

Title VI Equity Analysis

South Cobb Microtransit Service Expansion

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Introduction

This memorandum documents the Service Equity Analysis performed for the expansion of the CobbLinc Go service, operating in South Cobb County. Service Equity Analyses are a requirement of the Federal Transit Administration (FTA) under Title VI of the Civil Rights Act of 1964, which prohibits the 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 if 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 expansion of its existing CobbLinc Go Zone, a microtransit service currently serving the communities of Austell and Powder Springs, to include the northwest portion of the City of Mableton. This proposed expansion is consistent with the CobbForward Transportation Plan’s recommendation to establish microtransit zones within each municipality in Cobb County and is intended to respond to growing transit demand and evolving travel patterns in South Cobb.

The CobbLinc Go service operates as an on-demand, shared-ride service within a defined zone and is intended to improve access to the broader transit network by connecting riders to fixed-route services, employment centers, and essential destinations. The service operates Monday-Friday 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. The proposed expansion to Mableton is expected to operate under the same service model, fare structure, and hours.

Within and adjacent to the existing microtransit zone, CobbLinc currently operates fixed-route services along major east–west corridors. Routes 25 and 30 provide service between the H.E. Holmes MARTA Station and the Cumberland and Marietta Transfer Centers, respectively. These routes are designed to serve higher-density travel markets and provide regional connectivity, but do not fully address first- and last-mile access needs in areas with low-density land use patterns.

The expansion of the South Cobb 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 25 and 30 will continue to operate as they do today, while benefiting from additional connections provided by the expanded microtransit service.

Background

The proposed expansion of the South Cobb CobbLinc Go Zone is the next phase of an approved, locally tested microtransit program. CobbLinc Go was implemented as a two-year pilot program to enhance public transportation in South Cobb by replacing the former Flex Service with an expanded curb-to-curb, on-demand service model. Since launching in October 2024, the service has demonstrated sustained ridership growth, strong customer satisfaction, and use for everyday local trips. The proposed extension to Mableton would build on this existing program by expanding access to additional activity centers while maintaining the same basic service model, fare structure, transfer policy, and operating hours.

Consideration of Approved Planning Efforts

The proposed South Cobb CobbLinc Go Zone expansion 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 South Cobb, including the Austell, Powder Springs, and Mableton areas. While some elements of the broader CobbForward transit vision would require future funding and additional implementation steps, the microtransit recommendation provides a practical near-term strategy for expanding transit access in areas identified for improved coverage. In South Cobb, this is especially relevant because existing Routes 25 and 30 provide important regional connections, but portions of the area remain outside convenient walking distance of fixed-route service.

The proposed Mableton expansion advances this adopted planning direction by extending the existing CobbLinc Go service model to additional South Cobb neighborhoods and activity centers within the City of Mableton. It also aligns with CobbLinc's current microtransit program direction, which identifies expansion of the South Cobb zone, incorporation of more activity centers, and standardization of the microtransit program as next steps for future growth.

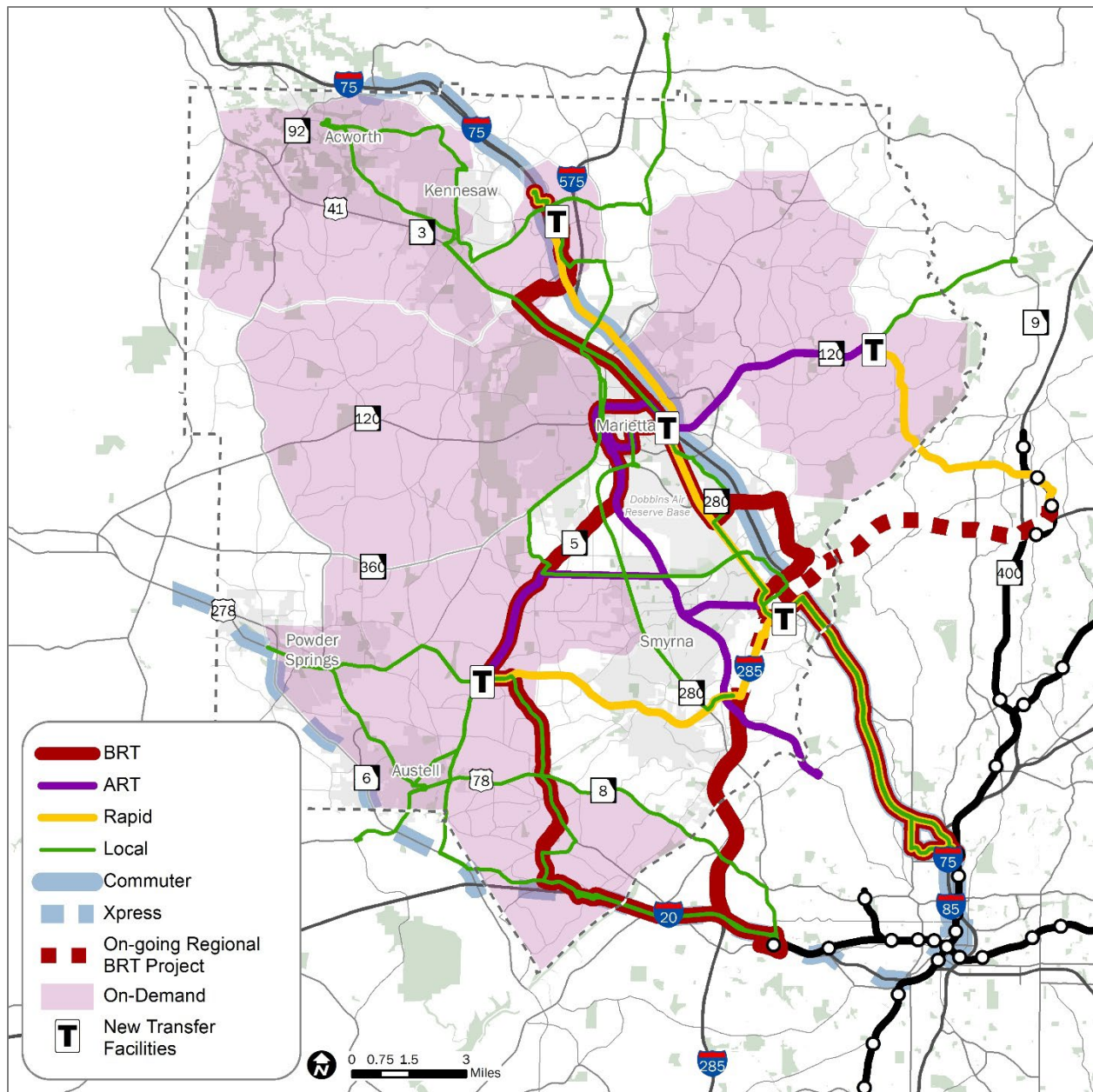


Figure 1: CobbForward CTP Aspirational Plan

Demonstrated Service Need and Market Demand

The South Cobb microtransit market has shown strong demand since the launch of CobbLinc Go. The former CobbLinc Flex Service averaged approximately 640 passenger trips per month before the transition to CobbLinc Go. In contrast, CobbLinc Go recorded 824 passenger trips in November 2024, its first full month of reported ridership, and continued to grow throughout the pilot period. Ridership peaked at 3,628 passenger trips in April 2026, more than five times the former Flex Service monthly average. Across the first 19 months of service, CobbLinc Go averaged nearly 2,400 riders per month, indicating that the expanded, on-demand service model is attracting substantially higher use than the previous Flex Service. The monthly ridership trend for the South Cobb service is shown in **Figure 2**.

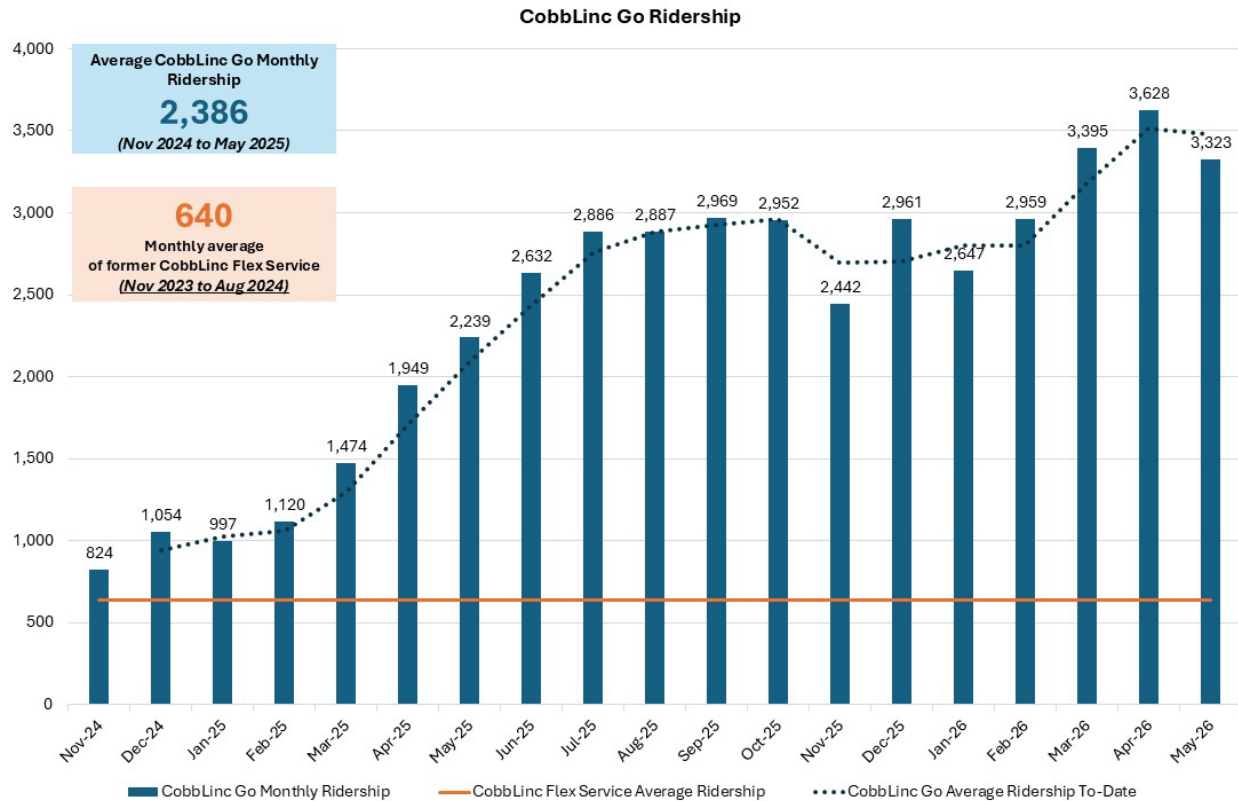


Figure 2: CobbLinc Go Ridership, Nov. 2024 – May 2026

This ridership growth indicates that the expanded, on-demand service model is better aligned with current travel needs and development patterns in South Cobb than the prior Flex Service model. Customer usage data shows that CobbLinc Go is being used for a range of everyday trip purposes, including access to apartments and residential areas, shopping plazas and grocery stores, gyms and fitness centers, fast food and restaurants, childcare facilities, and K-12 schools. These travel patterns support the need for a flexible service model that can connect riders to local destinations as well as to the broader CobbLinc network.

Activity Center Access and Market Conditions

South Cobb includes a mix of residential neighborhoods, commercial destinations, schools, medical facilities, recreational destinations, and community services. Existing fixed-route service provides important regional connectivity along major corridors, including connections to Routes 25 and 30, but portions of the area remain difficult to serve through fixed-route transit alone because destinations and residential areas are dispersed and not always within convenient walking distance of existing stops.

CobbLinc Go is designed to address these conditions by providing curb-to-curb, shared-ride service within a defined zone. The existing program provides free transfers to local Routes 25 and 30, allowing the microtransit service to function as both a local mobility option and a first-/last-mile connection to the broader transit network. Expanding the zone to include Mableton would extend this flexible access model to additional activity centers and neighborhoods while continuing to complement, rather than replace, existing fixed-route services.

Alignment with System Goals

The proposed service supports CobbLinc's broader goals outlined in the CobbForward Comprehensive Transportation Plan of increasing access, improving system connectivity, and expanding mobility options for residents and visitors. By enhancing first-/last-mile connections and improving coverage in underserved areas, the expanded South Cobb microtransit service is intended to strengthen the overall effectiveness of the transit system without duplicating or replacing existing fixed-route services.

The expansion of the CobbLinc Go service in South Cobb County also 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 service left riders with unreliable options. The service reduces wait times and improves 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 the broader regional network.
- **Accessibility:** Providing curb-to-curb service within the South Cobb 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 in areas that may not support fixed-route service, allowing CobbLinc to extend coverage efficiently rather than concentrating service only 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 connecting riders to major destinations such as healthcare facilities, 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 the expansion of a route that extends the geographic area of transit service by at least one-half mile in length.
- An increase in the service hours of any route by at least 10 percent of the total hours operated on a daily basis, or an increase in the number of days of the week that any route operates.

Although the policy specifically mentions the creation and expansion of routes, the creation and expansion of microtransit zones is implied to fall under this definition. As a result, the CobbLinc Go Zone expansion

qualifies as a major service change and requires a service equity analysis. No existing fixed-route services are proposed to be eliminated, reduced, or modified as part of this change.

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 individual who does 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 percent.

Disproportionate Burden Policy

The Disproportionate Burden Policy sets a threshold to determine whether 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 percent.

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 expansion of the South Cobb 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 service change would result in a disparate impact or disproportionate burden, the populations served by the existing South Cobb microtransit zone were compared to those served by the proposed service area expansion.

Following CobbLinc’s Title VI 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 are sourced from 2020–2024 ACS Five-Year Estimates at the census block group level. Figures 1 and 2 below show the existing CobbLinc Go Zone and the proposed expansion.

Because microtransit operates as a zone-based service, the service area was defined as all census block groups located within the existing and expanded microtransit zone boundaries. 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 rather than proximity to fixed stops.

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.

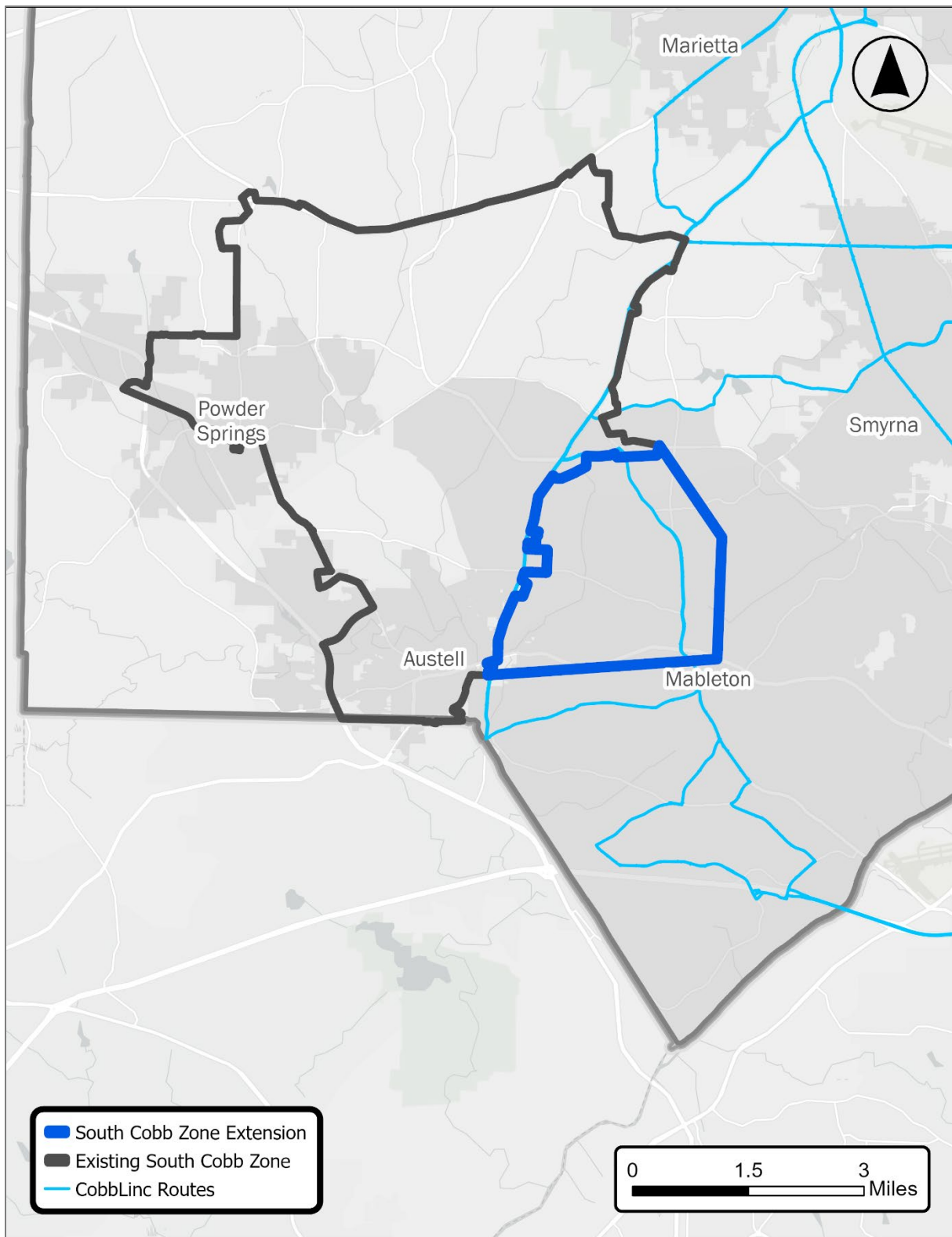


Figure 3: CobbLinc Go Zone with Mableton Extension

Results: Disparate Impact

The results of the analysis indicate that the proposed expansion of the South Cobb microtransit zone does not result in a disparate impact on minority populations.

The expansion area 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 zones as shown in **Table 1**. 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. The cumulative impact analysis, which is summarized in **Table 2** and **Figure 3**, shows that:

- Minority population increases by approximately 16 percent, and
- Non-minority population increases by approximately 28 percent, resulting in a difference of approximately 12 percent, which is well below the 25 percent threshold.

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 Microtransit Zone	97,231	72,280	74%	24,951	26%
Expansion Area Only	18,105	11,231	62%	6,874	38%
Expanded Microtransit Zone (Combined)	115,336	83,511	72%	31,825	28%

Table 2: Comparison of Cumulative Impacts – Disparate Impact

	Existing Service Area	Impacted Service Area	Change	Percent Change
Total Population	97,231	115,336	18,105	19%
Minority Population	72,280	83,511	11,231	16%
Non-Minority Population	24,951	31,825	6,874	28%

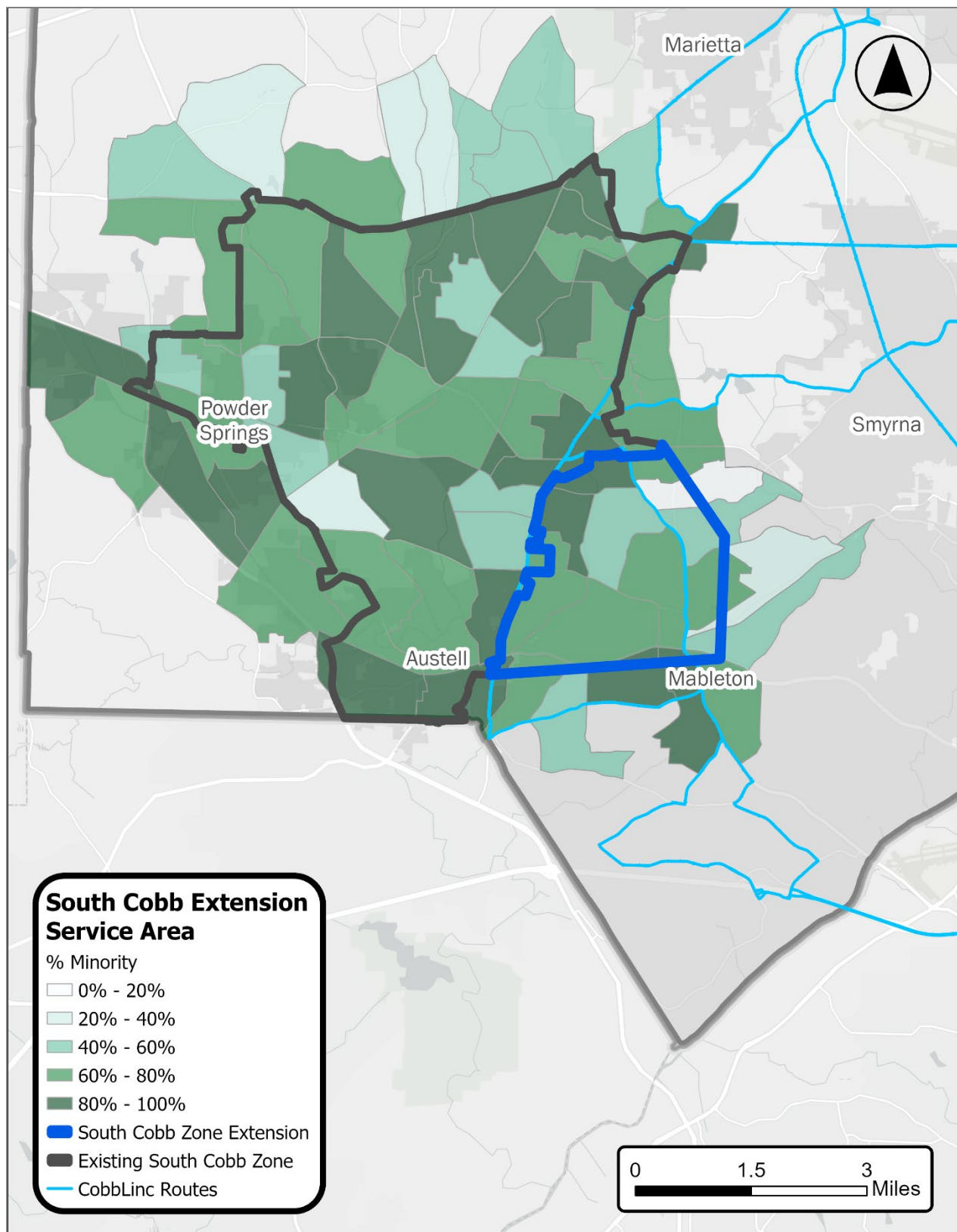


Figure 4: Percent Minority – South Cobb Extension

Results: Disproportionate Burden

The results of the analysis indicate that the proposed CobbLinc Go Zone expansion does not result in a disproportionate burden on low-income populations. The expansion area has virtually the same proportion of low-income populations as the existing microtransit zone. As a result, the addition of the expansion area does not materially change the overall distribution of low-income populations within the combined service area, as shown in **Table 3**.

The cumulative impact analysis, shown in **Table 3** and **Figure 4**, shows that:

- Low-income population increases by approximately 18 percent, and
- Non-low-income population increases by approximately 19 percent, resulting in a difference of approximately 1 percent, which is negligible and well below the 25 percent threshold.

This minimal difference, which falls below the 25 percent threshold identified in CobbLinc's Title VI policy, indicates that the benefits of the expanded service are distributed proportionately across income groups and do not impose 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 Service Area	97,231	16,564	17%	80,667	83%
Expansion Area Only	18,105	3,035	17%	15,070	83%
Expanded Microtransit Zone (Combined)	115,336	19,599	17%	95,737	83%

Table 4: Comparison of Cumulative Impacts – Disproportionate Burden

	Existing Service Area	Impacted Service Area	Change	Percent Change
Total Population	97,231	115,336	18,105	19%
Low-Income Population	16,564	19,599	3,035	18%
Non-Low-Income Population	80,667	95,737	15,070	19%

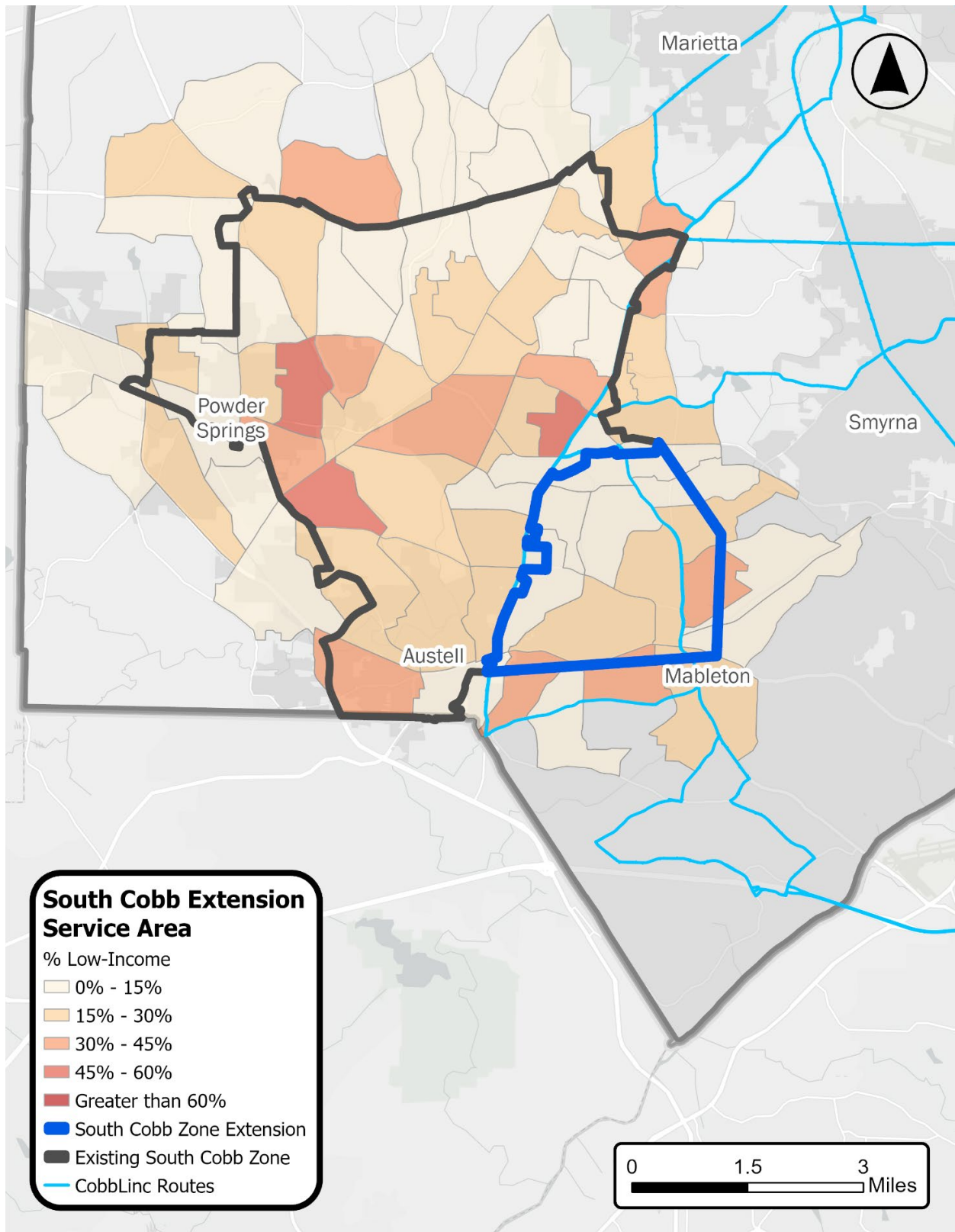


Figure 5: Percent Low-Income – South Cobb Extension

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 an opportunity for CobbLinc to gather feedback on the impact 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 16, 2026	4:30 pm – 6:30 pm	South Cobb Community Center 620 Lions Club Dr. SW, Mableton, GA 30126
July 29, 2026	5:30 pm – 6:30 pm	Virtual

This section will be updated after 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 South Cobb microtransit expansion:

- Does not 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

While the demographic composition of the expansion area differs slightly from the existing service area, these differences are not substantial enough to exceed the thresholds established in CobbLinc's Title VI program. Furthermore, because the proposed action expands rather than reduces service, it does not result in any loss of transit access for existing populations.

Mitigating Actions and Service Alternatives

No mitigating actions or service alternatives are necessary because no disparate impact or disproportionate burden was found. Further, the expansion of the CobbLinc Go Zone represents an increase in service, serving more destinations and allowing for more connections to CobbLinc fixed-route services.