

# Mobile Dwellings in Oregon

## Legislative Opportunities for Interim Housing



Planning and Building Department  
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**APPLICATION FOR VEHICULAR RESIDENTIAL FACILITIES**

**General Information**

Project Name: \_\_\_\_\_  
 Applicant Name: \_\_\_\_\_  
 Address of Project: \_\_\_\_\_  
 Applicant Phone: \_\_\_\_\_

**Project Description**

1.  New Vehicular Residential Facility (including a Vehicular Residential Facility)  
 2.  Expansion of Existing Vehicular Residential Facility (including a Vehicular Residential Facility)

Project Description	Number of Units	Number of Units	Number of Units	Number of Units	Number of Units
Single-Family Units					
Multi-Family Units					
Mobile Home Units					
RV Units					

**Site Plan/Map Information**

See attached site plan showing the location of the proposed facility and the proposed site plan. The site plan shall show the location of the proposed facility and the proposed site plan. The site plan shall show the location of the proposed facility and the proposed site plan.



Mobile Dwellings Policy Workgroup  
January, 2022



In the face of a growing housing affordability crisis, policy makers are searching for innovative housing solutions. One solution that has existed for decades but that has not yet received adequate policy consideration is formalizing and scaling up opportunities for housing in mobile dwellings, including RVs, Park Model RVs, and Tiny Houses on Wheels.

In 2021, an interdisciplinary workgroup of Oregon housing professionals convened monthly for a year to review the status of legislation and common local regulations for mobile dwellings, explicitly with the lens of using them as housing. We asked, ‘How do these mobile dwellings fit within Oregon’s existing formal, legislative housing policy and framework? Given their features, design, and durability, what role might they play in meeting immediate and longer-term housing needs?’ This group then reviewed options for legislative and regulatory concepts to foster a more formal institutionalization of these housing types in Oregon.

The opportunity presented by mobile dwellings is significant.

Mobile dwellings provide *vastly* less expensive housing types than all other conventional housing options- a budget RV may cost \$30K, whereas a typical house for sale in Portland costs over \$500K (circa Jan, 2022). This cost delta is due in part to the fact that mobile dwellings 1) do not have a concrete foundation 2) aren’t financially tethered to land 3) are very small and 4) are built to lesser standards than traditional site-built homes.

However, these differentiating attributes also position mobile dwellings with a different set of regulatory challenges and market opportunities than permanent housing on foundations. Their mobility makes them more facile, but also limits their height, width, and weight. Few legal places currently exist to dwell in them. They are not held to the same health and safety standards that conventional housing is held to.

With this overview in mind, this report offers three concepts: 1) mobile dwellings policy proposals; 2) policy and definitions matrix, and 3) existing regulations by dwelling type.

We offer these documents for feedback and refinement about a baseline policy framework for the place mobile dwellings could have in Oregon and beyond. Please share with us your perspectives, refinements, and any other suggestions, information, and examples on these concepts, and use them as relevant in your own work to help generate more low cost viable housing options.

Co-Facilitators	Workgroup members
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# Policy Concepts

## Introduction

Below are three policy opportunities we believe are worth exploring further to see if and how they can help address Oregon's housing shortage and its impacts. Distinct from "safe parking programs" for people residing in their vehicles that include connections to social services, these concepts are intended to expand Oregon's mix of allowable lower-cost housing options. They are focused on expanding what has traditionally been thought of as conventional housing; there might be others. This is a working paper, designed to gather input from a wide array of interests. It is meant as a starting point for more discussion.

1. Introduce a new category of housing called "Interim Housing."
2. Integrate Recreational Vehicles (RVs) and Tiny Homes on Wheels (THOWs) into residential neighborhoods as forms of Interim Housing. Concepts advanced are intended to mitigate the current impacts of the state's housing shortage.
3. Explore the potential of a smaller type of factory-built housing on wheels called a Park Model RV to provide good quality, permanent, year-round housing.

## Problems and Opportunities

- Oregon has a housing shortage overall and a lack of lower-cost housing. Indications are that this shortage is continually worsening; both Washington and California foreshadow this.
- As a result, some households are living in places not traditionally considered suitable for housing.
- Oregon also has a shortage of lower-cost, entry level homeownership opportunities.
- Some households are rethinking what they want for housing and are innovating. New informal housing types are emerging, but they are not yet fully recognized or addressed in state or local law. An example is Tiny Homes on Wheels, which are classified as recreational vehicle by Oregon.
- Recognized/regulated smaller housing types, such as single-wide manufactured homes and park-model RVs, could help address the needs of smaller households if existing barriers were addressed.
- In proposing policy changes, it is important to consider and address any potentially harmful effects on the intergenerationally economically disenfranchised, including people of color, people with disabilities, and other groups who have historically been denied full access to their housing of choice.
- Mobile dwellings should be treated legislatively as a new category of housing called "Interim Housing," distinct from permanent housing. It is important to consider ways in which expanding options for small housing on wheels can improve options for people currently needing/choosing access to these interim housing choices, but still focus efforts to expand accessible permanent housing choices for people at all income levels.

## Policy Topic 1: Interim Housing and a Category of Interim Housing Consisting of Mobile Dwellings

*This recommendation stems from dialog and experience by members of this 2021 workgroup address the issue of non-standard, informal, lower cost housing types that are already being used in practice but not formally recognized by statute or by local regulations.*

At the state level, define a new category of housing called “Interim Housing.”

- “Interim Housing” is a type of housing that lacks the durability and conveniences of traditional site-built housing or factory-built dwellings, but which offers needed shelter and is suitable for living on a multi-month basis.
- “Interim housing” should be considered by jurisdictions whose HNAs show a shortage of lower-cost permanent housing units.
- Interim housing should not count toward a jurisdiction’s total housing for Housing Needs Analysis and Housing Production Strategy purposes.
- Interim housing should be permitted subject to clear and objective standards.
- While termed “interim,” there should not be formal time limits tied to permits.
  - Additional discussion is needed on how to prevent the outcome of households having no option but to live in interim housing indeterminately.
- As a form of “Interim Housing,” allow the use of RVs and THOWs in residential locations on an interim basis.
  - Define a category of “Interim Housing” called “Mobile Dwellings” that includes RVs and Tiny Homes on Wheels.
  - Explore ways to integrate “Mobile Dwellings” into residential neighborhoods, including 1) in “Interim Mobile Dwellings Clusters,” 2) as an additional dwelling on a lot with an existing home (Portland model), 3) as the sole dwelling on a residential lot. These options are further described below.
- Pursue ways to promote the use of “Mobile Dwellings” as “Interim Housing” in residential neighborhoods.
  - Step 1: Include as a tool in the Housing Production Strategy Toolkit.
  - Step 2: Integrate “Interim Housing” and “Mobile Dwellings” in residential neighborhoods into HB 2003 reforms.
  - Step 3: Provide models: To encourage implementation, provide models that can be adapted and adopted by local jurisdictions.
  - Given the novelty of this residential housing approach, jurisdictions and the State should evaluate the impacts “Interim Housing” generally and “Mobile Dwellings” specifically on communities and on the property owners and occupants of the dwellings.

## Policy Topic 2: Mobile Dwellings

*These recommendations for model approaches to integrate RVs and tiny homes on wheels into residential neighborhood stem from dialog and experience by members of this 2021 workgroup to address the shortage of viable locations to reside in an RV in urbanized areas.*

1. As a form of “Interim Housing,” define and allow “Mobile Dwelling Clusters” in residentially zoned neighborhoods. “Mobile Dwelling Clusters” are groups of RVs or Tiny Homes on Wheels located in residentially zoned neighborhoods.

- Allow outright in medium and high-density residential neighborhoods.
- Likely not a viable permanent use in cities with land development pressures, but it could be financially viable interim use.
- Standards could address:
  - Maximum number of dwellings scaled to zone and lot size
  - Minimum length of stay (not intended for short-term stays). Option: 30 days or longer
  - Required site improvements: Utility hookups, shared open space, fence or buffering, setback requirements, trash management, other essential site improvements related to sanitation, health, and safety.
  - Surfaces: “Mobile Dwellings” without motive power should be allowed on gravel and other firm pervious surfaces, whereas RVs with motive power should be on impervious surfaces to control engine runoff.
- Barriers in State Law: May need exemption from state “Recreational Campground” regulations found in ORS 918-650-0000. Residential Campground development standards require vehicle circulation patterns suitable to facilities in which RVs come and go on a regular basis.
- Related examples:
  - Food cart pods as an interim commercial use: Varying degree of improvements based on desired length of use. Required to include utility hookups, seating areas, sanitation, garbage, curbs, and surfacing.
  - Safe parking programs: Usually nonprofit or church run, with access to sanitation facilities. In Portland, currently limited to three vehicles per site. Many examples nationally.
  - Wildfire recovery: The City of Talent and the Urban Renewal Agency developed a site for 50 RVs to be used as interim housing for families displaced by wildfires. The site will be developed for permanent housing in the longer term, and all site improvements including utilities, frontage improvements and internal circulation were designed to serve both the interim and permanent uses.

2. As a form of “Interim Housing,” allow a single “Mobile Dwelling” to be an additional dwelling on a lot with a home in residential neighborhoods.

- Example: Portland allows one occupied recreational vehicle on a site with a house, attached house, or manufactured home. A permanent recreational vehicle utility hookup that includes an electrical outlet, a water connection, and a sanitary sewer dump must be provided on the site, except that a water connection and sanitary sewer dump is not required if the vehicle lacks internal plumbing. Allowed recreational vehicle types are travel trailers, park model recreational vehicles, campers or motor homes. [Chapter 29.50 Other Requirements | Portland.gov](#) Portland code does not permit an occupied RV to be the sole dwelling on a residential parcel.

3. As a form of Interim Housing, allow a single “Mobile Dwelling” to be located as the sole dwelling on a lot in a residential neighborhood.

- Adapt the Portland model.

### Policy Topic 3: Park Model RVs

*The recommendation below results from the efforts of the Mobile Dwellings Work Group to explore the potential of a smaller type of factory-built housing on wheels called a Park Model RV to provide good quality, permanent, year-round housing.*

Determine whether Park Model RVs meet sufficient durability and energy standards to be allowed as permanent housing in applications such as cottages, plex units, and ADUs.

- Park Model RVs are factory-built dwellings of 400 SF or less that function like small manufactured dwellings but are governed (per federal law) by specialized RV building standards.
- Status: This topic requires additional research and development. More needs to be understood about Park Model RV construction standards and the living environment they support. Collaboration among manufacturers, planners, and building code officials is needed to explore how to expand the use of these while also protecting the health and safety of residents and neighbors.

**Guide to Current Regulations for Non-Traditional Dwelling Types on Wheels and Manufactured Housing  
December 2021**

	<b>Manufactured Housing</b>	<b>Park Model<sup>i</sup></b>	<b>Recreational Vehicle</b>	<b>Tiny House on Wheels</b>
<b>Location: Where are they likely allowed by state law and/or local code?</b>				
As primary or sole dwelling on SF parcel	Allowed. Design standards likely apply. <sup>ii</sup>	Regulated locally. Not typically permitted.	Regulated locally. Not typically permitted.	Regulated locally. Not typically permitted.
As ADU or other secondary dwelling	Allowed, but design standards may make it infeasible. <sup>iii</sup>	Regulated locally. As secondary dwelling, allowed in Portland. <sup>iv</sup>	Regulated locally. As secondary dwelling, allowed in Portland. <sup>v</sup>	Regulated locally. As secondary dwelling, allowed in Portland. <sup>vi</sup>
As du-, tri-, or quad, if jurisdiction allows detached plexes	Allowed, but design standards are an issue.	Not allowed.	Not allowed.	Not allowed.
As unit in cottage clusters	Allowed, but design standards are an issue.	Regulated locally.	Regulated locally.	Regulated locally.
In manufactured dwelling park	Allowed. Most common location.	Allowed.	Allowed. <sup>vii</sup>	Not allowed.
In RV park <sup>viii</sup>	Unlikely.	Allowed.	Allowed.	Unknown.
On public ROW or other public land	Not allowed.	Not allowed.	Not allowed but not uncommon at present.	Not allowed.
<b>Mobility: How easy is it to move from one site to another?</b>				
How mobile?	Least mobile. Built to be permanent, stationary housing. ODOT trip permit required.	Not easily mobile. Commonly never moved. ODOT trip permit required.	Easily transported and set up. Jurisdictions cannot limit length of stay at RV or mobile home park. Some RVs have motive power; some are solely trailers.	Somewhat mobile. On chassis on piers. If >10' wide, ODOT trip permit required. Often stays in place 1+ years.
Estimated moving cost	\$25,000 to \$30,000+	\$2,000+	\$0 to minimal cost.	\$1,000+
<b>Construction and Durability: What level of habitability and permanence do they provide?</b>				
Year-round or temporary	Year-round, permanent housing.	ODOT: Temporary. Land Use Planning: Year-round. <sup>ix</sup>	ODOT: Temporary. Land Use Planning: Year-round. <sup>x</sup>	Typically built as permanent housing.
Wastewater disposal	Connects to sewer or septic like SF home.	Same as SF home.	Toilets not required, but if present, sewage contained in a holding tank emptied into a dump station.	Varies; composting or conventional toilet.
Water	Same as SF home.	Same as SF home.	If available, typically held in tank and supplied via flexible supply lines rated for potable water.	Varies; often has hose connection to potable water. Full kitchen & ½ or full bath typical. Insulation typical.
Dimensions	Minimum of 8'x40' (320 sf). In practice, 400 sf or more. <sup>xi</sup> Requires ODOT trip permit to transport.	> 8.5' wide and < 400 sf per ODOT. Requires ODOT trip permit to transport.	Must be no more than 8.5' wide per ODOT.	Not regulated. Typically, under 200 SF.
Construction Standards	HUD Code <a href="#">HUD's Office of Manufactured Housing Programs (OMHP)   HUD.gov / U.S. Department of Housing and Urban Development (HUD)</a>	<a href="#">ANSI A119.5 Park Model RV Standard (2020 Edition)</a> . Features of Park Models RVs are like manufactured housing features, but in smaller home. Some insulation.	Per ODOT, National Fire Protection Standard 1192 (or NFPA 501c or ANSI A119.2 standard if the vehicle is an older RV). <a href="#">NFPA 1192: Standard on Recreational Vehicles</a>	No standards. Tiny Home Industry Association creating standards; goal is acceptance as "permissible and permanent housing." To keep development costs low, others oppose standards.
Price range new, no land	\$40,000 to \$200,000+	Starts around \$43,000 for 200 sf models.		Uncertified: \$50,000+ Certified: \$100,000+

## About This Matrix

This matrix was compiled in 2021 to better understand the current regulatory framework surrounding nontraditional dwelling types that some Oregonians are adopting in lieu of more traditional, permanent, site-built housing. It was created to contribute to current discussions about how best to adapt the current regulatory framework to better address Oregon's evolving housing continuum. Current regulations can be conflicting or ambiguous. This matrix does not constitute legal advice.

Throughout the state, people are debating and rethinking what constitutes housing. Readers are encouraged to send corrections, comments, and updates to this matrix as well as relevant resources and models to the volunteer RV & THOWs Work Group via Andrée Tremoulet at [andree@commonworksconsulting.com](mailto:andree@commonworksconsulting.com). Thanks for your interest.

## Notes

<sup>i</sup> Park Model RVs are, in effect, small homes of no more than 400 sf built on an RV frame in compliance with RV construction standards. Like manufactured dwellings, they are towed to a site; they do not have motors. PMRVs are designed as a dwelling first and foremost, and as a mobile unit secondarily. ODOT refers to them as "temporary living quarters." See definition here: [https://www.oregonlegislature.gov/bills\\_laws/lawsstatutes/2019orlaw0585.pdf](https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2019orlaw0585.pdf).

<sup>ii</sup> Jurisdictions may adopt design standards for manufactured dwellings outside manufactured dwelling parks no less restrictive than those set forth at ORS 197.307(8) [ORS 197.307 - Effect of need for certain housing in urban growth areas \(public.law\)](#). Many jurisdictions have adopted these state standards rather than less restrictive ones.

<sup>iii</sup> Among the standards for manufactured dwellings outside manufactured dwelling parks set forth at ORS 197.307(8) are requirements that the homes be doublewides or larger, enclose at least 1,000 sf, and have a garage or carport. These standards, if adopted locally, prevent manufactured dwellings from being used as an ADU, a detached plex, or a cottage due to conflicts with the standards for these uses. Local jurisdictions can resolve this conflict either by adopting less restrictive standards for manufactured dwellings outside manufactured dwelling parks or by exempting manufactured dwellings used as ADUs or Middle Housing.

<sup>iv</sup> Portland allows one occupied recreational vehicle provided on a site with a house, attached house, or manufactured home. A permanent recreational vehicle utility hookup that includes an electrical outlet, a water connection, and a sanitary sewer dump is provided on the site, except that a water connection and sanitary sewer dump is not required if the vehicle lacks internal plumbing. Allowed recreational vehicle types are travel trailers, park model recreational vehicles, campers or motor homes. [Chapter 29.50 Other Requirements | Portland.gov](#)

<sup>v</sup> The Portland regulation described in endnote iv above applies to recreational vehicles as well as park model recreational vehicles. [Chapter 29.50 Other Requirements | Portland.gov](#)

<sup>vi</sup> In this application, Portland treats THOWs like RVs, thus the provisions described in in endnote iv above apply. [Chapter 29.50 Other Requirements | Portland.gov](#)

<sup>vii</sup> ORS 197.493 prohibits jurisdictions from limiting the length of stay of an RV in a manufactured dwelling park or RV park if it is occupied as a residential dwelling and lawfully connected to electricity, water, and wastewater systems. [ORS 197.493 - Placement and occupancy of recreational vehicle \(public.law\)](#)

<sup>viii</sup> RV Parks have very a limited presence in high-cost regions. If they're allowed at all, they're typically only allowed in commercial zones, and there are often long wait lists to stay at them.

<sup>ix</sup> ODOT states that Park Model RVs are intended to serve as temporary living quarters in, but Park Models are built to be a dwelling first and for mobility secondarily. [https://www.oregonlegislature.gov/bills\\_laws/lawsstatutes/2019orlaw0585.pdf](https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2019orlaw0585.pdf)

<sup>x</sup> Oregon land use law treats RVs as permanent housing, but ODOT treats them as "a vehicle with or without motive power that is designed for use as temporary living quarters." Compare [ORS 197.493 - Placement and occupancy of recreational vehicle \(public.law\)](#) with [ORS 174.101 - "Manufactured structure," "recreational vehicle" defined \(public.law\)](#)

<sup>xi</sup> Manufactured dwellings are made in sections in a factory. Individual sections can be joined onsite to make doublewides, triplewides, etc.



## Informal Definitions

**Mobile or Manufactured Home:** a dwelling intended for year-round occupancy that is built in a factory in one or more sections on an integral chassis that allows it to be pulled by a truck down the highway by adding axels and wheels. Mobile/manufactured homes built after June 15, 1976, must be manufactured in compliance with a national building code administered by the US Department of Housing and Urban Development (“HUD Code”) instead of local building codes, although local building codes apply to the foundation (if any) and utility connections.

Oregon law (ORS 446.003) distinguishes among three kinds of “manufactured dwellings”:

- residential trailers: built before 1962,
- mobile homes: built between 1962 and June 1976 in conformance to a State of Oregon mobile home construction code, and
- manufactured homes: built after June 1976 in conformance to the national HUD Code.

In contrast to mobile/manufactured homes, modular homes (another type of factory-built dwellings) must be built in compliance with local building codes, do not have an integral chassis, and are transported to the site on flatbed trucks.

**Recreational Vehicle (RV):** “a motor vehicle or trailer which includes living quarters designed for accommodation. Types of RVs include motorhomes, campervans, caravans (also known as travel trailers and camper trailers), fifth-wheel trailers, popup campers, and truck campers. Typical amenities of an RV include a kitchen, a bathroom, and one or more sleeping facilities. RVs can range from utilitarian – containing only sleeping quarters and basic cooking facilities – to luxurious. ...RVs can either be trailers (which are towed behind motor vehicles) or self-motorized.” (Wikipedia [Recreational vehicle - Wikipedia](#))

Motorized RVs come in three classes:

- Class A: The largest RVs, typically built on a diesel or gas-powered vehicle, commercial truck, or commercial bus chassis and the most expensive to run. May require a specialized driver’s license.
- Class B: Camper vans or converted vans. These are the smallest motorized RVs.
- Class C: Medium-sized RVs, often built on the chassis of pickup trucks or vans, making it more fuel-efficient and less expensive than the Class A.

In 2018, HUD attempted to make a clear distinction between RVs and mobile homes for the purpose of clarifying that HUD’s national building code that applies to mobile homes does not apply to RVs. HUD defines RVs as “vehicles or vehicular structures:

- not certified as manufactured homes,
- designed only for recreational use and not as a primary residence or for permanent occupancy,
- and either:
  - built and certified in accordance with NFPA 1192-15 (a National Fire Protection Association code that regulates minimum requirements for the installation of plumbing, fuel burning, electrical and other safety-related systems) or ANSI A119.5-15 (an American National Standards Institute code that covers plumbing, fuel systems, fire & life safety, construction of park-model RVs); or
  - self-propelled vehicles.”

The Recreational Vehicle Industry Association (RIVA) advocates for the industry, promotes self-regulation and provides educational resources for the manufacturers, suppliers, distributors, dealers and businesses that comprise the industry. [Homepage | RVIA](#)

**Park Model RV:** The Recreation Vehicle Industry Association (RVIA) defines Park Model RVs as “a unique trailer-type RV that is designed to provide temporary accommodation for recreation, camping or seasonal use.” Park Model homes, also known as recreational park trailers, are built on a single chassis mounted on wheels. They are no larger than 400 square feet and are built in compliance with ANSI A119.5, a manufacturing code that regulates plumbing, fuel systems, fire and life safety standards and general construction of park-model RVs.

While Park Model RVs are considered recreational vehicles, they are typically used more like small manufactured dwellings. They are transported or towed as needed, then placed for long-term use or permanently placed at a location where local codes permit. Once at its destination, the necessary utilities, fixtures, and appliances are connected.

**Tiny Houses on Wheels (THOWs):** There is no legal definition of THOWs applicable to Oregon. They’re typically built outside of any regulatory framework, by amateurs. In fact, their origin in the early 2000s stems from *intentionally* avoiding building code regulations by putting the dwellings on wheels. These codes effectively prevent small home development through a host of building code issues related to minimum room sizes, sleeping lofts, ceiling heights, composting toilets, etc.

Because they are built to be road worthy, the maximum dimensions allowed, without obtaining a special permit, are 8 feet 6 inches wide, 13 feet 6 inches tall, and 40 feet long. While this is the maximum, it is rare to see tiny houses longer than 32 feet, since beyond that length they become much more difficult to transport.- <https://www.tinyhomebuilders.com/help/tiny-house-movement>

Some THOW companies build to specific RV building code standards, including to Park Model RV standards, and some organizations, such as the Tiny House Industry Association, are attempting to establish building code standards for THOWs, such as ANSI A119.5. Other THOWs advocates explicitly do NOT wish for formalization of these standards, as it is against the spirit, intent, and utility of the DIY, rogue, tiny house movement, and increases costs.