

**Proposed Amendments to the 2015 Standards of Performance for New
Residential Wood Heaters, Hydronic Heaters and Forced-Air Furnaces
EPA Public Hearing
June 8, 2020
Written Comments from Richard Hoffman – Chairman
Hearth, Patio & Barbecue Association Board of Directors**

Good afternoon and thank you for the opportunity to speak.

I am located in Western North Carolina, a short drive to adjacent states of Virginia, Tennessee, & Georgia, all being a wood burning region.

I am a small business owner, with 24 years as a hearth retailer and industry participant. I have been a HPBA member and a regional affiliate member for over 20 years, and in the recent 5 years on the HPBA Board of Directors. In March of this year I was elected the HPBA Chairman.

I want to speak from a retailer's perspective in favor of the extension of sell through of the affected appliances in the proposed amendment due to the impact Covid 19. In November 2019 we sold the retail portion of our business, but I remain active in the industry.

I am like many other retailers in the industry, I prepared for this deadline. When we transitioned to the new owner the operation of the store, and an inventory of affected units which was less than 6. Getting to that number was a bumpy road. Selling wood heaters from as early as the fall of 2018 was very challenging. Many consumers came to our store with some knowledge, mostly misinformation that step 1 stoves were not desirable and thought to dirty burning. Yet some of our units already met the grams per hour requirements but were only in the process of being recertified. We educated those consumers and discounted the units as possible to move them. Some inventory remained for the next season.

Purchasing for the next season became an obstacle with carry over stoves to be adjusted for as I projected how to make buying decisions. Deciding the allocation of funds to the mix of available stoves was painful. Our product line up represented four different manufacturers. Some of them had transitioned well with the majority of their line now certified to the new standard, others had not been as thorough with only two to four units available. To be prepared for May 15, 2020, we aggressively discounted and promoted the non-compliant units. Our fall season was very difficult.

I am happy to report that the new owner continued that effort, and only had one unit as of the first of March. Other retailers are not as successful!

The Covid 19 pandemic brought on the closure of retail hearth stores across the nation for as much as ninety days. Consumers are not yet returning to retail hearth stores! Having the last sixty days of the selling season lost to Covid 19 is financially devastating to the stores with these new and viable step 1 units.

As was said earlier, there is a fear that exists by retailers with step 1 units to speak up and be identified. I want to be their voice. I ask for approval of the proposed amendment to allow RETAILERS with step 1 units to have those last sixty days of selling taken away by Covid 19 pandemic and distribution.

Thank you for the opportunity to speak and share a RETAILER'S perspective.