

Guidance Document for Recreation Park Trailers

Purpose: This document is being prepared as an aid to local code officials receiving permit applications for the installation of Recreational Park Trailers.

What is a Recreational Park Trailer (also known as a Park Model)? – A Recreational Park Trailer is a small pre-manufactured unit. It does not fall under the HUD standards which start at 400 square feet. By definition, Recreational Park Trailers are under 400 square feet and over 320 square feet, and therefore, do not fall under the scope of the HUD standards for manufactured homes. They are built on a chassis, are equipped with a hitch that is in some cases removable, are built in a factory and are delivered to the consumer as closed construction which prevents the inspection of much of the unit's construction. They are marketed and are generally used in a manner wherein they are installed on a site and remain in place for a number of years.

The Recreational Park Trailer Subcode (N.J.A.C. 5:23-4D) was adopted on August 4, 2008 and addresses the construction requirements for Recreational Park Trailers. As is the case with modular buildings or HUD units, on-site inspections to verify that the unit complies with the Uniform Construction Code are not possible without extreme dismantling of the unit. Therefore, similar to HUD units and modular buildings, the Department has allowed for an inspection process at the factory as a substitute for inspections when the unit arrives on site. Recreational Park Trailers are required to meet ANSI A119.5 and have a Recreational Park Trailer Industry Association (RPTIA) label affixed. (The rules allow for the Department to recognize labels from other organizations. To date, the RPTIA label is the only one approved.) The label is evidence that the unit complies with the standard. The label is generally placed on the exterior of the unit.

Site work associated with the installation of a Recreational Park Trailer is subject to the Uniform Construction Code (See bulletin 07-1 for further guidance).

Permit application:

The installation of a Recreational Park Trailer requires a permit under the Uniform Construction Code. Plans may be prepared by the homeowner in the case where the applicant owns the lot or has a long term lease on the property. In other cases, the plans are required to be prepared and signed and sealed by a New Jersey Licensed design professional in accordance with the Uniform Construction Code rules (see bulletin 96-2 for further guidance).

The permit application is required to be accompanied by a plan that shows the following:

- Location of the unit on the lot (where there are lot lines), or the location of the unit in relation to other nearby structures. In the case of a homeowner preparing drawings for his own dwelling on his own lot or a lot for which he/she has a long

term lease, the submission can be made by showing the locations on an existing survey or plot plan in lieu of having a survey done to show the proposed location of the unit. In the case where the land is owned by the park owner and the unit owners have short term leases, the park owner may choose to have an overall plan of the park prepared by a licensed professional showing the proposed location of all of the prospective units. The plan would be acceptable for permit submissions as the units are installed. The placement of the unit must be such that the required fire separation distances are maintained. In accordance with the requirements of the 2006 International Residential Code (2006 IRC), this means 5 feet from the lot line in cases where there are lot lines or 10 feet between adjacent units where there are no lot lines.

- The utility connections to the unit. The utility connections must be made in accordance with the applicable sections of the Electrical and Plumbing Subcodes. If someone other than the homeowner is making the connections, he/she must be licensed.
- The anchoring details for the unit. The unit need not have foundations or footings that extend below the frost line. The anchoring system should conform to manufacturers' recommendations where there are recommendations. Where there are no recommendations, the homeowner may either prepare an anchoring detail or have a registered design professional do it. The anchoring system must be able to withstand the applicable wind loads in the one- and two-family dwelling subcode (Section R301.2.1 and Figure 301.2(4) of the 2006 IRC. Also, see bulletin 03-4 for further guidance). The owner of the park may have a prototype anchoring detail prepared by a licensed design professional to be used throughout the park as long as the design criteria for the prototype are clearly outlined (the assumed weight of the unit, the assumed uplift surface area, the assumed wall area, the assumed exposure classification, etc).

The fee for a building permit covering the installation (building, plumbing, electric and fire) of a Recreational Park Trailer should be a flat fee.

Field Inspections:

The unit, when placed on site, must be inspected for proper anchorage and support (per the approved plans), proper spacing from other units (fire separation distances apply), and proper utility connections. Inspectors may also do a walk through of the unit to look for signs of damage that may have occurred during shipping and to ensure that the smoke detectors and carbon monoxide detectors are operational.

Water supply connections must be made with materials that are appropriate for potable water applications and appropriate for the water service pressure dictated by the plumbing subcode (Section 3.4.2 of the 2006 NSPC). Sanitary sewer discharge must use appropriate material. Corrugated piping is not allowed. The sewer piping must connect to an appropriate point of disposal as dictated by the health department for individual

subsurface disposal systems (septic systems) or municipal sewer as dictated by the local municipal utility authority.

Electrical connections to the unit must be in accordance with the electrical subcode, specifically Article 552 of the 2005 NEC.

Additions:

Add-ons that are provided as an option by the manufacturer (usually lightweight porches) are required to be installed in accordance with the manufacturer's installation instructions. Site-built additions, such as porches, decks, or Florida rooms are required to meet all of the requirements of the Uniform Construction Code. Because the connection of the addition to the unit is a rigid connection, there is a concern about differential movement of the site-built addition and the Recreational Park Trailer to which it is attached. Such movement over time can weaken the connection of the addition to the Recreational Park Trailer. Therefore, if the Recreational Park Trailer is to be used to support the addition, it must be constructed with a foundation system that extends below the frost line or be provided with another means of preventing differential settlement of the unit and the addition.

Plumbing that is part of the addition must run independently of the piping within the Recreational Park Trailer. The waste line from the Recreational Park Trailer may be connected to the addition outside and below the Recreational Park Trailer so that there is, in effect, a single building sewer.

Electrical service to the addition must be made with a separate feeder that is not part of the Recreational Park Trailer. Wiring may be such that there is a main panel in the addition with a receptacle to supply the Recreational Park Trailer that is appropriately sized and installed per the electrical subcode for the load imposed by the Recreational Park Trailer.

Heating and air conditioning add on units must be appropriately listed and labeled for the intended application and installed in accordance with the requirements of the manufacturer, the electrical subcode and the mechanical and fuel gas chapters of the one- and two-family dwelling subcode. Such units may be supplied by receptacles from the unit provided that the over-current protection is appropriate for the load imposed by the unit.

Existing Units:

Because there was a period when the applicability of the Uniform Construction Code to Recreational Park Trailers was disputed by some park trailer owners and/or manufacturers, there have been numerous units that were installed without permits. Many of these units may have code violations. The Department is recommending the following course of action to deal with Parks that have been installed. Only items that would present a significant and immediate hazard to the public need to be addressed.

1. Perform an outside visual inspection for obvious hazards, such as no tie downs, hazardous electrical connections, etc.
2. If there are hazards, issue an unsafe structure notice.
3. Only in cases where there is reasonable cause to believe that there may be a code violation that affects the life safety of the occupants is an inspection of the interior of the unit required.

Existing Additions

Where there are site-built additions that were constructed without a permit, such as additional rooms, decks or porches, etc., the construction official has the right to enter the premises, pursuant to N.J.A.C. 5:23 – 2.29(d), and require that the owner apply for the appropriate permits. As an alternative, the code official may offer to do a Continued Certificate of Occupancy inspection. Bulletin 06-1 contains guidance on work that was done without permits. As noted in the bulletin, the construction official and subcode official should only require such dismantling of the addition as is reasonably necessary to determine that there are no life safety issues. In many cases, the addition and/or the unit that supports the addition will not have a foundation that extends below the frost line. If there is evidence of differential settlement of the unit and addition, foundations to frost must be provided. In cases where the addition is structurally independent of the Park trailer the code official may require the installation of a foundation system that extends below the frost line if there is evidence of significant settling or heaving of the foundation.

In some municipalities, there may be a substantial amount of work that has been done without permits. Construction officials may want to prioritize their inspections of the work that was done without permits giving priority to the additions that seem to present the greatest hazard based on an exterior visual inspection.

Removal of a Recreational Park Trailer

When a recreational park trailer without site-built construction and with utility connections that are readily disconnected is to be removed from a site, no demolition permit is needed. The purpose of a demolition permit is to ensure that the site is restored to a condition that will not present a hazard (no open foundations that someone can fall into, etc) and to ensure that the disconnected utility lines have been appropriately dealt with. Because the removal of a recreational park trailer, will not result in residual construction that may present a hazard and because they have utility connections that are designed to be readily disconnected no demolition permit is required.