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March 24, 2020

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Re: Request for emergency extension of Step 1 sell-through due to COVID-19 crisis

The Hearth, Patio & Barbecue Association (HPBA) writes to you today requesting emergency relief for an industry that is in dire straights during these uncertain times. EPA made the decision not to grant any sell-through relief for any appliances regulated by the Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces. (RIN 2060-AU00) HPBA disagrees with the assertion in the Final Rule that “statements from manufacturers and retailers asserting economic harm from stranded inventory if a retail sell-through was not allowed ... were not supported by contextual data.” Even though data was provided prior to the February 12, 2019 close of the comment period, it was difficult for industry to accurately estimate the impacts of the May 15, 2020 deadline at that time – 15 months and a more than a full selling season prior to the prohibition on sale of Step 1 appliances.

Retailers of wood and pellet stoves and other wood heating products have been hard at work over the past few years trying to sell all remaining products that do not meet the Step 2 requirements. During a normal year, retailers would use the early spring timeframe to sell those Step 1 stoves that they could not sell during the heating season. With the COVID-19 outbreak, everything has changed.

Business has come to a complete standstill for small retailers across the United States. A growing number of states have ordered or advised any “non-essential” businesses to close their doors. Any hope of selling those remaining Step 1 stoves has been crushed under the weight of public efforts to stem the spread of COVID-19. February through April can be a busy time for retailers, many of whom offer steep discounts (particularly this year), as price-conscious consumers look for deals at the end of the season.


Even in states where dealers can remain open, the impacts of closures, public health and safety warnings, and a terrified public have had devastating consequences for hearth retailers. Not only have sales come to a complete standstill, but some products that have already been sold have been returned or sales cancelled because customers don't want installers in their home during quarantine, or installers are unable to get to a home because of a community lockdown.

HPBA surveyed our retailer and distributor members. Within 72 hours, we received responses from 183 retailers (employing more than 500 people), identifying almost \$4 million in product will be stranded with the denial of any sell-through beyond May 15, 2020. In addition, some of our members supply major home center chains, and report that over \$10 million worth of product will not sell in time and must be repurchased. This may even call into question the continued existence of these small manufacturers. It is worth noting that these manufacturing companies are in rural areas. Compared to the relief packages being considered by Congress, these figures may not appear to be much, but for small businesses in mostly rural areas, the loss of jobs will be a significant shock to the local economies.

We ask for an extension of the retail sell-by date for Step 1 product to December 31, 2020 to give retailers time to sell their soon-to-be stranded products. Without this relief, especially in combination with impacts all small businesses are facing at this time due to COVID-19, numerous stores will close permanently.

Following this letter is feedback we received from small retailers and distributors in just a few days last week.

Thank you for your consideration,

A handwritten signature in black ink that reads "Jack W. Goldman". The signature is written in a cursive style with a large initial "J" and "G".

Jack Goldman
President & CEO
Hearth, Patio & Barbecue Association

What plans or sales have been disrupted and what is happening in communities?

Below is the feedback we received from retailers and distributors, organized by state. We have removed any information that could identify individual businesses as many are fearful of being targeted for future enforcement action.

Alabama

- “Our showroom has been completely empty since Thursday March 12, 2020. Our outside sales/ inspections are not having any immediate sales due to the Corona Virus outbreak as everyone has decided to wait and see what is going to happen with their jobs and the stock market.”

Alaska

- “The vast majority of our sells takes place in 4 months: Aug, Sept, Oct, Nov. We survive on repairs and chimney sweeps most of the year. As of Jan 1st till today, March 19th, we've sold 2 stoves. The installation cannot take place till May. We've ran full page advertising sale on stoves and deals on spring installation. However it is difficult to sells stoves when we cannot install them for months due to Alaska's harsh weather condition.”

Arkansas

- “Even with social media posts, clearance signage, and use of online sales sites, now that COVID-19 represents a very real potential to many, our showroom has gone from several people a day to several a week. A majority of all sales in the last week and a half have been people getting their last few bags of pellets for the season. At a time where people are worried school and business closing, or about stores being able to stock commodities; our ability to sell through our remaining Phase I stoves has dwindled to almost nothing. This is a small, family owned business. Loss of revenue from COVID-19 coupled with the loss of capital by us scraping our remaining stoves will be financially devastating to our business.

I am the lone salesman for this store. Up until the last year or so, we have used family members to help with sales during the off season. As a husband and father of three, I have a family that is depending on me for this job. The current climate certainly lends itself to the real possibility of me losing my job, and my ability to take care of my family. I imagine many others in the industry have similar stories.”

California

- “We have closed the store to customers but remain inside to answer phones and receive deliveries. 2 people are working from home. Our installers are limiting their installations for now. Anticipate sales will be down at least 30% or more.”
- “We are one of the oldest hearth dealers in California, established in 1960. The COVID-19 virus has certainly affected our foot traffic at our retail location. With only 6 employees, we try to take of any “early buy” purchasing options we can; the current crisis, coupled with the

Northern California fires over the last few years, has left us with an overstock of wood-burning products. People aren't out currently, and the fires created a general sensitivity to wood-fired appliances. We normally sell anywhere from 20-30 wood-burning appliances annually, and another 40+ pellet appliances. 2020 has not followed any trend I've seen in the 30+ years I've been in the trade.

It is my belief that many small retailers, like us, will suffer at the end of this. Manufacturers consider those units bought and paid for. They will be our 'boat anchors' come May."

- "Foot traffic is way down due to the hysteria surrounding COVID-19 which makes it difficult to sell through the step one units."
- "The impact of coronavirus will impact the hearth industry significantly. The risk of 7 grams of particulate versus 2 grams per hour is minuscule compared to the economic impact. Please consider and vote showing mercy."
- "We were anticipating having a large sale in April, but I am unsure if we will be able to. We may have to close our doors, because my office employees are getting concerned about coming into work. We are taking as many precautions as we can, but if the virus progresses we could be left with a lot of step 1 products."
- "I cut staff to 3."
- "Just showing my concerns with the deadline for sell through on the non 2020 compliant stoves. We employ about 53 employees. We have been in business for over 50 years. It seems that having a cut and dried time frame for selling out of a non-compliant stove is a little over the top. Now with the COVID-19 closures going on and cancelling of events I am not sure how some businesses will survive let alone trying to sell out of a non-compliant stoves (without little to no profit at this point with the deadline coming up). We rely on two big events with lots of exposure to show and sell our product each year and they have both been canceled. A Home Show and a City wide event called Cool April Nights. Our business is very much influenced by weather and we had a record of 0" of rain for February and 80 degree temps, which has not helped in selling heating products. With all of that said please push for an extension on the non-compliant deadline."

Colorado

- "All plans and sales have been disrupted. Down 60%"
- "Prior customer interest has been put on hold due to financial uncertainty"

Connecticut

- "Coronavirus has stopped our floor traffic to sell the last remaining stoves in stock."
- "Winter Savings Sale - lack of traffic, not able to get people into our showrooms based on the Coronavirus."

- “Both the number of customer visits and purchasing have evaporated because the shoppers have been refocused on basics like toilet paper and being told they should shelter in place or limit shopping and gathering activities. Further, the economic impact to furloughed employees diminishes their spending and we now have the largest employers, the casinos, shuttered. We have instructed our advertising media to cut our ad spend in half as a result. The virus has also crippled world markets including oil prices in an added wound to the prospects of sales.”
- “Now, more than ever, with the coronavirus effecting all of our daily wellbeing this EPA change out has us on the brink of shut down. We have 17 units left to move out. The price markdowns are drastic. But the city is a ghost town as no one ventures out of their home. Hard to make sales when we are told to stay home. Businesses are struggling and some won't make it. People will lose their jobs and many already have. Many are sick, will get sick, or worse. And right now, many are feeling isolated. The EPA should step in line with other government agencies in the attempt of trying to help in these difficult times, not create more hardships. And we would gladly trade all 17 wood stoves for 17 respirators and give them to people who really need help. Stay healthy. Be safe.”

Delaware

- “Due to Governor mandates in our state we have canceled our large end of season event, and are experiencing much lower than normal floor traffic.”

Georgia

- “We have already discounted the remaining product by 50% and posted for sale/promotion on all of our electronic media venues. We have signage indicating clearance/moving sale outside the store and have email-blasted our entire client list. With the current state of affairs our store traffic has dropped to almost zero.”
- “We have had our store traffic drop by 95% in the last week. Our sales are off the same amount on a week to week basis and it does not look good to improve any time soon. I am not sure what to do at this point but to wait it out. It does not look good.” (Georgia and North Carolina locations)

Illinois

- “We were in the process of a close out sale that we were advertising in the local magazines, papers & electronic media. We have 4 full time employees that are being affected by the current shut down. At present we have less than 1 customer per day coming into our stores where we would normally have a least a couple dozen.”
- “Showroom traffic is very minimal due to coronavirus state mandated rules. Cannot sell product if no one can see to purchase. In home service is limited to emergency only to minimize exposure to our service team, so no installations can happen. Homeowner addition purchases are being cancelled due to uncertainty of income.”

- “All upcoming weekend sales events officially cancelled through at least end of April - Local building economy just dropped off a cliff - We are confident that without actually paying people to take these stoves off of our hands, there is no way in this world we will be rid of them in time.”
- “Covid 19 Disrupted Commercial traffic to our store, which will make selling stage 1 inventory harder by deadline.”
- “Our advertising on radio, TV, and newspaper has been suspended; on-line advertising continues, although it now focuses more on items for delivery/pick-up rather than installed products.”
- “COVID-19 has really made our customers uncertain about spending money right now.”
- “All office, installation, and support staff have been reduced to 24 hour work weeks in an attempt to give everyone enough income to make ends meet without using earned PTO time. Retail floor traffic and sales have dropped to almost nothing and installations are difficult to get scheduled with the concerns.” (Illinois and Wisconsin locations)
- “We have cut our hours in half as people have called and cancelled appointments. We are putting 2 of the full time employees on Unemployment.”

Indiana

- “We are a one store business that has been open for over 50 years. We have scaled back our operation and we will probably close for at least two weeks because of the coronavirus.”
- “We have had to shut down completely in the last two weeks because we have had 6 cases of the Coronavirus in our area.”

Iowa

- “All these Step 1 stoves/inserts are reduced at least 25% below what we paid for them. I have only been able to sell one in the last 8 weeks. I have used radio advertising and social media boosted to a 50 miles radius to sell these items. The coronavirus is causing panic in the marketplace and no one is walking through our doors. We are hoping social media will help but right now people are holding on to their money for necessities only. Unless we are allowed to sell through longer, we don't know what to do with the inventory that we have. Our history is alternative fuel and we have slowly moved more into the gas and electric market since LP gas has remained low. We have continued to follow EPA guidelines and change our wood/pellet inventory accordingly.

We are in a rural area of Iowa where many people still want to burn wood or pellets so offering gas and electric only puts a strain on our business. To maintain our business here wood stoves are a must with pellet stoves a secondary option for those customers. We need to be able to sell our old inventory so we can get 2020 certified stoves and insert. The pandemic is adding factor that will surely make it difficult for us to survive.”

- “We are currently running advertisements with discounted pricing on our 2 remaining stoves.”
- “I have zero foot traffic and with the markets in freefall and MANY local businesses closed and employees not working it will be quite a feat to sell my remaining product.”

Kentucky

- “Roughly 5 sales of existing step 1 products have been canceled or postponed. Overall sales for March (MTD) are 18% lower than March (MTD) 2019.”
- “We are not able to do sales promotions, like Winter Clearance Sales due to the COVID-19 outbreak due to people having to stay in. Store traffic has been reduced drastically and the consumer for wood has not had the opportunity to come in.”

Maine

- “Two locations. Had to suspend current "winter clearance event" sale and take ads off the radio - not sure if we can remain open for enough hours to sell through these stoves.”
- “There is no economic activity. We have two service calls for next week. This week, we have a full schedule, about 25 service calls. No one coming into the store. No phone calls. About \$15,000 to be lost. 2 weeks worth of payroll. Maybe a bit more. We might have a couple of them sold but the deals not done yet and everybody is spooked.”
- “While we have worked hard and had sales to successfully move out most of our soon to be obsolete product but the remaining product are ones which fit a limited number of niches and, even with substantial discounts being offered, require time to find the right customer.”
- “Today we have locked our front doors to protect our employees and customers and hopefully the country from any further spread of COVID-19. If our small contribution can help flatten the curve and save lives we are all in. We will do our best to keep our 8 employees as long as it takes, but at some point with our doors shuttered we may have to shut down. We still have 26 non 2020 stoves to sell. We have reduced prices and have been moving them until now. I am confident an extension on the sell thru deadline would allow us to move out the remaining product once we can re-open. Our business has been here since 1974, and will get thru this. PLEASE GIVE US THIS EXTENSION.”
- “Due to coronavirus, consumers have stop coming in. We need help. Mandate, like all business, it is putting us and employees out of work, please help us. p.s. we have 50 stove and fireplaces that must be sold. Do the right thing, thank you.”
- “As a 40 year old established small mom- pop business, our challenges are to complete these pre 2020 sales timely, in an environment where customers are urged to stay home, compounded by self limiting our exposure in the business as owners due to our age ..all the while working to accommodate employees with unexpected child care responsibilities as schools are now closed for a month. Our son, our key salesman and single parent, is now working remotely at home while caring and online schooling his twins as he is

uncomfortable with the risk of the grandparent child care option. Our other key employee is a veteran army reservist who I hope is allowed to stay with us through this all. Today our governor urged non essential businesses to close for 2 weeks however we remain open at this time as we have incoming freight. Store traffic is non existent everywhere i am told. Certainly in our shop. All sit down restaurants were ordered closed as of 8:00 tonight. We are 4 employees and have service sub contractors who depend on our sales for a portion of their income.”

Maryland

- “Our showroom foot traffic has been dramatically reduced due to COVID-19, keeping people from seeing the inventory we have for sale.”
- “We have reduced the price of the stoves to cost and have no one interested because no one is shopping. I may be forced to start giving a bag of toilet paper with every stove purchase.”
- “We had our end of burn season sale February 26th through March 8th and we were approximately 30% down from last year’s sale.”
- “How many Step 1 stoves do you have? Approximately 50 Units (Currently Unsold) ... However we added 2 Units yesterday because customers canceled sales stating that they did not want to move forward due to the concerns over the Coronavirus. Both issues were money, job loss concerns and did not want installers in the home. This number could easily rise to 75 Units (25) Units sold but not installed) with potential cancellations. In addition to the obvious loss of inventory, I have a marketing and advertising push for “Year End Clearance Sale” that was planned to start next week with an outlay of over \$20,000 over two weeks. This plan was developed months ago to clear out remaining non – compliant units. The biggest issue for all dealers has been the record breaking warmth this winter that has dramatically impacted demand. Either way I had a big blow out planned for next couple of weeks to clear things out.” (Maryland and New Jersey locations)

Massachusetts

- “Our spring sales are effectively cancelled because no one is leaving their homes. We are also concerned because there is an expectation that Massachusetts may impose a shelter-in-place order similar to San Francisco to deter spread of the virus.”
- “We can’t afford to take a loss like this. We are a wholesale distributor. About a third of the stoves were purchased in 2014-2015 before that new standard came out. These were still current models in 2019. The wood stove market has been soft the last few years, that’s why we still have so many stoves left. We have 6 employees. We have offered them to our customers at our cost for the last several months, again the soft market didn’t do much to help move the inventory.”
- “We are closed for the next two weeks, at least. We plan to make sure every one of our 8 employees is paid during this pandemic. Our local homeshow was scheduled for the third week of March and has now been cancelled. Our hope was this would be our final push to get rid of the remaining non 2020 stoves. We currently have 20 stoves that we were hoping to

sell through by the May deadline. This pandemic is having a HUGE impact on our ability to do so. I am hoping the EPA can see their way clear to giving us the same compassion that we are giving our customers and employees during this unfortunate time. We totalled the value of the remaining 20 and wholesale cost would be about \$30,535. That's huge loss for a small business like ours."

- "We have very little traffic coming through the doors due to the current situation."
- "We have 8 employees and are no longer doing installs or service in people's homes until further notice. We have no one coming into the shop except to purchase a few bags of pellets or propane. We are discussing closing for the next few weeks to see what happens and trying to keep our staff protected."
- "Our current End-of-Season Spring Clearance sale is doing nothing (people are at grocery stores in anticipation of any area lockdowns."
- "With this current virus there has been almost no traffic shopping in our place of business. We don't see ourselves selling them before the deadline."
- "We had planned on holding a "tent sale" this spring but had to cancel due to Covid-19." (Massachusetts and Rhode Island locations)
- "I am closing the storefront a couple weeks. Hopefully we can find a way to get rid of them or write them off."
- "Cut back on hours, not doing routine service calls, only service calls for out-of-service problems as well as installations already scheduled. Taking extreme caution educating employees, in store posting signs for keeping six-foot distances, washing hands, cleaning all surfaces, asking customers if they have illness in the home. We are open, but are seeing very little traffic in the store. Trying to keep paychecks paid, but if necessary, we will have to lay off."
- "We are closing for at least one month."

Michigan

- "SPRING SALES EVENT THAT USUALLY DRAWS 100+ PEOPLE WAS CANCELED TO MAINTAIN SOCIAL DISTANCE."
- "We have 2 stores with a total of 16 employees. Since this started we have NO traffic. If they don't allow any sell through this could severely hurt our business and all involved. Please pass this on to whoever might be able to help."
- "At this time we are seeing much reduced store traffic do to the Virus situation. I believe this will have a big impact on our ability to move these stoves by the current deadline. To be stuck with these units we would have a loss of at least 25,000.00 dollars. That amounts to 4-5 weeks payroll."

- “Walk in's - Like a Ghost town.”
- “We have 17 Step 1 stoves left to sell. We have averaged 87 total stoves sold throughout the last 2 years. We normally run a layaway sale through April 15th, and part the final step of our step 1 close out included our advertisement during that sale that includes clearance prices on our step 1 stoves that is just now below cost for final liquidation. People are getting the message to stay home and not shop (restaurants in MI are closed except for takeout) and this will disrupt our final step of our closeout plan.”
- “Since the outbreak the showroom traffic has dropped off over 80%. Some people are putting off repairs and running electric heaters instead of having a tech come into the home. Lot's of people are worried and not letting us in to work.”
- “It is still unknown as to if we are to close the store, but there is virtually no traffic. We have reduced hours.”
- “Major sale of Step 1 product clearance has been disrupted.”
- “Since the scare of the virus we have been open with limited people working. 5 working, 6 people laid off. I highly doubt we will be able to move these stoves with the problems we are facing in the next months. We are getting very few calls for emergencies and next to no customers coming in to the store. We sold some wood pellets Thursday that was about all we had for business. It has been a very warm winter here so it had already slowed a bit before the virus hit, now business is about stopped completely.”

Minnesota

- “We have been forced to limit store hours which limits our ability to sell these step one stoves. Depending on the progress we are likely going to have to limit hours worked. The fear caused by COVID-19 has slowed store traffic a great deal. With the money on the above step 1 stoves already invested in the product, an allowed sell through period would greatly help our bottom line, more importantly keep our current staff fully employed.”
- “Shortened hours due to the virus outbreak, customer traffic has slowed WAY down. Like most within the last 12 hours we have reduced hours going forward and will likely be cutting staff by the end of next week.”
- “Had our local home show last weekend and attendance was lacking. Customers have cancelled estimates/previews as they do not want anybody in the home.”
- “Traffic is way off - and our bbq demos are cancelled.”
- “All of our plans for 2020 are disrupted at this point. (in prediction we will lose \$400k-\$500k per month at the current rate. If the government shuts down business, we will lose \$650k per month).”
- “Our largest show of the year, Arrowhead Home and builder show, has been cancelled. Last year this show produced six percent of our gross sales for the year. Foot traffic in the store

has stopped. We have furloughed one service tech and reduced hours for the office staff, and plan to reduce additional staff hours in the following weeks.”

Missouri

- “While I have been able to sell 3 in stock Phase 1 units over the past 2-3 months, Covid-19 has brought our entire company to almost a screeching halt. While I had a plan of action to try to offload these units, in the wake of this virus outbreak, I will most likely end up eating these units as bad debt should the May 15 deadline remain intact. We have been blowing these out at cost for months but now the season is over and very doubtful these will sell. Business has been disrupted dramatically since the virus outbreak and seems it will get worse.”
- “We have had zero foot traffic and the phone calls have slowed down dramatically.”
- “Planned on holding an End of season sale/ Foot Traffic has been bad.”
- “Our floor traffic has gotten almost flat at this time! We need more time to sell!! Please help!”

New Hampshire

- “What plans/sales have been disrupted: Slower foot traffic, slower than normal sales, people not spending, just waiting to see what's going to happen.”
- “No sales events have been interrupted currently but I imagine it will as door swings have declined significantly in the passing weeks, and continue to decline as the days roll on. In addition, clients are postponing technicians and installers coming into their homes. Even as a sales guy I have already had 2 site inspections cancel this week as people are concerned for their health and safety (which is understandable). Sales will continue to slow. Sales, and sales events will be impacted over the next several weeks/months. The hardest part about this is that no one buys wood stoves on May 14th... these next few weeks into early April will be a lot of hearth dealers best shot at getting rid of their 2019 inventory, and the next few weeks will likely be some of the most impacted times by this virus.”
- “Last Summer we ceased purchasing any Step 1 models that had comparable Step 2 alternatives available, but several of our manufacturers didn't have Step 2 alternatives ready until just a few months ago (some still aren't ready.) Each year we have a large "Spring Cleaning Sale" promotion in March where we clear out previous year inventory, and this year we marked down Step 1 models to our cost (meaning no profit) to make sure they clear out. Normally we would easily clear out as many units as we have left during the annual promotion, and in the first few days we were off to a good start, but with the current National Emergency our store traffic is now almost zero and our customer base is being financially impacted in ways that make them unlikely to be able to purchase a stove before the May 15th deadline.”
- “Our late winter early spring step 1 spring sell off sale has been affected by the Coronavirus repercussions. Mainly the Federal and State Governments advisories/recommendations to

utilize social distancing, stay away from places where 10 or more people gather (NH) and the public's general fear have slowed our business to a crawl at this point in time. Our plans are to wait and see the economic impact and evaluate conditions on a daily basis."

- "We are remaining open at this time but each day we see a big drop in walk-ins as well as phone calls. Honestly, this is our historic slow period anyway but it certainly feels more ominous than usual and I don't anticipate it getting better in the next six weeks or more. We felt confident that we could easily sell the remaining stoves prior to this outbreak but again, now it is unclear. In fact, I am wondering how many current contracts/sales orders will be cancelled from our clients because of the overall uncertainty of this ongoing crisis."
- "We've had several jobs cancel due to people not wanting service techs in their home. We also had 2 restaurant jobs cancel due the cash flow issues with restaurants and bars being closed. The phones just aren't ringing and there hasn't been foot traffic in the store due to the "social distancing" requirement. We have 5 Step 1 stoves left. Our entire showroom was changed over during the peak season but these is inventory that just hasn't sold. Our sales were primarily pellet and gas this year with limited wood sales. This is strange for us, our market is usually the opposite."
- "Business has been slow this past year and now it is DEAD! No one is coming through the door in spite of print and radio ads. And signage out front. Discounts are not bringing in the customers, either."

We are a small "mom & pop" shop with one, sometimes two additional employees with only one location. We are going to take a huge hit if we cannot sell through the Step 1 stoves. The emissions of the stoves we have in stock are very low as it is, and would not make any measurable impact on the environment if they were to be sold. It is really sad that a committee of few have dug their feet in the sand to affect thousands, just because they can."

- "Our sales right now are ... non-existent."

New Jersey

- "How many Step 1 stoves do you have? Approximately 50 Units (Currently Unsold) However we added 2 Units yesterday because customers canceled sales stating that they did not want to move forward due to the concerns over the Coronavirus. Both issues were money, job loss concerns and did not want installers in the home. This number could easily rise to 75 Units (25) Units sold but not installed) with potential cancellations. In addition to the obvious loss of inventory. I have a marketing and advertising push for "Year End Clearance Sale" that was planned to start next week with an outlay of over \$20,000 over two weeks. This plan was developed months ago to clear out remaining non-compliant units. The biggest issue for all dealers has been the record breaking warmth this winter that has dramatically impacted demand. Either way I had a big blow out planned for next couple of weeks to clear things out." (Maryland and New Jersey locations)
- "Currently 50% off sale, no traffic at this time. Warren County, NJ and surrounding areas have minimal virus outbreaks, but no foot traffic on Saturday which is our best day. Customers are staying home."

- “Store closed due to virus, no traffic, no sales. Approx \$27,000 loss between units, venting, labor.”
- “We had planned a very aggressive marketing plan to sell them off prior to the May 15, 2020 deadline, however with the current Covid-19 issue myself and my twelve employees are respecting the request to quarantine making it unlikely that these stoves will find new homes any time soon.”

Nevada

- “We have had to shut down Saturdays so far and may eventually shut down temporarily.”

New York

- “Since the Coronavirus outbreak, the phone is barely ringing, and little to no customers visiting our store.”
- “We are seeing reduced store traffic, but everything is changing by the hour.”
- “Showroom closed for two weeks.”
- “Money, and often their investments in "display stoves" comes out of their own pockets. Preventing these dealers from selling off these perfectly good stoves is hurtful and damaging to the industry! All the stoves that meet the 2015 standards already burn close to the 2020 standards, so extending these sales will NOT do any harm to the environment! BUT, it will negatively affect all the small businesses that still have some remaining stock.”
- “We have seen sales on these units stop over the past 2-3 weeks with concerns in the world with the virus and economy. We’ve had several orders for non-2020 units canceled by dealers due to their customers canceling or postponing jobs due to financial concerns. The customers are saying they still want the units, but are concerned with their current financial situation and are asking to have the units installed later in 2020. We offered these dealers great discounts on product to help move inventory through, of which the dealers sold the product at equal discounts. If the customers wait until after May 15th, 2020 they will not be able to purchase these units that they had already intended to buy and will most likely back up of any purchase. The recent events is going to cause hardship.”
- “Although this is normally our slow season, our in store sales have dropped to zero. All of our customers have stopped spending money on anything that is not a necessity. Within the next week or so we will have to make the decision on if we will have to close entirely. This will hurt our more vulnerable customers as they will still need stove repairs, and pellets for their heat.”
- “Unfortunately, we started seeing uncertainty in the market and an end to the selling season much earlier than we have in recent years due to the COVID-19 crisis. We have had little to no activity at the store for going on weeks. This week, we are closed to the public, and

employees will be filing for unemployment. Due to financial market conditions and volatility, I don't think it's possible to vacate the remaining models without doing so at a great loss."

North Carolina

- "We have 6 employees and have recently invested \$10,000 in an ad campaign as an attempt to sell them just before COVID-19 struck. Traffic has stopped."
- "We've had zero walk in traffic since Monday and jobs that were currently on the schedule are being canceled by the homeowners out of fear."
- "Business nearly halted...much shutdown ...opportunity to sell these dwindling by the minute. Projects on back burner for most people. Question even keeping showroom open."
- "Floor traffic is dead, may have to lay off installers."
- "We have had our store traffic drop by 95% in the last week. Our sales are off the same amount on a week to week basis and it does not look good to improve any time soon. I am not sure what to do at this point but to wait it out. It does not look good on selling those six stove though." (North Carolina and Georgia locations)
- "We have closed our doors to the public and are doing our best to give our six employees hours in the morning, cleaning , repairing thins at the store and out doing some on site projects which haven't been finished while waiting for parts and shipments."

North Dakota

- "We have zero walk in traffic at this time, only people that we have been working on getting a project going for before the Covid-19 virus. Hopefully we have a little extra time to get rid of the units or we must eat the money spent on inventory of them, zero profit...cost of advertising is gone also then."

Ohio

- "We are a small business the impact from people scared to get out, let alone short window to sell in, we cannot absorb the cost don't know if we can stay in business."
- "Due to the adverse issues going on I will be forced to lay off 2 of my employees at the end of March until business picks back up. What plans/sales have been disrupted - Installing new units and building improvements have been halted dot the sudden stoppage of sales since this outbreak. I typically sell 2 to 3 stoves a week and during the spring time sell 8 to 10 gas grills a week. Over the last 2 weeks I have sold 0 of both products."
- "The store traffic has gone from very heavy this time of year. To just about nobody. The stoves that people do want to buy don't want us to deliver until this virus passes over. Which is good thinking and I don't want to send my guys out either. So to sum this up. We need this deadline extended or my company whom is already losing sales will have to take another loss in May. Thank you for listening."

- “We have two sales set up. One is being impacted from the virus, the other was not successful due to warm weather.”
- “Customer traffic is much lower as compared to previous years at this time. Coming out of the winter season, it will be difficult to move the wood burning product before the deadline.”
- “Everything is shut down – people are scared both to shop in stores for fear of catching something and to make large purchases for fear of the economy not recovering any time soon. Traffic and sales are way down as a result with no idea of when things will go back to normal.”
- “We have our hours the same but no traffic. The phones are dead, the media is saying to stay home except for nonessential business. Most people don’t feel a wood or pellet stove/insert is essential particularly since we are looking at spring and it’s been a very mild winter. Demand is way down. The virus restrictions are killing the little there has been.”

Oklahoma

- “Big ad campaign started 3 weeks ago and is not bringing in customers...First week was good but last 2 have been zero.”

Oregon

- “We are located on border of Washington State a National Hot Bed for Covid19. The state of Wa. and Or. have instructed everyone to limit there leaving home only for essential items which has literally halted floor traffic regardless of T.V. advertising stating we are open for business. We are now out of Woodstove Season which makes it near impossible to move these stoves.”
- “Plans and sales have been disrupted with the impact of the coronavirus and we strongly urge the EPA to extend the sell-through date for these stoves. We currently have two install technicians out sick and are under quarantine. With a small business and under staffed, we are having a difficult time selling our inventory because of the extended wait times.”
- “Store traffic for new products is practically nonexistent, which is highly unusual for this time of year. Store hours will be cut back by 55% starting next week for 30-45 days, then be re-evaluated. We have not yet laid off any employees, but hourly workers will have hours cut back to 25 hours.”

Pennsylvania

- “Both our retail stores are closed to the public because of corona virus. PA State “strongly recommends” so we are complying.”
- “We are willing to dispose of all of these units at or below cost. Perfect storm conditions: seasonal slowdown, mild weather, very low heating oil prices, stock market crash,

impending recession. It is highly unlikely that we will see any buyers between now and May 15.”

- “We started a sale at the beginning of the month that we are calling March Mania End of Season Clearance and just as the advertising kicked in and we were starting to get some traction this coronavirus shutdown hit (Pennsylvania’s governor has ordered a shutdown of non-essential businesses). We weren’t waiting until now to sell them off; this is the third iteration of the sale, we had Holiday and New Years’ versions previously, increasing the discount each time. Given the extraordinary nature of this pandemic I don’t think some relief is coming out of left field here.”
- “Home shows have been canceled, customers staying home, people fearful of economic downturn holding off on making big purchases.”
- “About 3 sales of woods stoves have been disrupted as of today. Plans we had to mark down them down further and advertise in the paper we typically do as well as online.”
- “Closed for 14 days due to order by Governor Tom Wolf. And urged by President Trump. We are a high risk household with 2 kids who have Crohns Disease and my husband/owner who has diabetes.”
- “Obviously the Coronavirus had slowed down retail traffic into our store. Despite the state of PA recommending most businesses close we have maintained normal hours so far. But given how the media scarred the general consumer people are not traveling so of course our retail volume is down. An extension of the 2020 May deadline would of course be helpful to not only our store but to most Hearth Dealers in general...Everyone is in the same boat.”
- “As of March 6, 2020: *NO SALES; *NO CUSTOMERS INTO OUR STORE; *Stove Sales have been disrupted/non existent and waiting to hear whats the next step our company needs to take.”
- “As of Tuesday when Governor closed non-essential retail establishments, we laid off 3 FT positions.). What plans/sales have been disrupted: Showroom has had little foot-traffic as the COVID-10 Pandemic started to spread. We have historically moved over 30 units in March. (This year, while only the 18th we have moved 3...there is no way our sales volume will increase as only more restrictions are on the horizon.”
- “Sales have slowed down quite a bit this week.”
- “To make things worse we have lost our only chimney sweep crew and 2 install crews do to the COVID 19 Virus. We have 1 location and usually 25 employees. At this moment we have lost 7 employees for one reason or another due to this virus. We will most likely not meet the deadline for clearance of last year’s E.P.A. Appliances. We have been trying to clear product out around cost the last 7 months. But it hasn't been as successful as we hoped with the warm winter.”

- “We were supposed to have a clearance sale to move the remainder of the phase 1 units but have had to delay the sale due to the present health crisis.”

Rhode Island

- “We had planned on holding a “tent sale” this spring but had to cancel due to Covid-19.” (Rhode Island and Massachusetts locations)

South Dakota

- “As of 3/18/20 traffic is low due to the Virus.”

Tennessee

- “Since the start of restrictive movement policy and the fear factor that the public is going through our traffic in the store has dropped drastically. We have reduced the prices on these significantly but with the current situation it is unlikely that we will be able to move all of these units. We will try some other means to stimulate interest but we feel that more time is needed. We respectfully ask that you request on behalf of all dealers at least a 6 month extension. Worst case scenario we would welcome even a 90 day extension. We have been dropping the price on these units in some cases below our cost. But if we can’t get the traffic to the store we can’t move the product.”
- “We are right now looking at laying off 3 of our office staff as business has slowed to a crawl. We will probably have to reduce our store hours as that leaves me as the only one in the office full time.”
- “The Corona virus has just about shut business down. Schools, government offices, restaurants, are shutting down. Even some grocery stores in our area have announced they are shutting the doors as soon as their stock is gone. Our loss by having no other choice but to literally give away this huge inventory investment, even with tax breaks, will be devastating, especially to my 76 year old husband and partner.

We have been working over a 100 hours a week to try to keep up with the advertising, marking products down and it is just not going to work. We have worked very hard all these to build a successful business supporting 16 employees and their families, We were near being able to retire, only now, we are afraid we will not make it through and may lose this business and our retirement. A Mom & Pop business (especially at our age range) just cannot sustain a total loss to their inventory at this stage in our lives. We would appreciate some compassion and aid so we can get additional time to sell of the stoves and pull through this, so our family’s lives, as well as the lives of the families of our 16 staff members will not be wrecked by loss of their jobs after we get through this corona virus difficulty. Of course, sales Sales and more SALES! We had signage outside and inside the store as well. From one themed sale to another, advertising in different venues from print – local newspapers, several “shopper” publications with wide reach, online on local classified online ads, Craigslist and Ebay. Google ads, Facebook posts and ads. We did sell quite a few in Sept. and October, but we had a whole lot to start with. After the holidays, no amount of advertising at

highly discounted prices seemed to change the lack of interest. Even marking them down to the 50%- 60% off range has not attracted customers at this time.”

Texas

- “We started the year with somewhere less than 150 units. We now are down to around 25 mostly Hearthstone units. With the turn in the economy I doubt we will sell through. We went through this in...what the 80’s. I would not say we have ignored but I am not living my life around this. I feel for small Mom and Pop that get caught with 3-4 units. They are sunk. It is enough to deal with all the changing regulations, tax laws and new competition online but with all of this we have put together stellar years.”
- “We have worked and worked to sell the 41 units since October. We just sold one to a couple but they will not come to our store due to the COVID 19 outbreak. We have seen our walk-in traffic decrease last week and less this week. We have calls asking if we are open. Our builders, which is a large part of our business are seeing a slow down too.”
- “We were going to have a big sale the week after Easter but that is ‘to be determined’ now.”
- “We had plans to build a new larger building, already had land lined up to buy and plans drawn up, that’s on hold now.”
- “Store traffic has gone to 0, orders from customers have been postponed or cancelled all together until further notice. Some new construction builders have shut down work sites, until further notice. Customers will not allow us into their homes to preform requested work and or service calls.”

Vermont

- “Sales are still good but traffic has definitely slowed this last week and customers are starting to reschedule March jobs into June.”

Virginia

- “Things have tanked. We will have to give them away at the beginning of May.”
- “We have no idea where we will be come May 15th but even with an aggressive 25% off we have no sales of stoves in March and only two phone contacts about wood stoves of any kind.”

Washington

- “Our sales are off 50% since the National Emergency was announced. We stand to lose \$50,000-\$60,000 if our remaining Step 1 product goes unsold.”
- “The COVID-19 fears and resulting governmental restrictions to avoid going out in public have significantly and detrimentally affected our ability to sell these products before the current deadline. We have a single location store with 6 employees. Since the government

requirements for social distancing, our store traffic has all but ceased. We join our voices in appealing this deadline as it is detrimental to our business and seek relief for this burden due to these exceptional circumstances.”

- “Disrupted Plans/Sales: Home and Garden Show March 21st and 22nd was cancelled.”
- “We had to cancel our Two County Home Show (Mar 27-29), Service has been postponed for older customers, We have Annual Spring/Summer Cleanings (April 1st – July 31st) which gets us thru the off season, Service calls and installations we can do are taking longer because of all the protocol for Covid-19 virus we have had to implement, Employee’s (3) working from Home, Store traffic and over counter sales has dropped dramatically.”
- “What plans/sales have been disrupted: Our Spring Sale and Skagit Valley Home Show.”

Wisconsin

- “I have fourteen employees, one with an immune system compromised child, and three employees over 60 years of age. In considering closing my locations I have decided I cannot afford the financial sacrifice my family would endure not selling these brand new products. I have thus decided because of the policy of the EPA of not allowing a sell through period that I will have to keep all employees on staff and my locations open in order to not endure the financial hardship that the coronavirus will inevitably cause on top of having to destroy inventory. Extraordinary times require extraordinary actions and our governmental agency (EPA) is failing its citizens miserably.”
- “We will be having our annual anniversary sale in April, but with the arbitrary depression, people will not be making purchases as normal do to either not working or people not coming into their personal business and spending money. We normally make in the one month sales what we would do in a “in season” month. This will hurt us and our employees.”
- “The retail value on these products is over \$20,000 and we have already reduced the sale prices to our cost (or below) but the majority of consumers have little interest in shopping for a cold weather seasonal product as Spring is approaching and are now very hesitant to spend money and won't leave their home as the Coronavirus has overtaken the minds of everyone. We definitely need more time. December 31st, 2020, as a minimum, would help greatly, as that is the time of year consumers search for this type of heating product and look for deals around the holidays to finalize a purchase.”
- “Was going to have a spring sale. But now nobody is spending money.”
- “New proposals are being signed very slow if any. If we don't see improvement in the economy and this situation within a month we could be in trouble. We had a sports show signed up for this weekend. Because this situation is an act beyond the expos control we are out the deposit of \$2000 and out \$3000 of brochures and banners that we bought for the event. This is definitely hurting the pocket books and account payables.”

- “Due to the COVID-19 virus it will be extremely unlikely to sell off inventory by May 15th, already we have customers delaying and or cancelling projects, I'm sure this is only going to get worse in the next month or so. Sure would be practical to extend deadline on the inventory sell off. As of this week things have slowed down to a trickle form what is normal business this time of year (70 % less/down).”
- “All office, installation, and support staff have been reduced to 24 hour work weeks in an attempt to give everyone enough income to make ends meet without using earned PTO time. Retail floor traffic and sales have dropped to almost nothing and installations are difficult to get scheduled with the concerns.” (Wisconsin and Illinois locations)
- “The impact of the covid 19 warnings and restrictions has led to a 90% reduction in foot and phone traffic into our fireplace store. Virtually no new sales are happening. If there is no sell thru allowance this will be another economic impact in an already economical stressful year. Please do what you can to allow a reasonable sell thru period for these units be cleared out.”

Wyoming

- “Customers are financially capped. We have had multiple already sold step 1 units try to back out in the last two day, but due to the fact that we won't be able to sell them in time we have had to tell them no.”