

**COMMUNITY AFFAIRS**

**DIVISION OF CODES AND STANDARDS**

**Uniform Construction Code**

**Adopted Amendment: N.J.A.C. 5:23-4D.3**

Proposed: January 21, 2025, at 57 N.J.R. 109(a).

Adopted: June 30, 2025, by Jacquelyn A. Suárez, Commissioner, Department of Community Affairs.

Filed: June 30, 2025, as R.2025 d.090, **without change**.

Authority: N.J.S.A. 52:27D-119 et seq.

Effective Date: August 4, 2025.

Expiration Date: February 9, 2029.

**Summary of Public Comments and Agency Responses:**

Comments were received from Mitchell Malec, a retired former employee of the Department of Community Affairs (Department).

1. COMMENT: The commenter notes that the Department did not provide free read-only access to ANSI A119.5-2020 and recommended that it provide such.

RESPONSE: The Department does not have the authority to distribute free copies of this referenced standard; the links available for other codes on the Department's website are provided by the publisher or publishing organization.

2. COMMENT: The commenter asked by what date the manufacturer's certification must indicate compliance with ANSI A119.5-2020. The commenter further questioned whether certification can be from a third-party agency in lieu of the manufacturer.

RESPONSE: Upon the effective date of these amendments, there will be a six-month grace period pursuant to N.J.A.C. 5:23-1.6. After that date, the certification must indicate that the recreational park trailer has been manufactured in compliance with ANSI A119.5-2020, as adopted at N.J.A.C. 5:23-4D. Certification must be made by the RV Industry Association (RVIA) or other recognized agency.

3. COMMENT: The commenter asked what agencies are currently approved for certification of recreational park trailers.

RESPONSE: The Recreational Park Trailer Industry Association merged with RVIA; RVIA is the only agency that certifies recreational park trailers.

4. COMMENT: The commenter asked whether recreational park trailers already built in compliance with ANSI A119.5-2020 are acceptable at this time or if variations need to be granted prior to adoption of these regulations. The commenter recommended that the Department provide guidance to clarify the timing of compliance requirements.

RESPONSE: Recreational park trailers labeled by the RVIA that meet ANSI A119.5-2020 would be accepted in the State, if necessary, by variation. The Department respectfully disagrees that guidance is necessary; the industry has been operating without confusion while this rulemaking has been underway.

5. COMMENT: The commenter asked whether existing recreational park trailers can be upgraded or modified to meet the specifications set forth in the 2020 edition without a new certification being issued. Specifically, could an existing recreational park trailer increase the

non-permanent propane capacity to four DOT cylinders, add a wall bed, or decrease the vent termination to one inch, all of which are included in ANSI A119.5-2020?

RESPONSE: Recreational park trailers certified prior to the end of the six-month grace period to the 2020 edition would be approved to be installed as-is with no need for modifications.

Pursuant to N.J.A.C. 5:23-4D.3(b), alterations of existing recreational park trailers must comply with N.J.A.C. 5:23-4D. Upon the effective date of this rulemaking, any existing recreational park trailers could be modified to meet the requirements at ANSI A119.5-2020.

6. COMMENT: The commenter asked whether existing recreational park trailers can be relocated without making upgrades to comply with the ANSI A119.5-2020 requirements. The commenter sought confirmation that no retrofit requirements are necessary.

RESPONSE: Recreational park trailers are generally used in a manner wherein they are installed on site and remain in place for several years. Relocation of these trailers is not common.

Regardless, N.J.A.C. 5:23-4D is not a retrofit requirement, but any voluntary alteration, repair, or increase in size in the recreational park trailer would be subject to N.J.A.C. 5:23-4D-3.

7. COMMENT: The commenter posed a series of questions regarding the ANSI A119.5-2020 amendment that reduces the roof extension of vent terminations from two inches to one inch above the roof. First, the commenter asked for confirmation that the change requires the vent pipe to pass through the roof and terminate vertically, undiminished in size, not less than one inch above the roof. The commenter requests the Department provide justification for adopting this change and notes that the plumbing subcode requires that vent pipes terminate not less than six inches above the roof. The commenter further notes that consideration should be made for

snow, rain, potential for frost closure, and that vent caps are optional. Ultimately, the commenter recommends that the Department not adopt this change in the ANSI A119.5-2020 and instead retain the 2015 requirement for a two-inch vent termination. The commenter feels that this change in the 2020 standard creates the potential for unsafe conditions.

RESPONSE: The commenter is correct that the language of ANSI A119.5-2020 simply changed the two-inch vent pipe termination to a one-inch termination; there was no change in how or where to measure the termination from. The Department is adopting this requirement because the recreational park trailer industry, who are experts in the field, have determined this measurement to be appropriate for recreational park trailers. Regarding the concern over snow and frost closure, be advised that ANSI A119.5 defines recreational park trailers as “[a] single living recreational vehicle that is primarily designed and completed on a single chassis, mounted on wheels, to provide temporary living quarters for recreational, camping, or seasonal use, is certified by the manufacturer as complying with all applicable requirements of ANSI A119.5.” ANSI A119.5 (emphasis added). As such, because these trailers are used for camping purposes for a limited amount of time each year, the Department respectfully disagrees that snow and frost closure are a potential cause for concern. The Department notes that the plumbing subcode requires vent pipe termination six inches above the roof because it addresses permanent structures, not recreational park trailers used for camping.

8. COMMENT: The commenter asked whether a recreational park trailer subject to these requirements with low voltage electrical systems needs to comply with the ANSI/RVIA Low Voltage Systems in Conversion and RVs Standard?

RESPONSE: Pursuant to the requirements set forth at ANSI 119.5-2020, recreational park trailers must comply with the requirements of the electrical subcode, N.J.A.C. 5:23-3.16 (the National Electrical Code). The ANSI/RVIA Standard for Low Voltage Systems in Conversion and Recreational Vehicles is not a referenced standard at ANSI 119.5-2020 and is not proposed for adoption by the Department; it applies only to recreational vehicles (RVs) rated 60 volts DC or less.

9. COMMENT: The commenter asked when the last time the Department confirmed that new recreational park trailers are constructed to comply with the subcode, as amended, was, or whether the Department relies on other monitoring tools.

RESPONSE: The Department relies on the RVIA certification to show compliance with the requirements adopted by reference at N.J.A.C. 5:23-4D.

10. COMMENT: The commenter asked how the label or certification indicates compliance with the New Jersey subcode and shows that energy, wind load, roof design loads, and other provisions that the Department adopts are met. The commenter asks whether energy insulation values are being met and how.

RESPONSE: The certification provided by RVIA, and all other documentation required pursuant to N.J.A.C. 5:23-4D.6, appropriately meet the compliance requirements set forth in the park model subcode.

11. COMMENT: The commenter noted that it appears that the Recreational Park Trailer Association is regulating the construction of recreational park trailers sited in New Jersey and

elsewhere and asks whether their ANSI A119.5 certification seal (or the predecessor RPTIA seal) is enough to indicate compliance with N.J.A.C. 5:23-4D. The commenter notes that the edition of ANSI A119.5 utilized is not indicated on the seal.

RESPONSE: Please see the Response to Comment 10.

12. COMMENT: The commenter notes that the regulations define recreational park trailers as being certified by the manufacturer as complying with ANSI A119.5 and further notes that N.J.A.C. 5:23-4D.4(a) notes that the label “is supposedly indicating” that the unit has been manufactured in compliance with the Department’s recreational park trailer subcode; the commenter states that the UCC requires the label to bear the name and seal of the RVIA or other Department-approved organization with a quality assurance program, as well as the label serial number. The commenter states that it appears that the tracking of these recreational park trailers can only be accomplished by the label serial number. Given that, the commenter asks how, hypothetically, the Department can determine whether a recreational park vehicle complies with N.J.A.C. 5:23-4D, whether it was initially sited in Pennsylvania or California and is being relocated to New Jersey. The commenter asks if the Department is able to obtain the serial numbers of all recreational park vehicles in compliance with N.J.A.C. 5:23-4D.

RESPONSE: As noted in response to prior comments, it is rare for recreational park trailers to be relocated. However, if a trailer were to be relocated, the Department requires the label to be accessible and visible in order to see that the trailer is properly certified by the RVIA. Further, the vehicle must include a permanently attached data plate with a serial or VIN number listed pursuant to Section 1-4.2 of ANSI A119.5.

13. COMMENT: The commenter asks whether N.J.A.C. 5:23-4D is applicable when a movable tiny house is used for temporary or seasonal occupancy. The commenter asks whether a movable tiny house in compliance with NFPA 1192, Standard on Recreational Vehicles, would be allowed to be installed as a recreational park trailer. The commenter asks if both NFPA 1192 and ANSI 119.5 need to be met, or just ANSI A1195 needs to be met for movable tiny houses. The commenter further asks what provisions of the Uniform Construction Code apply to situations of this nature.

RESPONSE: N.J.A.C. 5:23-4D is not applicable to movable tiny houses. Further, the Department does not adopt NFPA 1192.

14. COMMENT: The commenter asks if movable camping cabins are subject to N.J.A.C. 5:23-4D, and if not, what UCC provisions apply to movable camping cabins.

RESPONSE: Movable camping cabins are not subject to N.J.A.C. 5:23-4D, which is the only subject of this rulemaking.

15. COMMENT: The commenter notes that the Department contains standards for recreational park trailers at N.J.A.C. 5:23-4D and standards for tiny houses used as single-family dwellings at N.J.A.C. 5:23-3.21. The commenter recommends that the Department promulgate regulations for seasonal use movable tiny homes and movable camping cabins. The commenter recommended adoption of the 2021 International Tiny House Provisions relating to temporary or seasonal use recreational vehicles or park models. He asked how the Department intends to address the use of these structures in the meantime. The commenter states that if the Department does not promulgate rules for these structures, a UCC Bulletin should be issued to address them.

RESPONSE: The Department disagrees that further standards or guidance need to be adopted or issued; the UCC appropriately addresses modular construction, recreational park trailers, and tiny homes.

16. COMMENT: The commenter noted that the Department’s proposed rulemaking appears to “be just a catch-up with how the RV industry is constructing recreational park trailers ... therefore, making adoption of this amendment ... a moot issue.”

RESPONSE: The Department agrees with the commenter’s summation that this rulemaking aligns the State with current industry standards.

#### **Federal Standards Statement**

No Federal standards analysis is required because the adopted amendment is not being adopted in order to implement, comply with, or participate in any program established pursuant to Federal law or a State law that incorporates or refers to Federal law, standards, or requirements.

**Full text** of the adoption follows:

TEXT