



June 26, 2019

Drew Gruenburg, Society of American Florists
Craig Regelbrugge, AmericanHort

Dear Mr. Gruenburg and Mr. Regelbrugge,

Thank you for your recent letter concerning the renewal of the Census of Horticultural Specialties. The primary functions of the National Agricultural Statistics Service (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices and to collect information on related environmental and economic factors, whole farm characteristics, and operator demographics. Timely, reliable, and detailed statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations. NASS is the primary data collection Agency of the US Dept. of Agriculture.

The content of the Census of Horticultural Specialties has been developed over the years making updates at the request of numerous data users like yourselves, along with others like the Bureau of Economic Analysis, Bureau of Labor Statistics, California Cut Flower Commission, American Rose Growers Association, Ball Horticultural and others.

Recommendation 1: 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*.

Reply: This request is approved. Statistics Division agrees with these scientific names being added to the questionnaire.

Recommendation 2: 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.

Reply: More information is needed. If we break Phlox out, do the two suggested varieties sum to the total? Is there a Phlox, other? Is there another variety of Phlox? If we decide to move forward with the change, the industry would need to be aware.

Recommendation 3: 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.

Reply: This request is approved. Additionally, the team will ensure consistency with scientific names being in italics and common names being in parentheses.

Recommendation 4: 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.

Reply: This request was denied. Scope, resources, and spacing will not allow this request to be granted.

Recommendation 5: 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.

Reply: This request has been partially approved. An exclude statement will be added to Section 3 so that respondents know to report Ornamental Grasses in Section 9. Due to spacing, we cannot add the additional scientific names of ornamental grasses in Section 9.

Recommendation 6: 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*.

Reply: Statistics Division has approved adding these items; however, the addition of these items may impact the data series and cause disclosure issues.

Recommendation 7: 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*).

Reply: Impatiens Walleriana and Impatiens New Guinea are already listed on the questionnaire. However, we noticed the spelling error and will correct.

Recommendation 8: 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.

Reply: Strawberry plants are already cross-referenced in Section 4 to report in Section 9.

Recommendation 9: 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.”

Reply: We will add 4 of the 5 suggested items due to spacing. Statistics Division has decided to not separate cacti and succulents.

Recommendation 10: We suggest that for Section 6 “Cut Cultivated Greens” also include *Ruscus*, *Magnolia*, *Monstera*, *Calathea*, *Aralia* and Olive.

Reply: This request has been approved.

Recommendation 11: For Section 20 Market Channels, it is advisable that “e.g., Farmstands and Farmers’ Markets” be inserted after Consumers (direct sales).

Reply: This request has been approved.

Recommendation 12: 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)

Reply: This request was denied. Scope, resources, and spacing will not allow this request to be granted. A special tabulation can be requested after the data is released.

Once a finalized draft of the questionnaire is ready it will be submitted to OMB along with the supporting statements, samples of publicity materials, and other documents for the public to review for 30 days. After that OMB will be able to begin their review of the complete docket materials. The materials will be available in the Office of Information and Regulatory Affairs system <https://www.reginfo.gov/public/do/PRA>Main>.

The Census of Horticultural Specialties is extremely important to our data users. Your comments will be provided as a part of this submission to the Office of Management and Budget.

Please let us know if you have any questions or concerns.

Again, many thanks!

Joseph L. Parsons
Chair, Agricultural Statistics Board
U.S. Department of Agriculture
National Agricultural Statistics Service