



August 29, 2019

Kevin L. Barnes
Associate Administrator
National Agricultural Statistics Service
United States Department of Agriculture
South Building, Room 5336
1400 Independence Ave. SW
Washington, DC 20250-2024

Re: Notice And Request For Comments; Docket Number 0535–0236, 2019 Census of Horticultural Specialties

Dear Mr. Barnes:

The Society of American Florists (SAF) and AmericanHort appreciate the opportunity to comment on docket number 0535–0236 relating to the 2019 Census of Horticultural Specialties.

SAF is a national trade association representing the floriculture and greenhouse industry. Its 7,000 small business members include growers, wholesalers, retailers, importers, suppliers, researchers, students and related organizations located in communities nationwide and abroad. The industry produces and sells cut flowers and foliage, foliage plants, potted flowering plants and bedding plants, which compete in the international marketplace.

AmericanHort is a national trade organization representing the horticulture industry. AmericanHort represents and supports nearly 14,000 member and affiliated businesses that include plant breeders, greenhouse and nursery crop growers, garden retailers, distributors, interior and exterior landscape professionals, students, educators, researchers, manufacturers, and all of those who are part of the industry market chain. Greenhouse and nursery plant growers represent the largest share of our active member firms.

Data collected and presented by the Census of Horticultural Specialties have been a valuable resource to the floriculture and nursery industries since 1889. The Census is certainly justified, in that these industries represent roughly one-third of the value of all specialty crop production in the U.S. Data are also used widely by industry wholesalers and retailers, since many of our products change little from the producer level all the way to the consumer. In addition to industry, the information included in the report is routinely used by government agencies, academia, media, and the general public.

The report serves as a vital tool to examine the current state of horticultural specialty production in the U.S., study historic trends and current conditions to plan for the future, and design new and improved methods to increase horticultural specialty production and profitability.

We would like to note that several important perennial crops missing from those listed in the announcement that should be included in the Census. We suggest that the Census include: *Ajuga*, *Delosperma*, *Gaura*, *Iberis*, and *Lithodora*.

Also, we suggest that “Phlox, creeping (*Phlox subulata*)” be separated from “Phlox, upright garden (*Phlox paniculata*)” as these crops are very different in both production and marketing and are often produced by different growers.

In addition, Bleeding Heart should be changed to “*Dicentra* (Bleeding Heart)” and Coral Bells (*Heuchera*) should be changed to “*Heuchera* (Coral Bells).” Both of these reflect the fact that in grower circles and in the trade, those that would be filling out and using the data, one hears more use of the genus and less use of the common names, especially as the number of cultivars increases.

It may be advisable to keep all the perennials together in the questionnaire by moving parts of the last column of Section 9 to Section 3, including the Woody Ornamentals and Vines (though *Clematis* is technically woody, the vining part is very soft, almost herbaceous, until late in the season, and *Vinca* groundcover and other vines and groundcovers are more herbaceous than woody, per se) and the Bareroot herbaceous perennials.

In addition, ornamental grasses should be moved from Section 9 to Section 3 or at least be cross-referenced in Section 3 to report these in Section 9 and should be expanded to include *Calamagrostis*, *Miscanthus*, *Panicum*, *Pennisetum* and Other.

We suggest that “Annual Bedding/Garden Plants” in Section 4 should also include *Bacopa*, “*Euphorbia* (other than poinsettias, which should be reported in Section 2),” “*Impatiens*,

interspecific hybrids (e.g., Sunpatiens®, Bounce™, etc.)”, *Ipomea* (Sweet potato vine), and *Lantana*.

It should be noted that botanists have returned to specifying “*Impatiens walleriana*.” *Impatiens* still need to be collected as New Guinea, interspecific hybrids, and other (e.g., *walleriana*).

Strawberry plants should be cross referenced in Section 4 to report in Section 9 or possibly added in Section 4 to the vegetable list. Many newer strawberry varieties (especially for garden use) are seed propagated today and grown as bedding plants or in baskets.

We suggest that “Foliage Plants” in Section 5 also include *Agave*, *Pothos*, *Sanseveria*, “*Alocasia/Colocasia*” and *Cordyline*. It is advisable that “Cacti” be separated from succulents, where the latter category should be reported as “Succulents, other.”

We suggest that for Section 6 “Cut Cultivated Greens” also include *Ruscus*, *Magnolia*, *Monstera*, *Calathea*, *Aralia* and Olive.

For Section 20 Market Channels, it is advisable that “e.g., Farmstands and Farmers’ Markets” be inserted after Consumers (direct sales).

It would be helpful if the market channel data were reported by type of grower (Cut Flower Grower, Potted Flowering Plant Grower, Foliage Plant Grower, Annual and Perennial Plant Grower, Nursery Grower, Greenhouse Vegetable Grower, etc., perhaps, using the “50%+\$1 rule.” It would also be very useful if the market channel information were cross-tabulated by size of operation (using total sales).

SAF and AmericanHort greatly appreciate the opportunity to provide comments on this important issue for the horticulture industry. We look forward to working with NASS to promote survey participation in the months and years to come. Please feel free to contact us if we can be helpful in any way.

Regards,



Drew Gruenburg
Chief Operating Officer
Society of American Florists



Craig J. Regelbrugge
Senior Vice President
AmericanHort