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Sent: Monday, June 24, 2019 1:25 AM
To: DES SBCC <sbcc@des.wa.gov>
Cc: Lori Johnson WA Food Truck Assoc <lorij@wafoodtrucks.org>
Subject: Testimony on the adoption of the 2018 IFC

Hello. I understand that the SBCC has a hearing on July 12, and one of the topics will be the 2018 IFC code changes. As a result, I'd like to offer my insight regarding some of the code changes that will impact my business (mobile food service).

I am a small business owner, and my business is The Ultimate Melt food truck. We have been open since 2014, and we provide food service in several cities on the Eastside (across Lake Washington from Seattle). These cities include Bellevue, Redmond, Kirkland, Bothell, Woodinville, Issaquah, Sammamish, and others.

The 2018 IFC includes many new items that will impact mobile food service providers, including my food truck. These items have the ability to affect the flow/availability of my business, as well as increasing our financial liabilities, possibly to the level of creating financial hardships. These items include, but are not limited to, the following...

-- **Permits (IFC 319.2)** - it has been stated that every city can require their own fire permit for food trucks, each with its own fee (which each city determines on their own). As listed above, my truck operates in a minimum of 7 cities which could mean hundreds of dollars per city each year. (Seattle currently charges close to \$500 for its annual fire permit.) There is also nothing that states what these fees will be used for, which means this is most likely just another tax/revenue stream at the expense of small businesses. It would be far more appropriate to have one permit (with a single suitable fee) which has reciprocity across all cities in Washington.

-- **Fuel-supply piping (IFC 319.5)** - if this requires our food truck (and all food trucks) to go back through the L&I approval process to verify that this standard has been met, that implies the potential to shut trucks down until this is done, thereby creating immediate and devastating hardships to these small businesses, many of which will be unable to recover from. It should be noted that all food trucks in Washington have already been required to obtain L&I approval before they could open for business, and often times L&I is backed up around 8 weeks for approval inspections on new trucks. If 319.5 requires an additional approval process with L&I, the timeline for having this done is unfathomable. Plus undoubtedly there will also be a fee that food trucks will need to pay to get this approval done, even though we've all already paid for our original L&I inspection.

-- **Exhaust System (IFC 319.10.1)** - requiring hood cleaning every 6 months is largely superfluous for the majority of food trucks (including mine). Unlike restaurants which are generally open for business a minimum of 10 hours a day and 6-7 days a week, my food truck is open around 3 hours a day and 5-6 days a week (subject to variances as a result of seasonality). So for the sake of comparison, a restaurant is most likely open a minimum of 60 hours per week vs 15 hours per week for my truck. So having the same 6-month frequency for a hood cleaning for our

truck as well as for restaurants seems inappropriate given the inequality between the two (I believe every 12 months would be much more appropriate for us), especially given the hundreds of dollars that we'd have to pay twice a year (typically a hood cleaning for us costs about \$500).

-- **Fuel gas systems (IFC 319.10.3)** - this annual inspection by an approved inspection agency has numerous challenges attached to it. First of all there is no official list of approved inspection agencies that does this in Washington. Secondly this will require an annual fee which could be in the hundreds of dollars each year, which will have a significant impact on these small businesses. Third, why is yet another inspection required, when this should already be taken care of via the fire permit process (which should have it's own inspection to justify the associated fee we're paying for that)?

If you total up just these four items (which doesn't include any other new parts of the 2018 IFC that will also apply to food trucks), this is a substantial financial and time impact these small businesses will be facing, in many cases causing undue burdens which cannot be overcome.

As a result, I'd appreciate your time and attention on how to minimize these issues so that the mobile food service businesses can focus on serving customers and not on being taxed to death.

Thank you, and please let me know if you have any questions I can assist with.

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