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TRAILERS AND TRAILER CAMPS IN THE COMMUNITY*

Approximately 500,000 trailer coaches or house trailers now in use in the United States house more than 1,500,000 persons. Between 80 and 90 percent of the trailers are occupied as residences, while the remainder are used either for vacation or business travel. In 1949, 94.5 percent of the trailers were sold for residential purposes. Approximately 85,000 trailers were manufactured in 1948, and 46,000 in 1949, with sales prices averaging \$2,500 - \$2,700 per trailer. Although the prophesy made by economist Roger Babson in 1936 that "within 20 years, more than half the population of the United States will be living in automobile trailers," has not been approximated, communities which have seen the trailer utilized extensively during the housing shortage, must expect it to continue to be used as a type of inexpensive form of shelter. Because trailers are used for residential purposes, they necessitate the provision of residential services; they also require special "twists" to building, health, sanitary and housing codes, and raise special problems in respect to location, assessment, and taxation, among others. This report presents background information on the nature of trailers, and gives examples of regulations and standards affecting trailers and trailer camp operation.

The Trailerite

The trailer is a unit designed to be moved easily from place to place, and the persons inhabiting trailers are generally mobile persons: the retired worker, the young couple in search of new job opportunities, the migratory worker. Under the stress of a housing shortage during World War II (which shortage still exists) the Federal government encouraged the use of the trailer by war-workers; many of those trailers, in addition to those purchased by individuals, are now being used by veterans who were unable to find adequate permanent housing within their economic reach, by students in university communities, and by others who would ordinarily prefer an apartment or house, and who do not intend to take advantage of the mobile features of the house trailer. For the non-mobile person, the trailer is a substitute for a permanent dwelling unit, and the chief advantage of the trailer is its relatively low cost.

It may be said that the phenomenon of the trailerite is part of the trend toward smaller dwelling units, smaller families, separate housing for the aged,

and more older persons in the population, increased mobility and potential job insecurity, and increased leisure time. The family inhabiting trailers tends to be small: one and two person families own 61 percent, three and four person families own 38 percent, and larger families own 1 percent of the trailers in this country. The older age groups tended to occupy trailers prior to the war, when, according to Mobile Homes, A Study of Trailer Life (by Donald Olen Cowgill, published by the American Council on Public Affairs in 1941) a sample revealed that 78 percent of the persons residing in trailers were over 40 years old, and 45 percent were over 50 years old. The study also found that trailerites tended to be "home owners" - 98.4 percent of the trailers being owned by the occupants - and that they were "predominantly ... married couples with few children.... The people come mostly from cities and have a high economic status.... The group as a whole, is rather highly educated."*

The educational level of trailerites may still be high: by the end of 1946, the Federal Public Housing Authority had allotted 11,266 family trailers and 214 dormitory trailers to educational institutions, and it has been forecast that trailers will be an integral part of campus life for quite a few years. The Trailer Coach Manufacturers Association estimates that 35.5 percent of the trailer coach residents are production workers, 15.6 percent are employed in sales and services, 15.4 percent are executives and professionals, 8 percent are retired, 6.9 percent are construction workers, 6.6 percent work for the government, 12 percent were unclassified and .02 percent unemployed.

The Trailer Camp

The Trailer Coach Manufacturers Association estimates that there are approximately 8,000 trailer camps in the country, of which approximately 6,000 have been inspected by the Association. All states have camps, with the largest concentrations in California, which has almost one-sixth, and in Florida, Texas, Arizona, Illinois, and Ohio. Thirty-three states have state parks with space for trailers, and parking sites are available in 27 national parks. A few camps are listed for Mexico and Canada.

*Mobile Homes, A Study of Trailer Life also includes information on the cost of the trailer related to monthly income; reasons given for obtaining the trailer; months during the year spent in trailer; seasons of year during which trailer was used; the number of trailer camps by regions; the average size of trailer camps by states; regularity of employment of trailerites; religious preference of trailerites; state of residence at time of getting trailer; rural-urban background of trailerites prior to getting trailer; nationality of trailerites; nationality of trailerites parents; racial classification, marital status; proportion of marital partners living in trailer; ages of children of trailerites; attitude toward size of trailer; family friction caused by size of trailer; and attitude towards degree of privacy allowed by trailer.

The trailer camp is a "potential gold mine and a profitable field for trained property managers," according to an article "Managing a Trailer Court," in the December 1948 issue of The Journal of Property Management. The article states that "trailer sites provide a larger return on capital investment than any other type of rental property today."

"A good base to use as a guide is the setting of \$1,000 per trailer lot as the amount of capital investment in land and improvements, the same to be paid off with interest in 7 years. The additional operation costs of providing services, plus a nominal profit thereon, should be added to this amortization of capital investment, and the result should be the rate on permanent guests."

Although transient rates are usually 100 percent higher than permanent rates, the ideal ratio between permanent and transient is considered to be 8 to 1, or 1 transient trailer for every eight permanent trailers. One of the most difficult jobs in a trailer camp is parking and "anchoring" the trailer; therefore, the "permanent" guest is desired.

It is recommended that each trailer plot should have a concrete slab set in the ground measuring approximately 90 square feet which can be used for the base floor of an adjacent porch. Each plot should have a sloping wedge-shaped ditch arrangement into which the trailer can be backed. This recess should contain concrete abutments which will hold the trailer tires off the ground, giving the same protection to the tires as though the trailer were on blocks. The abutment will protect the tires from the elements and provide a slight form of shelter for the trailer floor. A few sites should be equipped with two-bedroom structures which can be readily hooked into the trailer, giving the tenant additional habitable space.

Speeds in excess of 10 miles per hour inside the tourist camp are undesirable. Roads should be graded and tarred at least every two years and ditching should be done every year in the fall to lessen soil erosion. Trees often affect the painted surfaces of trailers and cause them to depreciate rapidly, and therefore should be removed from trailer parking spaces. Electricity should be available to all tenants and metered on the trailer site by individual meters. Garbage should be removed at least once a day and may require at least one full time employee and full time use of a truck.

There is incentive for the trailer park owner to locate within a municipality since, if he must supply water and sewage disposal facilities, the costs will amount to 90 percent of all the services he offers. Laundry facilities are necessary and it is recommended that enclosed community recreation be provided. This can be located economically above the laundry facilities.

The Journal of Property Management article recommends that additional commercial enterprises be undertaken: sale of trailers requires very little capital investment, as used trailers can be sold on consignment and a large stock of new trailers is not necessary for a successful operation. A grocery store, a

restaurant, tavern, general store and a filling station are suggested, and if the population of the camp and its distance from existing commercial facilities are both large enough, a large commercial development might prove to be very lucrative.

Trailer camp ground and facilities were estimated above to be approximately \$1,000 per trailer space. The cost of providing a trailer camp for 500 to 600 trailers for veterans in Milwaukee County, Wisconsin, according to the December 1948 issue of Public Works, was expected to be approximately \$900,000 or at least \$1,500 per trailer space (exclusive of the cost of the trailers). The 45 acre camp was to have an 8 acre wooded site to be used as a park and playground for the tenants, and 6 service buildings so spaced that no trailer will be more than a block away. Each trailer was to have from 1,200 to 1,500 square feet around it with wooden sidewalks connecting trailers to concrete walks. Trailer lots average 35 feet x 50 feet. The trailer area is horse-shoe shaped with access provided by inner, outer and central drives, and regular streets. There were proposed 3 miles of macadam roads, 3 miles of concrete sidewalks, 6 miles of street lighting, 2 miles of water pipes and enough hydrants for fire protection. Three 200 to 250 foot wells were to be connected to a central pumping station for pumping into the water main, the sum of \$50,000 was allotted to the construction of an administration building. All buildings were to be built with the idea of future use after the need for the camp is passed. No cars will be parked alongside the trailers because the resultant congestion would be a fire hazard. There was to be provided instead a parking lot for 300 to 400 cars on the outskirts of the park. There are no sewer or water connections to any of the trailers. All water must be carried in from the taps provided in the service buildings and all sewage must be emptied in the designated facilities.

Trailer camp operation practice has been to segregate trailers within the camp on the basis of (1) intended length of stay, (2) the type of trailer, and (3) whether or not there are children in the trailer family. This has been due, in large part, to the desire of camp operators to place the newer and more expensive trailers where they could be seen from the street and where they could impart an attractive appearance to the park. However, different type water and sewer connections are required by different types of trailers and the camp operator is able to justify such segregation by the necessity for having different hook-ups for water and sewage disposal facilities.

Trailer Camp Design: Additional Information

"Standards for War Trailer Projects," Technical Bulletin No. 4 of the Federal Public Housing Authority, released during the war, contains standards for and illustrations of site plans for trailer camps. Since the standards were proposed at a time when economy and careful use of construction materials were required, many of the standards should be considered as minima. Some of the pertinent recommendations are as follows:

"Area Required

"Area required should be calculated upon the basis of the proposed number of units. The 'property density' appropriate to trailer projects should approximate 10 to 18 trailers per acre of usable land. 'Property density' is based on the land purchased, minus areas unfit for trailer sites or for playgrounds or other project use."

"Soil conditions should be favorable to low grading and maintenance costs and good livability. The presence of rock close to the surface will add materially to the cost of utilities.

"Shape of site preferably should be compact, but practicability of laying out economical streets and utilities takes precedence over regularity of outline.

"Hilly sites imply higher development costs; these rise sharply when grades exceed 8%."

"Lot Sizes

"The following sizes are recommended:

"Standard trailer lots	1250 sq. ft. minimum,	preferably	25' x 50'
Expansible "	"	1500 "	"
			30' x 50'

"Spacing

"The following minima are recommended:

"Side-to-side spacing 10 feet
End-to-end spacing 14 feet

"Staggering adjacent rows of trailers within the trailer block increases livability and provides greater privacy. End lots at street intersections should be somewhat increased in width (by about 5 feet) to insure reasonable privacy.

"Set-backs from adjacent building property should be great enough to afford protection from serious loss of livability. In general, a set-back of 50 to 100 feet wide is recommended."

"Projects for privately owned trailers shall provide parking for 100 percent car ownership. For economy in construction cost

and simplicity in drainage design, parallel parking should normally be provided."

"Service Trailers or Buildings (Community Toilets and Laundries).

"Space, well correlated with the rest of the site arrangement, should be provided for service trailers or buildings as required in the section on project facilities for administration, tenant activities, outdoor recreation, health services and other project services. Walking distances from trailers to community toilets should not exceed 200 feet; to community laundries, 350 feet.

"Collection stations for refuse, garbage, sink waste, and water supply, should be provided as necessary, one station--- for not more than 12 trailers. Walking distance from trailer to collection station should preferably not exceed 150 feet. Convenient vehicular access should be provided to each collection station.

"Outdoor Laundry Drying Yards

"Provide laundry drying yards (preferably wood fenced) adjacent to laundry trailers or buildings. Based on use five days a week allow 12-15 feet of line per trailer. Supports for clothes lines should be of wood construction."

"Liquid waste from kitchens should generally be disposed of (by tenants) in slop hoppers located in the collection stations. Exception may be made in the case of sites on which there is very porous soil (percolation of 1 inch in not more than 5 minutes); in such cases, the drain from each kitchen sink may be connected to a dry well, located at least 2 feet below the ground surface and containing approximately 5 cubic feet of coarse gravel or broken stone. However, even when dry wells are constructed, slop hoppers should be provided in collection stations or elsewhere, so as to be available - for use in case of stoppage of dry wells - at a walking distance of not more than 150 feet from any trailer."

"Sanitary sewers for trailer projects should be installed to collection stations, and to trailers or buildings containing plumbing fixtures. These will normally consist of toilet, shower, laundry office, and health facilities. They should be designed for a maximum flow, with sewers flowing half full, of approximately 300 gallons daily per trailer."

Trailer: Taxation

It has been argued that the trailer-dweller escapes his share of a community's taxes, whether he is located in the community on a temporary or more permanent basis. He is said to get the advantage of the facilities of those communities where he stops, including sewage disposal, garbage collection, water supply, police protection, fire protection, health protection, streets, parks and public buildings. In addition to these, he may use facilities for education, for relief and for voting, the latter two, of course, subject to residence restrictions.

However, others argue that the trailerite, if he is itinerant and chooses to maintain a permanent residence, may have an income and property tax to pay in his state of legal residence. He pays additional gasoline tax to pull the trailer, a license tax on his trailer and sometimes a personal property tax on it. Trailer camps are taxed and in many instances, licensed. These charges are passed on to the trailerite through rent paid to the camp operator. Some of the more direct charges levied on trailers are listed below.

Taxation of Trailers: Personal Property

The following states and the District of Columbia tax trailers as personal property: Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Georgia, Illinois, Indiana, Kansas, Maine, Maryland, Mississippi, Missouri, Montana, Nebraska, Nevada, Texas, Virginia, and West Virginia. Washington levies an excise tax based upon the value of the vehicle which is collected at the time the license is applied for. In other states, trailers are generally classified as vehicles on which no state property tax is levied.

Taxation of Trailers: Real Property

When trailers which are used as residences are fixed to the ground by either resting on a foundation, or by having the wheels removed, real property taxes have been levied. For example, on a local level in New York State, house trailers are placed on the assessment rolls of Batavia, Binghamton, Fulton, Gloversville, North Tonawanda, Sherrill, Watertown, Ardsley, Baldwinsville, Hilton, Hudson Falls, Johnson City, Massena, Newark, Ossining, Pleasantville, Skaneateles, and Tupper Lake - - - - according to Report No. 3094 of the New York State Conference of Mayors, Bureau of Municipal Information of March 3, 1949. The yardsticks used to determine whether to assess particular trailers, are in general: if the wheels are removed and the trailer is placed on a foundation, if the trailer has been connected with electric or water or sewer connections, if its capacity is such that it may be used for living quarters, and size (trailers being divided in North Tonawanda into three classifications for assessment purposes - small, medium, and large, which were assessed respectively at \$500, \$800, and \$1,000). Cost of trailer is another method of deciding whether to assess trailers or not, as is also whether they are "fixed to real estate." Hudson Falls specifies that it must be placed on a concrete foundation, and Webster, New York, states that the assessment of the property owner would

be raised if trailer is occupied and has a water connection. Ithaca considers trailers, if on wheels, as "definitely personal property."

The approximate value placed on the trailers, varies in amount and in the way in which it is measured. Batavia puts a \$600 valuation figure on house trailers. Dunkirk says that it would calculate a base square footage and apply the cost of construction to determine the value and also consider the location, utility service, etc. Ithaca uses a method generally comparable to the cubage method of rating dwellings - usually 50¢ to 80¢ per cubic foot. Sherrill uses 30 percent of cost, Watertown depreciated replacement value, Ardsville places a value of \$1,000, and Baldwinsville \$500. Pleasantville says it assesses at "actual full value." In each case, the assessment is levied against the owner of the land.

State Licensing of Trailers and Trailer Camps

Since trailers are designed to travel on the highways of the nation, all states except Kentucky and Tennessee require trailers to be licensed, according to "State Motor Vehicle Laws Affecting House Trailers," 1948 edition, of the National Highway Users Conference. The majority of the registration fees are based on weight of the trailer; Arizona, California, Colorado, Connecticut, Florida, Indiana, Kansas, Maine, Massachusetts, Missouri, Montana, Nevada, North Dakota, Vermont, and Wyoming, levy a flat fee, ranging from \$1.00 in Massachusetts to \$10.00 in Florida. Oklahoma bases its fee on the cost of the trailer: it charges \$15.00 for the first \$600.00 of the manufacturer's delivered price, and \$1.50 for each additional \$100.00 of price in excess of \$600.00. Wisconsin bases its fee on trailer length: the fee for under 25 feet is \$5.00 and for over 25 feet is \$10.00.

Some states require licensing of trailer camps: this is undoubtedly a measure designed to regulate the camps as well as to raise revenue. For example, according to "Taxation and Licensing of House Trailers," published by the Federation of Tax Administrators in 1949, Indiana levies a \$5.00 annual license fee on tourist camps without sleeping rooms; California provides for a \$25.00 annual license fee for trailer parks located outside incorporated areas; Michigan provides for a fee of \$25.00 for each 10 acres of land used by the trailer camp and in addition, charges \$1.50 per month for each trailer located within the camp. The Michigan statute provides for returning the monthly charge to localities on the following basis: 75 cents to the school district in which the camp is located, 50 cents to the county, and 25 cents to the municipality.

Regulations Pertaining to Trailers and Trailer Camps

Since trailers may be both mobile and stationary, they require dual sets of controls - one pertaining to them as vehicles and the other pertaining to them as residences. As moving objects, they must be subject to regulations similar to those that would pertain to trucks with semi-trailers, that will protect the safety of other vehicles and persons. The Uniform Vehicle Code contains provi-

sions that are applicable to house trailers, and the National Safety Council and the American Association of Motor Vehicle Administrators have concerned themselves with standards of trailer design and equipment. Some of the major recommendations of the latter group are summarized below.

Trailer Design Standards

The American Association of Motor Vehicle Administrators in adopting the recommendations of its Committee on House Trailers, recommended, among other items, that trailer coaches should not exceed 96 inches in width, 120 inches in height, that motor vehicle trailer coach combinations should not exceed 45 feet in length. (The Trailer Coach Manufacturers Association informs us that 37 percent of the trailers sold in 1949 were above 27 feet in length, with the maximum generally 34 feet. A 34 foot trailer plus towing vehicle would exceed the 45 foot limitation specified.) Windows which are hinged to swing outward should not be employed, if such windows extend on either the right or left side of the coach beyond fenders or hub caps. Coupling devices should prohibit side-sway but should allow a turning angle of at least 60 degrees; the device should be of rigid construction, should be firmly affixed to an integral part of the frame of the towing vehicle. A trailer coach weighing 1,500 pounds or more, or if less than 1,500 pounds, but constituting 50 percent or more of the weight of the towing vehicle, should be equipped with a braking system. No trailer coach should be operated unless equipped with a rear light and with clearance lights. Safety glass is desirable.

The National Fire Protection Association published a report in 1940, "Standards for Trailer Coaches and Trailer Coach Camps," in which standards were established for trailer vehicle construction, including chassis design and construction, body, roof, means of egress, wiring systems, heating stoves, cooking stoves, auxiliary fuel storage tanks, flue pipes, propeller generators, gasoline generator sets, battery chargers, battery protection, liquid fuel appliances, refrigeration equipment, air-conditioning equipment, and fire extinguishers. Safety features pertaining to trailers in transit such as axles, springs, hubs and bearings, tires and wheels, braking equipment, couplings, bridging, safety chains and automatic brakes, safety glass, directional signals, stoplights, and flares, were discussed. The section on regulation of trailers while not in transit includes the prohibition of parking of trailers other than approved camps except for a non-paying guest of a resident of the municipality who may park for 72 hours on the resident's property, and the following regulations:

"Trailer Camps

"(a) Because of the effect of a trailer camp on traffic, the location of such a camp and of its entrances and exits should meet with the approval of the local Planning Board, if any. Inasmuch as trailer camps constitute a business use of land comparable to a public garage, such camps as are operated commercially shall

be excluded from residential districts, and shall be admitted to business districts only upon approval of the Zoning Board of Appeal, acting under their power of original jurisdiction after the applicant has filed the consents of at least 65 percent of the property owners by number and area of ownership within 600 feet of all boundaries of the camp site. Although municipalities have the authority to locate municipal camps wherever they choose as a municipal use, it is recommended that as a matter of comity and fairness they comply with the requirements prescribed for commercially operated camps.

"(b) It is further recommended that in the interest of fire prevention and protection trailer camps shall be required to provide the following:

"(1) Access to a public street by directly abutting thereon, or by means of a private hard surface road not less than 20 feet wide, the camp to have hard surface and well-lighted roadways not less than 20 feet wide, to which every trailer unit shall have direct access.

"(2) Sub-division into trailer units (the term 'units' referring to a plot of land provided for the accommodation of not more than one trailer and not more than one towing car), each unit to contain not less than 1,000 square feet of ground area and be of not less than 25 feet in width, the boundary lines of such units to be plainly and permanently marked.

"(3) Restriction of the parking of trailers and tow cars upon their respective units, so that no trailer or towing car is closer than 8 feet to the side boundary line of its unit.

"(4) When the camp is not under full public fire protection of a municipality, there shall be provided adequate protection by a standard system of fire hydrants and hose houses, or a standard complement of extinguishers on wheels so located that all trailers shall be within 300 feet of an extinguisher.

"(5) At least one standard fire alarm box, depending upon the size of the camp, connected with city fire alarm systems, or, in the absence of such systems, suitable telephone facilities accessible at all times.

"(6) An adequate system of collection and safe disposal of rubbish; incinerators, where provided, to be well detached from all camp buildings and trailer units.

"(7) Standard watchman and camp supervision when camp is not under police protection.

"(8) Standard underground storage and handling of gasoline.

"(9) Camp electric wiring and equipment complying with the National Electrical Code. Camp operators shall provide at each unit a means for connecting the trailer frame grounding terminal to an effective ground when outside current is provided.

"Note: The word 'standard' as used herein refers to equipment, systems, or modes of installation in compliance with the applicable Standards or Recommended Practices of the National Fire Protection Association.

"Removal of Wheels

"Removal of wheels of a trailer, except temporarily for repair, or the permanent blocking up of a trailer, or the enclosure of the space beneath the trailer, whether situated in a camp or elsewhere, shall be construed to automatically convert the trailer into a permanent structure, subject to the requirements of the building code, housing laws, and all other laws and ordinances applicable to dwellings. Notice of such removal of wheels, blocking up, or enclosure, shall be given forthwith to the building inspector of the municipality or political subdivision in which the trailer is situated.

"Note: The foregoing recommendations for the regulation of trailers while parked in municipalities outside of, or within, established camps, being solely in the interest of fire prevention and protection, it should be understood that such recommendations should be supplemented by sanitary and such other regulations as may be necessary in the interest of public health, safety, and general welfare."

The chairman of the NFPA Committee on Trailers and Trailer Camps, Mr. Hugh M. Robinson, believes that the above standards are somewhat out-of-date, and hopes to activate the Committee to revise these standards in the near future. He wrote in part, in answer to an inquiry from PLANNING ADVISORY SERVICE that:

"Consultation with trailer coach manufacturer has indicated the desirability of separating the Trailer Vehicles Standard from the Trailer Coach Camp Standard and in the new edition this will undoubtedly be done.

~~"The NFPA Committee on Flammable Liquid is now revising the Flammable Liquid Standard to incorporate a section on the use of liquefied petroleum gases in house trailers and the new~~

Standard for Trailers will include the LP-gas requirement which are to be incorporated in the Flammable Liquids Committee report of this year. These sections on means of egress, wiring systems, heating and cooking stoves, and grounding will also undergo complete revision in view of developments which have occurred in the past several years with respect to the design of equipment covered by those sections.

"The section on trailer camps will be materially expanded and will contain considerable more detail than now appears in it and undoubtedly other sections of the Standard will be revised to lesser extents."

The Control of the Location of Trailers

Some communities completely bar trailers from locating within their incorporated boundaries: Richmond, California, is one such example, and, as reported by the New York State Conference of Mayors in 1949, this practice is followed in Jamestown, and the villages of Briarcliff Manor, Cedarhurst, East Rochester, Fairport, Farmingdale, Fayetteville, Freeport, Hamburg, Hamilton, Hilton, Johnson City, Lakewood, Larchmont, Lewiston, Lindenhurst, North Syracuse, and Spencerport, New York.*

Other communities such as Pensacola, Florida, and Elmira, New York, specify that trailers may be located only within authorized camps.** Some communities such as Union, New York, specify that trailers must be in authorized camps except that a trailer may be permitted to locate on private property if the occupants are guests of the owner:

"A single occupied trailer may be parked on the premises of a dwelling for a period not to exceed thirty days provided that the occupants of said trailer are guests of the property owner and that no charge is made for this location or for any facilities offered...."

*"House Trailers, Comparative Provisions of Fifty-Three Municipal Ordinances," published by the American Municipal Association in 1937, listed the following communities as completely barring trailers: Asbury Park, New Jersey; Aurora, Illinois; Barrington, Rhode Island, Cape May, New Jersey; LaPorte, Indiana; Livingston, New Jersey; Point Pleasant Beach, New Jersey; Reading, Massachusetts; Reno, Nevada; Stone Harbor, New Jersey.

**The AMA 1937 publication listed the following communities as barring trailers from all locations other than in authorized camps: Alhambra, California; Atlantic City, New Jersey; Banning, California; Brigantine, New Jersey; Corona, California; Detroit Lakes, Minnesota; Falmouth, Massachusetts; Manitou Springs, Colorado; Newport, Rhode Island; Ocean Township, New Jersey; Phoenix, Arizona; Portland, Oregon; St. Louis, Missouri; Sault Ste. Marie, Michigan; Virginia Beach, Virginia; West Palm Beach, Florida and Winnetka, Illinois.

A maximum time allowance for parking trailers outside authorized camps may also be specified; this is more difficult to enforce, as it entails field checking over a scattered territory. Permits should be issued, if enforcement of the provisions is intended.* Eumenclaw, Washington, specifies that a trailer may remain outside a trailer camp location for a period of 24 hours, and San Buenaventura, California, provides that one trailer coach may be placed to the rear of a residential dwelling, and used for sleeping quarters, provided that:

"...Such trailer coach shall not be kept or maintained for sleeping purposes as permitted herein for more than ten (10) successive nights in any successive ninety (90) days."

Some communities also set a time limit in which trailers may be located within trailer camps; this regulation has generally been adopted to restrict the camps to transient use. Further examples of these various types of provisions are given later in the report.

The zoning ordinance, PLANNING ADVISORY SERVICE believes, should be confined to regulating the location of trailers and specifying permitted locations for trailer camps. Some zoning ordinances contain detailed provisions governing the layout of trailer parks, the types of facilities to be furnished, the type of camp maintenance to be observed, etc., but such matters are more fittingly provided for in a special trailer ordinance designed for licensing, control of sanitation, building, public health, and other purposes.

The majority of zoning ordinances that permit trailers specify the commercial or business zone as the location for trailer camps, some further refining such designation to a particular commercial zone, for example, local business, or the least restricted commercial zone. A commercial district would seem to be a reasonable location for trailer camps, particularly since sale of gasoline and refreshments is likely to accompany the use. Also, trailer camps, if properly regulated, might be established in certain types of multiple-residence districts. In a number of communities, trailers and trailer camps are considered special uses and their location is left to the discretion of the board of adjustment or appeal. In some ordinances, trailers and trailer camps would seem to be permitted in the zones for which wording such as: "Any lawful business, commercial or professional use (is permitted) except the following uses which are expressly prohibited" is employed, and trailers are not expressly prohibited.

*The AMA 1937 publication reported the following: in Janesville, Wisconsin; Long Beach, California; and Seattle, Washington, a trailer could remain outside a trailer camp location for 24 hours, while 48 hours in any 30-day period held for Salem, Oregon. A 21-day period was permitted in Detroit, Michigan, and 60 days in Minneapolis, Minnesota.

See also the American Municipal Association publications, "The House Trailer, Its Effect on State and Local Government" (1937), and "House Trailer Regulations" (1941).

Some examples of various zones to which trailers and trailer parks have been assigned are given below.

Azusa, California - M-1, Light Manufacturing District

Chesterfield, County, Virginia - C-H, Highway Commercial District

Dallas, Texas - C-1, Commercial District

Detroit, Michigan - B-2, (Business District limited to buildings of no more than 35 feet in height); these provisions are not included in the proposed revised zoning ordinance for Detroit

Fresno, California - C-2, Commercial Zone

Huntington Beach, California - the Shoreline District

Los Angeles, California - Commercial Districts, C-2, C-3, C-4, (trailer camps are considered as conditional uses and a permit is required)

Lufkin, Texas, G, Local Business District

Mount Vernon, New York - Industrial District

Providence, Rhode Island - C-4, Heavy Commercial Zone, "provided they are conducted more than 50 feet from an R zone boundary line " (proposed ordinance)

Salinas, California - C-3, Commercial District

San Gabriel, California - Light Manufacturing District

Tulare County, California - C-2, General Commercial Zone

Some communities specify that the board of appeals or adjustment may permit trailer camps to locate in certain districts. Fort Worth, Texas, provides that the Board of Adjustment may permit, after public notice and hearing, the location of tourist or trailer camps in a district from which they are prohibited. San Diego, California, authorizes the Zoning Committee "to grant conditional variances or Resolutions of Property Use for auto courts or trailer camps."

More detailed provisions in zoning ordinances may be found in the communities of: *

*The following provisions on pages 15-19 and page 23 are reprinted from the ASPO publication "Trailer and Tourist Camps" which is out-of-print.

Arlington County, Virginia

"1. The parking of a trailer in an 'A' Residence, 'B' Residence, Local Business, and General Business District, shall be prohibited except that one trailer may be parked or stored in an approved enclosed garage, or accessory building, on any lot or plot, provided that no living quarters shall be maintained or any business practiced while such trailer is parked or stored.

"2. No tourist camp or trailer camp shall hereinafter be permitted in Arlington County, unless and until a permit shall have been obtained therefor. Application for such permit shall be made in writing to the County Manager and shall be accompanied by plans and specifications sufficient to establish the fact that the applicant is able to comply with the requirements set forth,

"Such permit, when issued, shall show on its face whether a tourist camp or trailer camp, or both are permitted. The permit shall be in writing and shall be displayed in some public place on the premises to which it is applicable. The permit shall be for an indefinite period and shall be revocable by the said County Manager, at any time, for the failure of the licensee to maintain all requirements hereinafter set forth.

"No such permit shall be issued unless the said County Manager, shall find, from the said application, plans, and specifications, that the applicant is a person of good moral character and is otherwise prepared to conform to the following applicable requirements:

"(a) No tourist camp or trailer camp, shall be constructed, or maintained, on a lot or plot in an approved zone, which has a width of less than 400 feet frontage, and a depth of less than 400 feet, or a total ground area of less than 100,000 square feet.

"(b) The minimum unit area of premises used, or occupied, as a tourist camp unit shall be 25 feet by 35 feet, defined by markers at each corner, and provided further that the minimum lanes or driveways between rows of trailers or tourist cabins shall be 18 feet in width.

"(c) No trailers shall be placed within 10 feet of one another nor within 50 feet of the right-of-way line of any street, nor within 100 feet of any gasoline or oil storage tank.

"(d) ~~Tourist cabins constructed in a tourist camp shall~~
comply with the requirements of trailers.

"(e) The sanitary regulations of the county shall be complied with as to all plumbing fixtures installed or maintained in any tourist camp, and provided further that there shall be one complete set of sanitary facilities for each 5 trailers or tourist cabins.

"(f) No trailer shall remain in any one or more tourist camps, in Arlington County, for a period exceeding 60 days of any calendar year.

"(g) Provision shall be made for the removal of all garbage, trash, or refuse from any trailer camp in conformity to the sanitary regulations of Arlington County.

"(h) All entrances, exits, lanes and driveways, between rows of trailers, or cabins, used or occupied in any tourist camp shall be lighted by electricity; at least one 50 watt light shall be provided each 50 lineal feet.

"3. No tourist camp shall be located within 300 feet of the right-of-way of the following highways: (Specified)

"4. All tourist camps, or trailer camps shall maintain a register for the registration of all camp occupants, and such other information as follows:

"(a) Name and address of occupants.

"(b) Trailer license number and manufacturer's name.

"(c) Automobile license number and name and make of automobile.

"(d) Last place of location.

"(e) Date of arrival.

"(f) Date of departure.

and provided further that a certified copy of the aforementioned registration and particulars, shall be filed in the office of the County Manager the 15th of each month by the owner, or lessee, of each tourist camp or trailer camp.

"5. Any trailers existing in any A, B, C, or D Districts, and any tourist camps, or trailer camps, existing in any Light Industrial District shall conform to all of the above regulations, except Section 2a, within 60 days after their passage and publication. The foregoing provisions of this section which define

and limit the location of tourist cabins within a tourist camp shall not be applicable to those cabins which were constructed, and in use as tourist cabins, on March 30, 1939. But this exception shall not relieve the proprietor of any tourist camp, or tourist cabin, in operation on March 30, 1939, from complying with all other requirements of this section."

Dade County, Florida

"(A) All trailer camps and tourist parks shall comply with Rule No. 91-A and all other regulations of the Florida State Board of Health.

"(B) No automobile trailer, house car, camp car, trailer camp, tourist cottage camp, or any portable or mobile residence shall be established within 500 feet of the exterior boundary of any zone established hereby, excepting as provided in Section 5, paragraphs (i) and (t), for proposed sites in Zones AU, RU-3B, BU-2, BU-3, GU or IU-1.

"(C) No automobile trailer, or any other residence of the types enumerated in (B) above, shall be placed within 300 feet of the (specified) highways.....excepting that trailer camps will be permitted along said highways when a petition signed by all the property owners within 500 feet radius approving such use accompanies the application or that after an advertised public hearing by the Zoning Director all written protests and endorsements be reported to the Board of County Commissioners for their decision.

"(D) Where automobile trailer camps or tourist cottage parks are permitted in any zone, plans and specifications for such usage shall be submitted to the County Zoning Director with application for permit, subject to the following regulations:

"1. The minimum unit area of premises used or occupied as a trailer park unit shall be 25 feet by 35 feet defined by markers at each corner. The Zoning Director may refuse permit to construct a new Trailer Camp on a site having a width of less than 400 feet, or a depth of less than 400 feet in any zone, or a total ground area of less than 100,000 square feet."

Dobbs Ferry, New York

"No trailer camp shall be permitted in a Business 'B' District, except that the Board of Appeals may permit the establishment of a trailer camp in a Business 'B' District,

provided the applicant files the consents, duly acknowledged, of the owners of at least 65% of the property within 600 feet from all boundaries of the camp site."

Miami, Florida

"House cars, camp cars, or trailers may not be used as living or sleeping quarters within the Primary Fire Zone or on any lot fronting on any main thoroughfare as indicated in the Ordinance describing the Secondary Fire Zone or in any part of the area lying between the Florida East Coast Right of Way and Biscayne Bay or in R-1 Districts.

"House cars, camp cars or trailers shall also be subject to the following requirements:

"In R-2 Districts outside of the above prohibited areas, one trailer or house car only shall be permitted to be used for sleeping or housekeeping quarters when secondary to a Single Family Residence already erected on front portion or half of lot. In R-3, R-4, B-1, B-2, B-3 and I-1 and I-2 Districts, one trailer or house car shall be permitted for each additional 2,500 square feet of lot area not already occupied by a residential or commercial structure, but not more than two trailers shall be permitted on any one building site.

"Any such house car, camp car, or trailer shall be mounted on wheels and propelled either by its own power or by other power-driven vehicle and shall only be placed on rear of lot and must not occupy more than 30% of rear lot area; must provide a side and rear yard of 10% of width of lot and, on corner lots, 15 foot setback from side street line; and a distance of at least 10 feet from any other building or other House Car or trailer.

"Building permit for such house cars, camp cars or trailers must be obtained by owner of property or legal agent. A fee of \$1.00 shall be charged for such permit. Written consent for use of toilet facilities must be obtained from occupant of main building and filed with application for such permit and said location and conditions must be approved by Health and Zoning Departments before permit is issued. Said permit shall be revocable and for a 6 months period. Such permit shall be prominently displayed on permitted trailer."

Milwaukee County, Wisconsin

"(1) Parking Prohibited, When:

"No person, firm or corporation shall park any trailer in the R- 1 to R-8, both inclusive, Residence Districts, except that one trailer may be parked or stored on any lot, provided that no living quarters shall be maintained for more than forty-eight (48) hours, or any business practiced while such trailer is parked or stored.

"(2) Permits:

"(a) No automobile court or trailer camp shall hereafter be constructed, operated, or maintained, in any Town in Milwaukee County in which this ordinance applies without a permit therefor, issued by the County Building Inspector. Applications for such permits shall be made in writing, and shall be accompanied by plans and specifications sufficient to establish the fact that the applicant is able to comply with the requirements thereafter set forth.

"(b) Such permit, when issued, shall show on its face whether an automobile court or trailer camp is permitted. The permit shall be in writing and shall be displayed under glass in some public place on the premises to which it is applicable. The permit shall be for an indefinite period and shall be revocable by said County Inspector at any time for failure of the licensee to maintain all the requirements herein set forth. No such permit shall be issued unless said County Building Inspector shall find from said application, plans, and specifications that the applicant is prepared and agrees to conform to the following applicable requirements:

"1. No trailer camp shall be constructed, operated, or maintained which has a total ground area of less than eighty thousand (80,000) square feet. No automobile court shall be constructed, operated, or maintained which has a total ground area of less than twenty-five thousand (25,000) square feet.

"2. The minimum unit area of premises used or occupied by each trailer shall be two thousand (2,000) square feet, clearly defined on the ground by stakes, posts, or other markers, except that where a separate parking area is provided on the trailer camp lot for motor vehicles and no motor vehicles are parked on the trailer unit area, that the minimum unit area of the premises used or occupied by each trailer shall be fifteen hundred (1,500) square feet. The minimum area of premises used or occupied by one unit in an automobile court shall be fifteen hundred (1,500) square feet. The minimum lane or driveway on which each indi-

vidual trailer, tourist cabin, or automobile court unit shall front shall be twenty (20) feet in width, surfaced with a durable, dustproof, hard surface. Such lane or driveway shall have unobstructed access to public street or highway.

"3. No trailer shall be placed within twenty (20) feet of another, or within thirty (30) feet of the right-of-way line of any street, or within ten (10) feet of the boundaries of the trailer camp lot. No tourist cabin shall be placed within twelve (12) feet of another, or within thirty (30) feet of the right-of-way line of any street, or within ten (10) feet of the boundaries of an automobile court lot, provided that in automobile courts sleeping units not more than two (2) rooms in depth may be placed side by side in a continuous structure and, provided further, that the maximum number of such sleeping units in any one structure shall not exceed ten (10), and that the minimum distance between said structure shall be twelve (12) feet at the ends thereof, and twenty (20) feet when such structures are placed back to back or front to front. No automobile court structure shall be placed within ten (10) feet of the boundaries of the automobile court lot.

"4. The sanitary regulations of the County and the Town in which said facilities are located and of the State Board of Health shall be complied with as to all plumbing fixtures and sewerage facilities installed or maintained in any automobile court or trailer camp, provided that there shall be sanitary facilities for each sex in the proportions recommended by the State Board of Health.

"5. No automobile court or trailer camp shall be constructed, operated, or maintained unless there shall have been erected thereon a suitable building or buildings proportionate in floor area to the size of the trailer camp or automobile court for housing toilets, lavatories, showers, slop sinks, and laundry facilities pursuant to the regulations of the Town in which said automobile court or trailer camp is located, and to the rules or recommendations of the State Board of Health. The distance from any trailer unit to the lavatory, toilets, and shower accommodations shall not exceed two hundred fifty (250) feet.

"6. Provisions shall be made for handling and removal of all garbage, trash, or refuse from any automobile court or trailer camp in conformity with the sanitary regulations of Milwaukee County, of the Town in which located, and of the State Board of Health.

"7. All entrances, exits, lanes, and driveways between rows of cabins or trailers used or occupied in any automobile

court or trailer camp shall be lighted by electricity; at least one (1) fifty (50) watt light shall be provided for each fifty (50) lineal feet.

"8. Gasoline or oil storage tanks shall comply as to location and size with regulations of the Town in which such tanks are located and of the Wisconsin Industrial Commission.

"9. No business shall be conducted in any trailer in a trailer lot, or in any tourist cabin in an automobile court.

"(3) Registers:

"(a) Each automobile court or trailer camp shall maintain a register for the registration of all occupants, which register shall contain information as follows:

1. Name and address of each occupant.
2. Trailer license number and manufacturer's name.
3. Automobile license number and make of automobile.
4. Number of site to which assigned.
5. Last place of location.
6. Date of arrival.
7. Date of departure.

"(b) A certified copy of the aforementioned registration and particulars covering arrivals and departures for each month shall be filed by the fifth of each month in the office of the County Building Inspector by the owner or lessee of each automobile court or trailer camp. A complete list of all occupants as of the first of each month shall likewise be filed on the fifth of each month. This regulation shall apply to all automobile courts or trailer camps, whether established before or after the effective date of this ordinance.

"(4) Trailer or Tourist Cabin Not a Permanent Abode:

"(a) No person shall use a trailer, tourist cabin, or automobile court as a place of abode in Milwaukee County for more than ninety (90) days in any calendar year, except that for the duration of the present war and for six (6) months thereafter, trailers occupied by employees in bona fide defense industries may remain beyond the ninety (90) day limit.

"(b) A trailer shall not be used as a permanent place of abode. Removal of the wheels of a trailer, except temporarily for repair, or the permanent blocking up of a trailer, or the enclosure of the space beneath the trailer, whether situated in a

camp or elsewhere, shall be construed to automatically convert the trailer into a permanent place of abode. Such trailers shall then be subject to the requirements of the building code, housing laws, the requirements of this zoning ordinance, and all other laws and ordinances applicable to dwellings. Notice of such removal of wheels, blocking up, or enclosure shall be given forthwith to the County Building Inspector and the Building Inspector of the Town in which the trailer is situated.

"(5) Use With Fixed Structure - Limited:

"Any action to erect, place or maintain any structure, tent, sectional or pre-fabricated cabin or cottage, or any other structure in or upon any premises licensed as a trailer camp, which is to be used in connection with or added to any trailer legally located on a unit of land in such trailer camp shall subject the trailer to the requirements of this zoning ordinance for dwellings and to the Town building code.

"(6) Time for Compliance:

"Any automobile court or trailer camp now established in areas covered by this ordinance shall conform to all of the above regulations, except subsection (2) (b) 1, within ninety (90) days after effective date of this ordinance.

"(7) Water Supply:

"An adequate supply of pure water, furnished through a pipe distribution system connected directly with the public water main, with supply faucets located not more than two hundred (200) feet away from any trailer shall be furnished for drinking and domestic purposes in all trailer camps where a public water supply is available; where a public water supply is not available, each camp shall be provided with a safe water supply, approved by the State Board of Health, with supply outlets located not more than two hundred (200) feet from any trailer.

"(8) Fencing:

"Every trailer camp shall have erected around its borders a suitable woven wire or open metal fence not less than five (5) feet, nor more than six (6) feet in height, having only necessary openings for ingress and egress to public street, highway, or alley. Barbed wire shall not be used in construction of any fence.

"(9) Official Inspection:

"All automobile courts or trailer camps and appurtenant

facilities shall be open to inspection by public officials at all times."

Missoula, Montana

"Trailer camps or trailer parks shall be allowed only in such places, or locations as the Board of Adjustment, with the consent of the City Council, shall approve, and only under such regulations as to protect the public health, safety and general welfare. - 'B' Residence District.

Wichita, Kansas

"Nothing in the Above Uses (LC Light Commercial District) shall be construed as to permit the use of occupancy of any premises by house cars where a fee or rental is charged for such occupancy or where such occupancy is without the knowledge or consent of the owners of the premises.

"In order to regulate and determine the occupancy of house cars, each house car shall be considered the same as a building occupied by one family, and all of the area regulations shall apply to such house car for the district in which it is located that same as if it were a building."

Examples of special ordinances adopted to regulate trailers are those
of:

Fort Worth, Texas

"An Ordinance Defining Automobile Trailers and Trailer Camps: Regulating and Licensing Their Use in the City of Fort Worth: Providing a Penalty for the Violation Thereof: and Providing for an Emergency.

"Restrictions Applicable to Automobile Trailers:

"(a) No person, firm or corporation shall place, keep or maintain any automobile trailer used for human habitation upon any lot or parcel of ground within the City of Fort Worth for a period exceeding one week in any one year, except in a licensed

trailer camp or in a municipal park area designated by the Board of Park Commissioners as a trailer park.

"(b) Automobile trailers having their running gear, wheels, or other equipment designed for the transportation of said vehicles from one location to another removed or blocked up or otherwise made stationary and in use for living quarters shall be classed as dwellings, and as such shall be subject to all of the provisions of ordinances of the City of Fort Worth pertaining to dwellings and living quarters.

"(c) No automobile trailer shall be used for living quarters upon any street, alley, or other public way in the City of Fort Worth.

"(d) No person, firm or corporation shall make any electrical connection for any automobile trailer to any building or other source of electricity without the approval of the Electrical Inspector as to the method of such connection.

"(e) No person, firm or corporation shall deposit garbage or waste water from any automobile trailer on the premises where the trailer is stationed or on adjoining premises, and the garbage shall be placed in a suitable and adequate metal container equipped with a fly tight and water tight cover for collection by the Garbage Department."

Pensacola, Florida

"An Ordinance Regulating the Occupancy, Location and Operation of Trailers and Trailer Parks Within the City of Pensacola.

"Whereas the use of trailers for human habitation and for storage seriously affects the health and fire hazards of the citizens of Pensacola, and should be rigorously controlled to prevent the spread of disease and fire.

"Now, Therefore, Be It Ordained By The City Council Of The City Of Pensacola:

"Section 1. That no trailer shall be used for human habitation or for the storage of goods, except in duly licensed trailer parks as hereinafter provided."

"An Ordinance Regulating Tourist Parks or Camps and Automobile Tourist Parks or Camps of the Unincorporated Portion of the Town of Greenburgh, Westchester County,

New York," adopted March 16, 1939, states:

" No person shall use or park any automobile trailer or house car for living or sleeping quarters within the Town of Greenburgh except when parked in a licensed automobile tourist park or camp, except that not more than one automobile trailer or house car of a non-paying guest of a resident of the town may park on the property of said resident for not exceeding 72 hours in any one month, provided it is not used for living quarters and the location of the automobile trailer or house car complies with the setback requirements of the zoning ordinance and is not less than 10 feet from any building or other such vehicle."

Elmira, New York

"Location Outside Camps.

"(a) It shall be unlawful, within the limits of the City of Elmira, for any person to park any trailer on any street, alley, or highway, or other place, or on any tract of land owned by any person, occupied or unoccupied, within the City of Elmira, except as provided in this ordinance.

"(b) Emergency or temporary stopping or parking is permitted on any street, alley or highway for not longer than one hour subject to any other and further prohibitions, regulations, or limitations imposed by the traffic and parking regulations or ordinances for that street, alley or highway.

"(c) No person shall park or occupy any trailer on the premises of any occupied dwelling or on any lot which is not a part of the premises of any occupied dwelling either of which is situated outside an approved trailer camp; except, the parking of only one unoccupied trailer in an accessory private garage building, or in any district, is permitted providing no living quarters shall be maintained or any business practiced in said trailer while such trailer is so parked or stored."

Charleston County, South Carolina

"No trailer used as a habitation shall be parked for more than 48 hours without a permit on a residential property having a site area of less than 9,000 square feet, nor for more than 24 hours on any lot which is not a part of the premises of an unoccupied dwelling. It shall be allotted a minimum of 700 square feet of space and have a minimum of 20 feet separation between

it any any principal building or accessory building on the premises. Such use shall be temporary only and for a period not to exceed 60 days, when the health and sanitation requirements of this ordinance are complied with, and a permit obtained at the office of the County Planning Board shall be required, nor shall any person permit such parking use, or occupancy beyond 48 hours unless the occupant of the trailer shall first have obtained a permit therefor from the Board.

"No person shall park, use or occupy any trailer of any kind on any street, alley, highway or other public place; or in any tract of land in Charleston County except as provided in this ordinance or the Interim Zoning Ordinance."

Wichita, Kansas

"It shall be unlawful for any person, firm or corporation to park, place, erect or maintain any trailer upon any lot, premises, area or tract, other than a camp grounds, without first obtaining a permit from the Inspection Department and paying therefor the fee herein prescribed.

"The permit fee for locating and maintaining a trailer outside of an authorized camp grounds shall be as follows:

3 months or less.....	\$ 5.00
6 months	9.00
9 months	12.00
12 months	15.00

"No permit shall be issued for less than three (3) months. No refund shall be made for unused permits.

"No permit for locating a trailer outside of an authorized camp grounds shall be granted by the City unless the application shows the street address of the proposed location, the name of the trailer occupants, a signed statement by the owner, lessee or agent of the lot, premises, area or tract to be occupied, certifying that sanitary facilities are installed and will be available at all times to the trailer occupants, and such other pertinent information as may be required."

Madison, Wisconsin

"(3) Permit and Regulations for Trailer Parking Outside Trailer Camps.

"(a) The parking of any occupied trailer outside an approved trailer camp as previously defined, is hereby prohibited, unless the trailer be parked to the rear of a premise and a permit therefor obtained from the Building Inspection Department. The parking of more than one occupied trailer on any preinises except an approved trailer camp is hereby prohibited. Such permit shall be issued upon compliance with the following conditions:

"1. No permit to park an occupied trailer outside an approved trailer camp shall be approved for a period of greater than 10 days in any one year, and unless there shall have been filed with the application for permit, the written consent of the property owner or lessee of the premises, that the occupant or occupants of such trailer have twenty-four hour a day access to the sanitary facilities of the property proximate to the trailer.

"2. Except in the case of an approved trailer camp, no permit shall be issued for an occupied trailer unless the period of such occupancy is definitely stated in the application for permit and approved by the Superintendent of Building Inspection.

"3. No automobile trailer shall be used for living quarters upon any street, alley, or public way in the City of Madison.

"4. No person, firm, or corporation shall make any electrical connection for any trailer to any building or other source of electricity without permit and approval of the electrical inspector.

"5. No person, firm, or corporation shall deposit garbage, waste, water, rubbish or other waste combustible materials on the premises where an occupied trailer is parked or on adjoining premises. Garbage and rubbish and other waste combustible materials shall be placed in suitable metal containers for collection by the City Departments involved in such collections and at times specified by such departments. Waste water shall be kept in suitable metal containers and all other sanitary requirements for trailer wastes observed as set forth for the sanitary regulation of trailers in trailer camps.

"6. The Building Inspection Superintendent shall issue a permit upon payment of a \$1.00 fee and filing of an application complying with provisions of this ordinance. Each permit card shall be posted on the trailer for which it is issued."

Pacific Grove, California

"Section 14. House-Cars on Private Property. No house-car, while occupied as living or sleeping quarters, shall be

parked or remain upon any private lot, parcel or tract of land within said City except upon an auto-court established in accordance with the provisions of this ordinance.

"Nothing herein contained shall prohibit the occupant of any dwelling to allow one house-car on the premises thereof, provided that access is given to the sanitary facilities in said dwelling. Permit from the City Building Department must be secured before such occupancy, and shall only be granted for a period not to exceed ninety (90) days.

"Any house-car having wheels removed, being blocked up or otherwise made stationary shall be thereby considered a permanent dwelling or structure and it shall be unlawful for any house-car to be made stationary in any manner except in compliance with the state housing laws and City building regulations pertaining to the erection of such dwellings and structures.

"Section 15. House-Cars On Streets And Other Public Property. No house-car shall remain parked upon any public street, lane, or alley at any time while occupied as living or sleeping quarters. No house-car whether occupied or vacant, shall remain upon any public street, lane, or alley between the hours of 10 p.m. and 6 a.m.

"No house-car shall be parked or remain upon any public park, waterfront or other public property except on established roads or other spaces designated for the parking of automobiles, and no house-car shall remain parked on any of said public property between the hours of 10 p.m. and 6 a.m. It shall be unlawful for any automobile with trailer attached to be parked along any portion of any street marked for diagonal parking.

"Section 16. House-Car Sanitation. No toilets of any house-car are permitted to be used anywhere within said City. It shall be unlawful for the owner or occupant of any house-car to spill or allow the leakage of any sewers or any other liquid waste upon the ground, or to deposit any garbage, rubbish or other litter upon the ground anywhere within said City."

Examples of Department of Health Regulations

The Virginia State Department of Health in Chapter 255, Acts of 1948, is authorized to see that trailer camp operators provide: at least 1,000 square feet of ground for each trailer; well drained and orderly kept premises; safe water supply; approved sewage disposal; adequate toilet facilities; leak-proof garbage containers. Also, owner or operator of a trailer camp shall not allow a nuisance to be created or to continue to exist in his camp and no trailer camps

may, after January 1949 , operate without first securing a permit.

The Public Health Service of the Federal Security Agency is presently engaged in compiling the various state health regulations affecting trailers, and is expecting to recommend model legislation after examination of the provisions now in effect. The regulations adopted by California, Colorado, Florida, Indiana, Michigan, New York, Ohio and Wisconsin, are considered to embody the latest concepts on trailer camp sanitation.

The sanitary code governing the conduct and maintenance of trailer camps in the City of New York, adopted May 10, 1938, regulates the lot area - not less than 875 square feet per trailer, and automobile location in respect to the street provision of water supply, regulation of the number of water closets, lavatories, showers and slop sinks, the storage of waste liquids, garbage disposal, adequate lighting, sanitary maintenance and display of permit and registration of guests. There is also a provision that no flush-toilet may be used in a trailer or house-car in New York, except when in a trailer camp and the discharge pipe is directly connected to a sewer; no dry or chemical toilet may be used in a trailer or a house-car while in New York, and such toilet and flush toilets, unless connected with a sewer, shall be sealed while inside the city limits.

Model Ordinances: Office for Emergency Management

A suggested ordinance for the regulation of trailer coach parking and trailer parks was prepared by the Office for Emergency Management in cooperation with the United States Conference of Mayors, the National Institute of Municipal Law Offices, The American Municipal Association, the Department of Labor, the Farm Security Administration and others at a time when emergency housing was needed just before World War II. The definitions used in the ordinance were:

"'Trailer Coach' shall mean any vehicle used, or maintained for use, as a conveyance upon highways or city streets, so designed and so constructed as to permit occupancy thereof as a temporary dwelling or sleeping place for one or more persons, having no other foundation than wheels or jacks."

"'Trailer Park' shall mean any site, lot, field, or tract of ground upon which two or more trailer coaches are placed, and shall include any building, structure, tent, vehicle or enclosure used or intended for use as a part of the equipment of such park."

"'Trailer Coach Lot' shall mean a unit of local, adequately drained ground of definite size, clearly indicated by corner markets, for the placing of a trailer coach or a trailer coach and tow car."

The following are recommendations made within the text of the ordinance:

- 1) A Trailer Park Permit shall last for a period of twelve (12) months,

2) The Trailer Park shall be located on a well drained site suitable for the purpose.

3) It shall have an entrance and exit well marked and easily controlled and supervised.

4) It shall have surfaced roads not less than ten (10) feet wide. Eighteen (18) feet is preferred for two-way traffic. (Toledo has a minimum width of not less than twenty (20) feet, San Diego has a minimum width of twenty-five (25) feet.)

5) These roads shall be easily accessible to all trailer coaches and shall be adequately lighted. The walk-ways to the various buildings shall also be adequately surfaced and lighted.

6) The trailer coach park shall provide lots for each trailer coach of an area of not less than at least 800 square feet (as large an area as possible is recommended).

7) The minimum width for a trailer lot with a tow car shall be 25 feet.

8) The minimum depth of the trailer lot for a tow car and trailer coach shall be 35 feet. If the trailer coach is parked separately on a trailer lot, and the tow car parking is provided in another separate place, the trailer lot may be reduced to 700 square feet with a minimum width of 20 feet and a minimum depth of 35 feet.

9) Each trailer coach shall be located at least 10 feet from any building, and at least as far from the building line as the nearest adjacent permanent building on the same lot, and at least three feet from the property line.

10) Adequate space must be provided for - (a) clothes drying adjoining laundry facilities, (b) locations for burning rubbish and for incinerator space and (c) play space for children (the size and character of the play space shall be specified).

11) A sufficient supply of pure, healthful drinking water shall be supplied - drinking water that has been approved by the state, county or city department of health. It shall be provided in convenient locations but should not be further than 200 feet from any trailer coach. No common drinking vessel shall be provided. Waste from this supply shall be emptied into a drain connected to an approved disposal system. An abundant supply of hot water shall be provided at all times for bathing, washing, and laundry facilities. There shall be no drinking water in toilet compartments.

12) Flush toilets shall be placed in conveniently located buildings not more than a maximum distance of 200 feet from each trailer coach. "The building shall be well lighted at all times, ventilated with screened openings, and constructed of moisture-proof material permitting satisfactory cleaning. The floors shall

be concrete or similar material, slightly pitched to a floor drain." Toilets shall be enclosed in separate compartments, with fly doors, and have the minimum width of two feet, eight inches. Toilets shall be provided for each sex in the ratio of one toilet for every eight females and one toilet for every twelve males. In addition, every male toilet room shall have one urinal for each sixteen males, but in no case shall any male toilet room be without one urinal. Toilet rooms shall contain one lavatory with hot and cold running water for each two toilets, but in every case not less than one lavatory with hot and cold running water in every toilet room.

13) It is assumed that the toilet and washing facilities will be based on the total park capacity according to the accepted plans and shall be computed on the basis of a minimum of three persons to each trailer coach, with the sexes being assumed equal in number.

14) Separate bathing facilities for each sex shall be provided at the same distance as to the toilets from the most remote trailer coach. Each section shall contain one shower for each eight families, at least 3 feet square with a dressing compartment of at least 7-1/2 square feet - preferably 12 square feet.

15) Laundry facilities shall be provided in the ratio of one double tray and ironing board for every fifteen trailer coaches (where washing machines are available it is recommended that laundry trays be provided in the ratio of one double tray for each twenty coaches).

16) If no local means of collection of the trailer coach wastes is provided, then slop sinks shall be provided, properly connected to the sewage system at a maximum distance of not more than 100 feet from any trailer coach.

17) Waste from showers, toilets, slop sinks and laundries, shall be disposed into a public sewer system in such manner as approved by the appropriate department of health or into a private sewer and disposal plant or septic tank system approved by the same department.

18) All kitchen sinks, wash basins or lavatories, bath or shower tubs in any trailer coach located in any trailer park shall empty into an approved receptacle or approved disposal system.

19) Toilets and water closets not connected with an approved disposal system shall not be used and it shall be further unlawful for any person to use or permit the use of such fixtures.

20) Fly type metal depositories with tight fitting covers shall be conveniently located for the collection of rubbish and debris not further than 200 feet from any trailer coach. However, if a central deposit system is used, this distance may be increased.

21) Any action towards the removal of wheels except for the temporary purpose of repair, or other action to attach the trailer to the ground by means

of posts, piers, foundation or skirting, shall subject the trailer to the requirements of the building code.

The recommended park plan to be submitted by the trailer park operators would include a legal description and map clearly setting forth the following information:

- (1) The extent and area to be used for park purposes;
- (2) Driveways at entrances and exits, roadways and walkways;
- (3) Location of sites for trailer coaches;
- (4) Location and number of proposed sanitary conveniences, including proposed toilets, washrooms, laundries, laundry drying space, and utility rooms;
- (5) Method and plan of sewage disposal;
- (6) Method and plan of garbage removal;
- (7) Plan of water supply;
- (8) Plan of electric lighting;
- (9) Incinerator and burning space;
- (10) Children's play area.

Court Decisions

Ordinances regulating trailer camps have been upheld in the cases of, among others, Egan v. City of Miami, 178 S. 132 (Florida, 1938); Davis v. City of Mobile, 16 S. (2d) 1 (Alabama, 1943); Cady v. City of Detroit, 286 N.W. 805 (Michigan, 1939); Spitler v. Town of Munster, 14 N.E. (2d) 579 (Indiana, 1938); Renker v. Brooklyn, 40 N.E. (2d) 925 (Ohio, 1942); and Wyoming Township v. Herweyer et al., 33 N.W. (2d) 93 (Michigan, 1948). See also the cases of Loose v. City of Battle Creek, 309 Mich. 1, 14 N.W. (2d) 554; White v. City of Richmond, 168 S.W. (2d) 315 (Kentucky, 1943); and City of Texarkana v. Brachfield, 183 S.W. (2d) 304. The constitutionality of the Georgia Licensing Act under which trailer camps must obtain licenses was upheld in the case of Nichols v. Pirkle, 43 S.E. (2d) 306 (Georgia, 1947).

A Rochester, New York ordinance providing that no trailer shall be used as a residence for more than 48 hours without a permit, which permit could be revoked at any time, was declared invalid when the trailer in question was not used contrary to any sanitary, zoning or other regulations of the city, in the case of Rochester v. Olcott, 16 N.Y.S. (2d) 256.

A trailer camp located in an area zoned for residential uses (not including trailer camps) but adjacent to a city-owned trailer camp, was permitted to continue by the courts which held the zoning ordinance unreasonable because of the proximity to the city-owned trailer camp, in Pringle et ux (City of Port Huron, Intervener) v. Shevnock, 14 N.W. (2d) 827 (Michigan, 1944).

In Commonwealth v. Reed, 67 A. (2d) 288 (Pennsylvania, 1949), the defendant was convicted of violating the zoning ordinance of the Borough of

Bellevue, Pennsylvania, which prohibited the use of land within a commercial zone for trailer camps, since he had permitted families to live in trailers on land for the sale and repair of trailers.

The United States Supreme Court dismissed an appeal on October 14, 1946 from the Pennsylvania Superior Court which had supported a lower court in the case of Lower Merion Township v. Gallup, 46 A. (2d) 35 (Pennsylvania, 1946). The major issue of the case was whether or not the building code was applicable to house trailers. The court held that house trailers were "dwelling houses" within the definition of the building code.

However, in the recent case of Michaels v. Township Committee of Pemberton Township, Burlington County et al., 67 A. (2d) 324, (New Jersey, 1949) the court held that a trailer camp could be prohibited in a residential district, even though the zoning ordinance did not specifically prohibit trailer camps from such districts, since trailers, in relation to the context of the zoning ordinance, could not reasonably be interpreted to come within the definition of the term "dwelling" and thus could not come within the permitted dwelling uses for the residential district.

"Automobile Trailer and Tourist Camps - Legal and Administrative Problems of Municipal Regulations with an Annotated Model Ordinance," Report No. 75, of the National Institute of Municipal Law Officers (1941), contains some additional early court decisions affecting trailers and trailer camps.

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