



# Mankato Transit System Title VI Plan

This plan was adopted April 2017, updated July 2020, and updated August 2023.

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## Introduction

Mankato Transit System's Title VI Program ensures that no person, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity under the control of the Mankato Transit System. The City of Mankato will ensure that members of the public within the service area are aware of the provisions and responsibilities associated with Title VI of the Civil Rights Act of 1964.

This program was developed in compliance with Federal Transit Administration (FTA) requirements and guidelines of FTA Circular 4702.1B.

The plan evolved from its creation by SRF Consulting Group Inc. to its revision by Mankato Transit System.

## Program Objectives

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

## Reporting Requirements

Title 49 CFR Section 21.9(b) requires recipients to "keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with [49 CFR part 21]." FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years. The Title VI Program must be approved by the direct or primary recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Submit a copy of the Board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors of appropriate governing entity or official(s) has approved the program.

## Dissemination of the Title VI Program

This document is available at the City of Mankato website located at this link.

<https://www.mankatomn.gov/your-government/departments/mass-transit>

Anyone may request a copy of the Title VI Program via telephone, mail, or in person and shall be provided with a copy at no cost. Translated copies of the program will be provided at no cost upon request.

Questions or comments regarding the Title VII Program may be submitted to:

- The online submission form located at the website [Online Submission](#)
- Phone: 311 or 507-387-8600
- Mail:  
Associate Director Transportation Planning Services  
10 Civic Center Plaza  
Mankato, MN 56002-3368

## About Mankato Transit System

The city of Mankato provides fixed route and paratransit services with fewer than 30 fixed route vehicles in peak service. The service area includes North Mankato, Skyline, and Mankato which is about 24 square miles with a population of approximately 60,206.

## Investigations, Complaints, and Lawsuits

Mankato Transit System has not received a complaint of discrimination since the development of the Title VI Program in the year 2020.

Attachment A contains a record of the investigations, lawsuits, and complaints.

## Notice to the Public

The following notice is posted on the City of Mankato's website, in transit revenue vehicles, and on printed schedules.

### **Notifying the Public of Rights Under Title VI**

#### **Mankato Minnesota**

The City of Mankato's Transit System operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Mankato.

For more information on the City of Mankato's civil right program, and the procedures to file a complaint, call 311 or (507) 387-8600; mail Associate Director Transportation Planning Services, 10 Civic Center Plaza, Mankato, MN 56002-3368 or visit our customer service office at the Intergovernmental Center, 10 Civic Center Plaza, Mankato, MN, 56002-3368. For more information, visit [www.mankatomn.gov](http://www.mankatomn.gov).

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, then contact 311 or (507) 387-8600

Si necesita información en otro idioma, comuníquese al 311 o (507) 387-8600

Haddii macluumaadka looga baahan yahay luqad kale, la xiriir 311 ama (507) 387-8600

Based upon the results of the Four Factor Analysis and Safe Harbor Provisions, translation of documents is not a requirement, rather it will be done upon request.

## Complaint Procedures

If information is needed in another language, then contact 311 or (507) 387-8600

Si necesita información en otro idioma, comuníquese al 311 o (507) 387-8600

Haddii macluumaadka looga baahan yahay luqad kale, la xiriir 311 ama (507) 387-8600

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the City of Mankato's Transit System (hereinafter referred to as "City") may file a Title VI complaint by completing and submitting the form which is available at [www.mankatomn.gov](http://www.mankatomn.gov) and Attachment B. The City of Mankato's Transit System investigates complaints received no more than 180 days after the alleged incident. The City will process complaints that are complete.

Once the complaint is received, the City will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing whether the complaint will be investigated by our office.

The City has sixty days to investigate the complaint. If more information is needed to resolve the case, the City may contact the complainant. The complainant has

ten business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten business days, the City can administratively close the case. A case can be administratively closed also if the complainant no longer wished to pursue their case.

After the investigator reviews the complaint, they will issue one of two letters to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarized the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, they have ten days after the date of the letter or the letter of finding to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

## Promoting Inclusive Public Participation

Every effort will be made to seek public involvement as early as possible. Public meetings will be held at locations accessible to the public, including those with disabilities. Moreover, the public meeting location and time will be such that the meeting is accessible by fixed route service. Upon request, a sign language interpreter will be made available for hearing impaired persons, and language assistance (e.g., interpret services) will be made available to persons with limited English proficiency. Any requests for accommodation should be submitted to the staff advertised in the public notice at least seven (7) days prior to the public meeting.

Notice of a public comment period and public meetings will be published in the Mankato Free Press and posted on the City website at least fourteen (14) days in advance of the scheduled public meeting. The public notice shall describe the proposed action; date, time, and location of the public meeting; instructions for submitting comments, including any submission deadlines; and contact information for the purposes of asking questions or receiving additional information.

Notices may also be directly provided to interested persons, community groups and organizations, businesses, or other stakeholders deemed by Mankato Transit System to be directly affected by the proposed change. Where applicable, additional efforts shall be made to ensure minority, low-income, and limited English proficient populations are informed of proposed changes and resources are made available to enable their participation.

Comment cards will be available at the Customer Service Desk (311) located at the Intergovernmental Center, 10 Civic Center Plaza, Mankato. While written comments are encouraged, staff will also document verbal comments. Both written and verbal comments will be included as part of the public record.

The public participation plan deployed by staff differ for each project. The methods used are selected based on the demographics of the affected population, the type of plan, program, or service, and resources available. Community partners play a critical role, as Mankato Transit staff leverage the networks of dozens of community partners to increase the reach and efficacy of its public engagement efforts, while building trust.

## Public Participation Summary of Efforts

As part of its efforts to engage the diverse public within its service area, and continue to be inclusive of Limited English Proficiency communities, Mankato Transit relies on partnerships with a variety of organizations and communities, including, but not limited to the following:

- Boys & Girls Club of Mankato
- Greater Mankato Area United Way
- Greater Mankato Diversity Council
- Leisure Education for Exceptional People (LEEP)
- Lutheran Social Services
- Minnesota Council of Churches
- Mankato Area Public Schools, ISD 77
- Mankato Area Adult Basic Education (ABE) Program
- Mankato Rehabilitation Center Inc. (MRCI)
- Minnesota River Area Agency on Aging
- Minnesota State University, Mankato (MSU-Mankato)
- Minnesota Valley Action Council
- Mankato YMCA
- Mankato YWCA
- Partners for Affordable Housing
- Salvation Army
- VINE Faith in Action.

The following highlights engagement activities conducted on a routine basis to specifically engage minority and limited English proficient populations:

**Public Engagement Tools** include KNUJ and KMSU Radio, KEYC Television, Mankato Free Press, Mankato City News, Mankato City Podcasts, Mankato website and Mankato social media - Facebook, Twitter, Instagram, and YouTube.

**Minnesota State University, Mankato (MSU-Mankato)** Staff meet with the International Student Association during University orientation to provide information about transit services provided and to teach students how to ride the bus.

**Mankato Area Public Schools** Adult Basic Education and English as a Second Language classes. At least twice a year, staff meet with program participants to gather information on their transportation needs and to provide information on the transit system. Meetings generally involve hands-on training and transit system education.



**Mankato/North Mankato Area Planning Organization (MAPO)**, the federally designated metropolitan planning organization for the urbanized area conducts planning activities, including those to inform, engage, and gather feedback from the public. Mankato Transit, an active participant in MAPO supports their Title VI Program, Language Assistance Plan, and Public Participation Plan for public engagement.

**Mankato Transit Development Plan 2023 Update**, a five-year strategic plan to guide future investments was completed. The public participation plan is included as Attachment C.

## Meaningful Access to Limited English Proficient Persons

Limited English-speaking households<sup>1</sup> identifies households that may need English-language assistance. A “Limited English-speaking household” is one in which no member 14 years old and over (1) speaks only English at home or (2) speaks a language other than English at home and speaks English “Very well.”

The City of Mankato uses INGCO International<sup>2</sup> in our committed to provide all individuals, including those with limited English proficiency, meaningful access to transit programs and services.

## Four Factor Analysis

The Four Factor Analysis is an individualized assessment that balances four factors and helps determine if Mankato Transit Service communicates effectively with limited English proficient persons and informs language access planning.

1. The number or proportion of limited English proficient persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which limited English proficient persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people’s lives.
4. The resources available to the recipient for limited English proficient outreach, as well as the costs associated with that outreach.

## Safe Harbor Provisions

Department of Transportation has adopted Department of Justice’s Safe Harbor Provision, which stipulates that, if a recipient provides written translation of vital documents for each eligible limited English proficient language group that constitutes five percent (5%) or 1,000 persons, whichever is less of the total population of persons eligible to be served or likely to be affected or encountered,

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<sup>1</sup> American Community Survey and Puerto Rico Community Survey 2021 Subject Definitions

<sup>2</sup> <https://ingcointernational.com/about-us/>

then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

For the Mankato urbanized area, 1,000 persons is the threshold for Safe Harbor Provisions, which apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to limited English proficient individuals through competent oral interpreters where oral language services are needed and are reasonable.

### Area Analysis of English Proficiency

Utilizing Minnesota Department of Transportation Limited English Proficient Data Tool<sup>3</sup> for the cities of Eagle Lake, Mankato, North Mankato, and Skyline the total limited English proficient person count is 1,237 for all language groups (Attachment D). Breaking the total into the Forty-Two Group Classifications for translation assessment, no language rises to the level of Safe Harbor Provision.

- 350 persons or 1.23% - Other Unspecified
- 284 persons or 1.38% - Spanish
- 183 persons or 0.76% - Arabic

Other and unspecified languages are Hungarian, Jamaican Creole English, and Unspecified<sup>4</sup>.

Students Primary Home Language data indicates transit's focus on the languages of Spanish and Somali. The offer to translate documents into these languages are expressed in the native word and incorporated into the Notice of a Persons Rights under Title VI.

- If information is needed in another language, then contact 311 or (507) 387-8600
- Si necesita información en otro idioma, comuníquese al 311 o (507) 387-8600
- Haddii macluumaadka looga baahan yahay luqad kale, la xiriir 311 ama (507) 387-8600

Additionally, technology services such as the Bus Mankato app are shared using a QR Code which the user's electronic device can translate into the language of choice.

### Frequency of limited English proficient persons encountering Transit Services

The analysis relies on information from bus drivers, staff, and documented requests for services and information.

Mankato Transit conducts quarterly training meetings with bus drivers about operational and customer service topics, including any language barriers. Drivers report most frequently encountering limited English proficient persons while

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<sup>3</sup> <https://www.dot.state.mn.us/civilrights/lep-data-tool.html> uses data gathered from the American Community Survey (ACS) 5-year estimate (2015-2019) from [Table ID C16001](#).

<sup>4</sup> American Community Survey and Puerto Rico Community Survey 2018 Subject Definitions

servicing the Lincoln Community Center in Mankato, where the Mankato Area Public School District's English as a Second Language (ESL) program is offered. Drivers report that the main languages spoken by those with limited English proficiency appear to be Spanish and Somali. Drivers and staff have found that nonverbal communication with riders is often effective for the purposes of helping the rider pay their fare or request the bus to stop.

Representatives from Mankato Transit occasionally meet with ESL classes and/or staff to assist persons in accessing the region's public transit services. In the past, meetings have involved a bus picking up the class and taking them on a tour of bus routes in the community. The ESL class is taught by several interpreters who are also on board during the training. While touring bus routes, staff discuss topics such as how to pay a fare, request a transfer, request that the bus stop, and where to wait for a bus.

In the last three years, MTS has had zero requests for language interpreters and zero requests for translated documents. All such requests are to be documented along with the date, type of service requested, and primary language of the individual.

### Nature and Importance of Programs, Activities, and Services

Many limited English proficient persons rely on public transportation for their mobility needs. According to DOT LEP guidance, "providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."

Mankato Transit Services takes seriously the importance of transit service and language assistance services for the limited English proficient customers. This commitment to provide access to limited English proficient persons, enable the use of transit to access important destination for education, health care, and employment. Drivers report the main destinations for limited English proficient riders include the Lincoln Community Center and Open Door Health Center, an income-based health care facility located in Mankato.

### Resources Available and Associated Costs

Mankato Transit Services is prepared to provide language assistance resources upon request. It has been determined that Mankato Transit could afford professional interpretation and translation services on an as-needed basis and includes translation services in the annual operating budget.

Additionally, Mankato Transit is prepared to partner with outside organizations to augment internal capacity and provide necessary services, including the Lincoln Community Center and Minnesota State University, Mankato International Student Office, among others.

### Facility Siting Equity Evaluations

The Title VI Circular states the following regarding the siting of facilities:

In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin...

Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

The Transit Maintenance Facility opened in May 2016, following years of planning and coordination between the City, MnDOT, and FTA. As part of the project, the City completed a thorough environmental review process resulting in a categorical exclusion. The project included the construction of a 21,000-square foot bus storage and maintenance facility to house the entire bus fleet, a wash facility, and office space.

The process for selecting the site of the Transit Maintenance Facility was completed prior to the inclusion of Facility Siting Equity Analysis guidance in Title VI Circular 4702.1B in 2012. Thus, a facility siting equity analysis was not completed concurrent with the NEPA process, nor prior to construction of the Transit Maintenance Facility. As part of its ongoing commitment to fulfill the requirements of Title VI, Mankato Transit System retroactively completed a full Facility Siting Equity Analysis for its new transit facility in accordance with FTA Circular 4702.1B.

The complete Facility Siting Equity Analysis was provided to FTA as part of the previous Title VI Program in 2017. The review found that the Transit Maintenance Facility did not have the potential for disparate impacts to minority populations or disproportionate burdens to low-income populations. Further, no potential for cumulative impacts associated with the Transit Maintenance Facility site area were found.

## Fixed Route Service Guidelines

Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and locations of routes may not be determined based on race, color, or national origin.

Mankato Transit sets these standards and policies which apply to the agency rather than industry wide as in the case of the American Public Transportation Association.

The following standard and policies address how service is distributed across the transit system and ensure the manner of distribution affords users access to Mankato Transit's assets. Service standards are based upon quantitative indicators whereas policies are not necessarily based on a quantitative threshold.

## Vehicle Load Standards

Expressed as a ratio of passengers to the total number of seats on a vehicle. These standards apply to both peak and off-peak times for fixed route and demand response (flex) service.

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
Class 400 Length 24 feet	12	2	14	1.2
Class 400 Length 26 feet	16	3	19	1.2
Class 700 Length 35 feet	32	6	38	1.2
Class 700 Length 40 feet	38	7	45	1.2

## Vehicle Headway Standards

Expresses as the amount of time measured in minutes between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headway is one component in the amount of travel time expended by a passenger to reach a destination.

Route Type	Weekday		Weekend
	Day	Evening	Day and Evening
Campus Routes	30 minutes	60 minutes	60 minutes
All Other Routes	60 minutes	60 minutes	60 minutes

Campus routes are those primarily serving Minnesota State University Mankato campus and surrounding areas; including Route 1A North, 1B North, 1A South, 1B South, Routes 6, 8, 9, 12, Stomper Express and Campus Express.

## On-Time Performance Standards

A measure of runs completed as scheduled, fixed routes are measured against route origin and destination as well as specified time points along the route. Most fixed routes have at least five timepoints.

- Ninety (90) percent of Mankato Transit's fixed route vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule or published timetables. Vehicles may not depart the timepoint until the scheduled time.
- Ninety (90) percent of Mankato Transit's demand response (Flex) vehicles will complete their established runs no more than 10 minutes early or late in comparison to the established schedule. Vehicles may not depart the stop until the scheduled time.

## Service Availability Standards

A general measure of the distribution of routes within the service area.

Mankato will distribute transit service so that 75 percent of all residents in the service area are within a 1/4 mile walk of the bus service for weekdays.

Citizens that reside over a 1/4 mile walk from fixed route bus service and are in the Flex Zone are eligible for Kato Flex, a shared-ride, curb to curb service.

## Distribution of Transit Amenities Policy

Mankato Transit's distribution of amenities policy is evolving as the contract with SignPro has expired. Mankato is in the process of replacing contractor amenities with city owned amenities.

### Seating

Benches will be placed at bus stops with 15 or more daily boardings.

### Shelter

Shelters will be placed or incorporated at stops with at least 20 boardings per day or at major transfer points.

## Provision of Information

Printed route maps and schedules are available in the buses or at the Intergovernmental Center Customer Service Desk. Schedules include the QR Code directing customers to the Bus Mankato app.

Digital route maps and electronic vehicle location are available on the City website and through the use of the Bus Mankato app; developed in partnership with Minnesota State University Mankato. The app helps pinpoint Mankato buses and view scheduled stops using real-time information. Included is a trip planner,

schedule information, and a link to transit routes. Download the app on Google Play and the Apple Store.

### Escalators, Elevators, and Waste receptacles

The Intergovernmental Center includes an elevator and waste receptacles (trash and recycling) which are publicly available for transit customer use. The Public Works Center is not open to the public. There are no additional transit facilities such as stations or depots.

### Vehicle Assignment Policy

Routes with lower ridership may be assigned a Class 400 bus rather than Class 700. Some routes requiring tight turns on narrow streets are operated with Class 700 35-foot rather than 40-foot buses.

All routes are served with vehicle assets that include air conditioning and ADA ramp service.

### Evaluation of Service or Fare Changes

This requirement applies only to transit providers that operate 50 or more fixed route vehicles in peak service and are in an urbanized area of 200,000 or more in population. However, transit providers are required to comply with DOT Title VI regulations which prohibit disparate impact discrimination and should review their policies and practices to ensure changes do not result in disparate impact based on race, color, or national origin.

Close coordination with Mankato/North Mankato Area Planning Organization (MAPO) to conduct planning activities, including those to inform, engage, and gather feedback from the public. MAPO is the federally designated metropolitan planning organization (MPO) for the urbanized area. MAPO's Public Participation Plan will inform the techniques used to accomplish the public engagement efforts.

Active public participation is a necessary and integral part of transit planning and implementation. Early and continuous engagement with the public about opportunities to influence the direction of the plan and its eventual outcome is important. If it is determined that a disproportionate burden exists, steps to avoid, minimize, or mitigate impacts where practicable will be taken.

The Mankato City Council shall approve major service changes or fare changes.

Major Service Changes are a reduction of more than twenty-five (25%) percent of the daily service hours of an existing routes or demand response service.

The following service changes are exempt:

- Seasonal reductions
- Demonstration route or pilot project within the first 12 months of operation
- Special event service such as Mankato RibFest



- Undesigned changes such as those caused by an emergency, weather effects, major construction, labor strikes, or inadequate means to operate the service.

Fare changes applies to all fare changes regardless of the amount of increase or decrease.

The following fare changes are exempt:

- Instances when all passengers ride free
- Temporary fare reductions that are mitigating measures for other actions
- Promotional fare reductions lasting less than six months

### Disparate Impact Analysis

One purpose of conducting service and fare equity analysis prior to implementing service or fare changes is to determine whether the planned changes will have disparate impact based on race, color, or national origin.

Equity analysis will use the population of the service area as the comparison population, comparing the population in Census blocks or block groups served by the affected route(s) with the population in the service area to determine disparate impact. A transit planning platform will support this analysis, currently Remix.

*For example, if affected route serves Census blocks that are 40 percent minority and the service area is 45 percent minority, there would likely not be a disparate impact.*

### Disproportionate Burden Analysis

Low-income populations are not a protected class under Title VI. However, recognizing the inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear disproportionate burden of the changes.

Equity analysis will use the population of the service area as the comparison population, comparing the population in Census blocks or block groups served by the affected route(s) with the population in the service area to determine disproportionate burden impact. A transit planning platform will support this analysis, currently Remix.



## Attachment A: Investigations, Complaints, and Lawsuits



City of Mankato  
Transit System

### **Title VI 2023** List of Investigations, Lawsuits, and Complaints

	Date (MM/DD/YY)	Summary*	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

\*Include basis of complaint: race, color, or national origin

## Attachment B: Title VI Complaint Form



# TITLE VI Complaint Form



Any person who believes they have been discriminated against on the basis of race, color, or national origin by the City of Mankato's Transit System (hereinafter referred to as "City") may file a Title VI complaint by completing and submitting this form. The City of Mankato's Transit System investigates complaints received no more than 180 days after the alleged incident. The City will process complaints that are complete.

Once the complaint is received, the City will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing whether the complaint will be investigated by our office.

The City has sixty days to investigate the complaint. If more information is needed to resolve the case, the City may contact the complainant. The complainant has ten business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten business days, the City can administratively close the case. A case can be administratively closed also if the complainant no longer wished to pursue their case.

After the investigator reviews the complaint, they will issue one of two letters to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarized the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, they have ten days after the date of the letter or the letter of finding to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

### **Contact Us**

- [Online Submission](#)
- Email: 311@mankatomn.gov
- Phone: 311 or (507) 387-8600
- Mail: Associate Director of Transportation Planning Services  
10 Civic Center Plaza  
P.O. Box 3368  
Mankato, MN 56002-3368

## SECTION I: CONTACT INFORMATION

Name \_\_\_\_\_

Address \_\_\_\_\_

Phone Number \_\_\_\_\_

Email Address \_\_\_\_\_

## Accessible Format Requirements

Large Print \_\_\_ TDD/Relay \_\_\_ Audio Recording \_\_\_ Other \_\_\_\_\_

## SECTION II: THIRD PARTY INFORMATION

Are you filing this complaint on your own behalf? Yes No If yes, go to Section III.

If not, please supply the information of the person for whom you are complaining.

Name \_\_\_\_\_

Relationship \_\_\_\_\_

Please explain why you have filed for a third party:

[illegible]

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes No

**SECTION III: AGENCY THE COMPLAINT IS AGAINST**

Agency Name \_\_\_\_\_

Contact Person \_\_\_\_\_

Title \_\_\_\_\_

Phone Number \_\_\_\_\_

Email Address \_\_\_\_\_

**SECTION IV: BASIS FOR DISCRIMINATION**

I believe the discrimination I experienced was based on (check all that apply):

Race              Color              National Origin

Date of Alleged Discrimination (Month, Day, Year):

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses. If more space is needed, please use additional pages or the back of this form.

**SECTION V: FILING WITH OUTSIDE AGENCIES (check all that apply)**

Have you filed this complaint with any other Federal, State, or local agency, or with a court? Yes      No

If yes, check all that apply:

Federal Agency \_\_\_\_ Federal Court \_\_\_\_

State Agency \_\_\_\_ State Court \_\_\_\_

Local Agency \_\_\_\_ Local Court \_\_\_\_

Please provide information about a contact person at the agency or court where the complaint was filed.

Name \_\_\_\_\_

Title \_\_\_\_\_

Agency Name \_\_\_\_\_

Address \_\_\_\_\_

Phone Number \_\_\_\_\_

Email Address \_\_\_\_\_

**SECTION VI: CONCLUSION**

You may attach any written materials or other information that you think is relevant to your complaint.

Signature

Date

## Attachment C: Mankato Transit 2023 Development Plan Update – Public Involvement Plan

See next page for document.

# Public Involvement Plan

## Mankato Transit 2023 Development Plan Update

*Updated March 8, 2023*



# Project Summary

Project Item	Item Description
Public project name	City of Mankato Transit 2023 Development Plan Update
Project area	Mankato Urbanized Area
Schedule	January – September 2023
Branding	City of Mankato Transit System branding
Website	Content provided by project team – hosted on <a href="#">MTS website</a>

## Project Description & Purpose

The Mankato Transit Development Plan will update the 2018 Transit Development Plan and serve as the blueprint for 5 years ahead. Public involvement is a key component of this project and will help inform updates to the plan.

The public involvement plan's purpose includes:

- Effectively engage the public and stakeholders
- Gathering input and ensure issues, concerns, and aspirations are consistently collected, understood, and considered
- The process is intended to be inclusive and offer a variety of ways to participate

Development of this communications plan was based on insights from the Community Profile Report ([Appendix A](#)) and was led by Bolton & Menk, Inc., with input from the Mankato Urbanized Area and Toole Design.

## Project Engagement Goals

This project will seek to engage the public in unique ways to meet the project goals.

1. Ensure that project information is made available to the public in a clear, and effective manner.
2. Gather meaningful feedback from stakeholders to develop a community-supported project design.
3. Ensure that stakeholder questions and concerns are heard and addressed.
4. Maintain and strengthen the relationship between the Mankato Urbanized Area, the project team, and project stakeholders.
5. Document the progress and effectiveness of the communications plan.

## Key Stakeholders

A spreadsheet will be maintained throughout the project to build a comprehensive list of stakeholders and their contact information. Key stakeholder groups identified by the Community Profile include:

- Project Management Team (See [Appendix C](#))



- Mankato Urbanized Area
- MAPO Technical Advisory Committee
- MAPO Policy Board
- Mankato City Council
- Greater Mankato Growth
- Operations staff
- Local Schools & Universities
  - Minnesota State University Mankato (MSU)
  - Bethany Lutheran
  - South Central
  - Rasmussen
  - Mankato Area Public Schools
- Property and business owners
- Freight & rail
- Emergency services
- Utilities and services
- Religious institutions

See [Appendix B](#) for a full list of community stakeholder groups.

## Engagement Approach & Timeline

The following information summarizes the engagement tools the team will employ for this project.

- Phase 1: Existing Conditions – February – April 2023
- Phase 2: Alternative Scenarios – May – July 2023
- Phase 3: Proposed Improvements – August – September 2023

### Phase 1: Existing Conditions (February – April 2023)

Engagement Tool	Timeline
Project webpage setup	February – March 2023
Call for Resident Advisory Committee (RAC) members	March 2023
<b>INPUTiD™</b> – online comment map to identify issues and needs	March 2023
<b>Online survey</b> – public survey of community issues and needs	March 2023
<b>RAC meeting #1</b> – will introduce the project and discuss the materials to be presented during the first open house	March 2023
<b>Open house #1</b> – existing conditions, issues, and needs	April 2023
<b>Agency and advisory committee meetings (4)</b> – First round of project partner meetings with each group to discuss existing conditions and identify barriers, issues, and needs	April 2023
<b>Focus group meeting #1</b> – existing conditions with larger employers and businesses	April 2023

## Phase 2: Alternative Scenarios (May – July 2023)

Engagement Tool	Timeline
<b>RAC meeting #2</b> – review the findings of the first phase of engagement and plans for second phase of engagement	May 2023
<b>Focus group meeting #3</b> – discuss issues and needs with larger employers/businesses	May 2023
<b>Focus group meeting #4</b> – discuss issues and needs with transit operations staff	May 2023
<b>Open house #2</b> – feedback on service change alternatives	June 2023
<b>Pop-up meeting #1 and #2</b> – identifying community issues and needs	June 2023
<b>Agency and advisory committee meetings (4)</b> – Second round of project partner meetings with each group to compare options and gather feedback on preferred service changes	June 2023

## Phase 3: Service Change Recommendations (August—September 2023)

Engagement Tool	Timeline
<b>Open house #3</b> – feedback on draft recommended service changes	August 2023
<b>Pop-up meeting #3</b> – draft transit service changes	August 2023
<b>RAC meeting #3</b> – review the findings from the second phase of engagement and the share the proposed service change recommendations	August 2023
<b>Engagement summary</b> – graphical summary of engagement process and outcomes	September 2023

# Engagement Tools

## Resident advisory committee (RAC) meetings (3) – [Appendix D](#)

**Recruitment through social media, newsletters, papers, and from existing stakeholder lists including the Greater Mankato inclusivity study.**

The project team will work closely with the Transit Development Plan team to establish a Resident Advisory Committee (RAC) that is representative of the Mankato Transit System (MTS) area and will serve as a **sounding board** in developing project engagement materials. This group will include members of the Mankato Urbanized Area and will be representative of the various races and ethnicities, socioeconomic statuses, and ages of the community in the MTS project area. Following is a list of groups that we'll seek to include in the RAC:

- Existing transit users
- Pedestrians, bicyclists
- Seniors
- College students
- Faculty
- Retail/service industry employees
- Medical industry employees
- People with disabilities
- Local development agencies
- Low-income households
- Non-English speakers

**Purpose.** Instead of a conventional “advisory committee” that meets regularly to listen to a presentation and discuss topics, we propose a working group of existing transit users and potential customers to serve as a sounding board for the project team. The following is an example list of tasks or activities that we would seek input and ideas from the RAC members.

- Identify the best way to reach people
- Identify transit service-related issues and opportunities
- Test engagement strategies, beta test the online survey
- Identify Community priorities for transit
- Help get the word out, promote the survey and engagement opportunities

A variety of virtual and in-person involvement opportunities will be made available to better involve RAC members with different accessibility needs and lifestyles.

### Agency and advisory committee meetings (8)

Our team will hold eight in-person or virtual meetings with identified agency and advisory committees to discuss transportation issues, barriers, and needs. They will be spaced to correspond with key milestones in project development. The number of meetings per stakeholder group is as follows:

- MAPO Technical Advisory Board (2 meetings)
- MAPO Policy Board (2 meetings)
- Mankato City Council (2 meetings)
- Minnesota State University Mankato (2 meetings)

### Stakeholder focus groups (4)

**Recruitment will occur through stakeholder agencies, preexisting contacts from city stakeholder lists, and through public recruitment.**

Up to four virtual meetings will be conducted with large stakeholder groups representing employment sites such as hospitals, non-profits, and social service agencies. The following is a proposed list of recommended focus groups.

- Meeting #1: Existing conditions – employers/businesses
- Meeting #2: Existing conditions – operations staff
- Meeting #3: Review Alternative Scenarios – employers/businesses
- Meeting #4: Review Alternative Scenarios – operations staff

## Open houses (3)

Open houses serve as an opportunity for stakeholders to learn about project information, provide their feedback, and learn how to stay informed. Our team will hold three open houses at key milestones of the project including assessment of existing conditions, comparison of alternative scenarios, and service change recommendations. These meetings will be held in-person with meeting materials made available on the project webpage. The webpage will serve as a virtual alternative to the open houses to increase access for all residents. All materials for the open houses will be developed on an as-needed basis.

- **Open House #1** will share the existing conditions of the Mankato Transit System and will allow community members to learn about the TDP and the changes being considered in the plan. Community members will be able to offer insight into the existing conditions and ask about plan development and learn how to get involved.
- **Open House #2** will share the alternative scenarios with the community and receive feedback on the options presented. Attendees will be able to compare the scenarios, choose a preferred option, and offer further ideas for improvement.
- **Open House #3** will share service change recommendations to the Transit Development plan. The open house will allow community members to learn more about the details of the plan and future steps for implementation.

## Pop-up events (Up to 3)

Our team will attend up to three pop-up events to reach target audiences that don't always attend formal open houses. Pop-up meetings can be scheduled around community events and activities that already draw broad participation such as youth activities or park-based programming. These meetings will build off open house content to include fun and engaging activities. Some local event to consider include:

- Greater Mankato Area United Way – [Project Community Connect](#): April 18
  - o Includes free public transportation
- Cherry Street pop-up
  - o Host a popup for people to check out the city buses and learn more about the TDP!
- [Songs on the Lawn](#)
- Mankato MoonDogs Baseball: May-August
- North Mankato Fun Days
- Rockin' on the Hill

## Project webpage

The project webpage will be home to all project information including regular project updates, open house information, and any other supplemental items related to the project, and will be hosted on the MTS website. All communications will refer to the project audience to continuously check back to the webpage for up-to-date information.

## INPUTiD™ interactive comment map

The team will create and maintain an interactive project map, using Bolton & Menk's INPUTiD™, a custom web-based application that allows the public to provide comments specific to a location. Users can leave comments about the project anonymously as well as read and respond to other users' comments. This tool will be utilized to gather input on the project designs at each stakeholder meeting and will be housed on the project website. The INPUTiD™ map will be hosted on the project webpage, managed by the Mankato Transit System (MTS) team.

- Proposed comment types:
  - New stop
  - Frequency
  - Time of service
  - Needs improvement
  - Idea/Opportunity

## Online survey

Online surveys are an efficient, cost-effective way to gather information about project concerns and to learn more about the project area and the audience involved. The survey aims to capture information regarding the existing conditions of the transit system from riders and non-riders and may branch out to capture information from various groups including regular users of the system, infrequent users, and non-users. The survey will work to better understand attitudes towards the transit system and learn the needs and desires that would improve the quality of the system.

## Social media

Social media will be leveraged to promote various public engagement opportunities, such as the survey, INPUTiD™ mapping, and general project information. A project miniseries will be created to share timely project information around key milestones of the project and will feature up to six topics. These topics will include existing conditions, alternative scenarios, and service change recommendations.

## Promotional/Informational handouts

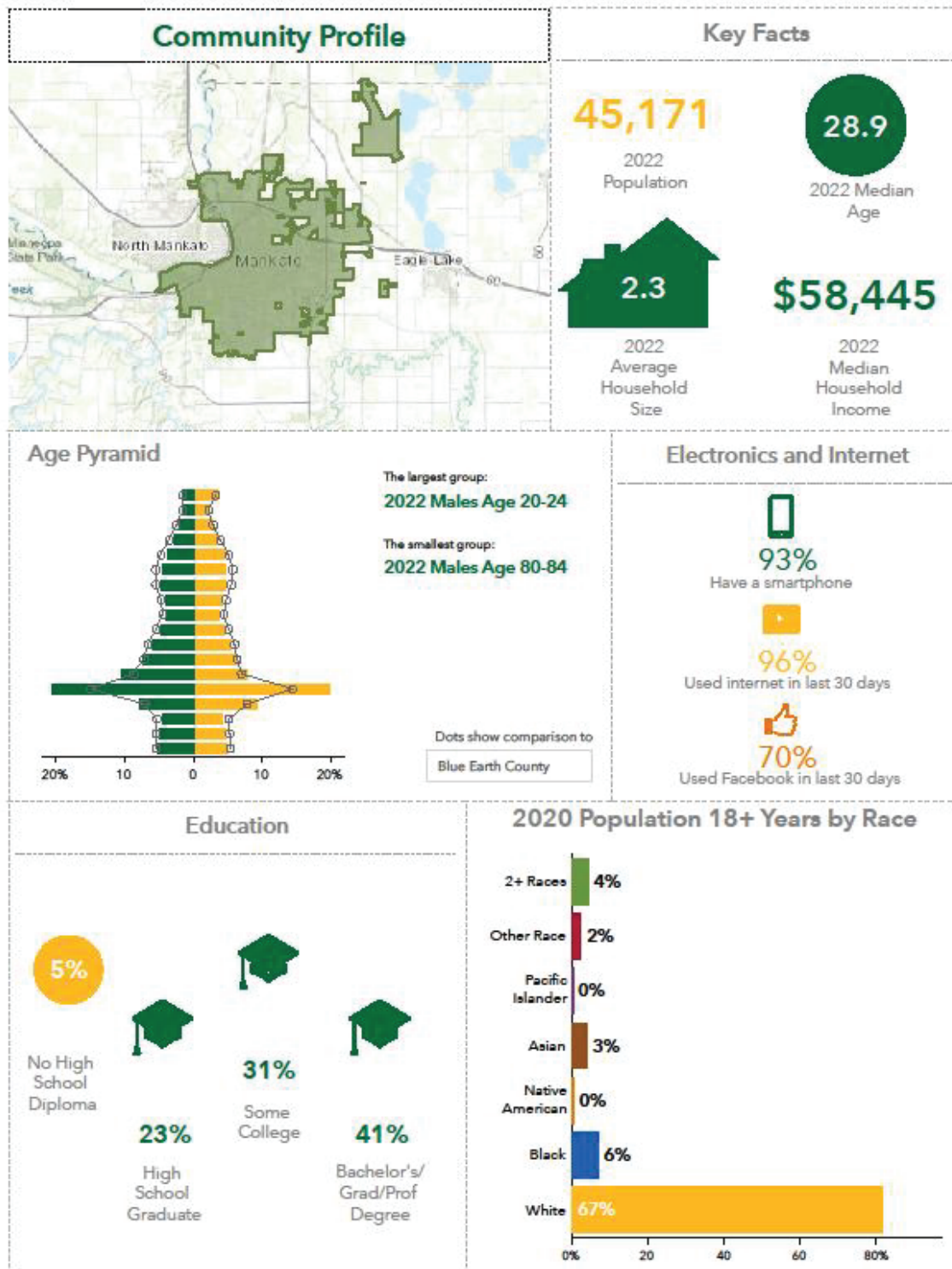
The team will develop handouts with key information about the project, including project scope, benefits, and a project timeline. Project handouts will also have a QR code to INPUTiD™ and direct stakeholders to the project webpage. These handouts will be available on the project webpage, at public meetings, and at events. Translations to these materials will be developed on an as-needed basis.

## Project signage

Project signage will be created to generate interest and discussion about the project. These can contain a QR code or URL that links to the website, survey, or other important online materials and placed in locations frequented by current or potential transit users such as on buses.

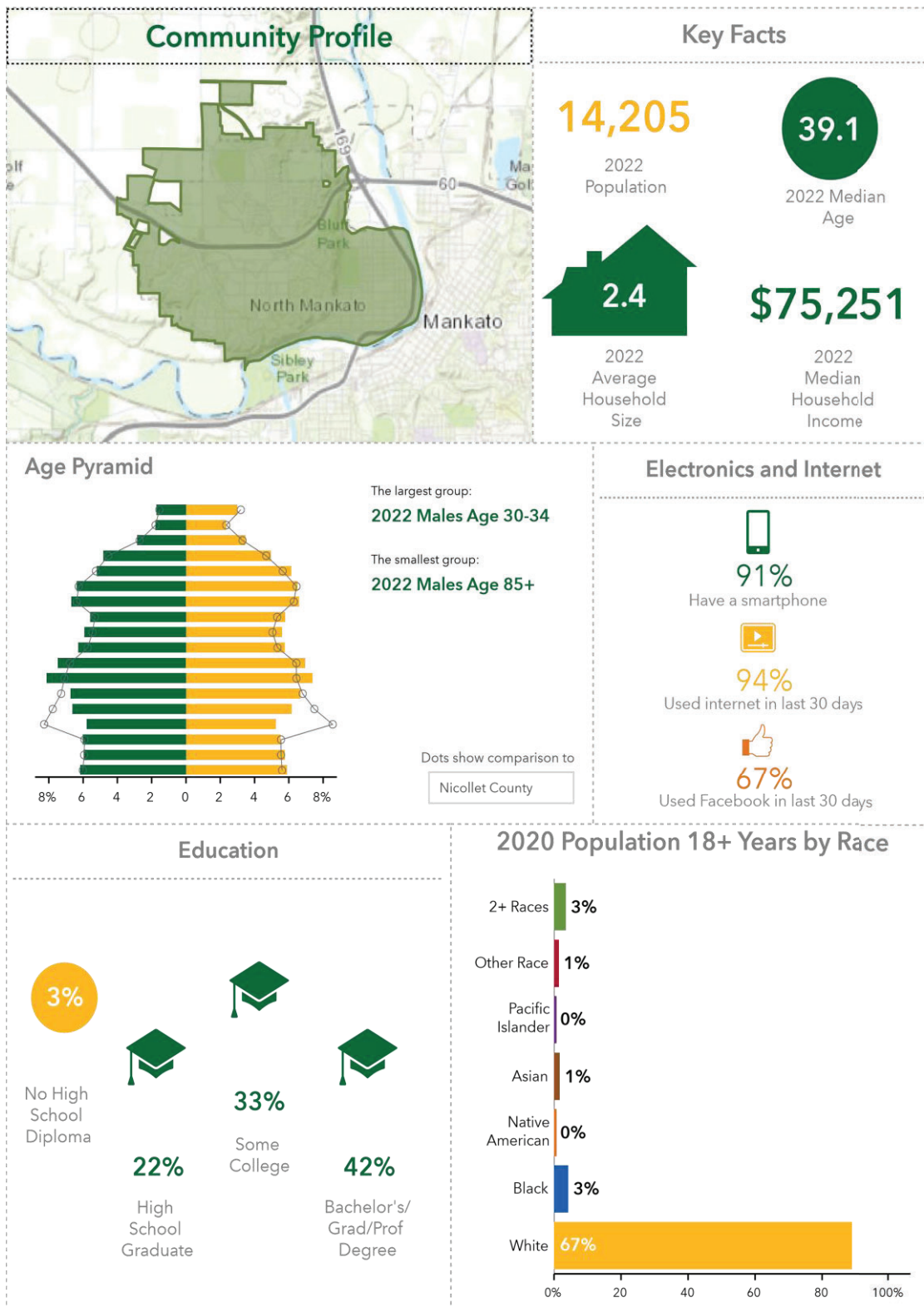
# Appendix A: Community Profile

## Mankato profile





## North Mankato profile



## Appendix B: Stakeholder Groups

Stakeholder Type	Stakeholder Groups
Education	<ul style="list-style-type: none"><li>• Bethany Lutheran</li><li>• Minnesota State University (MSU)</li><li>• South Central College</li><li>• Rasmussen College</li><li>• Mankato Public Schools</li></ul>
Medical	<ul style="list-style-type: none"><li>• Mankato Clinic Health System</li><li>• Mankato Clinic</li><li>• Open Door Health Center</li><li>• Wickersham</li></ul>
Business Community	<ul style="list-style-type: none"><li>• Taylor Corporation</li><li>• Greater Mankato Growth</li><li>• <a href="#">Visit Mankato</a></li><li>• Visit Mankato East</li><li>• <a href="#">Community Partners</a></li></ul>
Retail	<ul style="list-style-type: none"><li>• Mankato Heights Mall</li><li>• River Hills Mall</li><li>• Walmart</li><li>• Hy-Vee</li><li>• Aldi</li><li>• Cub Foods</li></ul>
Government	<ul style="list-style-type: none"><li>• DMV</li></ul>
Key Destinations	<ul style="list-style-type: none"><li>• YMCA</li><li>• YWCA</li><li>• Lincoln Community Center</li></ul>



## Appendix C: Engagement Team & Roles

Name	Organization	Role	Email
Shawn Schloesser	City of Mankato	Associate Director – Transportation Planning Services	<a href="mailto:sschloesser@mankatomn.gov">sschloesser@mankatomn.gov</a>
Matt Lassonde	City of North Mankato	City Planner	<a href="mailto:matthewl@northmankato.com">matthewl@northmankato.com</a>
Edell Fiedler	City of Mankato	Communications and Engagement Director	<a href="mailto:efiedler@mankatomn.gov">efiedler@mankatomn.gov</a>
Mitzi Alex	Toole Design	Project Manager	<a href="mailto:malex@tooledesign.com">malex@tooledesign.com</a>
Andrea Ostrodka	Toole Design	Deputy Project Manager	<a href="mailto:aostrodka@tooledesign.com">aostrodka@tooledesign.com</a>
Ciara Schlichting	Toole Design	Principal-in-Charge	<a href="mailto:cschlichting@tooledesign.com">cschlichting@tooledesign.com</a>
Angie Bersaw	Bolton & Menk, Inc.	Principal-in-Charge	<a href="mailto:Angie.Bersaw@bolton-menk.com">Angie.Bersaw@bolton-menk.com</a>
Haila Maze	Bolton & Menk, Inc.	Engagement Advisor	<a href="mailto:Haila.Maze@bolton-menk.com">Haila.Maze@bolton-menk.com</a>
Robin Kaufman	Bolton & Menk, Inc.	Engagement Lead	<a href="mailto:Robin.Kaufman@bolton-menk.com">Robin.Kaufman@bolton-menk.com</a>
Rachel LeMire	Bolton & Menk, Inc.	Engagement Support	<a href="mailto:Rachel.LeMire@bolton-menk.com">Rachel.LeMire@bolton-menk.com</a>

# Appendix D: Resident Advisory Committee (RAC) Plan

## Selection process

One of the first tasks of the communications and engagement team will be to let the public know that the study is underway to update the TDP and to do a call for applications. This can be done through social media posts as well as articles in newsletters, papers, and more.

To collect nominations, we'll complete a simple online survey that people can fill out their name, contact information, why they want to serve on the RAC and demographic data. The demographic data will be used to ensure that we have a diverse committee.

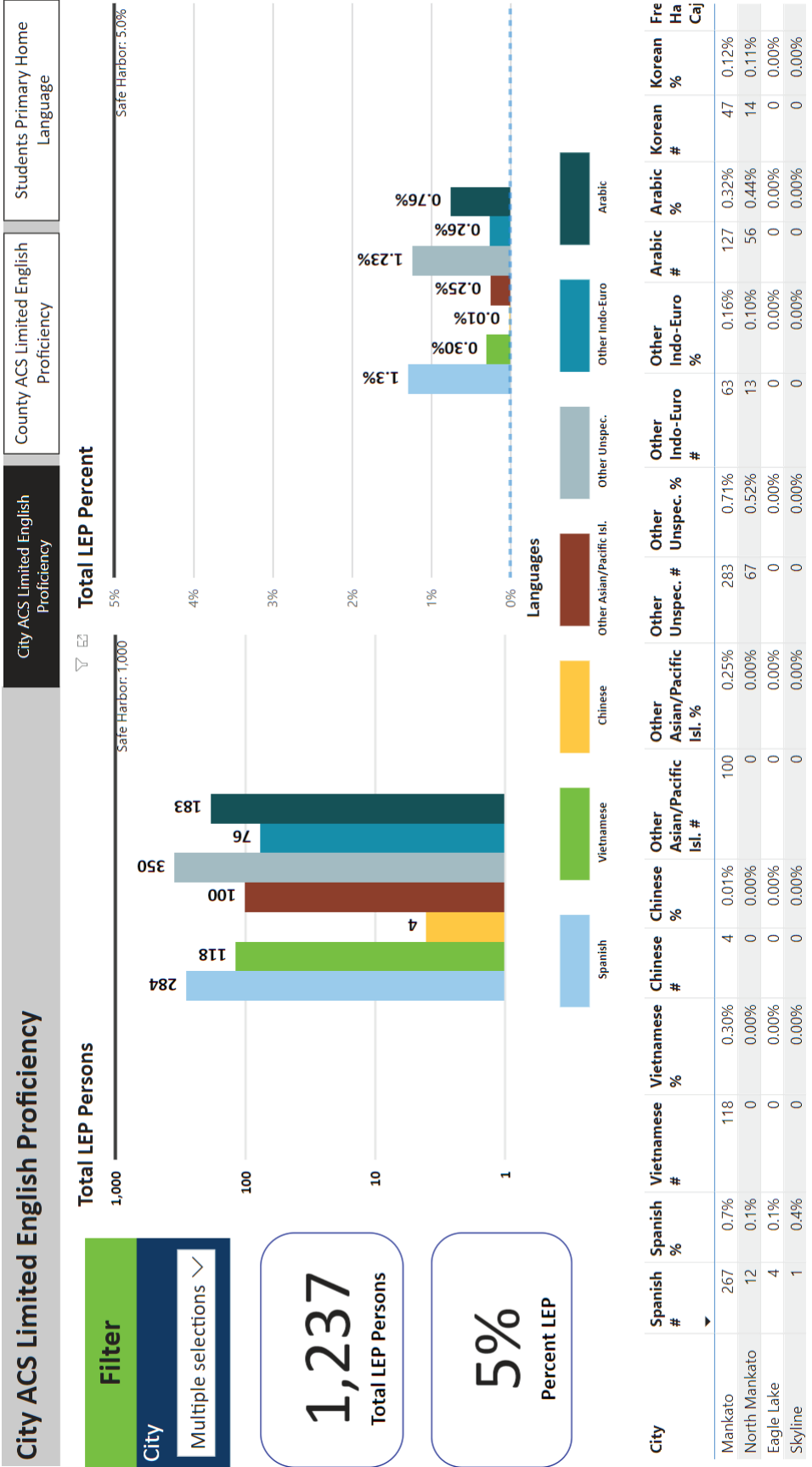
The goal would be to identify 12-15 people. As an incentive to apply, anyone that is selected will receive a 3-month transit pass (\$120 value) after participating in at least 3 meetings or activities.

## Timeline

Following is the initial list of meetings or activities that we'd ask RAC members to participate in

Date	Task
March 21- April 4	Seek nominations via 2-week online survey
April 4-11	Review applications, select 12-15 members
Late April	Hold in person kickoff meeting <ul style="list-style-type: none"><li>• Overview of committee</li><li>• Visioning</li><li>• What are the issues</li></ul>
	Virtual meeting pre-open houses to test materials, presentation
	Virtual meeting what did we hear, help interpret
	Invite RAC members to attend the forum
	Virtual meeting to review draft recommendations
	In between meetings they can provide feedback via the website or direct emails

Attachment D: Limited English Proficiency Analysis for Urbanized Area



# Limited English Proficiency Data Tool

Students Primary Home Language

City ACS Limited English Proficiency

County ACS Limited English Proficiency

Students Primary Home Language

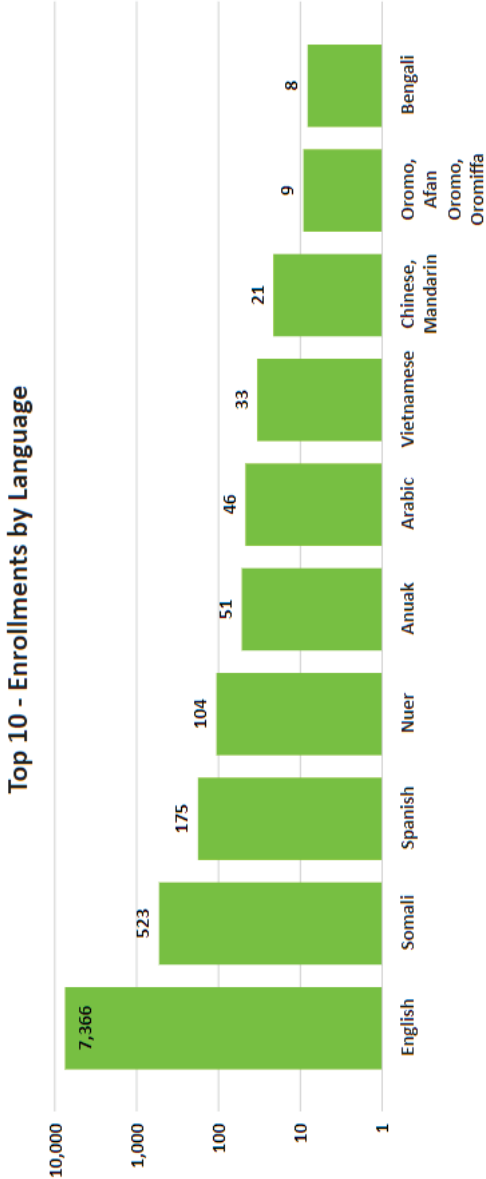
Filter

County

All

School District

MANKATO PUBLIC SCHOOL...



## Attachment E: Resolution Adopting the Mankato Transit Title VI 2023 Plan Update

R-2023-0814-150

### RESOLUTION ADOPTING THE MANKATO TRANSIT TITLE VI PLAN UPDATE

WHEREAS, THE City of Mankato is a direct recipient of federal funds for a public transit system; and

WHEREAS, as a direct recipient of federal funds, the City of Mankato is required to have an adopted Title VI Plan on file with the Federal Transit Administration; and

WHEREAS, the first Title VI Plan was adopted by the City Council on April 2017 in response to findings of the Triennial Review by the Federal Transit Administration and updated in July of 2020; and

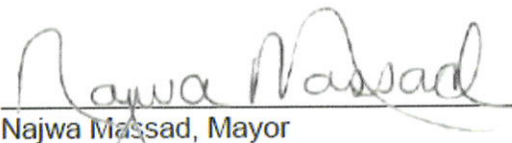
WHEREAS, the plan will be updated every three years to address necessary changes to the plan and update the City Council on revisions that have taken place since first adoption; and

WHEREAS, the updated plan has been reviewed by city staff; the Minnesota Department Transportation Office of Civil Rights, and was found to contain all necessary elements for federal compliance.

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MANKATO, MINNESOTA that the Mankato Transit Title VI plan update for 2023 be adopted.

This resolution shall become effective upon passage without further publication.

Adopted this 14th day of August 2023.

  
Najwa Massad, Mayor

ATTEST:   
Renae Kopischke, MMC  
City Clerk