Draft Title VI Report – Contingency Service Plan

Introduction

On March 25, 2026, the AC Transit Board of Directors approved a framework for a Contingency Service Plan to be implemented in calendar year 2027 in the event of a significant budget deficit. AC Transit, like many transit agencies across the nation, has struggled with the expiration of one-time transit funding allocations associated with the American Rescue Plan Act of 2021 (ARP), which AC Transit exhausted fully in fiscal year 2024-25. Using operating reserves and a loan from the State of California, AC Transit can maintain current service levels through the end of fiscal year 2026-27.

However, without obtaining sustainable funding, AC Transit projects $50 million in annual deficits starting in fiscal year 2027-28, making major service reductions unavoidable. While a regional tax measure is slated for the November 2026 ballot, which would help AC Transit avoid major service reductions, AC Transit must prepare for the worst.

This report analyzes the system-wide effects of the proposed service reductions on populations protected by Title VI of the Civil Rights Act of 1964 (Title VI). It contains statistical analyses and **finds that the proposed service reductions have no disparate impact on protected minority populations and no disproportionate burden on low-income populations.**

At a later date and before making any major service changes, staff will conduct a more detailed service equity analysis for the Board's consideration. The report (in its eventual final draft form) will also describe how the public, particularly communities protected by Title VI, were engaged in the planning process; how comments were solicited and obtained; and describe the comments received.

Title VI Obligations

Title VI of the Civil Rights Act of 1964 states: “No persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The Federal Transit Administration (FTA) issued a Circular in 2012 (Title VI Circular 4702.1B) to help transit agencies meet the mandate of Title VI. This circular guides AC Transit’s compliance with federal requirements because AC Transit is a designated recipient of FTA funding.

Commitment to Title VI compliance is an essential element of AC Transit’s strategic plan and the District’s operation. It is AC Transit’s goal to ensure that all transit service is equitably distributed and provided without regard to race, color, and national origin, or low-income status. AC Transit aims to provide equal opportunities for all persons to participate in the transit

planning and decision-making processes without regard to race, color, national origin, or low-income status. Several Board policies provide guidance to ensure these goals are met.

Service Equity Analysis

Board Policy 518 (Title VI Service Review and Compliance Report Policy) requires staff to conduct a Title VI service equity analysis whenever there is a major service change. A major service change, also defined in Board Policy 518, is generally one that constitutes a significant aggregate change in route miles or hours, and can include system wide route restructuring, changes in frequency, or adding and deleting service. Under these policies, the proposed changes in this report qualify as major service changes.

For such major service changes, the Board policies require staff to assess the quantity and quality of service provided and populations affected. Board Policy 518 states that for a major service equity analysis "the Title VI service equity analysis will assess the quantity and quality of service provided and populations affected; the analysis will measure service in terms of current AC Transit standards for frequency, span of service, and/or distance to bus routes." The service equity analysis aims to identify if, in implementing proposed changes, protected minority or low-income populations or riders would experience any greater adverse effect than other populations or riders.

If the District finds that the service change proposals result in disparate impacts on protected minority populations, the District must identify alternatives to the proposal that could serve the same legitimate objective with less disparate impact. If a less discriminatory alternative does not exist and AC Transit has a substantial legitimate justification that cannot otherwise be accomplished, AC Transit must identify measures to mitigate the negative impacts of the changes. Additionally, if the District finds that the service change proposals result in disproportionate burdens on low-income communities, the District must identify alternatives available to affected low-income riders and take steps to avoid, minimize, or mitigate impacts where practicable.

Public Engagement

In addition to the basic requirement to conduct a service equity analysis, the District's Title VI Program contains requirements to ensure all persons have equal opportunities to participate in planning decision-making and provide input about major service changes, regardless of race, color, national origin, or income status. The Program provides guidance on how best to reach people protected by civil rights legislation and regulations.

Through outreach to the community, AC Transit recognizes the importance of the diversity inherent within the service area from both a racial and economic perspective. The Public Participation Plan (PPP) in the Program was created to identify ways of communicating with and engaging communities that may have been traditionally underserved and determine the most effective strategies to encourage the participation of these communities in decision-making processes. The Language Assistance Plan (LAP) contains recommendations for communicating

with people who speak English less than very well in ways that make sense for those populations.

Staff will follow the recommendations contained in the PPP and the LAP to conduct a range of outreach activities and solicit feedback and opinions in a variety of ways.

Service Equity Analysis

Because the proposed service reductions amount to a system-wide service change, instead of analyzing every route change by segment, staff developed several methods to determine if there were any adverse effects on protected minority and low-income populations.

Methods

District staff conducted two separate analyses, which will be described further in this document:

- The service intensity analysis asks the following: (1) how the proposed service reductions would affect the amount of service available to protected minority populations compared to non-minority populations, and (2) how the proposed service reductions would affect the amount of service available to low-income populations compared to non-low-income populations.

- The service quality analysis asks the following: (1) how the proposed service reductions would affect the amount of time for protected minority populations to complete transit trips as compared to non-minority populations, and (2) how the proposed service reductions would affect the amount of time for low-income populations to complete transit trips as compared to non-low-income populations.

Data Sources

A variety of data sources were used for these analyses.

For the service intensity analysis, staff combined GTFS schedule outputs with data at the block group level from the American Community Survey 5-year dataset (2020-2024) using a variety of R programming language-based data science tools to measure the number of people living within 1/4 mile of bus stops and the number of trips available to those people before and after the proposed service reductions. The process, while conducted with different software tools, aligned with past AC Transit methodologies and current Board policies. This analysis was conducted at the system-wide level and at a smaller planning area level. More specific detail on the methodology and results can be found in Appendix A.

For the service quality analysis, staff used the r5 and r5r software packages, which are free and open-source and primarily developed by Conveyal and the Brazilian Institute for Applied Economic Research. These packages were used to calculate the number of jobs accessible from areas across the District; the pedestrian networks were derived from OpenStreetMap exports, and the transit networks from static AC Transit GTFS feeds. In this case, average job accessibility was calculated by Census block group for minority and non-minority populations, and low-

income and non-low-income communities, within 30, 60, and 90 minutes using the schedules for each service change. The analysis also calculated the average travel time from an expansive grid to all Census block groups within walking distance of the AC Transit bus network.

Summary of Findings

The Disparate Impact policy in Board Policy 518 states:

"When the proportion of people of color populations or riders adversely affected by the proposals is 15% (or more) than the proportions of non-people of color populations or riders adversely affected, such changes will be considered to have a disparate impact."

The Disproportionate Burden policy states:

"When the proportion of low-income populations or riders adversely affected by the proposals is 15% (or more) than the proportion of non-low-income populations or riders adversely affected, such changes will be considered to have a disproportionate burden."

The service reductions analyzed in this report had **no disparate impact** on minority populations and **no disproportionate burden** on low-income populations. From the outset, the goal of the plan was to minimize impacts on the entire District, with special care to prioritize protected populations' access to service. The analysis found some differences between the effects of the changes on populations protected and not protected by Title VI, however, none of the differences exceeded the Title VI policy thresholds. The full contents of the service equity analyses are contained in Appendix A of this report.

Appendix A: Service Equity Analysis

As stated in the report, District staff used two different methods to conduct the service equity analysis: the Service Intensity and Service Quality analyses. The line-by-line details of the proposed changes can be found in Attachment 2 to Staff Report 26-090a.

Throughout the Service Equity Analysis, the following parameters were used:

- Data related to all lines in the AC Transit service area were included in the analysis.
- For lines with varying schedules by day of the week, including many 600-series limited service lines, a typical Monday schedule was chosen to represent service throughout the week.
- "Minority populations" include all persons who self-identify as not white in the US Census, including all persons who identify as Latino/a or Hispanic. Low-income populations include all persons living in households with income less than 200% of the federal poverty level.

For background information, the AC Transit service area population of over 1.6 million people is approximately 75% minority populations and 22% low-income households (Exhibit 1).

Exhibit 1 - Population in AC Transit Service Area

Total Population	% Minority	% Low-Income
1,619,795	74.87%	21.86%

Service Intensity Analysis

The Service Intensity Analysis asks the question: “how would the service change affect the amount of service available to minority and low-income populations compared to non-minority and non-low-income populations?” Staff analyzed access to service and the amount of service available to minority and low-income populations system-wide. The amount of service was also analyzed on a smaller area-wide basis.

Methodology

Staff used official District GTFS data from the February 2026 service change as a baseline. For the Contingency Service Plan scenarios, given that official timetables and runcuts are yet to be produced given scheduling staffing limitations and the uncertainty of the fiscal situation, staff used the **gtfstools** R package extensively to create hypothetical GTFS schedules for each scenario based on scheduled runtime data in the February 2026 sign-up. Staff developed custom R functions to carefully match runtimes in in the Contingency Service Plan scenarios to the baseline GTFS feed by day type, route, trip start hour, direction.

Staff combined GTFS feeds from the baseline and proposed scenarios. The **tidyverse, sf, and lwgeom** R packages were used to count the number of people who live within 1/4 mile of bus stops under the baseline service and the Contingency Service Plan scenarios and to count the number of trips available to those people under all scenarios. The process aligns with Title VI policies and the past AC Transit methodology used, but was implemented with different software tools. This analysis was conducted at the system-wide level and within more fine-grained planning sub-areas.

The R scripting generated 1/4 mile buffers around bus stops and estimated the population within the buffers. The scripting also automatically counted the amount of bus service (i.e. trips) available in each of the buffers based on the service data contained in the maps.

Census data provided by the American Community Survey 2020-2024 5-year sample was sourced from the Census API with the use of the **tidycensus** and **tigris** r libraries. In this dataset, minority status is coded by subtracting the white, non-Latino/a population from the total population (in table B03002), and low-income status is coded at 200% of the US federal poverty rate (in table C17002).

Access to service

Staff first analyzed how many minority and low-income people lived within 1/4 mile of a bus stop under the existing service, and compared it to how many minority and low-income people would live within a 1/4 mile of a bus stop with the proposed service.

Exhibit 2 - Overall Population within 1/4 mile of service by proposed scenario		
People within 1/4 mile of AC Transit Stops	Baseline	$53m Reduction
Overall	1,584,459	1,580,488
Percent Change		-0.25%

This analysis found that the overall population within 1/4 mile of AC Transit bus stops would decrease slightly under the $53m reduction plan. The Percent Change describes the population no longer within ¼ mile of AC Transit bus stops after the proposed service changes.

This analysis was repeated for minority, non-minority, low-income, and non-low-income people, and the results were compared (Exhibits 3 and 4).

Exhibit 3 - Minority and Non-Minority Population within 1/4 mile of service by proposed scenario		
People within 1/4 mile of AC Transit Stops	Baseline	$53m Reduction
Minority	1,186,806	1,183,182
Non-Minority	397,653	397,306
Minority Percent Change		-0.31%
Non-Minority Percent Change		-0.09%
Difference between Minority and Non-Minority		-0.22%

Exhibit 4 - Low-Income and Non-Low Income Population within 1/4 mile of service by proposed scenario		
People within 1/4 mile of AC Transit Stops	Baseline	$53m Reduction
Low-Income	351,071	350,504
Non-Low Income	1,233,388	1,229,984
Low-Income Percent Change		-0.16%
Non-Low Income Percent Change		-0.28%
Difference between Low-Income and Non-Low-Income		0.12%

The differences between the change in access to bus stops for minority and non-minority and low-income and non-low-income populations fall below the District's threshold of 15% for disparate impacts and disproportionate burdens.

Amount of service

Along with analyzing the number of people who live near existing and proposed bus stops, staff measured the amount of service available to the population groups. This involved counting the number of trips passing through minority census block groups within 1/4 mile of bus stops and multiplying that by the total population in those census block groups, resulting in the number of annual minority trips near bus stops. This analysis was repeated for non-minority, low-income, and non-low-income population groups; and was repeated using both existing and proposed service.

Exhibit 5 – Minority and Non-Minority Trips by Census Block Group		
Annualized Person Trips	Baseline	$53m Reduction
Minority	128,864,806,141	112,480,262,718
Non-Minority	46,035,465,254	40,428,454,661
Minority Absolute Change		-16,384,543,423
Non-Minority Absolute Change		-5,607,010,593
Minority Percent Change		-12.71%
Non-Minority Percent Change		-12.18%
Difference		-0.53%

This analysis found that for the proposed service changes resulting from the $53m Reduction, minority populations receive less service (.53 percent less) than non-minority populations (Exhibit 5), which is well below the threshold for a disparate impact.

Exhibit 6 – Low-Income and Non-Low-Income Person Trips by Census Block Group		
Annualized Person Trips	Baseline	$53m Reduction
Low-Income	47,218,240,064	42,096,083,527
Non-Low-Income	127,682,031,331	110,812,633,852
Low-Income Absolute Change		-5,122,156,537
Non-Low Income Absolute Change		-16,869,397,479
Low-Income Percent Change		-10.85%
Non-Low Income Percent Change		-13.21%
Difference between Low-Income and Non-Low Income		2.36%

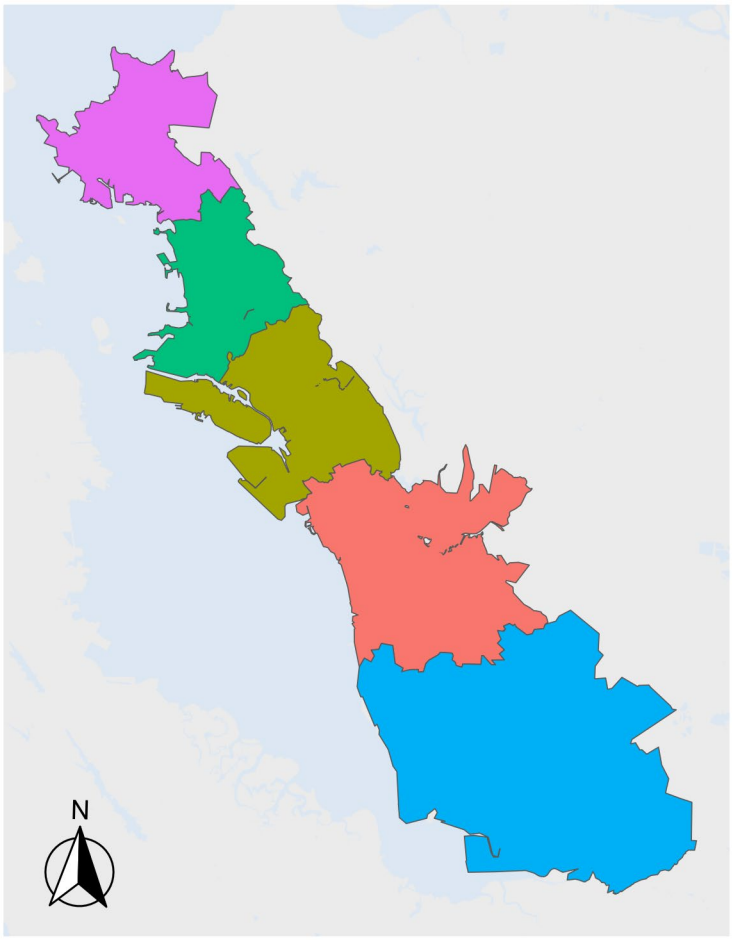
There is no disproportionate burden on low-income populations. In fact, low-income people would receive more service (2.36%) than non-low-income people under the proposed service changes resulting from the $53m Reduction (Exhibit 6).

Staff then took a closer look at the service intensity analysis by smaller areas. The following 5 geographic sub-areas as follows were used (Exhibit 7):

- Area A: The portion of West Contra Costa County included in the AC Transit service area.
- Area B: Northern portions of Alameda County, from the border with Contra Costa to downtown Oakland, including the cities of Albany, Berkeley, Emeryville, and Piedmont.
- Area C: East Oakland, Piedmont, and the city of Alameda – from downtown Oakland to the border with San Leandro.
- Area D: San Leandro, Hayward, unincorporated Alameda County, and Union City; commonly referred to in the Planning department as Central Alameda County.
- Area E: The cities of Fremont & Newark; commonly referred to in the Planning department as South Alameda County.

The amount of service assigned to each analysis area was then calculated using R scripts, but grouped by the geography areas denoted.

Exhibit 7 – Analysis areas in Contingency Service Plan



Findings:

No disparate impact or disproportionate burden was found. In all analysis areas, people living within 1/4 mile of bus stops experienced decreases in service and in ridership (person-trips). However, in all analysis areas, person-trips for minority and low-income populations would decrease less than for non-minority and non-low-income populations. Exhibits 8 through 16 for each individual geographic area are depicted below.

Exhibit 8 – Minority and Non-Minority Person Trips (Area A, West Contra Costa County)		
Annualized Person Trips	Baseline	$53m Reduction
Minority	11,546,560,030	9,572,674,960
Non-Minority	2,885,865,205	2,480,967,155
Minority Absolute Change		-1,973,885,070
Non-Minority Absolute Change		-404,898,050
Minority Percent Change		-17.10%
Non-Minority Percent Change		-14.03%
Difference between Minority and Non-Minority		-3.06%

Exhibit 9 – Low-Income and Non-Low-Income Person Trips (Area A, West Contra Costa County)		
Annualized Person Trips	Baseline	$53m Reduction
Low-Income	4,346,454,150	3,583,259,430
Non-Low Income	10,085,971,085	8,470,382,685
Low-Income Absolute Change		-763,194,720
Non-Low-Income Absolute Change		-1,615,588,400
Low-Income Percent Change		-17.56%
Non-Low-Income Percent Change		-16.02%
Difference between Low-Income and Non-Low-Income		-1.54%

Exhibit 10 – Minority and Non-Minority Person Trips (Area B, Northern Alameda County)		
Annualized Person Trips	Baseline	$53m Reduction
Minority	38,892,394,369	35,311,422,037
Non-Minority	25,652,002,153	23,043,372,526
Minority Absolute Change		-3,580,972,332
Non-Minority Absolute Change		-2,608,629,627
Minority Percent Change		-9.21%
Non-Minority Percent Change		-10.17%
Difference between Minority and Non-Minority		0.96%

Exhibit 11 – Low-Income and Non-Low-Income Person Trips (Area B, Northern Alameda County)		
Annualized Person Trips	Baseline	$53m Reduction
Low-Income	17,419,389,074	15,843,059,373
Non-Low Income	47,125,007,448	42,511,735,190
Low-Income Absolute Change		-1,576,329,701
Non-Low-Income Absolute Change		-4,613,272,258
Low-Income Percent Change		-9.05%
Non-Low-Income Percent Change		-9.79%

Difference between Low-Income and Non-Low-Income	0.74%

Exhibit 12 – Minority and Non-Minority Person Trips (Area C, East Oakland & Alameda)

Annualized Person Trips	Baseline	$53m Reduction
Minority	44,142,991,032	41,140,769,935
Non-Minority	12,183,474,964	10,894,722,946
Minority Absolute Change		-3,002,221,097
Non-Minority Absolute Change		-1,288,752,018
Minority Percent Change		-6.80%
Non-Minority Percent Change		-10.58%
Difference between Minority and Non-Minority		3.78%

Exhibit 13 – Low-Income and Non-Low-Income Person Trips (Area C, East Oakland and Alameda)		
Annualized Person Trips	Baseline	$53m Reduction
Low-Income	17,959,557,171	16,918,286,804
Non-Low Income	38,366,908,825	35,117,206,077
Low-Income Absolute Change		-1,041,270,367
Non-Low-Income Absolute Change		-3,249,702,748
Low-Income Percent Change		-5.80%
Non-Low-Income Percent Change		-8.47%
Difference between Low-Income and Non-Low-Income		2.67%

Exhibit 14 – Minority and Non-Minority Person Trips (Area D, Central Alameda County)		
Annualized Person Trips	Baseline	$53m Reduction
Minority	22,305,733,070	16,839,129,503
Non-Minority	4,237,941,475	3,264,939,243
Minority Absolute Change		-5,466,603,567
Non-Minority Absolute Change		-973,002,232
Minority Percent Change		-24.51%
Non-Minority Percent Change		-22.96%
Difference between Minority and Non-Minority		-1.55%

Exhibit 15 – Low-Income and Non-Low-Income Person Trips (Area D, Central Alameda County)		
Annualized Person Trips	Baseline	$53m Reduction
Low-Income	5,991,606,020	4,595,051,957
Non-Low Income	20,552,068,525	15,509,016,789
Low-Income Absolute Change		-1,396,554,063
Non-Low-Income Absolute Change		-5,043,051,736
Low-Income Percent Change		-23.31%
Non-Low-Income Percent Change		-24.54%

Difference between Low-Income and Non-Low-Income	1.23%

Exhibit 16 – Minority and Non-Minority Person Trips (Area E, Southern Alameda County)

Annualized Person Trips	Baseline	$53m Reduction
Minority	14,872,059,050	12,025,425,425
Non-Minority	2,756,204,550	2,221,789,260
Minority Absolute Change		-2,846,633,625
Non-Minority Absolute Change		-534,415,290
Minority Percent Change		-19.14%
Non-Minority Percent Change		-19.39%
Difference between Minority and Non-Minority		0.25%

Exhibit 17 – Low-Income and Non-Low-Income Person Trips (Area E, Southern Alameda County)

Annualized Person Trips	Baseline	$53m Reduction
Low-Income	2,443,712,375	1,952,735,055
Non-Low Income	15,184,551,225	12,294,479,630
Low-Income Absolute Change		-490,977,320
Non-Low-Income Absolute Change		-2,890,071,595

Low-Income Percent Change	-20.09%
Non-Low-Income Percent Change	-19.03%
Difference between Low-Income and Non-Low-Income	-1.06%

AC Transit Board Policy 518 indicates:

“When people of color populations or riders as a whole will experience a 15% (or more) greater adverse effect than that borne by the non-people of color populations or riders, such changes will be considered to have a disparate impact. An adverse effect is defined as a geographical or time-based reduction in service which includes but is not limited to: elimination of a route, short turning a route, rerouting an existing route, or an increase in headways.”

In no analysis area were service levels for non-minority populations prioritized over those for minority populations: the differences between the change of person-trips for minority and non-minority populations is lower than the disparate impact threshold. So this analysis finds no disparate impacts on minority populations.

AC Transit Board Policy 518 also says:

“When the proportion of low-income populations or riders as a whole adversely affected by the proposals is 15% (or more) than the proportion of non-low-income populations or riders adversely affected, such changes will be considered to have a disproportionate burden.”

In all planning areas, the differences between the change of person-trips for low-income and non-low-income populations is lower than the disparate impact threshold. There are no adverse effects on low-income persons, and no disproportionate burdens.

Service Quality Analysis

The Service Quality Analysis asks the question: how did the service change affect access to economic opportunity for minority and low-income populations compared to non-minority and non-low-income populations? In this case, staff used the number of jobs accessible by walking and by transit as a proxy for economic opportunity.

To accomplish this, staff carried out an Origin-Destination (or O-D) exercise using employment data from the U.S. Census Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics (LEHD LODES, or LODES) 2023 dataset. The LODES dataset provides employment numbers summarized at the block level and were aggregated by block group for this analysis.

Methodology

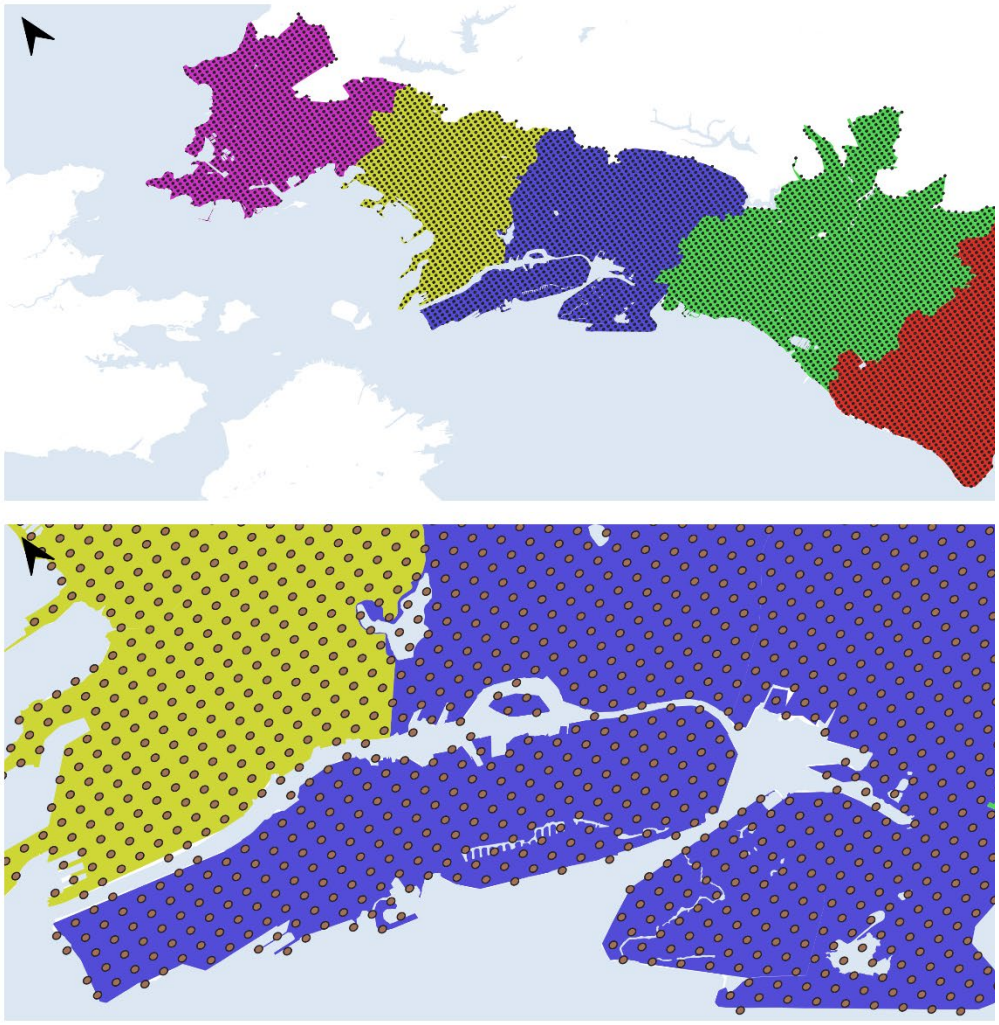
Staff used the open source r5 multimodal routing software package and its companion R programming language package r5r to generate combined pedestrian and AC Transit network analysis datasets reflective of the entire AC Transit service area. The r5 package is primarily developed by Conveyal and is derived in part from the OpenTripPlanner project. The r5r package is primarily developed by IPEA, Brazil's national Institute for Applied Economic Research.

The pedestrian network was derived from OpenStreetMap street centerline data and a digital elevation model from the USGS. Transit networks were derived from AC Transit's static GTFS feed for the February 2026 schedule change, and mock timetables for each proposed scenario were developed using a custom R programming workflow to extract existing runtimes from the February 2026 GTFS feed, generate new trip times based on those runtimes by day type, hour, and direction, adjust service spans, and truncate routes as relevant.

The r5 network parameters assume standard walking speeds of 1.5 meters per second (or just under three miles per hour) for pedestrian links, and average transit travel times during these periods based on GTFS transit schedules.

Using the r5r package, staff calculated median travel times for the weekday AM peak period (6:00 a.m. to 10:00 a.m.) for each block group in the AC Transit service area. For origins, 7,999 points on a 1/5-mile grid within the AC Transit service area (Exhibit 18) were used. For destinations, 3,803 ACS block group centroids within a two-mile radius of stops in the AC Transit bus network were used. For this analysis, 1.37 billion one-way travel times were calculated for each proposed scenario.

Exhibit 18 – Origin Grid at District-Wide Scale and 1:50,000



Using this as a starting point, each origin point was buffered by 200 feet and grouped by origin and destination block groups to ensure all origin block groups were covered in the model. Average travel times were then calculated between block groups (including walk times, out-of-vehicle wait times, and in-vehicle travel times) and the average number of jobs accessible within 30-, 60-, and 90-minute thresholds were tabulated. To select a representative job accessibility number for each block group, the analysis used the 10th percentile grid origin point for the median number of jobs accessible over the weekday AM peak.

A weighted mean was calculated using the representative job access number for each block group for minority, non-minority, low-income, and non-low-income people. This methodology is slightly different from past system-wide job access calculations used in AC Transit's Title VI analysis, but is designed to output a more actively legible output number; past person-job methodologies.

Exhibit 19 depicts the results of a sample origin-destination calculation between a point on the model's grid for analysis within the City of Alameda's West End and a census block group in downtown San Francisco. For this sample trip beginning at 6:00 a.m., r5r generated a two-seat trip utilizing AC Transit's local Line 51A and Transbay Line NL, complete with total estimated walk and wait times.

Exhibit 19 – Sample Origin-Destination Calculation from the December 2020 Service Change

Findings

Staff evaluated the number of accessible jobs within 30-, 60-, and 90-minute average travel times (which includes both average out-of-vehicle wait times and in-vehicle travel times), and found there were no disparate impacts or disproportionate burdens because of the proposed service reductions. The details are depicted in Exhibit 20.

Exhibit 20 – Average Jobs Accessible within 30, 60, and 90 minutes for Minority, Non-Minority, Low-Income, and Non-Low Income Populations

Mean Jobs Accessible by Category	Baseline	$53m Reduction	Absolute Change $53m Reduction	% Change $53m Reduction	Difference $53m Reduction
Minority - within 30 minutes	19,838	18,671	-1,167	-5.88%	-1.38%
Non-Minority - within 30 minutes	27,657	26,411	-1,245	-4.50%	
Low-Income - within 30 minutes	28,205	26,872	-1,333	-4.73%	1.10%
Non-Low-Income - within 30 minutes	19,927	18,766	-1,160	-5.82%	
Minority - within 60 minutes	143,091	130,013	-13,078	-9.14%	-0.62%
Non-Minority - within 60 minutes	194,289	177,731	-16,558	-8.52%	
Low-Income - within 60 minutes	188,294	174,547	-13,747	-7.30%	2.22%
Non-Low-Income - within 60 minutes	146,948	132,955	-13,994	-9.52%	
Minority - within 90 minutes	322,417	300,537	-21,880	-6.79%	-1.49%
Non-Minority - within 90 minutes	409,884	388,157	-21,727	-5.30%	
Low-Income - within 90 minutes	405,265	386,029	-19,237	-4.75%	2.17%
Non-Low-Income - within 90 minutes	326,410	303,818	-22,592	-6.92%	