

Title VI Equity Analysis

Acworth/Kennesaw Microtransit Service

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Introduction

This memorandum documents the Service Equity Analysis performed for CobbLinc’s planned Acworth/Kennesaw CobbLinc Go Microtransit Zone. Service Equity Analyses are a requirement of the Federal Transit Administration (FTA) under Title VI of the Civil Rights Act of 1964, which prohibits recipients of federal assistance from discrimination based on “race, color, or national origin.” The purpose of the analysis is to determine, prior to implementing any major service change, whether the planned change would have a disparate impact on protected classes. Although low-income populations are not a protected class under Title VI, the FTA also requires transit providers to determine whether low-income populations would bear a disproportionate burden, or whether non-low-income populations would receive a disproportionate benefit, from a proposed major service change. FTA’s Title VI regulations, including the guidelines for conducting Service Equity Analyses, are available for reference in FTA Circular 4702.1B.

Proposed Service Change

CobbLinc proposes the addition of a microtransit service zone serving the cities of Acworth and Kennesaw. This proposed service is consistent with the CobbForward Transportation Plan’s recommendation to introduce microtransit zones in each municipality within Cobb County and is intended to address growing transit demand and evolving travel patterns in North Cobb County. The microtransit service is intended to complement existing fixed-route transit by providing first- and last-mile connections, improving access to major destinations, and expanding mobility options in areas not well suited for traditional fixed-route service.

The proposed Acworth/Kennesaw microtransit service would operate as an on-demand, shared-ride service within a defined zone encompassing the cities of Acworth and Kennesaw, including Kennesaw State University. The service is planned to operate on weekdays from 7:00 a.m. to 7:00 p.m. with a one-way fare of \$2.50 and free transfers to local bus routes, consistent with CobbLinc’s existing microtransit fare structure.

Within the proposed Acworth/Kennesaw microtransit zone, CobbLinc currently operates several fixed-route services that provide regional connectivity. Routes 40 and 45 provide local service within Kennesaw and connections to the Marietta Transfer Center, while Rapid 10 offers limited-stop service connecting Kennesaw State University to the Marietta Transfer Center, the Cumberland Transfer Center, and the MARTA Arts Center Station. These routes primarily operate along major corridors and are designed to serve higher-density travel markets. While they provide important regional access, portions of Acworth and Kennesaw remain outside convenient walking distance of fixed-route service due to lower land use densities and lower residential densities.

Background

The proposed Acworth/Kennesaw CobbLinc Go Microtransit Zone represents the next expansion of CobbLinc's on-demand service model. CobbLinc Go was first launched in South Cobb as a two-year pilot program and replaced the former Flex Service with a curb-to-curb microtransit model operating within a defined service area. The proposed Acworth/Kennesaw zone would apply this same service model in North Cobb, expanding local mobility options while complementing existing fixed-route services that operate along major corridors.

The Acworth/Kennesaw microtransit zone is a two-year pilot supported by State of Georgia Transit Trust Fund resources, with a \$3.84 million contribution toward a \$4.8 million project. This funding commitment supports implementation of the Acworth/Kennesaw zone as part of CobbLinc's broader shift toward flexible, on-demand service models.

Consideration of Approved Planning Efforts

The proposed Acworth/Kennesaw CobbLinc Go Microtransit Zone is consistent with the adopted CobbForward Comprehensive Transportation Plan, which establishes Cobb County's long-term multimodal transportation vision. CobbForward identifies on-demand microtransit as one of several service models that can help meet countywide mobility needs, particularly in areas where dispersed development patterns, lower densities, or first- and last-mile access challenges make traditional fixed-route service less effective. The plan also recognizes the need to balance coverage and productivity, using different service types to respond to different travel markets and community needs.

The adopted CobbForward service vision map (shown in **Figure 1**) shows on-demand coverage in North Cobb, including the Acworth and Kennesaw areas. While some elements of the broader CobbForward transit vision would require future funding and additional implementation steps, the Acworth/Kennesaw microtransit pilot provides a practical near-term strategy for expanding transit access in an area identified for improved coverage. The proposed service therefore advances an approved planning direction without assuming implementation of broader unfunded transit improvements.

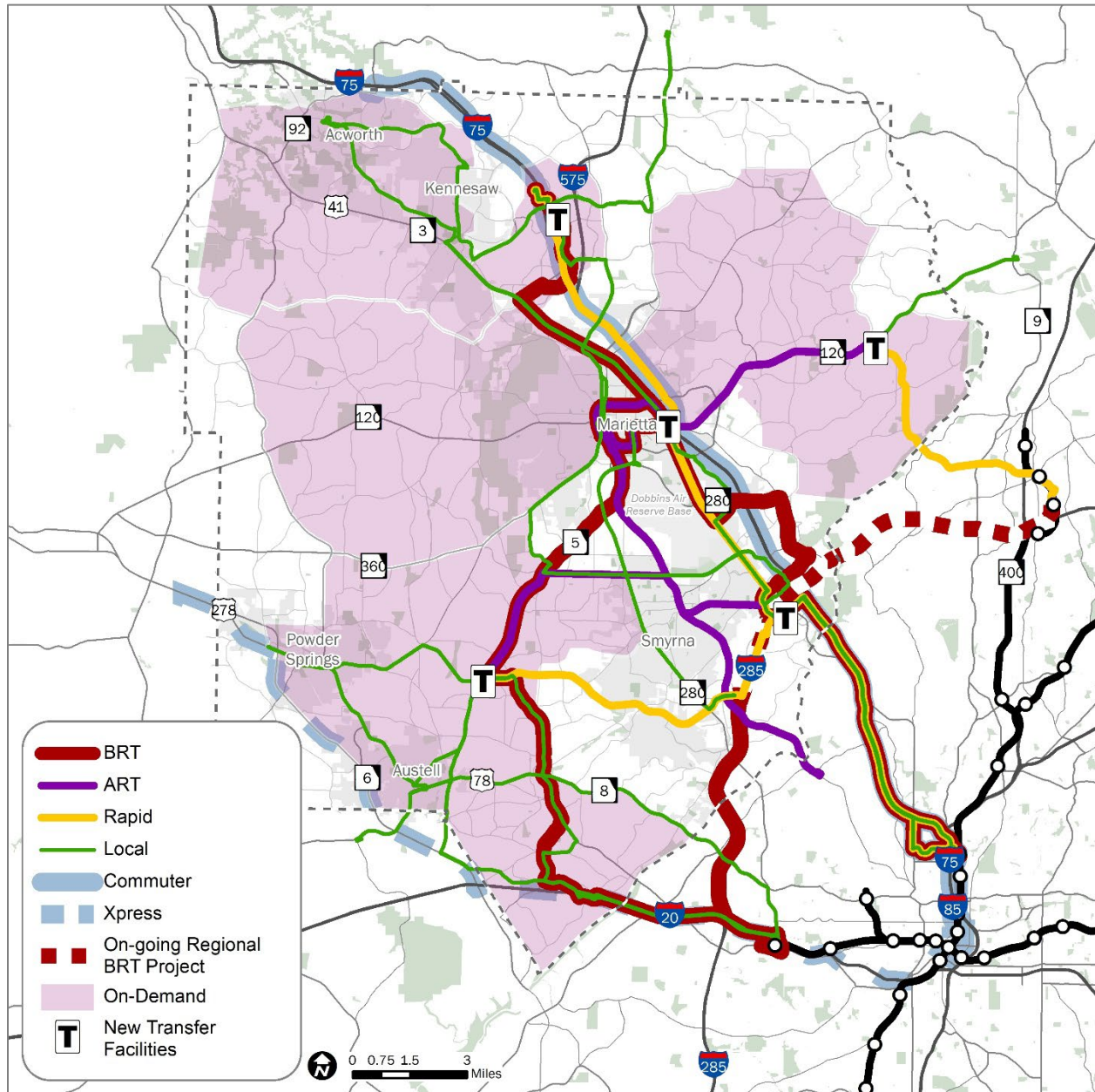


Figure 1: CobbForward CTP Aspirational Plan

Service Need and Market Conditions

Acworth and Kennesaw have experienced continued residential and employment growth, particularly around Kennesaw State University and along major corridors. The proposed service area includes a mix of residential neighborhoods, educational destinations, employment areas, commercial corridors, medical facilities, and regional activity centers. Kennesaw State University is a particularly important travel market within the proposed zone, and CobbLinc's existing partnership with KSU has already demonstrated demand for improved mobility options serving students and surrounding destinations.

While existing fixed-route services provide important regional connections in the area, including Routes 40 and 45 and Rapid 10, these routes primarily operate along major corridors and do not place all neighborhoods, destinations, or employment areas within convenient walking distance of fixed-route stops. Development patterns in portions of Acworth and Kennesaw remain relatively low-density or dispersed, limiting the effectiveness of fixed-route transit in serving all local travel needs efficiently.

Microtransit offers a flexible service model capable of adapting to these conditions by providing shared rides within a defined zone, improving access to key destinations, and connecting riders to the broader CobbLinc network. CobbLinc’s experience with the South Cobb CobbLinc Go pilot also supports the use of microtransit as a viable service model in North Cobb. While South Cobb ridership does not directly measure demand in Acworth/Kennesaw, the pilot demonstrates that the on-demand service model can improve rider experience and expand usable transit coverage when applied to appropriate market conditions. The monthly ridership trend for the South Cobb service is shown in **Figure 2**.

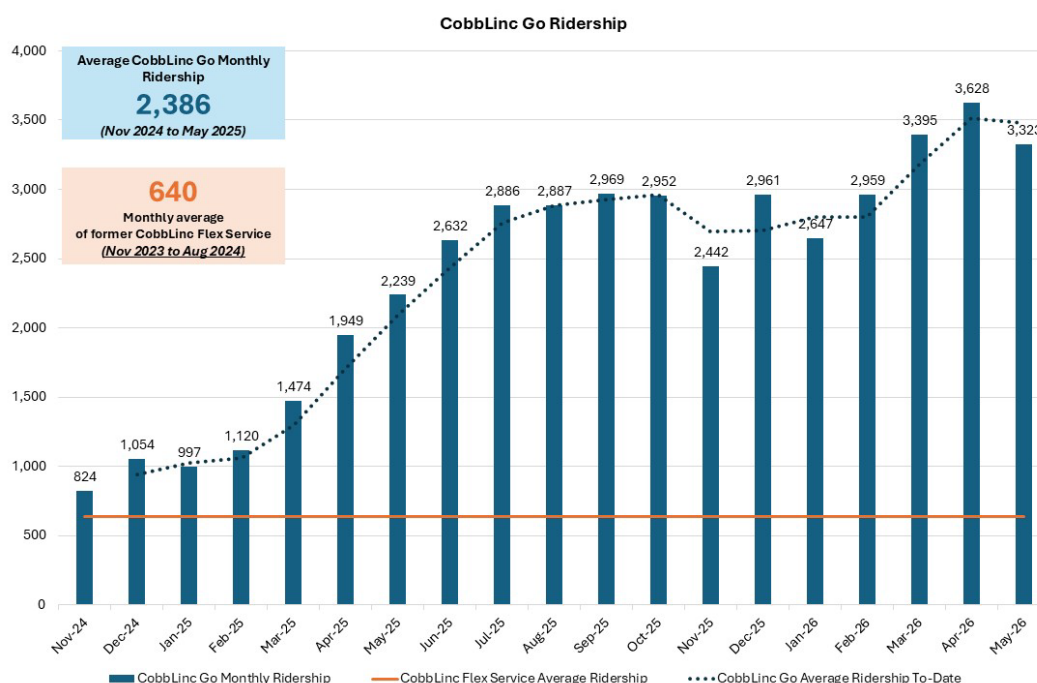


Figure 2: CobbLinc Go Ridership, Nov. 2024– May 2026

Alignment with System Goals

The proposed Acworth/Kennesaw CobbLinc Go Microtransit Zone supports CobbLinc’s mission to provide safe, reliable, and accessible multimodal transportation that connects Cobb County residents to jobs, services, and opportunities. By introducing on-demand service in North Cobb, the project advances CobbLinc’s broader objectives of improving connectivity, expanding accessibility, supporting community mobility needs, and using innovative service models to improve coverage.

Because the proposed service does not eliminate, reduce, or modify existing fixed-route service, it is intended to strengthen the CobbLinc network rather than replace it. Routes 40, 45, and Rapid 10 would continue to provide important corridor and regional connections, while the Acworth/Kennesaw CobbLinc

Go Microtransit Zone would improve local circulation, first- and last-mile access, and connections between North Cobb neighborhoods, activity centers, and the broader transit system.

Expanding CobbLinc Go service to North Cobb County, while maintaining the underlying fixed-route network, meets the following objectives outlined in CobbLinc's 2025 Annual Report:

- **Safety and reliability:** CobbLinc Go addresses gaps in the existing transit network and provides dependable, on-demand service in areas where infrequent fixed-route services left riders with unreliable options by reducing wait times and improving consistency for all riders.
- **Connectivity:** CobbLinc Go provides first- and last-mile service to the existing fixed-route network in low-density areas that otherwise may not support high-frequency fixed-route service, connecting riders to bus routes and to the broader regional network.
- **Accessibility:** Providing curb-to-curb, door-to-door service within the Acworth/Kennesaw zone removes the walk-to-a-fixed-stop barrier and expands accessibility for all transit users within the area, including riders with mobility limitations and those in areas lacking pedestrian infrastructure.
- **Innovation:** Microtransit offers a flexible, demand-responsive service that can be deployed to areas that may not support fixed-route service, allowing CobbLinc to extend coverage efficiently rather than concentrating service where ridership is already established.
- **Community focus:** CobbLinc Go is responsive to community needs by providing an appropriate level of transit service in lower-density areas while still connecting riders to major destinations such as healthcare, grocery stores, libraries, and community centers.

Cobb County Policies

CobbLinc last updated its Title VI program in February 2024. This Title VI program defines the procedures and policies related to Title VI requirements, including policies on communications, language assistance, service and fare policies and standards. Relevant to the equity analysis, the Title VI program provides policy definitions for Major Service Changes, Disparate Impact (regarding impacts affecting racial or ethnic minorities), and Disproportionate Burden (regarding impacts affecting low-income populations).

Major Service Change Policy

CobbLinc defines a major service increase to include the following:

- The creation of an entire route or an expansion of a route that extends the geographic area of transit service area at least a one-half mile in length.
- An increase in the service hours of any route of at least 10 percent of the total hours operated on a daily basis, or an increase in service of the number of days of the week that any route operates.

Although the policy specifically mentions only the creation and expansion of routes, the creation and expansion of microtransit zones is implied to fall under this definition. As a result, the introduction of the Acworth/Kennesaw microtransit zone represents a service expansion. No existing fixed-route services are proposed to be eliminated, reduced, or modified as part of this change. Routes 40, 45, and Rapid 10 will continue to operate as they do today, maintaining existing levels of service while benefiting from additional connections provided by the microtransit service.

Disparate Impact Policy

The Disparate Impact Policy sets a threshold to determine whether a service or fare change disproportionately affects minority populations compared to non-minority populations. For the purpose of this analysis, “minority” is defined as any individuals who do not identify as white and non-Hispanic or Latino. This includes the following racial and ethnic groups, based on classifications from the U.S. Census: Black/African American, American Indian/Alaska Native, Asian, Native Hawaiian/Pacific Islander, Other, Two or More Races, and Hispanic, Latino, or Spanish Origin.

CobbLinc’s Disparate Impact Policy states:

*“[CobbLinc’s] Disparate Impact Threshold to determine if the adverse impacts of a major service change or fare adjustment is established at **25 percent on the cumulative impact of the proposed service and/or fare changes**. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.”*

The policy states that a disparate impact is found if the difference in impact experienced by minority and non-minority populations because of a major service change is greater than 25%.

Disproportionate Burden Policy

The Disproportionate Burden Policy sets a threshold to determine if a service or fare change disproportionately affects low-income populations compared to non-low-income populations. CobbLinc’s Title VI program does not specify a local definition or threshold for “low-income”; for the purpose of this analysis, “low-income” is defined as 150% of the federal poverty line. CobbLinc’s Disproportionate Burden Policy states:

*“CobbLinc’s Disproportionate Burden Threshold to determine if the adverse impacts of a major service change or a fare adjustment is established at **25 percent based on the cumulative impact of the proposed service and/or fare changes**. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.”*

The policy states that a disproportionate burden is found if the difference in impact experienced by low-income and non-low-income populations because of a major service change is greater than 25%.

Analysis

In June 2026, the U.S. Department of Transportation issued a final rule amending its Title VI regulations at 49 CFR Part 21 to remove disparate-impact liability from DOT’s Title VI regulations. However, because FTA has not yet released updated guidance for evaluating major service changes and CobbLinc has not yet updated its Title VI Program, this service equity analysis was conducted using CobbLinc’s existing Title VI policies and procedures, which are based on the methodology outlined in FTA Circular 4702.1B.

The analysis evaluates whether the proposed addition of the Acworth/Kennesaw CobbLinc Go Microtransit Zone would result in a disparate impact on minority populations or a disproportionate burden on low-income populations under CobbLinc’s current Title VI Program. Using geospatial analysis, the populations served by the existing and expanded microtransit zones were compared to assess the

cumulative effect of the proposed expansion on the demographic composition of the service area. Because the proposed change is a service expansion rather than a reduction, the analysis focuses on the incremental populations added to the service area rather than populations losing access to transit service.

Methodology

To determine whether the proposed Acworth/Kennesaw Microtransit Zone would result in a disparate impact or disproportionate burden, the populations served by the existing countywide CobbLinc system were compared to those served by the CobbLinc system with the addition of the proposed Acworth/Kennesaw microtransit zone.

Following CobbLinc policy, a disparate impact or disproportionate burden is identified if the difference between the percent change in minority or low-income populations and the percent change in non-minority or non-low-income populations exceeds the established threshold of 25 percent.

The analysis was conducted using route and microtransit zone data provided by CobbLinc reflecting service as of April 2026. Population data were sourced from 2020–2024 ACS Five-Year Estimates at the census block group level.

Because microtransit operates as a zone-based service, the service area for microtransit zones was defined as all census block groups located within the existing and proposed microtransit zone boundaries, while the service area for existing fixed-route bus service was defined as all census block groups located within a quarter-mile buffer of existing bus stops. Population totals for each service area were calculated as the sum of block group populations within those boundaries. This approach reflects the full geographic coverage of on-demand service and fixed-route service.

The comparison of population totals between the existing and expanded service areas allows for the evaluation of cumulative impacts on minority and low-income populations relative to non-minority and non-low-income populations using the thresholds defined in CobbLinc’s Title VI program.

Results: Disparate Impact

The results of the analysis indicate that the proposed addition of the Acworth/Kennesaw microtransit zone results in a disparate impact on minority populations.

The new zone adds both minority and non-minority populations to the service area, with minority populations comprising a majority of residents in both the existing and expanded service. While the expansion area has a lower percentage of minority residents than the existing microtransit zone, minority populations remain strongly represented in the combined service area; however, the increase in service for non-minority populations is disproportionately greater than the increase in service for minority populations as shown in Table 1. Because this action represents a net expansion of service, no population experiences a loss of access to transit service because of this change. All impacts reflect increases in service availability.

The cumulative impact analysis, which is summarized in **Table 2** and **Figure 3**, shows that:

- Minority population increases by approximately 14.8 percent, and
- Non-minority population increases by approximately 40.2 percent, resulting in a difference of approximately 25.4 percent, which is above the 25 percent threshold.

The expansion introduces a disproportionately larger increase in non-minority population. The overall minority share of the expanded service area remains substantially higher than the countywide population, but the cumulative change is just above the 25% threshold outlined in CobbLinc policy. Therefore, the difference in impacts between minority and non-minority populations rises above the level of a disparate impact as defined by CobbLinc policy.

Because this action represents a net expansion of service, no population experiences a loss of access to transit service because of this change. All impacts reflect increases in service availability.

Table 1: Comparison of Minority Populations – Disparate Impact

	Total Population	Minority Population	% Minority	Non-Minority Population	% Non-Minority
Cobb County	775,208	410,214	53%	364,994	47%
Existing Countywide Service Area	384,778	266,005	69%	118,773	31%
New Acworth/Kennesaw Microtransit Zone	87,140	39,351	45%	47,789	55%
Impacted Service Area (Existing + New Zone)	471,918	305,356	65%	166,562	35%

Table 2: Comparison of Cumulative Impacts – Disparate Impact

	Existing Countywide Service Area	Impacted Service Area	Change	Percent Change
Total Population	384,778	471,918	87,140	23%
Minority Population	266,005	305,356	39,351	15%
Non-Minority Population	118,773	166,562	47,789	40%

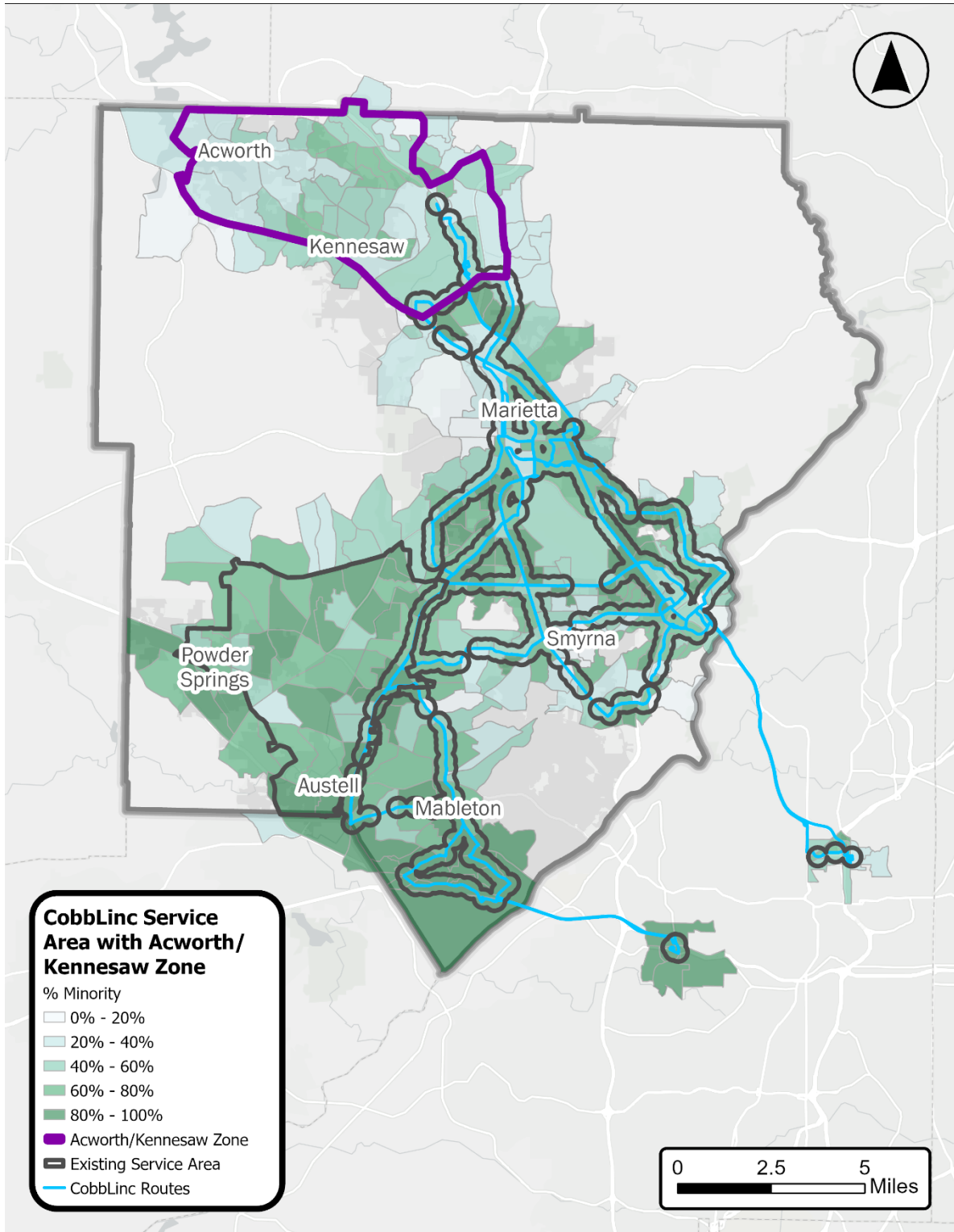


Figure 3: Percent Minority – CobbLinc Service Area with Acworth/Kennesaw Zone

Results: Disproportionate Burden

The results of the analysis indicate that the proposed Acworth/Kennesaw microtransit zone does not result in a disproportionate burden on low-income populations. The comparison of low-income populations in the existing CobbLinc service area and the new Acworth/Kennesaw zone is shown in **Table 3**.

The cumulative impact analysis, shown in **Table 4** and **Figure 4**, shows that:

- Low-income population increases by approximately 16 percent, and
- Non-low-income population increases by approximately 24 percent, resulting in a difference of approximately 8 percent, which is well below the 25 percent threshold.

This difference, which falls below the 25 percent threshold identified in CobbLinc's Title VI policy, indicates that the benefits of the new service are distributed across income groups and do not represent a disproportionate burden on low-income populations.

As with the disparate impact analysis, the proposed service change represents an expansion of service coverage. Therefore, no low-income populations are adversely affected through a loss of service, and all impacts reflect increased access to transit.

Table 3: Comparison of Low-Income Populations – Disproportionate Burden

	Total Population	Low-Income Population	% Low-Income	Non-Low-Income Population	% Non-Low-Income
Cobb County	775,208	109,365	14%	665,843	86%
Existing Countywide Service Area	384,778	77,705	20%	307,073	80%
New Acworth/Kennesaw Microtransit Zone	87,140	12,569	14%	74,571	86%
Impacted Service Area (Existing + New Zone)	471,918	90,274	19%	381,644	81%

Table 4: Comparison of Cumulative Impacts – Disproportionate Burden

	Existing Countywide Service Area	Impacted Service Area	Change	Percent Change
Total Population	384,778	471,918	87,140	23%
Low-Income Population	77,705	90,274	12,569	16%
Non-Low-Income Population	307,073	381,644	74,571	24%

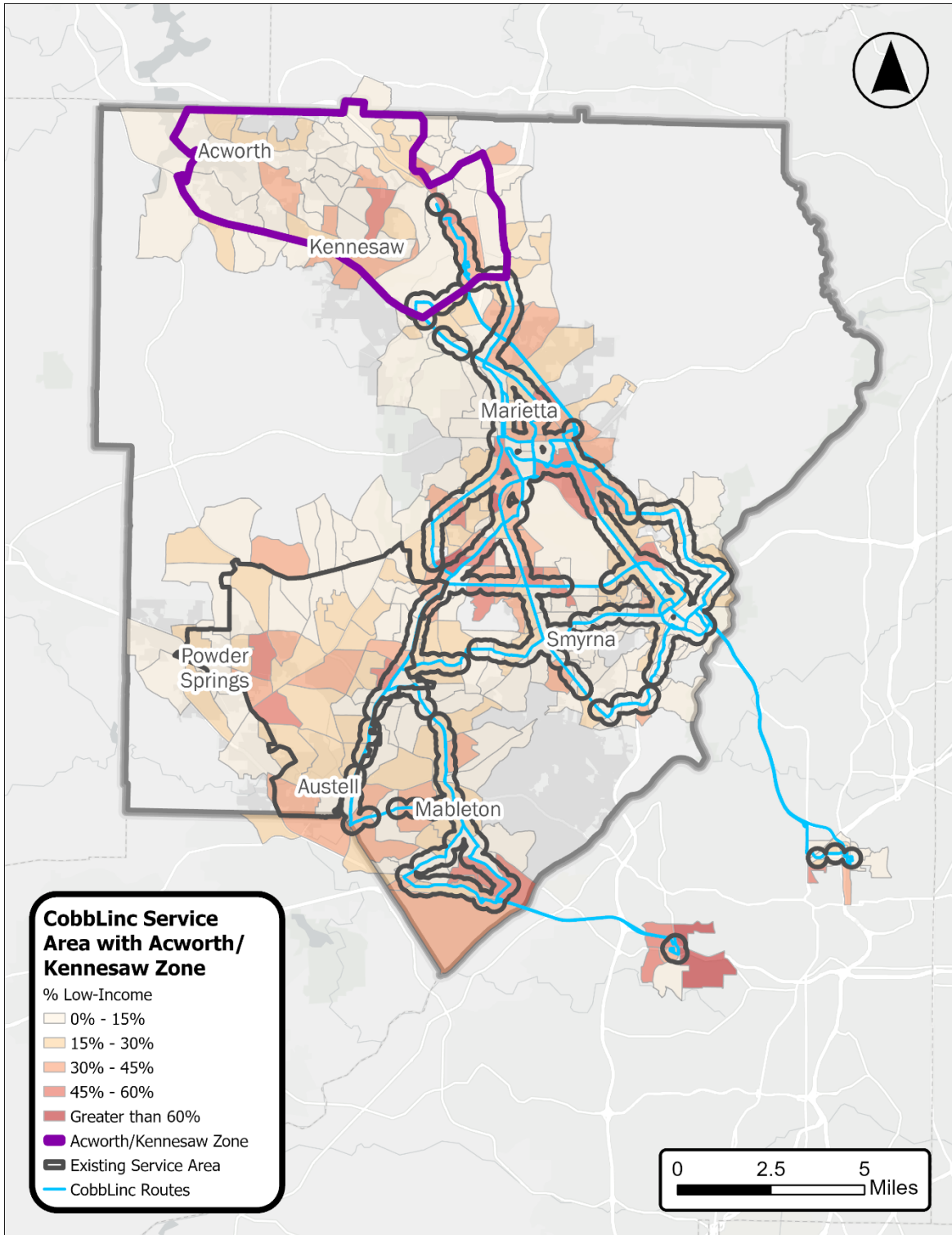


Figure 4: Percent Low-Income - CobbLinc Service Area with Acworth/Kennesaw Zone

Public Engagement Summary

To facilitate public input on the proposed service changes, CobbLinc is hosting a series of public workshops and informational sessions. These sessions will inform the public about the proposed service changes, the results of the equity analysis, and available service alternatives. They will also provide a venue for CobbLinc to gather public feedback on the impacts of the proposed service changes and refine an approach to mitigation and alternatives, if necessary.

These meetings will be held at the following dates, times, and locations:

Date	Time	Location
July 21, 2026	4:30 pm – 6:30 pm	Acworth Community Center 4361 Cherokee St., Acworth, GA 30101
July 27, 2026	5:30 pm – 6:30 pm	Virtual

This section will be updated at the conclusion of the 30-day public comment window, which opens on July 1, 2026 and closes on July 31, 2026, and after completion of the public meetings.

Conclusion

Summary of Findings

The analysis demonstrates that the proposed Acworth/Kennesaw microtransit zone:

- Does result in a disparate impact on minority populations
- Does not result in a disproportionate burden on low-income populations
- Results in net increases in service availability for all population groups

The demographic composition of the new zone differs significantly from the existing CobbLinc service area. While this change in composition does not constitute a disproportionate burden, the differences are substantial enough to exceed the thresholds for disparate impact established in CobbLinc's Title VI program. Although the proposed action expands service and does not reduce service, mitigating actions will be necessary to reduce the impact.

Mitigating Actions and Service Alternatives

The analysis identifies a disparate impact on minority populations under CobbLinc's Title VI policy; however, this finding reflects differences in the demographics of newly served areas rather than a reduction in service. The proposed action represents a net expansion of service, increasing transit access for both minority and non-minority populations, with no loss of access for any group.

Consistent with FTA guidance, the project meets legitimate planning and operational purposes, including expanding geographic coverage in North Cobb County, improving first- and last-mile connections, and addressing service gaps in areas not well suited for fixed-route transit. The service also improves connectivity to areas previously served through the Acworth Transfer Center. Modifications to the zone boundary, phasing, or methodology were considered but would not meaningfully change the outcome without limiting the effectiveness of the service.

To address the identified disparate impact, CobbLinc will implement the following mitigation strategies:

- **Targeted Outreach and Engagement:** Conduct focused outreach to minority communities during the public comment period and continue engagement after implementation through community partnerships, transfer center outreach, and targeted communications.
- **Targeted Access to Key Destinations:** Ensure effective service to community facilities, including affordable housing, employment centers, healthcare, and education destinations.
- **Monitoring and Evaluation:** Track ridership and usage patterns after implementation to inform adjustments to outreach or service delivery as needed.

With these mitigation measures in place, CobbLinc can advance the proposed service in a manner consistent with Title VI requirements while supporting broader system goals of increased access and mobility.