



Honorable Dennis M. Davin  
Secretary  
Pennsylvania Department of Community and Economic Development

Transmitted via email: RA-dcexemption@pa.gov

**RE: Request for a reclassification of NAICS code 4442 so that these businesses may reopen under the Governor's March 19, 2020 Closure Order**

### **PLNA Embraces Governor's Directive**

First and foremost, the Pennsylvania Landscape & Nursery Association (PLNA) embraces the goal of the Governor's directive to minimize the spread of the coronavirus that causes COVID-19 in our communities. For those sectors of our industry that are permitted to remain open, we are emphasizing that any decision to continue operating is at the discretion of the business owner and should be made based on what is best for their employees', customers' and suppliers' health.

### **Request that Independent Family-Owned Garden Centers be Permitted to Operate**

The Pennsylvania Landscape & Nursery Association (PLNA) is respectfully requesting that businesses in NAICS code 4442 Lawn and Garden Equipment and Supplies Stores be permitted to reopen and continue physical operation.

### **Supply Chain Interrupted**

Businesses in NAICS code 4442 Lawn and Garden Equipment and Supplies Stores are a key final step in the supply chain that begins in the farms, nurseries and greenhouses in NAICS 1114 Greenhouse, Nursery, and Floriculture Production which are permitted to continue physical operations under the Governor's order.

The greenhouse, nursery, and floriculture farms are now at the peak of their production and have already begun to ship their agricultural products to garden centers throughout Pennsylvania in anticipation of spring.

Unless the agricultural products produced by the nursery, greenhouse and floriculture agricultural sector can be sold to consumers this spring, both the growers and the independent family-owned retail garden centers will be irreparably harmed. We can expect many bankruptcies among both growers and the retail garden centers.

### **Spring Season is Critical to Garden Centers**

Independent family-owned retail garden centers typically see 60% to 70% of their annual revenue during the three spring months of April, May and June, selling to the public the agricultural crops raised by the nursery, greenhouse and floriculture growers in Pennsylvania.

Independent family-owned retail garden centers began receiving shipments in late February-early March in anticipation of an early start to the season this year. The crops produced by nurseries, greenhouse and floriculture producers are very perishable, having a shelf life of only weeks and months, once grown to salable size. Unless they can be sold in the three-month period April through June, they will be a total loss.

### **Garden Centers are a Key Resource for the Home Food Supply**

Independent family-owned retail garden centers carry seeds, vegetable plants and other gardening materials that people rely upon to plant their home gardens, so important in this time of an uncertain food supply, sheltering in place and employment insecurity.

Many independent family-owned retail garden centers have a farm market component that their customers rely upon for fresh produce.

### **Gardening Promotes Mental Health**

With Pennsylvania citizens being advised to be socially distance and to stay home, home gardening and landscaping is a welcome respite for many.

Gardening and home landscaping have been scientifically proven to reduce stress, improve mental health, reduce depression, and lower blood pressure, so needed during this time.

<https://ellisonchair.tamu.edu/benefitsofplants/>

Many independent family-owned retail garden centers are out-of-doors to allow the plants to receive sunlight.

### **Unfair Competition**

Big box stores such as Lowes and Home Depot are keeping their garden departments open, competing unfairly with independent family-owned garden centers which must be closed.

### **Mitigation Steps and Best Management Practices Recommended to Garden Centers by PLNA**

PLNA embraces the goal of the Governor's directive to minimize the spread of the coronavirus that causes COVID-19 in our communities. For those sectors of our industry that are permitted to remain open, we are emphasizing that any decision to continue operating is at the discretion of the business owner and should be made based on what is best for their employees', customers' and suppliers' health.

The Pennsylvania Landscape & Nursery Association will encourage the independent family-owned retail garden centers to use these COVID-19 best management practices, if permitted to reopen:

- Meter customers into a garden center so that social distances can be maintained, and crowding avoided. Garden center managers will enforce social distancing to reduce risk of transmission, as in grocery stores.

- Manage checkout areas to allow proper social distancing between employees and customers while waiting to check out.
- Place hand sanitizer in obvious places around the garden center and encourage customers and employees to use it.
- Shorten business hours or have open and closed periods during the day to allow time for disinfecting hard surfaces that customers and employees may come into contact with, like cash registers, counter tops, hand carts, shopping baskets, bathrooms, doorknobs etc.
- Set aside shopping times for more vulnerable seniors, preferably immediately after the premises have been disinfected.
- Accept phone and/or internet orders.
- Maximize use of websites, Facebook, Instagram, YouTube and Twitter to update customers on stock and to take orders.
- Have curbside pickup or deliveries.
- Be transparent with employees about plans for addressing COVID-19 risks.
- Inform their employees about the symptoms of COVID-19, based on guidance from public health officials, and tell employees that they should not come to work if they have any of these symptoms (at least that are not explained by some other condition, such as a runny nose due to seasonal allergies).
- Inform employees that the U.S. Centers for Disease Control and Prevention (CDC) guidance notes that age and underlying health conditions can put some people at higher risk of serious illness.
- Explain to employees that staying home when they have these symptoms prevents the spread of the virus and minimizes exposing customers and co-workers to a serious chance of illness.
- Encourage frequent handwashing, reporting of illness and reporting travel.

Thank you for your consideration.

Sincerely,



Ted Ventre  
Hively Landscapes  
Chairman of the PLNA Board of Directors

C: Secretary Russell Redding  
Deputy Secretary Fred Strathmeyer