other Support Services (flagging)	28	251			
	541370	Surveying and mapping	16	255			
		Subtotal	484	13,855	3.49%	25.54%	.89%

Contracting Opportunity	NAICS Code	NAICS Description	# of DBEs	Total Firms	Relative Availability	Forecast Weight	Weighted Availability
Fuel	424710	Petroleum Bulk Stations	0	49			
	424720	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations)	2	56			
	454310	Fuel Dealers	0	99			
		Subtotal	2	204	.98%	17.66%	.17%
Materials and Supplies	424120	Office Supplies	3	59			
	423120	Vehicle Supplies	2	178			
	423860	Transportation Equipment	0	21			
		Subtotal	5	258	1.94%	.02%	0.00%
Other Expense	541890	Promotional Items	4	152			
	459999	Recognition Awards	1	704			
	424340	Boots	0	17			
	315210	Uniforms	0	24			
		Subtotal	5	1042	.56%	2.17%	.01%
Software/ Hardware	423430	Computers and Software	0	145			
		Subtotal	0	145	0.00%	.41%	0.00%
Planning Statewide and Rural	541330	Transportation Planning	83	2375			
	541320	Urban Planning	24	225			
		Subtotal	107	2600	4.12%	2.26%	.09%
Transit Services	485113	Bus Transit Services	0	7			
	485210	Intercity and Rural Bus Service	0	6			
	485991	Paratransit Services	3	61			
	485999	Other Ground Transportation	2	49			
		Subtotal	5	123	4.07%	18.50%	.75%
Training	611430	Professional Development	13	419			
	611519	Bus Driver Training	0	119			
		Subtotal	13	538	2.42%	.21%	.01%
Vehicle Maintenance	811111	General Automotive Repair	1	1565			
	811112	Body Shops and Repair	4	743			
	811113	Automotive Transmission Repair	0	77			
		Subtotal	5	2385	.21%	20.77%	.04%
	TOTAL		966	40,315		100%	2.21%

STEP 2: ADJUSTMENTS TO THE BASE FIGURE

49 CFR Section 26.45 (d) provides examples of the various types of data that can be examined to adjust the Step 1 base figure and narrowly tailor the goals to the local market area. Step 2 of the goal setting methodology is intended to adjust the base figure to reflect, as accurately as possible, the DBE participation CDOT would expect in the absence of discrimination. Using that guidance, CDOT considered the following factors to determine whether an adjustment is appropriate.

Past DBE Participation

CDOT evaluated past participation compared to the Step 1 base figure to determine if an adjustment was warranted. Table 4 shows CDOT's annual DBE participation for the past three federal fiscal years.

Table 4. Past CDOT FTA DBE Goal Achievement

Federal Fiscal Year	Annual Overall FTA DBE Goal	Actual DBE Achievement (FTA-Assisted Projects Only)
2022	2.44%	2.41%
2023	2.44%	3.12%
2024	2.44%	6.73%
Historical Median		3.12%

*Pursuant to DOT guidance, CDOT is adjusting the Step 1 base figure by using the median DBE participation of 3.12%. This was averaged with the base figure of 2.21% resulting in a revised overall annual **DBE goal of 2.67%**.*

FTA Region 8 Comparison

To add context for establishing a reasonable DBE goal, CDOT conducted a comparison of FTA DBE goals of other DOTs in FTA Region 8. The Region 8 area includes Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming. These mid-western states share similar geographic and rural demographics. CDOT's proposed FTA DBE goal versus comparative states is higher than all states except for Montana. While this provides justification to lower the goal, **CDOT is confident that it can meet the adjusted goal of 2.67% based upon historical DBE participation.**

Table 5. Region 8 FTA DBE Goal Comparison of DOTs

State DOT	DBE Goal	Race-Neutral	Race-Conscious
Colorado	2.67%	2.67%	0.0%
Montana	2.70%	2.70%	0.0%
North Dakota	1.9%	1.90%	0.0%
Utah	0.15%	0.12%	0.03%
Wyoming	2.0%	2.00%	0.0%

CDOT determined that an adjustment to the base figure using this comparison is not warranted.

Regional Transit Agency Comparison

CDOT also reviewed the FTA DBE goals of five transit agencies in Colorado that are direct recipients of FTA funds and have their own overall annual DBE goals. These agencies are primarily located in metropolitan areas, where there is typically a higher availability of certified DBE firms. In contrast, most CDOT subrecipients are in rural areas. Still, comparing CDOT's DBE goal to those of other urban agencies offers a more geographically relevant benchmark within the state.

CDOT's proposed FTA DBE goal of **2.67%** falls in the middle range when compared to the DBE goals of these peer urban transit agencies. Nearly all agencies in the comparison rely almost entirely on race-neutral measures to achieve their goals. The two agencies with higher DBE goals are the Regional Transportation District (RTD) and Mountain Metro Transit, both serving densely populated urban areas along the Front Range. The remaining three agencies, while also located in urban regions, report DBE goals closer to or below CDOT's proposed figure.

Importantly, CDOT's proposed goal reflects the contract opportunities of approximately 80 rural subrecipient transit agencies across the state. It excludes contract opportunities of the urban transit agencies listed in Table 6, but includes the availability of all firms in Colorado. This makes the 2.67% goal relatively ambitious, especially given the rural context and limited access to DBE vendors in those areas.

Additionally, CDOT noted a significant downward adjustment in RTD's overall annual DBE goal—from 14.5% in the previous triennial cycle to a proposed 6% for FFY 2026–2028—indicating a projected decline in DBE opportunities based on upcoming contract types. This shift underscores broader market trends and supports the rationale behind CDOT's more modest goal.

Despite RTD's reduction and the rural nature of CDOT-dispersed FTA funds, CDOT remains confident it can achieve the proposed 2.67% target based on historical DBE participation.

Table 6. FTA DBE Goal Comparison of Regional Transit Organizations in Colorado

Transit Agency	DBE Goal	Race-Neutral	Race-Conscious
Denver Regional Transportation District (RTD)	6.0%	0.5%	5.5%
City of Colorado Springs Mountain Metro Transit	5.0%	5.0%	0.0%
Colorado Department of Transportation Division of Transit and Rail	2.67%	2.67%	0.0%
City of Fort Collins Transfort	2.29%	2.0%	0.29%
Mesa County Grand Valley Transit	1.06%	1.06%	0.0%
City of Loveland Transit (COLT)	.29%	.29%	0.0%

CDOT determined that an adjustment to the base figure using this comparison is not warranted.

Large Transit Projects, Building Construction, and Competitive Grants

Similar to data collected during the last methodology, the largest contracting opportunities had little to no DBE availability. As shown in Table 3, there are a small percentage of certified DBEs in several NAICS codes that have the highest weighted contract opportunities. These include Vehicle Maintenance (29%), Transit Services (26%), Fuel (24%). Collectively, these NAICS represent 79% of forecasted contracting opportunities for which there are only 12 DBE certified firms in Colorado. This results in a lower overall goal relative to FHWA-funded projects that have higher availability for the types of work contracted for highway design and construction.

Building Construction is one area where there is a relatively high availability of DBE firms (3.5%) and good potential for contracting opportunities (26%). These opportunities were weighted by evaluating forecasted amounts for fund type 5339(a) rural programs and 5339(b) which is part of FTA's competitive grant process for bus facilities. CDOT cannot predict how many of these competitive projects may actually be awarded or how much would be funded by FTA through CDOT because of the discretionary nature of these awards. CDOT does not know if they will have oversight of these projects on behalf of the subrecipient until after FTA awards the discretionary funds.

Therefore, these "special scenarios" are not accounted for in the DBE goal methodology. Rather, CDOT intends to track these opportunities and implement race-neutral methods, such as project-specific outreach events, that encourage DBE participation.

In summary, CDOT is not making an adjustment to the base figure to account for potential large transit projects or competitively awarded grants. However, CDOT will track potential projects such as:

- Front Range Passenger Rail
- Pueblo County Rail Station
- City of Trinidad Transit Center
- City of Cripple Creek Streetcar Maintenance and Storage Facility
- City of Telluride Bus Barn Improvements

BREAKOUT OF RACE NEUTRAL / RACE CONSCIOUS PARTICIPATION

The federal regulations require CDOT to meet the maximum feasible portion of its overall goal by using race and gender-neutral means. Race-neutral participation includes:

- DBEs who win prime contracts through customary competitive procurement procedures;
- DBEs who are awarded subcontracts on prime contracts that do not carry a DBE goal (0% assigned DBE goal); and
- DBEs who are awarded subcontracts in excess of the stated DBE project goal.

CDOT evaluated the awards on FTA-funded projects made to DBE prime contractors over the past five years as shown in the table below.

Table 7. Past DBE Prime Contract Awards

Federal Fiscal Year	\$ of Prime Contract Awards	# of Prime Contract Awards	# of DBE Prime Awards	\$ Awarded to DBE Primes	Participation % by DBE Primes
2020	\$328,401	20	3	\$17,686	5.39%
2021	\$748,063	42	2	\$76,970	10.29%
2022	\$1,141,839	29	2	\$27,500	2.41%
2023	\$810,843	46	0	\$0	0.00%
2024	\$83,038	15	1	\$5,590	6.73%

Based on past prime contract awards, CDOT determined that there are typically opportunities for DBE firms to be awarded prime contracts to meet the proposed 2.67% overall annual DBE goal using 100% race-neutral methods.

Race-Neutral Methods

The ongoing initiatives described below seek to reduce discriminatory barriers, increase capacity and level the playing field for the participation of DBEs and other small contractors. They are also designed to assist CDOT in increasing race-neutral participation on FTA-funded contracts.

- CDOT helps to maintain the **UCP DBE directory** as a primary source of DBE firms, certified by CDOT and the City and County of Denver, eligible to meet DBE participation requirements on FHWA, FAA and FTA-funded contracts in Colorado. The availability of the DBE directory makes it easier for subrecipients to identify and contact DBEs for potential contracting opportunities.
- **Connect2DOT** is CDOT's outreach and technical assistance program designed to help small businesses in the transportation industry become more competitive and successful in bidding and contracting. Connect2DOT offers one-on-one business and technical consulting, customized workshops and webinars, and various networking events to connect small businesses with transportation contracting opportunities. A complete description of the program can be found at www.connect2dot.org
- CDOT continuously strives to **increase the pool of certified firms** eligible to work on federally-funded contracts through Connect2DOT and various outreach and engagement efforts with industry stakeholders.
- CDOT **provides one-on-one consultation to DBEs** through the Connect2DOT program to help them understand opportunities with CDOT's transit partners.
- CDOT conducts **project-specific DBE outreach events** for capital construction projects funded under 5339(b). For example, CDOT coordinated with the subrecipient, general contractor, and design firm to host an outreach event for construction of the Summit County Transit Facility.
- CDOT DTR and CRBRC participate in **monthly virtual meetings with subrecipients** to review DBE requirements and encourage utilization of DBE firms to meet the overall annual goal. The agenda includes a **DBE Spotlight** where a DBE firm is invited to share their capabilities and experience working with transit organizations. This has helped facilitate networking between subrecipients and DBEs and has provided exposure to the various capabilities of DBEs statewide.

PUBLIC PARTICIPATION & FEEDBACK

In accordance with *49 CFR 26.45*, CDOT provided information about the FTA DBE goal setting process and encouraged input and comments at the CDOT Quarterly Small Business Forums and during the 45-day open public comment period.

Public Comments

CDOT published the overall goal methodology on June 11, 2025 on the [Civil Rights and Business Resource website](#). An email notice was sent to all DBE firms, industry organizations, and grant partners with the notice of the goal. CDOT plans to host a public meeting on June 16, 2025 to discuss the proposed DBE goal and solicit feedback from the contracting community and stakeholder partners such as Colorado Contractors Associations (CCA), American Council of Engineering Companies (ACEC), Conference of Minority Transportation Officials (COMTO), Hispanic Contractors of Colorado (HCC), and Black Construction Group (BCG). CDOT will also encourage public review and comment of the methodology in the [Connect2DOT eNewsletter](#) which has over 5,500 subscribers

CDOT is collecting and tracking comments received from industry and will evaluate each independently. An additional analysis will be performed on potential Step 1 and Step 2 adjustments, if warranted. CDOT intends to continue to engage in conversations with industry about the methodology, overall annual goal, and potential options to encourage DBE participation to meet or exceed the race-neutral goal over the next three federal fiscal years.

Comments related to the proposed FTA DBE overall goal or methodology should be directed to the CDOT DBE Program Manager below.

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