



The Idaho Association of NOXIOUS WEED CONTROL SUPERINTENDENTS

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IDAPA 02.06.09 Strawman Comment – Noxious Weed Free Forage and Straw Fee Increase Proposal

To: Idaho State Department of Agriculture Rulemaking Administrators

From: IANWCS Executive Board

Background: The following information has been compiled to address the potential of raising the inspection fees for NWFFS inspections during the 2021 Negotiated Rulemaking Process.

During the initial ISDA rulemaking meeting on April 23rd, 2021, comments were made in support of raising the fees for performing NWFFS inspections.

The proposed amendment would be made to section 320 of the published strawman ruleset:

320. VOLUNTARY NOXIOUS WEED FREE FORAGE AND STRAW CERTIFICATION PROGRAM (beginning p. 25)

16. Certification Fees. A minimum of thirty dollars (\$30) per inspection will be charged for up to ten (10) acres, and three dollars (\$3) per acre thereafter, for fields up to ninety-nine (99) acres. Fields that are one-hundred (100) acres or larger in size, the fee is three dollars (\$3) per acre for the first one-hundred (100) acres and two dollars (\$2) per acre thereafter. The agent is authorized to assess a general fee of thirty dollars (\$30) per year to recover overhead costs. (p. 28)

A previously-distributed spreadsheet for increasing the fees has been circulated for review within the leadership of IANWCS and other NWFFS stakeholders.

Comments were gathered and are listed below:

PRO:

“I would support table 4 for the Weed Free Hay Fees.” - Alan Martinson Latah County Noxious Weed Control Superintendent

“George Hamilton does inspections for Fremont, Jefferson, Bonneville, Teton, Clark and Bingham Counties so we wanted his input. Table 4 would be what we would

recommend since this may not come up for several years again and it should cover for increasing costs.” – Mitch Whitmill Jefferson County Noxious Weed County Superintendent

“I would approve Table 4 as well except for the addition of the admin fee.” – Terry Ruby, Gooding County Noxious Weed Control Superintendent

“I am in support of the fees listed in Table 4, as there have been no increase to the fees in many years and we lose money on NWFFS inspections. Our minimum charge for performing work onsite in Ada County is \$55, and we charge \$73.50 per hour in labor. Many of the hay inspections we do are under 10 acres and result in a loss in revenue for the work performed.”– Adam Schroeder, Ada County Noxious Weed Control Superintendent

CON: None

COMMENT:

We respectfully request that the fee structure language in the proposed strawman be amended to reflect the following changes:

16. Certification Fees. A minimum of thirty dollars (\$30) per inspection will be charged for fields up to ten (10) acres, and three dollars (\$3) per acre thereafter, for fields up to ninety-nine (99) acres in size. Fields that are one-hundred (100) acres or larger in size, the fee is three dollars and fifty cents (\$3.50) per acre for the first one-hundred (100) acres and three dollars (\$3) per acre thereafter. Fields that are greater than one-hundred acres in size, the fee is three dollars and fifty cents (\$3.50) per acre for the first one-hundred (100) acres two dollars (\$2) per acre thereafter. The agent is authorized to assess a general fee of forty dollars (\$40) per year to recover overhead costs.

Please see the tables below for current fee vs. proposed fee details.

COST COMPARISON

ACRES INSPECTED	CURRENT FEES	ACRES INSPECTED	PROPOSED FEES
Up to 10 Ac	\$ 30.00	Up to 10 Ac	\$ 40.00
11 Ac - 99 Ac	\$3.00 / Ac		
		11 Ac - 50 Ac	\$3.50 / Ac
		51 Ac - 99 Ac	\$3.00 / Ac
More than 100 Ac	\$2.00 / Ac	More than 100 Ac	\$2.00 / Ac
GENERAL FEE	\$ 30.00	GENERAL FEE	\$ 40.00

EXAMPLES

10 ACRES OR LESS INSPECTED

CURRENT FEES		PROPOSED FEES	
Up to 10 Ac	\$ 30.00	Up to 10 Ac	\$ 40.00
GENERAL FEE	\$ 30.00	GENERAL FEE	\$ 40.00
TOTAL	\$ 60.00	TOTAL	\$ 80.00
		DIFFERENCE	\$ 20.00

25 ACRES INSPECTED

CURRENT FEES		PROPOSED FEES	
Up to 10 Ac	\$ 30.00	Up to 10 Ac	\$ 40.00
15 Ac @ \$3.00	\$ 45.00	15 Ac @ \$3.50	\$ 52.50
GENERAL FEE	\$ 30.00	GENERAL FEE	\$ 40.00
TOTAL	\$ 105.00	TOTAL	\$ 132.50
		DIFFERENCE	\$ 27.50

50 ACRES INSPECTED

CURRENT FEES		PROPOSED FEES	
Up to 10 Ac	\$ 30.00	Up to 10 Ac	\$ 40.00
40 Ac @ \$3.00	\$ 120.00	40 Ac @ \$3.50	\$ 140.00
ADMIN FEE	\$ 30.00	GENERAL FEE	\$ 40.00
TOTAL	\$ 180.00	TOTAL	\$ 220.00
		DIFFERENCE	\$ 40.00

99 ACRES INSPECTED

CURRENT FEES		PROPOSED FEES	
Up to 10 Ac	\$ 30.00	Up to 10 Ac	\$ 40.00
89 Ac @ \$3.00	\$ 267.00	40 Ac @ \$3.50	\$ 140.00
		49 Ac @ \$3.00	\$ 147.00
GENERAL FEE	\$ 30.00	GENERAL FEE	\$ 40.00
TOTAL	\$ 327.00	TOTAL	\$ 367.00
		DIFFERENCE	\$ 40.00

200 ACRES INSPECTED

CURRENT FEES		PROPOSED FEES	
Up to 10 Ac	\$ 30.00	Up to 10 Ac	\$ 40.00
89 Ac @ \$3.00	\$ 267.00	40 Ac @ \$3.50	\$ 140.00
101 Ac @ \$2.00	\$ 202.00	49 Ac @ \$3.00	\$ 147.00
		101 Ac @ \$2.00	\$ 202.00
GENERAL FEE	\$ 30.00	GENERAL FEE	\$ 40.00
TOTAL	\$ 529.00	TOTAL	\$ 569.00
		DIFFERENCE	\$ 40.00