



MANUFACTURED & MODULAR HOME ASSOCIATION OF MINNESOTA

Opening doors to better living.

April 2, 2025

Dear Members of the House Transportation Finance and Policy Committee,

Re: HF2798/SF3004 Modernizing Minnesota's Pilot Escort Requirements

Thank you for the opportunity to testify in support of House File 2798, I am Mark Brunner, President and serve as President of the Minnesota Manufactured Housing Association (MMHA), the statewide trade association representing manufacturers, retailers, transporters, installers, and community operators committed to providing safe, affordable homeownership to Minnesotans. The bill updates Minnesota Statutes § 169.812 to modernize and clarify escort vehicle requirements for overdimensional loads. I

Briefly, the MMHA was formed in 1951 and is the statewide umbrella organization representing manufactured home and modular home builders and speaks for the nearly 1,000 privately owned manufactured home communities in Minnesota. Manufactured homes are Minnesota's largest source of non-subsidized workforce housing with four plants building both new manufactured and modular homes, employing about 1,000 workers, and an additional eleven plants exclusively building new modular homes. In Minnesota, 85-percent of all new manufactured homes sold are sited and affixed to real property with conventional type financing or mortgages. The remainder are placed on leased land in a community.

Minnesota's Pilot Escort Law Is Unique—and It Hurts Homebuyer Affordability

Minnesota is currently the only state in the Midwest that routinely requires licensed peace officer escorts for the transport of manufactured homes that briefly cross the centerline on rural or undivided roads.

Let me repeat that: No other state in the Midwest does this. Every other neighboring state finds safe, proven, and cost-effective ways to move these homes using trained civilian escorts, certified pilot cars, flaggers, and traffic control protocols—without requiring sworn law enforcement officers.

Minnesota's outlier status among its neighboring states imposes a punitive cost on homebuyers that serves no clear safety benefit. Requiring a peace officer escort—sometimes on routes with minimal traffic or for just a few feet of centerline encroachment—adds \$1,500 to \$3,000 per home to the final cost of delivery. And that cost is passed directly to the buyer.

Let me put that into perspective. The average cost of a new single-section manufactured home is about \$85,000; a multi-section home averages \$150,000. An added \$3,000 equals:

- 3.5% of the total cost of a single-section home.
- An estimated \$20–\$25 more per month in financing—enough to disqualify a buyer from FHA or USDA loans under typical debt-to-income limits.

For families earning under \$50,000—which includes more than half of manufactured housing buyers—this cost alone can push them:

- Out of qualifying for financing,
- Into a lesser or older home, or
- Out of the housing market altogether.

HUD considers housing “affordable” when it doesn’t exceed 30% of household income. For many working families, this escort fee tips them over that line.

The harm also falls hardest on historically underserved groups:

- Over 30% of manufactured homebuyers nationally are people of color.
- Manufactured homes remain one of the only unsubsidized paths to ownership still available to low-income households.

This policy effectively penalizes Minnesotans—especially working-class and minority households—for choosing the most affordable and sustainable housing option available.

HF2798 Brings Minnesota into the National Mainstream

HF 2798 offers a measured, responsible fix. It doesn’t eliminate police escorts—it simply gives MnDOT the discretion to:

- Require them where public safety truly demands, and
- Approve alternative safety measures when the same protections can be achieved using certified pilot cars, flaggers, signage, or traffic control plans—just like every other neighboring state already does.

This brings Minnesota into the national mainstream, aligning our permitting framework with best practices already in use across the country.

It also relieves unnecessary strain on law enforcement resources. By authorizing MnDOT to reduce escort requirements where appropriate, we avoid deploying peace officers in low-risk, low-traffic situations—freeing them to focus on higher-priority public safety needs.

Providing Dimensional Clarity

HF 2798 also removes longstanding ambiguity by setting clear, objective thresholds for when escorts are required based on width:

- No escort is required if the load is 15 feet or less at the base or 16 feet or less at the top;
- One rear escort is required on multilane divided highways above that;
- One lead and one rear escort are required on undivided highways.

This change aligns Minnesota with national norms and removes guesswork for permit writers, transporters, and law enforcement—reducing delay, inconsistency, and unnecessary cost.

Supporting Affordable Housing, Sustainability, and Equity

HF 2798 doesn't just solve a transportation issue—it advances core values shared across this Legislature.

- Affordable housing: Manufactured homes are often the only option within reach for essential workers, retirees, young families, and those recovering from housing insecurity.
- Racial and economic equity: This bill removes a cost barrier that disproportionately harms low-income and minority buyers.
- Climate goals: Manufactured homes are among the most resource-efficient and energy-conscious housing options on the market. Reducing regulatory friction helps make greener housing more accessible.
- Rural revitalization: Manufactured homes are key to housing the workforce in Greater Minnesota—teachers, nurses, construction workers, and small business owners who want to live near the communities they serve.

HF 2798 supports all of these priorities—and it does so while preserving MnDOT's full authority to regulate safely and responsibly.

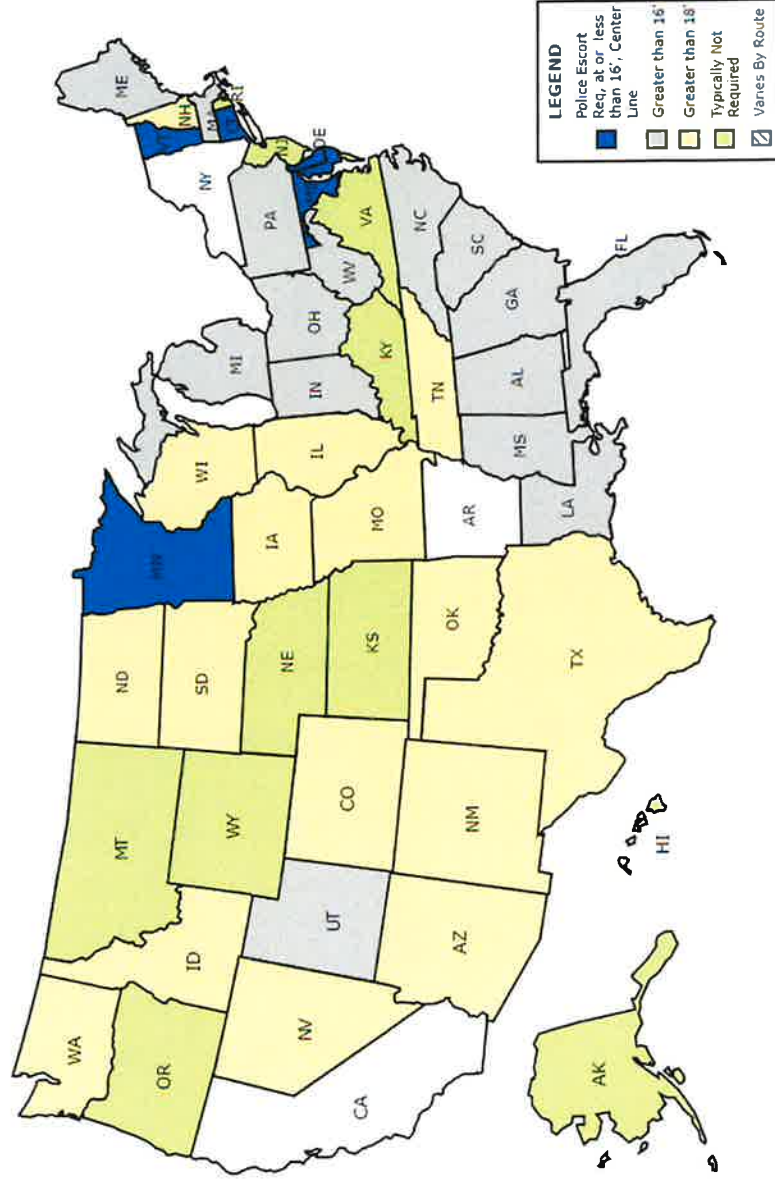
Conclusion: A Smart, Balanced Step Forward

House File 2798 is a balanced, common-sense update. It ensures public safety is maintained. It gives MnDOT the flexibility to regulate according to real-world risk. And it removes an outdated policy that is pricing working people out of housing—especially in rural, lower-income, and minority communities.

On behalf of the Manufactured & Modular Home Association of Minnesota, I respectfully urge your support and would be glad to answer any questions. Thank you.

Other State Requirements

- Surrounding states only require 1 to 2 escorts depending on route and size.
- No police escorts required with 900 miles of MN



Certified Pilot/Escort Vehicle Operator (P/EVO)

- MN already required all pilot drivers receive a P/EVO Certification
- P/EVO certification is considered gold standard in industry for training and qualifying safe operators
- Protects the motoring public, state infrastructure and property

