



July 10, 2022

Chair Norman Sutherland
Town of Highland Planning Board
4 Proctor Road
Eldred, NY 12732

*RE: Northgate / Sun Communities - Updated Campsite Models
Camp FIMFO Catskills
Job # 2220488*

Dear Chair Sutherland:

We thought it would be helpful to provide information about the updated models proposed for campsites. As discussed in the FEAF, the proposed project will not increase the overall number of campsites. With the proposed improvements, the campsite areas will be comprised of a mix of temporary Recreation Vehicle Industry Association (RVIA) certified units (see Sheet C604 in the plan set). Please find the following information enclosed documenting that the Project's proposed units are RVIA certified.

- RV Types, Terms, and Prices. Recreation Vehicle Industry Association (RVIA)
- U.S. Department of Housing and Urban Development (HUD) Office of Manufactured housing Administrator, Pamela Danner, Memorandum excerpt
- Park Model RVs

Should you have any questions regarding the above, or if you require any additional information, please contact our office at (845)-486-1458.

Sincerely,

A handwritten signature in black ink, appearing to read 'Caren LoBrutto', written in a cursive style.

Caren LoBrutto
Senior Planner

RV TYPES, TERMS & PRICES

Recreation Vehicle (RV) - A motorized or towable vehicle that combines transportation and temporary living quarters for travel, recreation and camping. RVs do not include mobile homes, off-road vehicles, snowmobiles and conversion vehicles. RVs are sold by recreation vehicle dealers.

Towable RVs

Designed to be towed by family car, van or pickup truck. Can be unhitched and left at the campsite while you explore in your auto.

TRAVEL TRAILERS

Conventional Travel Trailer

Wide range of floor plans and sizes
Affordable homelike amenities
Sleep up to 10
Typically \$8,000 to \$95,000 new



Fifth-Wheel Travel Trailers

Spacious two-level floor plans
Towed with a pickup truck
Sleep up to six
Typically \$18,000 to \$160,000 new



Travel Trailers with Expandable Ends

Ends pull out for roomy sleeping
Lightweight Towing
Sleep up to eight
Typically \$10,000 to \$30,000 new



FOLDING CAMPING TRAILERS

Fold for lightweight towing
Fresh-air experience with RV comfort
Sleep up to eight
Typically \$5,000 to \$22,000 new



TRUCK CAMPERS

Mount on pickup bed or chassis
Go wherever your truck can go
Sleep up to six
Typically \$6,000 to \$55,000 new



PARK MODEL RVs

Movable resort unit designed exclusively for part-time recreational use
Sleep up to ten
Typically \$20,000 to \$80,000



Motorized RVs

Living quarters are accessible from the driver's area in one convenient unit.

MOTORHOMES

Type A Motorhome

Generally roomiest of all RVs
Luxurious amenities
Sleep up to six
Typically \$60,000 to \$500,000 new



Type B Motorhomes

Commonly called van campers
Drive like the family van
Sleep up to four
Typically \$60,000 to \$130,000 new



Type C Motorhomes

Similar amenities to Type As
Optional sleeping space over the cab
Sleep up to eight
Typically \$43,000 to \$200,000 new



SPORT UTILITY RVs

Available motorized and towable (as travel trailers or fifth-wheels).
Built-in garage for hauling cycles, ATVs, and other sports equipment
Sleep up to eight
Typically \$10,300 to \$170,000 new



RECREATION VEHICLE INDUSTRY ASSOCIATION
1896 Preston White Drive • Reston, VA 20191
Phone: (703) 620-6003 Fax: (703) 620-5071 www.RVIA.org



The RV Industry Association is the national trade association that represents the manufacturers and component part suppliers of all recreation vehicles ("RVs"), including park model recreation vehicles. As a condition of their membership in RVIA, these members are required to manufacture their products and certify compliance with the provisions of certain standards. These include the National Fire Protection Association (NFPA) 1192 Standard on Recreational Vehicles and the American National Standards Institute (ANSI) A119.5 Park Model Recreational Vehicle Standard.

On January 20, 2015, U.S. Department of Housing and Urban Development (HUD) Office of Manufactured Housing Administrator Pamela Danner issued a memorandum in which she sought to clarify the measuring process for park model RVs. In this memorandum, Administrator Danner announced that HUD **will not** be enforcing the interpretation that that factory-built porches count toward the 400-square-foot park model RV limit.

As stated in the memorandum;

On December 2, 2014, the Manufactured Housing Consensus Committee voted to recommend to HUD a further delay in the enforcement of the unity measurement standard as set forth in the October 1, 2014, memorandum (see attached) until HUD promulgates a final rule clarifying the Recreational Vehicle (RV) exemption at 24 CFR Section 3282.8(g) in HUD's Manufactured Home Procedural and Enforcement Regulations. HUD has considered the December 2, 2014, vote of the MHCC and will delay the enforcement of the October 1, 2014, Memorandum until publication of a final rule concerning the RV exemption.

In short, until HUD issues a final rule regarding RV definitions, it is HUD's interpretation that factory-built porches do not count toward the 400-square-foot park model RV limit.

Best,

Michael Palicz
Manager, Government Affairs
Recreation Vehicle Industry Association (RVIA)
1896 Preston White Drive
Reston, VA 20191



Park Model RVs (aka Recreational Park Trailers): Definition and Use

What a Park Model RV is:

A park model RV (PMRV) is a unique trailer-type RV that is designed to provide temporary accommodation for recreation, camping or seasonal use. PMRVs (also sometimes referred to as recreational park trailers) are built on a single chassis, mounted on wheels and have a gross trailer area not exceeding 400 square feet in the set -up mode. They are certified by their manufacturers as complying with the ANSI A119.5 standard for recreational park trailers.

PMRVs are most often used in recreational vehicle campgrounds. They may be owned by the campground and rented to guests or they may be brought in and used exclusively by their owners on a site rented or leased from the campground. They can also be placed by their owners on private property. These units are designed and built to be used for recreational/camping purposes only. They are not meant to be affixed to the property in any way, they do not improve property values in any way, and they are neither designed nor intended by their manufacturers to be used as permanent residences. Park model RVs are titled as motor vehicles by the various states just like other RV types.

What makes PMRVs unique is that they are up to 15 feet in width or 36 feet long with a peaked and shingled or metal roof. Some offer gabled windows, and siding choices of cedar, aluminum, vinyl, masonite or even split logs for a rustic look, while others are made of full solid logs. They are often designed with built-in porches, decks and/or storage areas. Many look like tiny summer cottages. Others look more like traditional but slightly longer RV travel trailers.

Most park model RV owners (67%) locate their unit within several hours of drive time from their primary residences and use them for weekend camping get-aways. Some owners may place their PMRV in a warm climate location and use them as a seasonal/temporary get-away to escape the cold gray winter weather, while others place their PMRVs in cooler climate locations to escape the summer heat and humidity back home.

In the off-season, these units are typically winterized (i.e. have antifreeze in the water lines; and are unusable because water and sewage facilities are not operational). These units are left in “onsite storage” when not being used.

The Recreation Vehicle Industry Association (RVIA) operates a safety standards and inspection program that requires member manufacturers of all recreation vehicles, including park model RVs, to affix a RVIA standards program seal to every unit they build in their factories. This seal indicates the manufacturer’s certification that the unit complies with the requirements of the applicable standards. A park model RV can always be identified by the blue and gold RVIA ANSI A119.5 certification seal (or its predecessor green RPTIA seal) affixed to the right of main door of the unit.



RECREATION VEHICLE INDUSTRY ASSOCIATION

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What a Park Model RV is Not:

Although the distinctive appearance of park model RVs may sometimes lead people to think they look like small manufactured homes, appearances can be deceiving. PMRVs are actually titled and registered just like any other RV. Due to their design, small size and use as recreation, vacation and seasonal units, PMRVs are explicitly excluded from being considered or used as a manufactured home under the codes and regulations of the U.S. Department of Housing and Urban Development (HUD) specifically because they are a type of recreation vehicle (Title 24 § 3282.8(g)).

Park model RVs are built in accordance with the national safety standards set forth under a nationally recognized standard, the American National Standards Institute (ANSI) A119.5 Standard, not the HUD requirements that manufactured homes are mandated to comply with. The key distinction is that manufactured homes are single-family dwellings that are designed and built for *permanent* residency under standards set by the Department of Housing and Urban Development. Park models RVs, as noted, are designed and built to be used by families as a recreational, camping, or seasonal accommodation. PMRVs are not intended for, nor should they be used for, anything other than recreational camping or seasonal use. They are not permanent residences and should never be used as such.

Like RV motor homes, travel trailers and fifth-wheel trailers, park model RVs are built to ensure safety but are not required to meet the building codes or installation codes that stick-built or manufactured homes are required to meet. Although they are sometimes stabilized and/or skirted, they are designed to remain on their axles and wheels, ready for movement and are not connected to the ground by footers, foundations, or columns (some local units of government do require them to be anchored to the ground due to excessive local winds, but even then they can easily be detached in minutes with only hand tools).

PMRVs are not housing. There is no practical difference in the use of PMRVs than travel trailers or fifth-wheel trailers. They are not 'improvements' to campgrounds any more than a travel trailer placed and used in a campground is. They are simply one choice among many in the RV camping environment.

For more information about park model RVs, contact Matt Wald, RVIA Executive Director of Park Model RVs at (703) 620-6003 x. 313 or mwald@rvia.org.