FLORIDA GREEN INDUSTRY COALITION

Executive Summary

As Florida's elected leaders and government regulators struggle with maintaining the balance between business, citizen and environmental needs for our limited water resources, Florida Green Industry professionals have been engaged at every level of government, providing knowledgeable input on regulatory and policy initiatives which directly impact our businesses and Florida's economy.

Unfortunately, many of these new regulatory approaches do not rely on sound science, good economics, technical expertise or practical considerations. Let us be clear: Every Floridian wants clean water. We all want Florida to prosper from tourism and we all want to protect our natural resources. However, good policy decisions cannot be made by addressing only select facets of the issues. Government officials and regulators must engage those professionals who have the expertise and experience to help address water-related issues affecting urban lawns and landscapes.

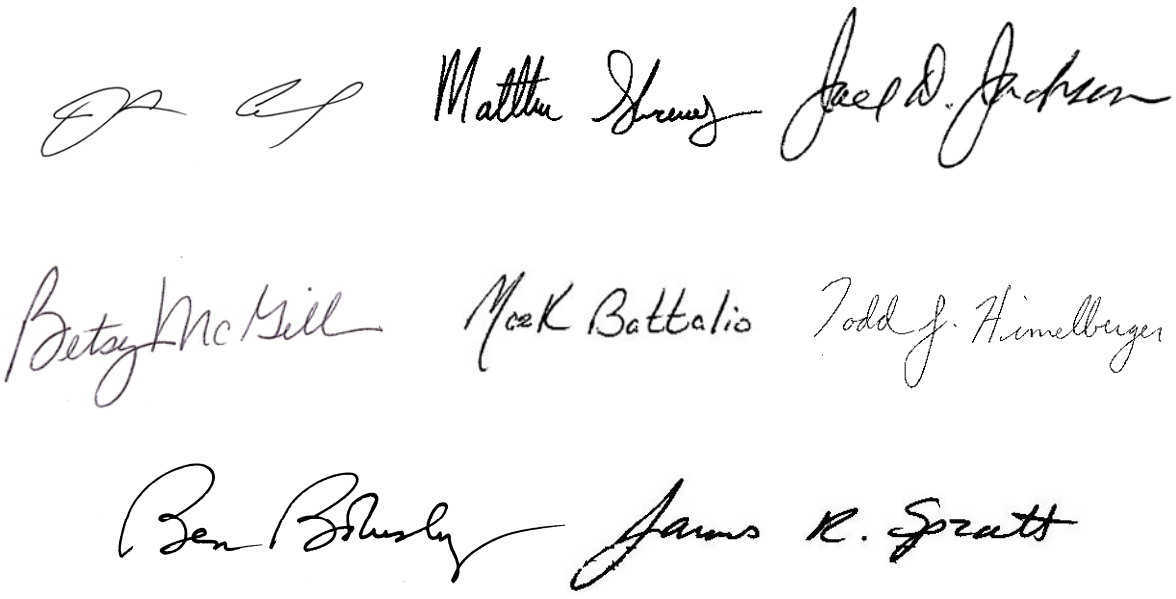
The Florida Green Industry Coalition represents an ad-hoc group of representatives from all aspects of Florida's Green Industry, including the Florida Nursery, Growers and Landscape Association; Florida Chapter of the American Society of Landscape Architects; Florida Farm Bureau Federation; Florida Turfgrass Association; Florida Landscape Maintenance Association; Florida Irrigation Society; Florida Sod Growers Cooperative; Florida Golf Course Superintendents Association; and the Irrigation Association.

The driving purpose of the Florida Green Industry Coalition is to develop Policy Position Papers and other resources which can be utilized at the local, regional and state levels in developing sound public policy decisions. The Florida Green Industry Coalition has developed three policy position papers: Industry Professionalism; Water Conservation; and Landscape Irrigation Standards.

The overarching tenets to the policy position papers include:

- Recognizing and utilizing appropriately licensed, certified and/or trained professionals for all aspects of landscape design, installation, and maintenance.
- Focusing on site conditions and site characteristics of the specific landscape projects rather than on limiting the palette of plants and turf.
- Utilizing micro-irrigation and other low-volume irrigation in appropriate areas, as well as committing the resources to aggressively utilize real-time, demand-based irrigation controllers, and other proven irrigation technologies which will significantly reduce, if not eliminate, overwatering lawns and landscapes --plants don't waste water; people do.
- Embracing the existing horticultural resources and tools, including the principles of Florida Friendly Landscaping and the State of Florida's Landscape Irrigation Design Standards.
- Developing regulatory programs based on sound science rather than politics and emotion.

The Florida Green Industry Coalition is pleased to provide these policy position papers as critical resources to be utilized in addressing Florida's water conservation and water quality issues. These papers provide insight, scientific guidance and practical solutions which are applicable throughout the State of Florida.



FLORIDA GREEN INDUSTRY COALITION

STATE ISSUE: **INDUSTRY PROFESSIONALISM**

POSITION: The Florida Green Industry Coalition supports the utilization of landscape and irrigation professionals for all aspects of green industry services via the attainment, recognition and reliance of appropriate licensure, certification and education of green industry companies and their employees.

BACKGROUND: Florida's green industry encompasses a diverse array of specialties including landscape architecture, landscape design, installation and maintenance, irrigation installation, turf grass professionals, plant production nurseries, retail garden centers and pest control businesses. Yet, all of these diverse industry segments share a common thread: the importance of professional standards and criteria. The professional training programs developed by each industry segment play critical roles in offering the services and demonstrating knowledge of green industry professionals.

Professionalism is attained through the education of business owners, managers, employees and customers. In Florida, education is offered through degrees at universities, community colleges and technical education centers, industry-specific certification training and systems of continuing education. Understanding the variability in green industry disciplines, individual segments oversee the contents of the specific professional criteria. However, the underlying theme to all professional recognition is steeped in the principles of Florida-friendly landscaping, Florida-friendly landscape irrigation design standards, best management practices, sound horticultural, agronomic, architectural and engineering sciences.

Statewide licensure regulates landscape architecture through the Florida Department of Business and Professional Regulation. Established and maintained by industry associations; industry specific certification provides regulators, consumers and other stakeholders reasonable assurance of a service provider's individual competence through a variety of assessment tools employed by various programs.

The Florida Nursery, Growers & Landscape Association (FNGLA) sets standards for horticulture professionals, landscape technicians, landscape maintenance technicians, landscape contractors and designers. The Irrigation Association sets standards for irrigation design, installation, maintenance, system management and auditing. The Florida Irrigation Society sets Florida-specific irrigation standards contained within Appendix "F" of the Florida Building Code. The Florida Landscape Maintenance Association is updating its certification program, which recognizes standards for operators and supervisors.

In addition, overarching educational programs in the *Green Industries Best Management Practices* provide workers with knowledge in water quality, fertilizer application and overall conservation goals. State and local regulators should explicitly recognize and/or require in their laws, rules and ordinances the use of licensed, certified and trained green industry professionals. Lastly, professionals from Florida's golf course industry, in conjunction with the Florida Department of Environmental Protection have developed and are utilizing the "Best Management Practices for the Enhancement of Environmental Quality on Florida Golf Courses, 2007."

Not only does professionalism increase an industry's stature, it assures adherence to standards which protect the industry and the environment through the use of best management practices and Florida-friendly principles. Support of professionalism discourages the use of invasive species and fosters the grouping of plants by water needs. It assists in the long term conservation and protection of water resources through consumer educational programs, such as *Florida Yards and Neighborhoods*.

There are additional educational and practical services, supported by the green industry, such as Mobile Irrigation Labs (MIL) which provide irrigation system evaluations and prescriptive remedies to help conserve water on individual irrigation systems. The local MIL -- are funded -jointly by the Florida Department of Environmental Protection, Florida Department of Agriculture and Consumer Services and water management district. -- have accounted for billions of gallons in water savings statewide. Services such as those provided by MILs help ensure residential and commercial irrigation systems remain efficient and effective components in Florida's landscapes. The Florida Green Industry Coalition urges regulators and policy makers to sustain full financial support of MIL services statewide and partner with certified green industry professionals who can implement MIL recommendations.

The Florida Green Industry Coalition encourages state and local governments to acknowledge and support the professionalism of the green industry by explicitly recognizing in their respective laws, rules, regulations and bid processes industry-licensed, certified and trained professionals. Recognizing the critical importance of using professionals for landscape, irrigation and related services will benefit residential and commercial landscape owners, the State of Florida and, most importantly, protect Florida's pristine and precious water resources.

FLORIDA GREEN INDUSTRY COALITION

STATE ISSUE: Water Conservation and Landscape Irrigation Regulations

POSITION: The Florida Green Industry Coalition supports water conservation programs and landscape irrigation regulations which encourage the continued development and implementation of alternative water supply sources and more effective use of existing water supplies, maintaining the net benefits of quality landscapes which conserve water, protect and enhance the environment. This must be coupled with "Florida-friendly" landscape and irrigation design, the identification and utilization of science-based water conservation Best Management Practices, as well as the increased utilization of innovative new irrigation technologies for commercial and residential landscapes. These must focus on advanced irrigation technologies as well as improved management strategies to maximize the efficiency of water use. The goal should be to manage water as efficiently as possible in the landscape and eliminate water waste.

BACKGROUND: Water conservation discussions have centered historically on the use of water in agricultural production. However, as Florida's population increases, so has the amount of potable water used to irrigate residential and commercial landscapes. It is estimated as much as 50% of Florida's potable water use is applied to lawns and landscapes. However, the large amount of water used for landscapes is often not reflective of plant needs. The Florida Green Industry Coalition believes regulatory agencies have yet to fully embrace science and technology such as need-based irrigation through the use of current weather data, soil moisture sensors and high efficiency irrigation delivery systems . In addition, very little utility has been placed on the concepts of sustainable site development practices which increase green space, are steeped in the principles of Florida-friendly landscaping, provide tremendous environmental benefits and lower home energy use.

The development and utilization of locally driven water budgets reflecting local conditions allow greenindustry professionals to design and install landscapes which fit under site-specific criteria. This allows maximum creativity in the landscape while providing specific incentives for incorporating new irrigation technologies. Over the past five years, significant technological and economic advancements have been made with need-based irrigation control and technologies such as: "smart controllers", rain sensors, soil moisture sensors and the conversion to more efficient means of irrigation delivery and application. . These conservation tools continue to show significant promise on projects throughout the state but many more projects would adopt these tools with encouragement from the regulatory agencies.

In addition, technologies -- such as rainwater harvesting and alternative water supply availability -- have provided homeowners practical alternatives to traditional water sources.

While each of these tools provides some level of water conservation benefit, we believe greater emphasis should be placed on these technologies thereby promoting a paradigm shift in consumer behavior regarding landscape irrigation. Given new traditional and innovative irrigation technologies are continuously entering the market, increased research and demonstration are critical in determining the economic feasibility and effectiveness of these new, innovative ways to maximize every drop of water utilized in lawn and landscape settings. Best available irrigation technology and practices consider all variables and apply only what is needed to maintain the health of landscape plants and turfgrass. Clock and calendar restrictions are not a substitute for responsible water management and have no regard for amounts and timing of rainfall or plant-soil-water relationships. Clock and calendar landscape irrigation restrictions cannot eliminate inefficient irrigation applications. While several local governments and water management districts have developed, or are in the process of developing, clock and calendar irrigation regulations under the guise of water conservation, such are not based on science. Water management districts and local governments must squarely focus on education, conservation and technology, maximizing every drop of water used and eliminating waste. While the intention of these conservation approaches is embraced by Florida's Green Industry Coalition, we have significant reservations about the effectiveness of measures that focus mainly on limiting the time and day windows in which water can be used in the landscape.

In order to achieve meaningful water conservation, the regulatory community must be willing to think outside of the "box." Using current regulatory matrices, incentive programs can be undertaken to help homeowners incorporate new irrigation technologies and practices into existing landscape irrigation systems. For example, rain and soil moisture sensors should be common instruments for residential and commercial landscape irrigation professionals. Residents and developers willing to deploy proven, advanced irrigation system technology in retrofits and/or new irrigation systems should be given tangible and visible incentives such as lower water rates or the flexibility to apply water using feedback from plants, soils and weather data rather than by clock and calendar. There are many options available to regulators and water users alike.

The Florida Green Industry Coalition believes Florida's regulatory agencies and Legislature must be willing to embrace every tool in the water conservation tool box--maintaining the net benefits of quality landscapes which conserve water, protect and enhance the environment. These tools must be accompanied with an increased focus on homeowner education, encouraging efficient water use in their lawns and landscapes. There must also be a greater emphasis placed on securing federal, state and private funds to underwrite practical research and demonstration projects that showcase functioning, energy-efficient, water-conserving and environmentally friendly landscapes which embrace both the principles of Florida-friendly landscaping and efficient irrigation delivery strategies.

FLORIDA GREEN INDUSTRY COALITION

STATE ISSUE: Florida Friendly Landscape Irrigation Standards

POSITION: The Florida Green Industry Coalition supports incorporation of the "Landscape Irrigation and Florida-Friendly Design Standards" into all new residential and commercial landscapes and, where economically feasible, the retrofitting of existing commercial and residential irrigation systems to maximize water use efficiency.

BACKGROUND: As Florida's population continues to increase, so does the demand on Florida's limited water resources. Florida law requires each of Florida's five water management districts to compile data based on current and 20-year projected water use demand. The data clearly shows Florida's water resources will continue to be strained in meeting current and future demands. Although programs approved by the Florida Legislature -- such as funding for alternative water supply projects -- have been helpful, these types of invaluable programs have been shown to be targets for funding cutbacks or elimination during difficult economic times. Another option -- underutilized by state and regulatory agencies -- is the integration of the "Landscape Irrigation and Florida-Friendly Design Standards" into all new residential and commercial construction projects.

Regulatory agencies must engage utilities, the green industry and the scientific community to reemphasize water supply protection and, more importantly, manage the demand on water use. Restructuring the regulatory framework is a huge undertaking. However, by making the necessary commitments, regulators will be better equipped to educate and promote water conservation to homeowners, utilities and lawn and landscape professionals. This will allow regulatory agencies to move away from arbitrary clock and calendar restrictions and focus more squarely on rules which allow landscape irrigators to conserve water while still providing supplemental irrigation to lawns and landscapes, maintaining the net benefits of quality landscapes which conserve water, protect and enhance the environment.

Historically, water use debates have centered on agriculture's use of water. The focal point has now shifted with a much greater emphasis on the water used in residential and commercial landscapes. During the 2005 Florida Legislative session, Chapter 373.228 of the Florida Statutes was adopted. The law identified a significant list of stakeholders and directed the Florida Department of Environmental Protection (DEP) to develop "Landscape Irrigation Standards." While the narrative document may be viewed as guidelines or minimum standards, the outlined practices and concepts will achieve water

conservation goals and greater water use efficiency in Florida landscapes. At the same time, this will allow consumers optimal choices in Florida-friendly plant palettes.

To date, there has been very little movement towards adoption of Florida's "Landscape Irrigation and Florida-Friendly Design Standards" Chapter 373.228 Florida Statutes, among water managers and local governments. Several local governments have proposed ordinances which attribute water conservation and minimal fertilizer inputs solely to native plants and often erroneously maligns turf areas. This effectively misses the entire genesis and underlying purpose of the "Landscape Irrigation and Florida-Friendly Design Standards" because it disregards the fundamental principle underpinning Florida-friendly landscaping -- "put the right plant in the right place." Incorporating this principle as outlined in the Landscape Irrigation and Florida-Friendly design standards will better equip homeowners and landscape maintenance professionals with the genuine ability to conserve water, irrigate as efficiently as possible and deliver only the amount of water necessary to meet plant health.

The DEP "Landscape Irrigation and Florida friendly Design Standards" can be found at: http://www.dep.state.fl.us/water/waterpolicy/docs/LandscapeIrrigationFloridaFriendlyDesign.pdf

State, regional and local governments must place greater emphasis on -- and even require -- use of the Landscape Irrigation and Florida-Friendly Standards on new developments and, where feasible, retrofit existing residential and commercial landscape irrigation systems. At the same time, regulatory agencies, in partnership with the industry must commit to increasing homeowner education about lawn and landscape irrigation. A concerted effort should also be made to identify specific incentives for residential and commercial landscapes to retrofit existing irrigation systems. These may include rebates for the purchase and installation of need-based irrigation control technologies such as: "smart controllers", rain sensors, soil moisture sensors or the conversion to more efficient means of irrigation delivery and application. The State of Florida should identify incentives for new developments which utilize innovative landscape irrigation technologies, develop new traditional or alternative water sources (such as utilizing rain water harvesting or storm water ponds) to provide landscape irrigation sources.

Florida is literally at a crossroads. In order to sustain the quality of life Floridians enjoy and allow Florida's economy to grow, everyone must think outside the box for solutions. We must collectively pool talents and resources to follow sound horticultural science and educate water users. Improved landscape systems are and have the potential to play an even larger role in aquifer recharge, storm water management and filtration, and the reuse of reclaimed water. The green industry needs flexibility in how landscapes are designed, constructed and managed to achieve water quality standards within individual stormwater systems.

Continued water availability is critical to the success of Florida's green industry in serving the state's growing population and its visitors. Healthy well-maintained landscapes provide the critical buffer to our natural systems by filtering stormwater, preventing erosion, filtering dust and odors and providing a general cooling effect within urban areas. Emerging data demonstrates landscapes are highly effective carbon sequestration systems, which have a critical role to play in climate change solutions.

The Florida Green Industry Coalition seeks and promotes scientific research and/or demonstrations to provide practical information for green industry professionals, as well as practical approaches to educate consumers about water conservation and irrigation efficiency. Implementation of the horticulturally sound, science-based "Landscape Irrigation and Florida-Friendly Design Standards" represents a vastly underutilized tool to help Florida residents and the green industry achieve true water conservation while preserving Florida's precious water resources. Regulators and policy makers must begin to look to the landscape industry for creative water management solutions.