

WASHINGTON TRAVEL TRAILER LENGTH

Why Statute Must Be Amended To Reflect Industry Norms

ISSUE: Currently in Washington, travel trailers are limited by statute (RCW 46.44.030) to an overall length of 40 feet, while most other states allow travel trailers to be 45 feet or longer in length. Washington is also one of only two states to regulate the manufacturing of RVs (recreation vehicles), requiring state approval of RV plans. Even though travel trailers over 40 feet have been produced, sold, and registered in the state of Washington for decades, the state has decided to stop approving plans for travel trailers over 40 feet in length because of the maximum vehicle length in statute.

This decision negatively affects the RV industry and RV dealers in Washington who could see an immediate loss of product and a loss of considerable revenue to their businesses if RVs over 40 feet are no longer approved in the state.

SOLUTION: Amend RCW 46.44.030 to add “travel trailer,” to the exemption section which already allows vehicles like motorhomes to legally operate upon the public highways of Washington at an overall length of 46 feet. With this amendment, Washington statute will reflect the norms of what the RV Industry produces and bring Washington in line with the legal travel trailer lengths in most other states.

BACKGROUND: Washington is a unique state because it is currently one of only two states that regulate the manufacturing of RVs. RV manufacturers submit model plans to the Washington State Department of Labor and Industries, pay a fee for each plan submittal, and Labor and Industries approves or denies the RV plans. After the model plan is approved, RV manufacturers purchase a Washington RV seal which is then attached to the vehicle. This is a necessary step in Washington for a RV manufacturer to sell their vehicle to a Washington RV dealer, and for a Washington RV dealer to sell that vehicle to a consumer.

In June, it was brought to the attention of the RV Industry Association that Labor and Industries will stop approving plans for travel trailers over 40 feet in length because of the maximum vehicle length in statute (RCW 46.44.030). Labor and Industries made this determination because they could not clearly show how they were legally applying a statute meant for public highway vehicle operation to its process for RV plan approval.

Although this has just become an issue, these vehicles over 40 feet are not new. Travel trailers over 40 feet have had their plans approved by Labor and Industries for decades without issue. Many travel trailer manufacturers produce vehicles over 40 feet and have done so for decades. These travel trailers have been sold and registered in the state of Washington for decades. Further, consumers in Washington who operate these vehicles on the public highways of Washington have been doing so for decades.

Many states which also enforce overall lengths on travel trailers do so at 45 feet or longer. In addition, some states do not enforce an overall travel trailer length, instead enforcing a total combination length of a tow vehicle and a travel trailer. Our goal this legislative session is to conform Washington statute with a majority of states by allowing travel trailers up to 46 feet in length to legally operate on the public highways of Washington, and to assist the Department of Labor and Industries by amending and clarifying statute to fit the industry norms.



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Senate Transportation Committee

RE: Please Support Senate Bill 6083; Concerning travel trailers.

Chair Hobbs and members of the Senate Transportation Committee,

I appreciate this opportunity to write you in strong support of Senate Bill 6083.

The RV Industry Association is the national trade association representing the diverse manufacturing businesses which manufacture more than 98 percent of all recreational vehicles produced in the United States — including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, and truck campers. We are the unifying force for safety and professionalism within the RV industry and work with federal and state policymakers to promote and protect the RV industry and its members.

According to our RVs Move America 2019 economic impact study, the RV industry has a \$2.1 Billion impact in Washington state alone. The RV industry supports almost 13,000 jobs, paying almost \$700 million annually in wages in Washington State.

Currently in Washington, travel trailers are limited by statute (RCW 46.44.030) to an overall length of 40 feet, while most other states allow travel trailers to be 45 feet or longer in length. In fact, your neighbors in Idaho allow towable RVs up to 48 feet, and your neighbors to the south in Oregon allow towable RVs up to 45 feet. Travel trailers over 40 feet in overall length are already operated by consumers on the public highways of this state. Furthermore, travel trailers over 40 feet in overall length have been produced, registered, and sold in this state for decades.

Senate Bill 6083 will amend the maximum vehicle length statute to include travel trailers and allow their overall length to be 46 feet. This section of statute already allows vehicles like motorhomes to legally operate upon the public highways of Washington at an overall length of 46 feet. We have cleared this amendment with the Department of Transportation, Department of Licensing, and Washington State Patrol. We have heard no concerns of safety and infrastructure impact from any department or agency from this proposed amendment.

Also, Washington is a unique state because it is currently one of only two states that regulate the manufacturing of RVs. RV manufacturers submit model plans to the Washington State Department of Labor and Industries, pay a fee for each plan submittal, and Labor and Industries approves or denies the RV plans. After the model plan is approved, RV manufacturers purchase a Washington RV seal for each RV, which is then attached to the vehicle. This is a necessary

step in Washington for a RV manufacturer to sell their vehicle to a Washington RV dealer, and for a Washington RV dealer to sell that vehicle to a consumer.

In June 2019, it was brought to the attention of the RV Industry Association that the Department of Labor and Industries would stop approving plans for travel trailers over 40 feet in length because of the maximum vehicle length statute (RCW 46.44.030) that Senate Bill 6083 will amend. Labor and Industries made this determination even though they could not clearly show how they were legally applying a statute meant for public highway vehicle operation to its process for RV plan approval. Although this has just become an issue, as I have already mentioned, Travel Trailers over 40 feet are not new and are owned by many consumers in this state already. Travel trailers over 40 feet have had their plans approved by Labor and Industries for decades without issue.

In working with Labor and Industries through the summer, fall, and winter we have come to an agreement that Labor and Industries would continue to approve travel trailer plans as we work towards a legislative solution. We do have confirmation from Labor and Industries that, if Senate Bill 6083 is enacted, Labor and Industries would approve plans of travel trailers up to 46 feet in overall length. Unfortunately, Labor and Industries has also confirmed that if the legislation does not pass it will cease approving plans of travel trailers over 40 feet in overall length.

If the legislation is not enacted it will negatively affect the RV industry and RV dealers in Washington who could see an immediate loss of product, and a loss of considerable revenue to their businesses if RVs over 40 feet are no longer approved by the state. We estimate the immediate loss to be in the millions of dollars.

As I mentioned before, Senate Bill 6083 will amend the maximum vehicle length statute to include travel trailers up to 46 feet in Overall length. Allowing travel trailers up to 46 feet in overall length would almost all travel trailers produced by RV manufacturers. Senate Bill 6083 would bring state statute in line with everyday practice of the manufacturers, dealers, and consumers.

Thank you again for the opportunity to urge your strong support of Senate Bill 6083.

Sincerely,

Nicholas Rudowich
Manager, Government Affairs
RV Industry Association