

# Title VI Equity Analysis

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## Green Circulator

Final  
April 10<sup>th</sup>, 2025



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# Introduction

This memorandum documents the Service Equity Analysis performed for the proposed removal of CobbLinc's Green Circulator. 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.

## Route Profiles

CobbLinc is considering the removal of the Green Circulator services in considerations of future budgetary needs of the transit program, patterns of declining ridership in comparison to the Blue Circulator and overall operational inefficiencies of the existing route alignment.

CobbLinc operates two fare-free circulator routes within the Cumberland CID area: the Green Circulator and the Blue Circulator (Error! Reference source not found.). The purpose of the circulators is to provide free, continuous, high-frequency transportation between the many key destinations within the Cumberland Area. These two routes serve the Cumberland CID and surrounding areas, which are home to the Cumberland Mall, Cobb Galleria Centre (a large convention center), the Cobb Energy Performing Arts Center, and Truist Park (home of the Atlanta Braves), among other large commercial, entertainment, and employment centers. The two routes interline, with a common timepoint at Truist Park/The Battery.

The Green Circulator is the northern loop, running from Truist Park/The Battery to the South, to a large commercial park located on Wildwood Parkway to the North. The Green Circulator loop also provides service to numerous large hotels (Atlanta Marriott Northwest, Hyatt Regency Suites Atlanta Northwest, and Hilton Garden Inn), and Wellstar Windy Hill Hospital. The loop operates from 12:00pm to 2:00am every weekday at 30-minute frequencies, from 12:00pm to 2:00am on Saturday at 60-minute frequencies, and from 11:30am to 6:30pm on Sunday at 60-minute frequencies.

The Blue Circulator is the southern loop, running from Truist Park/The Battery to the North, to the Cumberland Transfer Center (and Cumberland Mall) to the South. The route also provides service to Akers Mill Square (a mall) and Cobb Galleria Centre. This route operates on a similar schedule to the Green Circulator, operating from 12:00pm to 2:00am every weekday at 30-minute frequencies, from 12:00pm to 2:00am on Saturday at 60-minute frequencies, and from 11:30am to 6:30pm on Sunday at 60-minute frequencies.

If eliminated, passengers will continue to have access to the CobbLinc Route 50, which traverses Powers Ferry Road, nearest the area currently served by the Green Circulator alignment. This area has shown demand during active seasons in the Cumberland area, will continue benefiting from transit access and provide access to the Cobb Galleria area by way of Akers Mill Road. This route operates 7-days a week, with 30-minute to 1-hour frequency. It provides direct access to both the Cumberland and Marietta Transfer Centers.

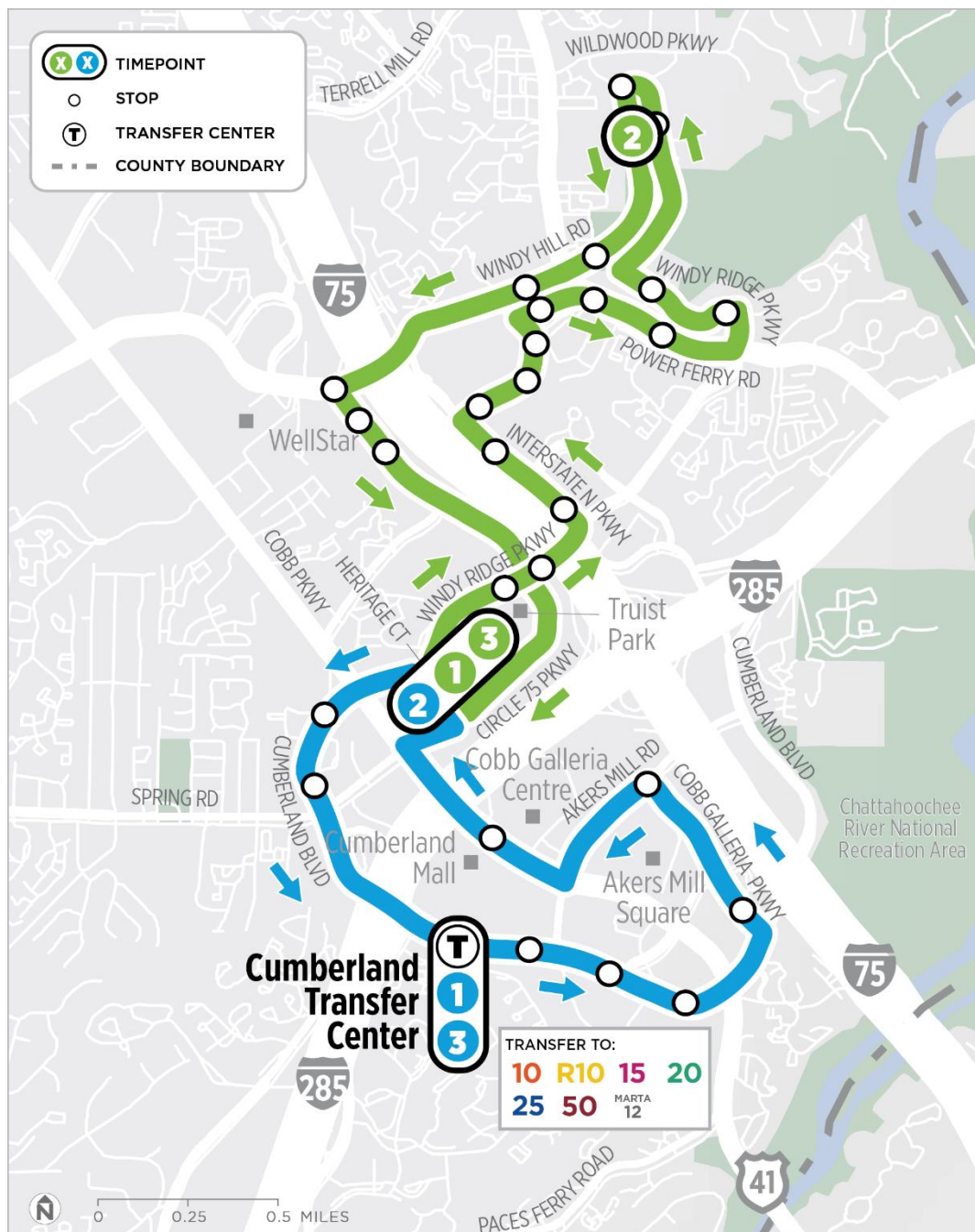


Figure 1: Blue Circulator and Green Route Map

# Background

## Consideration of Planning Studies

A previous planning effort, the Cumberland Circulator Improvements technical memorandum was completed in Spring 2023 and made initial recommendations to slightly modify the Blue Circulator's route and consider, as funding opportunities become available, an on-demand model for the Green Circulator service area to better target the demand that was more spread out along the existing route alignment. (Figure 2).



Figure 2: Proposed Circulator Service - Cumberland Circulator Improvement Technical Memorandum

The Cumberland Transit Alternatives Study, a current planning effort underway by the Cobb County Department of Transportation (CCDOT) with inclusion of the Cumberland Community Improvement District (CCID), is assessing transit access in larger context of the Cumberland Sweep multimodal path, and in future consideration of autonomous vehicle use for the area. The desired outcome of the study is to determine preferred, complimentary alternatives for transportation access throughout the Cumberland area.

The proposed service change, eliminating the Green Circulator, is a first step in aligning with previous planning recommendations, an attempt to better align service with demand, and to prepare for potential changes borne from ongoing planning efforts.

## Consideration of Future Funding Limitations

In the years leading to the November 2024 election season, Cobb County pursued a 1% sales tax, dedicated to transit operating and capital expansion over a 30-year timeframe. If approved, the Mobility Special Purpose Local Options Sales Tax (MSPLOST) would have collected approximately \$11 billion in dedicated funding to support \$14 billion in transit capital, operating and supportive projects with supplemented grant funding opportunities.

Currently, CobbLinc is funded primarily through local property tax revenues, with additional funding from federal sources, grants, and fares collected from customers. The failure of the MSPLOST resulted in the need to consider the current and future budget limitations of the transit program. Considering the unknown future of local and federal funding opportunities, the increasing costs of operating due to inflation, and to ensure the quality of the system can be maintained for the foreseeable future, reductions in services with the least impact to environmental justice and/or transit-dependent were considered.

## Circulator Ridership and Operational Challenges

While both Circulators have grown in ridership post-COVID, the Blue Circulator has historically had a higher level of ridership compared to the Green. This gap in route productivity has led to the reconsideration of the Green Circulator's function, and what alternatives may be available. In FY 2024, the Blue Circulator had an annual ridership of 21,027 compared to the Green's annual ridership of 13,220, both being the all-time high for annual ridership on each service. Over the past five fiscal years (FY 2019 – FY 2024), not including years when the Green Circulator was not operating, the Blue Circulator has averaged an annual ridership 156% greater (or about 2.5x higher) than the Green Circulator.

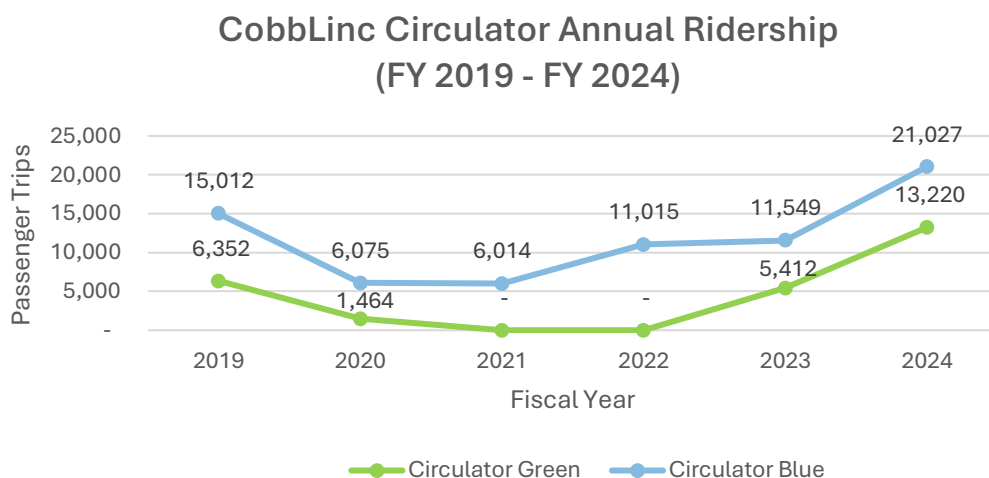


Figure 3: CobbLinc Circulator Annual Ridership - FY 2019 to FY 2024



# Cobb County Policies

CobbLinc last updated their Title VI program in February of 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 Impacts (regarding impacts effecting racial or ethnic minorities), and Disproportionate Burdens (regarding impacts effecting low-income populations).

## Major Service Change Policy

CobbLinc defines a major service reduction to include the following:

- The elimination of an entire route or a portion of a route that reduces the geographic area of transit service area. The realignment of a route or elimination of a portion of a route when existing or new service will still be available within one-quarter mile of the previous alignment will not be considered a major service reduction.
- A reduction in the service hours of any route of at least 20 percent of the total hours operated on the route on a daily basis.
- The elimination of at least 20 percent of the stops on a route – cumulative during a rolling one-year period.

Under this definition, because the route will not immediately be replaced with an on-demand, autonomous, or other alternative service, the elimination of the Green Circulator constitutes the elimination of an entire route and is considered a major service change.

## Disparate Impact Policy

The Disparate Impact Policy sets a threshold to determine if a service or fare change disproportionately affects minority populations compared to non-minority populations. For the intention 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, Hawaiian Native/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 as a result 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 as a result of a major service change is greater than 25%.

## Analysis

As required by the guidelines listed in FTA Circular 4702.1B, an analysis was conducted to assess the impact of the planned route elimination on minority and low-income populations in the service area compared to those borne by non-minority and non-low-income populations. This analysis is accomplished through the use of geospatial techniques, comparing populations potentially served by the Green Circulator, the existing CobbLinc System, and the impacted CobbLinc System, reflecting the individual and cumulative impacts of the planned service changes.

## Methodology

To determine whether the planned service changes represent a disparate impact or disproportionate burden, the populations served by the Green Circulator were compared to the population of the service area. Following CobbLinc policy, a disproportionate burden or disparate impact is found if the difference between the percent change in minority or low-income populations potentially served in the CobbLinc service area before and after the elimination of the Green Circulator and the percent change in non-minority and non-low-income populations in the service area is greater than 25%.

The analysis was conducted using route data provided by CobbLinc reflecting service as of March 2025. Population data is sourced from 2019-2023 ACS Five-Year Estimates at the census block group level. The service area for the system and each route was defined as block groups located within ¼ mile from a CobbLinc stop, including those not located within Cobb County (this includes block groups in Fulton and Cherokee County). The population totals considered for each service area were calculated as the sum of the populations for each block group within the service area. The comparison of totals for each service area allows for the assessment of a disparate impact and disproportionate burden using the thresholds defined in CobbLinc's current Title VI program, set at 25% of the cumulative impacts.

## Results: Disparate Impact

The results of the analysis indicate that there is no disparate impact caused by the elimination of the Green Circulator. Error! Reference source not found. displays the minority and non-minority populations of Cobb County, the existing service area, the Green Circulator, and the impacted service area after the elimination of the Green Circulator. The Green Circulator's service area has a slightly higher proportion of minority populations potentially served compared to the existing service area (+2.3%), meaning minority populations bear a slightly larger impact of the planned elimination. However, this margin does not exceed 25% and is not significant enough to constitute a disparate impact as defined in CobbLinc's current Title VI program.

Additionally, the elimination of the Green Circulator has no measurable cumulative impact on the overall population served by CobbLinc services as a whole, as its service area overlaps with the Blue Circulator and Route 50 (**Table 2**). This is not to say that there are no impacts caused by the elimination of the Green Circulator, only that the methodology used - the comparison of populations potentially served within ¼ mile of stops – does not reflect any potential impacts, given the overlapping service areas of the Blue Circulator, and Route 50. Said another way, the service areas of Route 50 and the Blue Circulator cover the same block groups, and so same measurable populations, as the Green Circulator.

Table 1: Comparison of Minority Populations – Disparate Impact

	Total Population	Minority Population	% Minority	Non-Minority Population	% Non-Minority
Cobb County	769,152	401,319	52.2 %	367,833	47.8%
Existing Service Area	372,415	241,470	64.8 %	130,945	35.2%
Green Circulator	18,836	12,646	67.1 %	6,190	32.9%
Impacted Service Area	372,415	241,470	64.8 %	130,945	35.2%

Table 2: Comparison of Cumulative Impacts - Disparate Impact

	Existing Service Area	Impacted Service Area	Change	Percent Change
Total Population	372,415	372,415	0	0%
Minority Population	241,470	241,470	0	0%
Non-Minority Population	130,945	130,945	0	0%

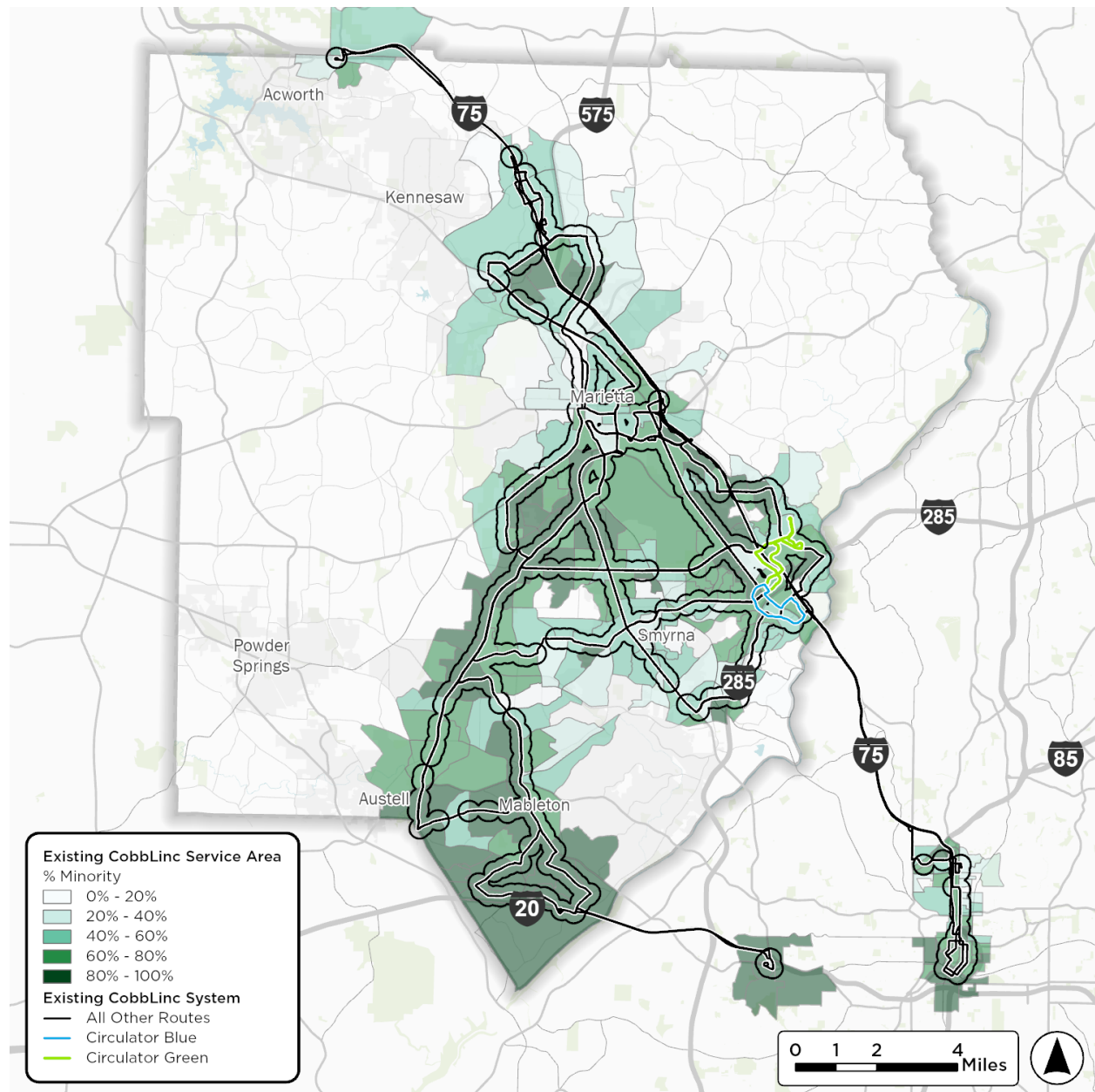


Figure 4: Percent Minority Populations - Existing CobbLinc Service Area



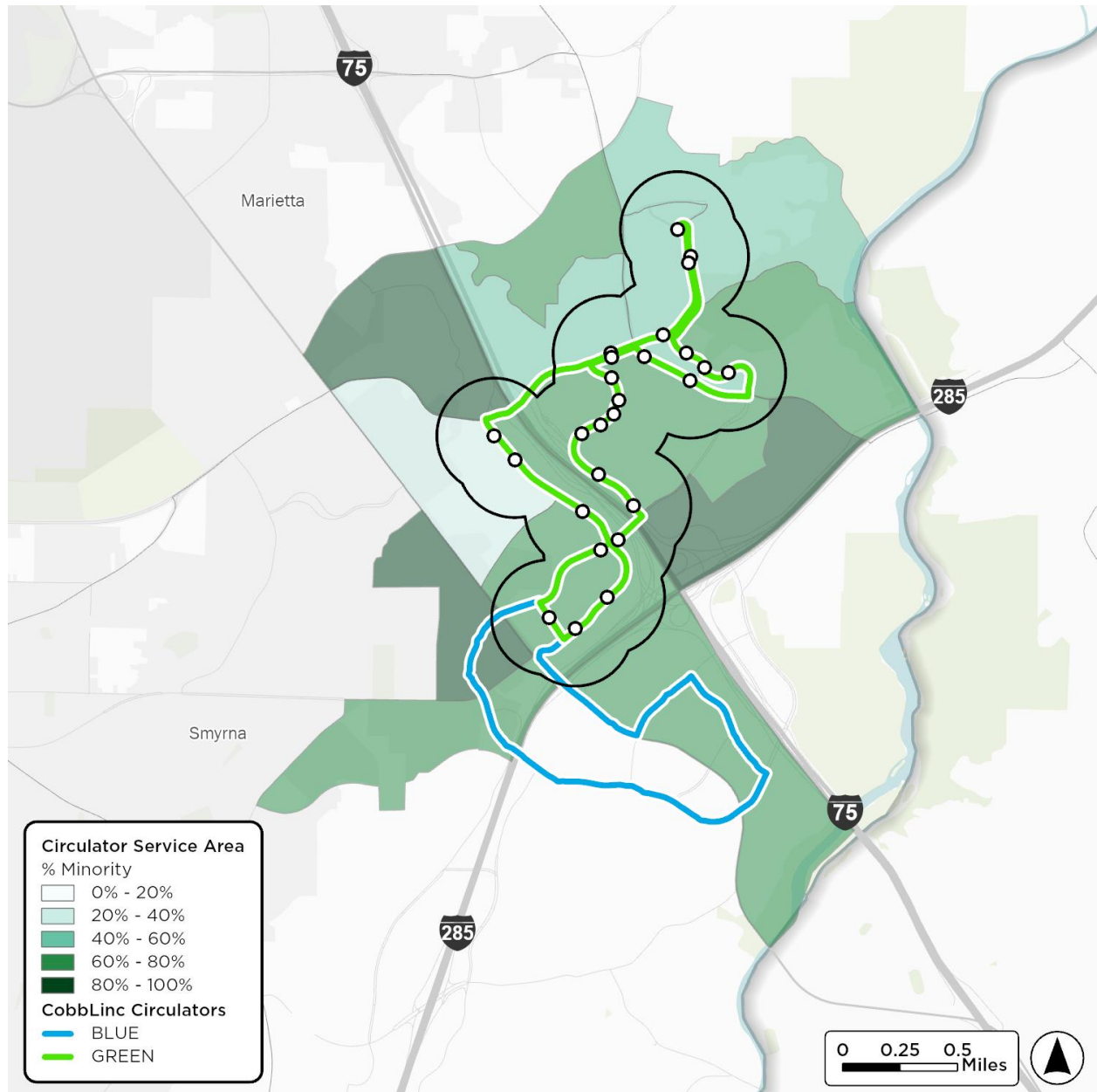


Figure 5: Percent Minority - Green Circulator Service Area

## Results: Disproportionate Burden

The results of the analysis indicate that there is no disproportionate burden caused by the elimination of the Green Circulator. Error! Reference source not found. displays the low-income and non-low-income populations of Cobb County, the existing service area, the Green Circulator, and the impacted service area after the elimination of the Green Circulator. The elimination of the Green Circulator does not exceed the 25% threshold defined in CobbLinc's Title VI program. As mentioned, the elimination of the Green Circulator has no cumulative impact on the overall population served, as its service area overlaps with the Blue Circulator, and other fixed-routes with nearby stops.

Similar to the Disparate Impact analysis, the elimination of the Green Circulator has no measurable cumulative impact on populations potentially served by the CobbLinc service area at-large due to overlapping service areas (**Table 4**).

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	769,152	111,087	14.4%	658,065	85.6%
Existing Service Area	372,415	74,944	20.1%	297,471	79.9%
Green Circulator	18,836	2,510	13.3%	16,326	86.7%
Impacted Service Area	372,415	74,944	20.1%	297,471	79.9%

Table 4: Comparison of Cumulative Impacts - Disproportionate Burden

	Existing Service Area	Impacted Service Area	Change	Percent Change
Total Population	372,415	372,415	0	0%
Low-Income Population	74,944	74,944	0	0%
Non-Low-Income Population	297,471	297,471	0	0%

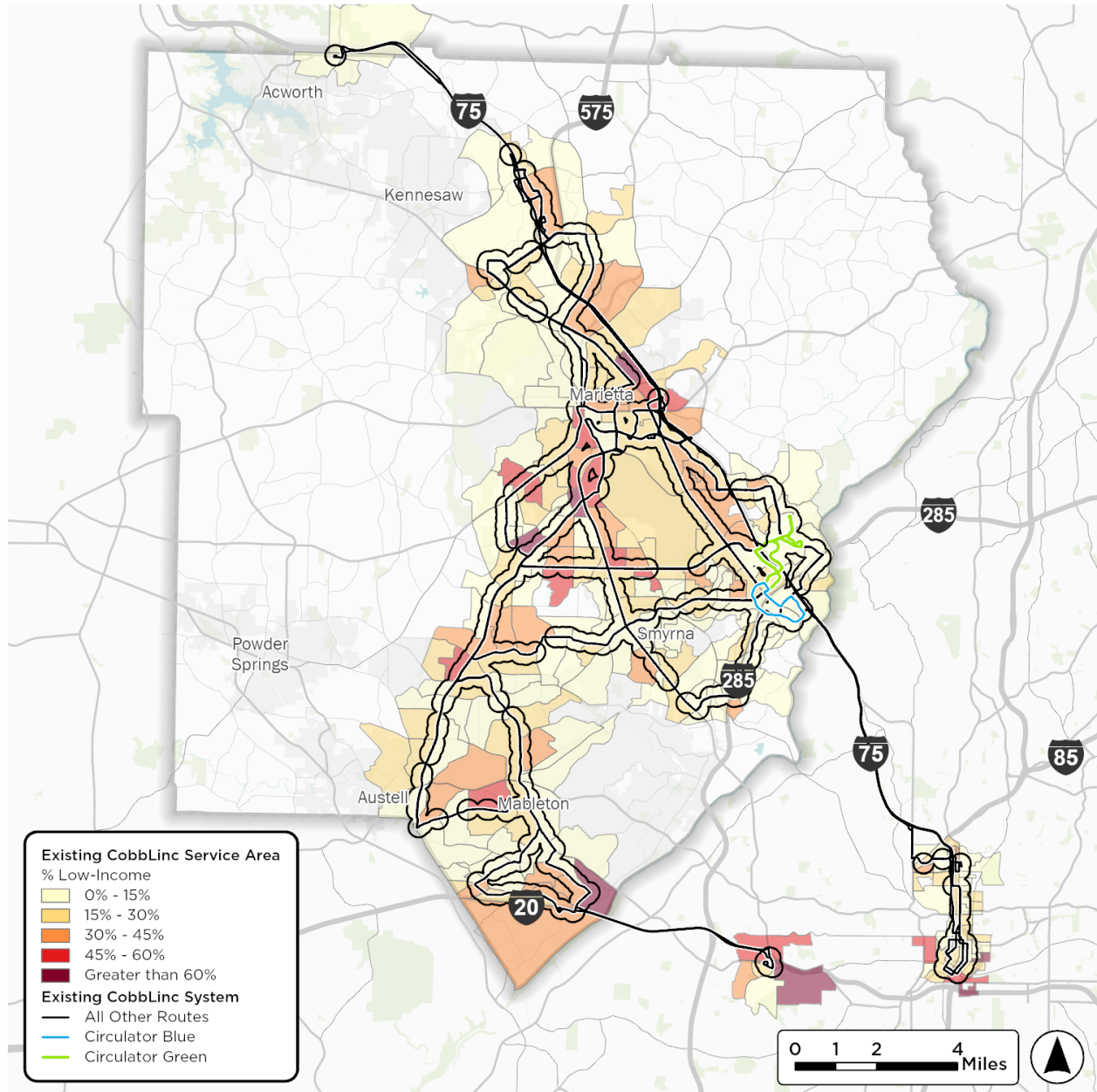


Figure 6: Percent Low-Income - Existing CobbLinc Service Area



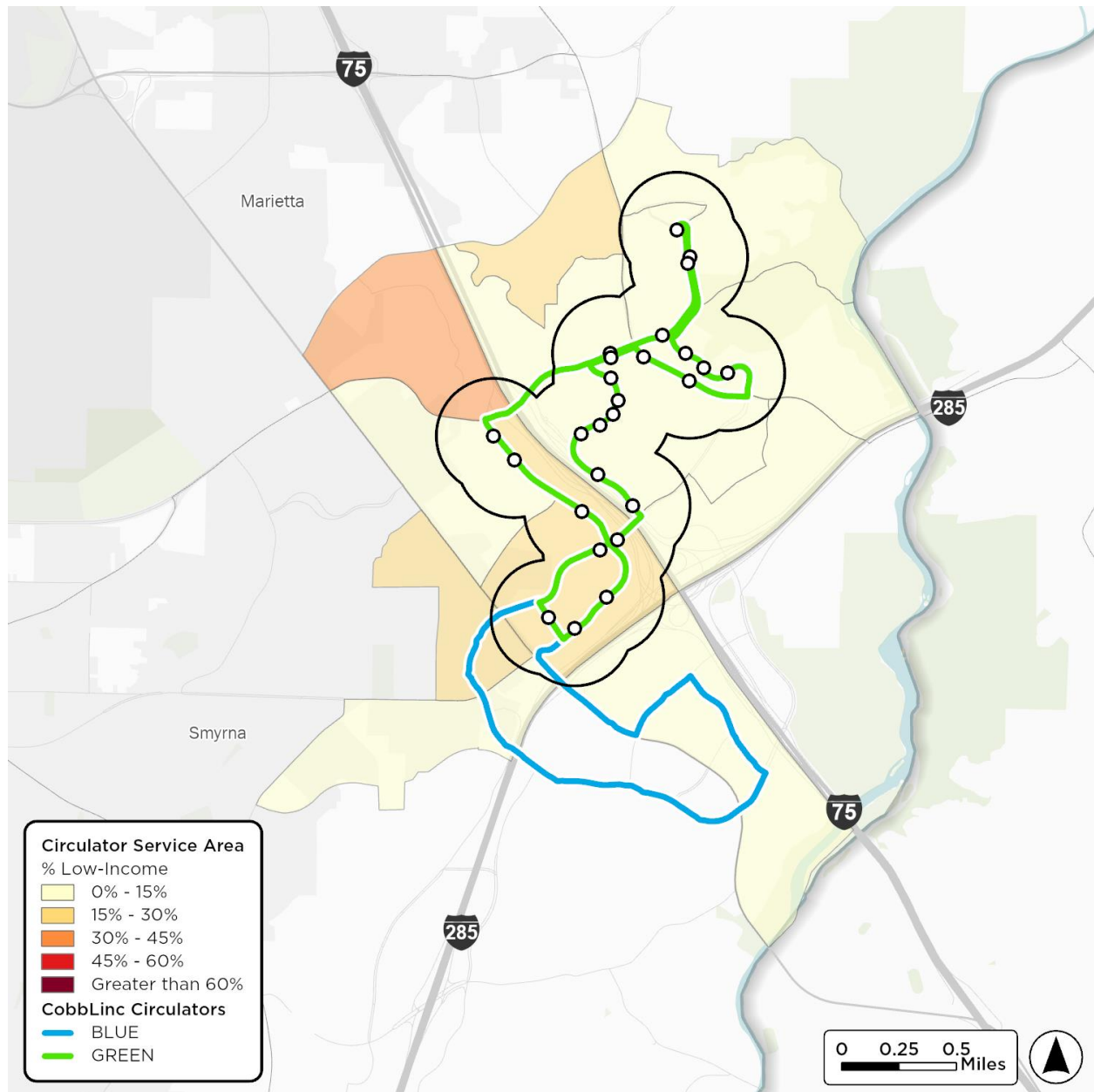


Figure 7: Percent Low-Income Populations - Green Circulator Service Area

## 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 what service alternatives exist. This is also a venue for CobbLinc to gather information and feedback about the impact of the proposed service changes on the public from the public, to better refine an approach to mitigation and alternatives, if necessary. These meetings will be at the following dates, times, and locations:

- Thursday, April 14<sup>th</sup>, from 11:00am to 2:00pm at Boy Scouts of America – Atlanta Area Council
  - 1800 Circle 75 Pkwy, Atlanta, GA, 30339
- Wednesday, April 30<sup>th</sup> from 11:00am to 2:30pm at Cobb Chamber of Commerce (Wellstar Community Room A)
  - 1100 Circle 75 Pkwy, Atlanta, GA, 30339

## Conclusion

### Summary of Findings

The analysis found that the proposed service changes for the elimination of the Green Circulator do not have a disparate impact, nor a disproportionate burden as defined in CobbLinc's existing Title VI program. The difference in proportion of populations potentially served by the Green Circulator and the existing service area are within the 25% threshold. Additionally, there are no measurable cumulative effects on overall service availability due to the elimination of the Green Circulator due to overlapping service areas with other services. The replacement of the Green Circulator with an on-demand service and/or autonomous shuttle in the future may supplement the loss in service availability to populations specifically affected by the elimination of fixed-route service.

### Mitigating Actions and Service Alternatives

Although mitigation actions are not required if a disparate impact or disproportionate burden are not found, CobbLinc values any potential hardship caused by the planned service changes and has planned with mitigating service alternatives in-mind.

Existing CobbLinc routes, namely the Blue Circulator, Route 15, and Route 50, offer an alternative to the eliminated Green Circulator. The Blue Circulator, which will continue to operate as it does at the time of writing, offers an alternative to trips within the Cumberland CID, although it does not serve the area north of I-75. Routes 15 and 50 are fixed route alternatives that provide access to stops similar to those served by the Green Circulator. Route 15 and 50 both operate between the Marietta Transfer Center and the Cumberland Transfer Center.

Route 15 provides service to Marietta/Marietta Square, Wellstar Cobb Hospital, and Truist Park/The Battery, using Powder Springs Street and Windy Hill Road, west of the I-75 corridor. Route 15 provides an alternative to accessing destinations along Circle 75 Pkwy currently offered by the Green Circulator, including Wellstar Windy Hill Hospital. This route operates weekdays from 5:00am to 11:00pm, at 30-

minute frequencies for the majority of the day (60-minute frequencies from 6:00pm to 11:00pm). Saturday and Sunday service runs from 7:00am to 8:00pm at 60-minute frequencies.

Route 50 operating between the Marietta Transfer Center and the Cumberland Transfer Center provides service along the I-75 corridor, including destinations along Cobb Parkway and Powers Ferry Road, including the industrial park at Wildwood Parkway. Route 50 provides an alternative to accessing destinations along Powers Ferry Road currently offered by the Green Circulator, including Wildwood Parkway. This route operates weekdays from 6:00am to 12:00am, at 30-minute frequencies most of the day (60-minute frequencies from 7:00pm to 12:00am). Saturday service operates from 7:00am to 10:00pm at 60-minute frequencies. Sunday service runs from 7:00am to 7:00pm at 60-minute frequencies.

The ongoing Cumberland Alternatives Analysis Study, currently underway and expected to be complete in Fall 2025, is assessing potential alternatives to the existing Green Circulator, including the possibilities of on-demand and/or autonomous services. The study is expected to produce plans and recommendations for service alternatives in the Cumberland CID, including alternatives to the Green Circulator. Along with an assessment of alternatives to existing circulator services, the scope of work includes an evaluation and recommendation of alternatives for an autonomous vehicle service along the planned Cumberland Sweep (**Figure 8**), a three-mile loop of multiuse paths serving the Cumberland CID.

While the elimination of the Green Circulator does decrease the amount of service available in the area, existing fixed-route service and any planned service that may come from ongoing studies can provide reasonable alternatives to the eliminated route. CobbLinc will continue to monitor public feedback, complaints, and ridership data to understand the effect of the eliminations on performance, equity, and customer satisfaction.

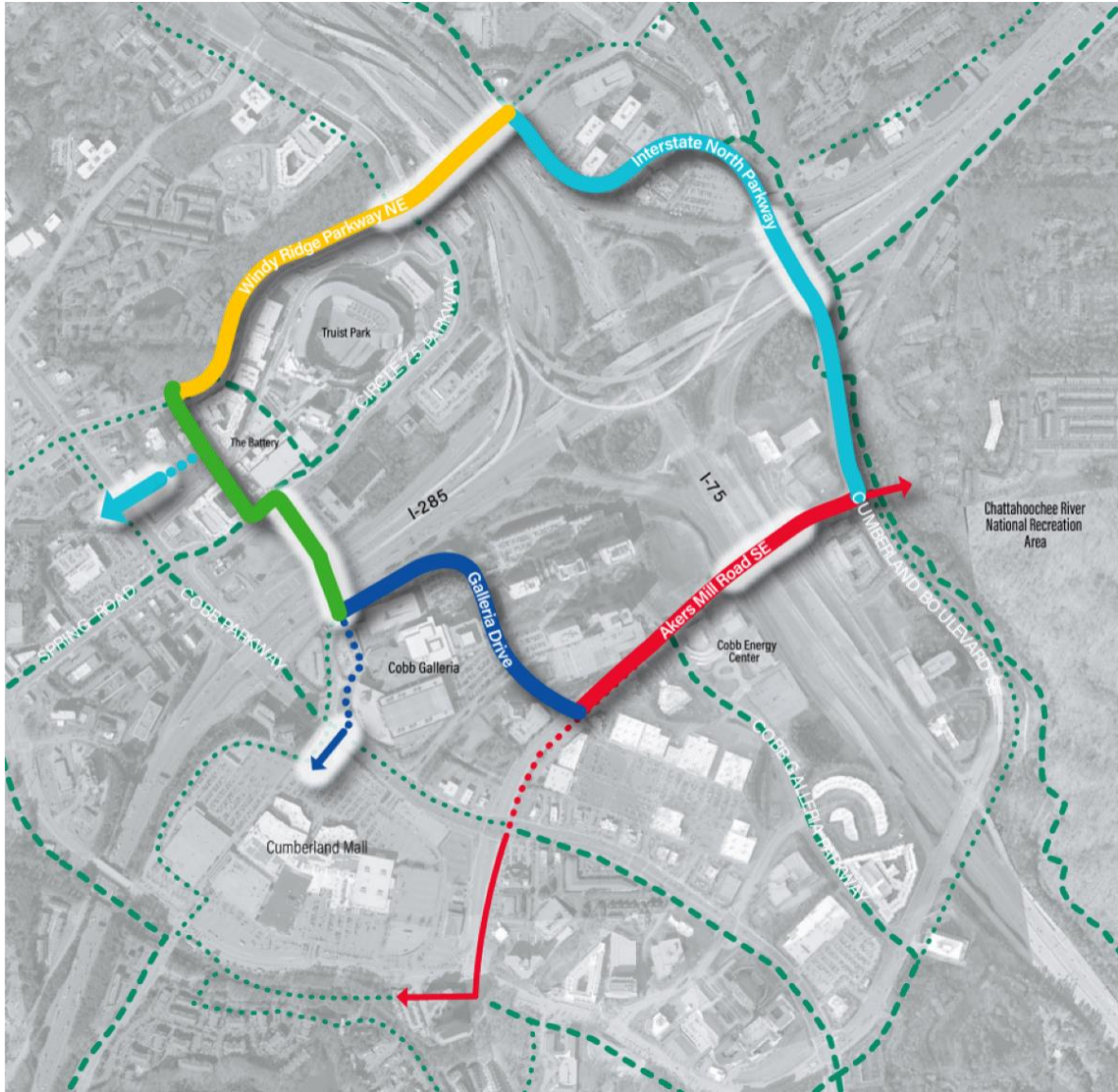


Figure 8: Cumberland Sweep Map; Highlighted Areas Indicate Planned Pedestrian Bridges.

Source: Cumberland Community Improvement District