



Idaho Farm Bureau Federation

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May 31, 2019

Submitted via email to kevin.merritt@isda.idaho.gov

Idaho State Department of Agriculture
2270 Old Penitentiary Road
Boise, Idaho 83712

RE: Proposed Rule Increasing Weights and Measures Fees

Sir or Madam:

On behalf of the more than 80,000 Idaho families who are members of the Idaho Farm Bureau, I want to thank you for this opportunity to submit the following comments regarding the proposal to increase fees for commercial weighing and measuring devices. The Idaho Farm Bureau Federation opposes the proposed action.

The Weights and Measures Program's (Program) proposed rule would increase the license fees for commercial weighing and measuring devices anywhere from 20% to 100%. The Program's justification for the drastic fee increase is the need to hire a new full-time employee and replace two trucks that cost approximately \$250,000 each. The Program has not provided an explanation of what is wrong with the current trucks, why they need to be replaced, or how much it would cost to repair them.

The fee increase would also create a \$189,068 surplus per year after hiring the new employee and returning \$100,000 per year back to the general fund. The cited need for such a large surplus is to replenish the Program's savings account after purchasing the new trucks, but the Program's savings account would be replenished after only three years. Surely the Program could seek financing for the trucks to pay them off gradually rather than burdening Idaho citizens with enormous fee increases.

Increasing these fees 100% is even less justified considering the number of gas pumps has increased by 3% each year and is projected to continue. The number of commercial electric charging stations is also increasing across the state. Each gas pump and charging station will need to be certified annually. This rule does not provide a fee for the charging station licenses though.


Furthermore, the Program has provided very little, if any, information to justify the extent of the fee increases. The last time these fees increased was in the early 1990's. At that time the fee for checking a gas pump increased from \$4.50 to \$6.00. Under the proposed rule, the same fee will go up to \$12.00. No explanation has been given as to how the Program arrived at these new fees.

Finally, the Program gave stakeholders a state-by-state fee comparison to show that many other states have higher fees than Idaho. The only states with lower fees were Utah and Wyoming, but their fees were not provided in the analysis. It appears the purpose of this fee increase is to put Idaho more in line with what other states charge rather than address a specific need.

In conclusion, more information is needed to explain why the Program needs two new trucks, why the trucks cannot be repaired or financed over time, how the Program justifies the extent of the fee increase, and why the Program needs a surplus of \$189,000 each year. Without this information, the Idaho Farm Bureau Federation opposes this rule change.

Please feel free to contact Russ Hendricks, Braden Jensen, or DeLon Lee in our Boise office at 208-342-2688 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Bryan Searle". The signature is written in a cursive style with a large initial 'B'.

Bryan Searle, President

Idaho Farm Bureau Federation