



April 22, 2014

The Honorable Blaine Luetkemeyer
U.S. House of Representatives
2440 Rayburn House Office Building
Washington, DC 20515

Dear Representative Luetkemeyer:

The National Federation of Independent Business (NFIB), the nation's leading small business advocacy organization, writes in support of H.R. 4407, the Wood Stove Regulatory Relief Act of 2014. This legislation will provide important regulatory relief for manufacturers of residential wood heaters from the Environmental Protection Agency's recently proposed rules limiting emissions from new units.

EPA's own estimates show that 90 percent of the manufacturers in this industry are small businesses. These companies provide the heaters that are the primary heating source in about 12 percent of American homes. Though the agency convened a Small Business Advocacy Review (SBAR) panel as required by the Small Business Regulatory Enforcement Fairness Act, NFIB is concerned that the proposed rule did not adequately incorporate the suggestions of that panel.

The increased costs imposed on these small businesses due to new emissions limit mandates and testing procedures will hit the bottom line twice. The first way is in increased upfront costs to comply with the proposed rule. The second is that with a higher cost to retailers and consumers, demand for these heaters will drop – perhaps substantially.

In particular, SBAR panel members recommended a longer phase-in period for the second-step of EPA's proposed two-step scheme. The current proposal of just five years is too short, according to the panel report. In addition, the panel said that EPA's testing requirements were too burdensome and expensive.

H.R. 4407 would address these two main problems by preventing EPA from issuing limits more stringent than the proposed first step for eight years after enactment. The legislation also requires EPA to accept commonsense testing procedures and ensures owners can sell any wood heaters certified by EPA for five years from date of certification.

Thank you for introducing this commonsense legislation that will ensure that small businesses can continue to supply the affordable heating source many Americans use each winter. We look forward to working with you to ensure H.R. 4407 is enacted.

Sincerely,

A handwritten signature in black ink, reading "Susan Eckerly". The signature is fluid and cursive, with a long, sweeping underline.

Susan Eckerly
Senior Vice President
Public Policy