



State of New Jersey  
THE PINELANDS COMMISSION  
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RICHARD PRICKETT  
Chairman  
NANCY WITTENBERG  
Executive Director

October 1, 2020

Travis Richards (via email)  
Weishoff & Richards, Attorneys at Law  
141 High Street  
Mount Holly, NJ



Re: Application # 1988-1133.005  
Block 701, Lot 4.01  
Southampton Township

Dear Mr. Richards:

We have reviewed your email received on August 17, 2020 regarding whether the placement of a mobile home on the above referenced parcel constitutes development. I apologize for the delay in responding. Review of the issue raised by your letter required considerable review.

The Pinelands Comprehensive Management Plan (CMP) defines a mobile home as a dwelling unit. Based upon the regulations contained in the CMP, the placement/establishment/construction of a single family dwelling on any parcel of land in the Pinelands Area constitutes development. This is true whether the concerned dwelling is stick built on a parcel, a prefabricated dwelling assembled on a parcel or a mobile home placed on a parcel. We believe that the placement/establishment/construction of a single family dwelling on a parcel meets several of the criteria listed in the CMP under the definition of development. For example, the placement/establishment/construction of a single family dwelling on a parcel constitutes a change in the type of use of the land where the single family dwelling unit is placed.

We do not agree that the distinction your letter discusses between the CMP definition of structure and a mobile home means that placement of a mobile home on a parcel does not constitute development.

Our April 30, 2020 letter indicated that the proposed reconstruction (replacement) of a single family dwelling within five years of its demolition (removal) does not require application to the Commission. With respect to a mobile home, this means that if a mobile home is removed from a parcel, that single family dwelling can be replaced on the parcel within five years of its removal without application to the Pinelands Commission.

If you have any legal questions regarding this matter, please contact Stacey Roth of our office. If you have any other questions, please contact me.

Due to the Coronavirus, the Commission has closed its offices and staff is working from home. All inquiries and application-related materials, including large reports and plans, should be submitted in digital format to [appinfo@pinelands.nj.gov](mailto:appinfo@pinelands.nj.gov). All plans must be in .pdf format.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. M. Horner', with a long horizontal flourish extending to the right.

Charles M. Horner, P.P.

Director of Regulatory Programs

c: Naushaun C. Richards (via email)  
Stacey Roth (via email)