

March 25, 2025

The Honorable Tou Xiong  
Chair, State and Local Government Committee  
3203 Minnesota Senate Building  
Saint Paul, MN 55155

The Honorable Andrew R. Lang  
Ranking Minority Member, State and Local Government Committee  
2205 Minnesota Senate Building  
Saint Paul, MN 55155

SUBJECT: Concerns Regarding SF 2162 – Proposed Changes to State-Aid Design Standards and Variance Procedures

Dear Chair Xiong, Ranking Minority Member Lang, and Members of the Transportation Finance and Policy Committee:

On behalf of the Minnesota Society of Professional Engineers (MnSPE), we are writing to share our concerns with SF 2162, which proposes significant changes to the State Aid rules, design standard variance processes, and the structure of review and oversight related to public roadway design. While MnSPE supports innovation and flexibility in engineering practices, we believe that several provisions in this bill are inconsistent with our Legislative Platform and could compromise public safety, uniformity, and the role of licensed professional engineers (PEs) in protecting the traveling public.

MnSPE has long advocated for the appropriate and ethical application of engineering expertise in decisions that affect public health, safety, and welfare. SF 2162 removes or limits the Minnesota Department of Transportation's (MnDOT) Office of State Aid's oversight of geometric designs for Municipal and County State Aid Highway (MSAS and CSAH) projects when alternative design standards are adopted locally. We are particularly concerned that this shift:

- Allows a city council or county board to adopt alternative design standards by resolution without requiring sign-off or involvement from their licensed city or county engineer, potentially bypassing the engineering expertise of the designated PE responsible for public infrastructure.
- Limits MnDOT's State Aid Office from reviewing design plans for MSAS and CSAH routes to ensure they meet core statewide standards, as well as recognized and accepted engineering design standards and guidelines.
- May erode statewide uniformity in road design, which is essential for maintaining consistent driver expectations and roadway safety. When roadway elements such as lane widths, design speeds, and pavement structure vary widely between jurisdictions, it can lead to confusion and increased crash risk—particularly for unfamiliar drivers and commercial carriers who rely on predictable design standards across the state.

SF 2162 also proposes to establish a new Advisory Committee on Design Variances, which would review and make recommendations to MnDOT regarding requested variances. However, a similar variance committee structure already exists under current MnDOT rules and practice, with representation from city and county engineers and other stakeholders. The proposed committee includes not only engineers, but also elected officials from county boards and city councils. MnSPE sees no clear justification for replacing the existing process with a more legislatively appointed and politically influenced structure. This change introduces additional complexity, reduces the emphasis on engineering judgment, and risks politicizing technical decisions that should remain grounded in sound, professional engineering principles.

MnSPE supports efforts to modernize design flexibility where appropriate through the rule making process—for example, updating to current best practices that may not yet be fully reflected in MnDOT State Aid's formal rules. We strongly recommend that core statewide design elements and the associated engineering design remain under MnDOT's oversight for MSAS and CSAH routes.



MnSPE appreciates the Legislature's continued work to improve Minnesota's transportation systems. We respectfully urge caution in advancing SF 2162 as currently drafted, and encourage further dialogue to ensure that licensed professional engineers remain central to public infrastructure decisions and that statewide safety and consistency are preserved.

Thank you for the opportunity to comment on SF 2162 and if you have any questions feel free to reach out to Darin Mielke at [dmielke@carvercountymn.gov](mailto:dmielke@carvercountymn.gov) or (952) 465-6795.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer Lowry".

Jennifer Lowry PE  
MnSPE President

A handwritten signature in black ink, appearing to read "Darin Mielke".

Darin Mielke PE  
MnSPE Legislative Advocacy Committee Chair