



## San Juan County Community Development & Planning

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### POLICIES & PROCEDURES

## Park Trailers

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**ISSUE:** In that Park Trailers are not recognized structures under the International Residential Code (IRC) and may not comply with all the IRC code provisions, may they be reviewed, permitted, and approved by the San Juan County Community Development and Planning Department?

**ANALYSIS:** In the previous Building Codes, as adopted and amended by San Juan County, Park Trailers were defined as a type of Recreational Vehicle (RV) and also approved for use as dwelling units under Section 15.04.211 of the San Juan County Code. This section stated that "Except for "Park Trailers" as defined in "Definitions" herein, no travel trailer, camp trailer, folding camp trailer, motor home, multi-use vehicle or bus vehicle can be used for permanent use as a dwelling or housing unit;". These provisions were deleted in the County's most recent adoption of the building codes.

Additionally, a recent change to Section 18.20.40 SJC Unified Development Code (UDC) specifically states that "Recreational vehicles are not dwelling units."

This has brought into question as to whether Park Trailers are allowed to be permitted, installed, inspected, and approved for use as permanent dwelling units, or other structures.

Under Section 43.22.335 of the RCW, Park Model Trailers are no longer classified as a type of RV and are separately defined as stand alone structures meaning:

"... a park trailer as defined in the American National Standards Institute A119.5"

Therefore, they are not RV's and are not automatically excluded as dwelling units under Section 18.20.40 of the UDC.

American National Standards Institute A119.5 further defines a Park Trailer as:

"A trailer type unit that is primarily designed to provide temporary living quarters for recreational, camping, or seasonal use, that meets the following criteria:

- (a) Built on a single chassis mounted on wheels.
- (b) Having a gross trailer area not exceeding 400 square feet (37.15 sq. m.) in the set-up mode.
- (c) Certified by the manufacturer as complying with ANSI A119.5.

The several complicating or applicable issues are:

1. These structures are "primarily designed to provide temporary living quarters for recreational, camping, or seasonal use". However, by the use of the word "primarily", these structures are not limited to temporary or recreational, camping, or seasonal use.
2. These structures are built on a chassis and mounted on wheels. However, they do not comply with road vehicle design requirements and are not intended to be regularly moved from site to site and should not be confused with road approved RV's. Additionally, they are intended

to be installed at a permanent location (more than 6 months) and designed to be set up on either temporary or permanent foundations. They generally function similarly to a HUD Manufactured Home or Mobile Home.

3. These structures are not prescriptively allowed or recognized under the IRC, as mandated by the State and adopted by the County. Nor are they required to comply with the federally mandated design requirements for HUD Manufactured Homes. However, they do comply with their nationally approved and accepted ANSI design standard, as adopted and administered by the State, for their intended use.
4. While not all, many of the Park Trailers comply with the UDC and IRC definitions of a dwelling unit. Many also comply with the minimum space planning requirements and other non-structural life safety provisions of the IRC and generally comply with the energy efficiency requirements of HUD Manufactured Homes.
5. The design, construction, inspection, labeling, and approval of Park Trailers are controlled by the Washington State Department of Labor and Industry (L & I).

POLICY: In that Park Trailers are not excluded for use as dwelling units by the UDC and are approved for residential use by L & I, those units which also comply with the dwelling unit definitions of the UDC and IRC and with the minimum space design requirements of the IRC shall be approved under the "Alternate materials, design and methods of construction and equipment" provisions of Section R104.11 of the IRC.

These structures are required to obtain a building permit prior to installation and to conform to all applicable rules and regulations including, but not limited to, land use density regulations and setbacks, septic design, and water availability. Permit application, fees, plan review, inspections, final approval, and occupancy shall be controlled under the administrative rules applicable to Mobile Home Permits with the following exceptions and/or conditions:

1. Park Trailers shall only be installed by the Manufacturer, approved Manufactured Home Installers, or the Owner, and
2. Park Trailers shall be installed in accordance with their manufacturers installation standards and instructions, and
3. Park Trailers shall be supported by a foundation system and anchored against displacement as recommended by the manufacturers installation standards and instructions or as approved by the building division, and
4. Park Trailers shall not be remodeled or otherwise modify the originally approved L&I floor plans, and
5. Park Trailers shall not be expanded beyond their originally approved L&I floor plans, and
6. Park Trailers shall not be combined with or otherwise connected to other enclosed structures, and
7. Park Trailers shall be installed so as to maintain the required minimum fire separation distance from all other structures as required by the adopted building and residential codes, and
8. Decks, covered porches, carports, and/or other adjacent accessory structures shall not be structurally supported by the Park Trailer, and
9. All plumbing and gas field installed service piping and connections shall be installed as required by the IRC (this prohibits the use of a flexible waste drain line plumbing pipe).