



November 19, 2012

TO WHOM IT MAY CONCERN:

This letter is in response to the claims that planting *Arundo donax* ("*Arundo*") commercially for biofuel and other uses poses a significant risk of spreading as occurred in California and Texas. Over the last 7 years we have intensely surveyed available information to uncover reliable, scientific and substantiated facts to base our conclusion that *Arundo* is not invasive. Any other rhizome based plant handled in a manner similar to *Arundo* would result in similar instances of invasiveness. The risks described extensively over the internet and in various publications focus exclusively on riparian areas. Commercial enterprises cultivated *Arundo* for decades without incident. Right in California, the epicenter of invasiveness information regarding *Arundo*, Rico Reed's 80 acre commercial *Arundo* plantation was not plagued by escaping plants for over 50 years. Many who have actually grown and studied *Arundo* across the globe and in various US states clearly verify that *Arundo* is biologically incapable of aggressive spreading when planted in appropriate locations and employing a minimum of crop hygiene. ***Arundo* did not invade California it was inadvertently propagated.**

This crop has the potential to provide energy needed by all the biotechnologies we rely on to defeat global warming and our dependence on fossil energy. Based on a complicated series of circumstances and reliance on recycled, narrow and incomplete misinformation the use of the only economically viable biomass crop available is in jeopardy. Before you take any action to block this rule I implore you to consider the following:

Incomplete, outdated, misinformation dominate internet - Unfortunately the "well-documented reports" of invasiveness all seem to be part of a closed loop of recycled information quoted from one source to another and back again. Government, quasi-government and reputable environmental sites lend credibility to reports found in their materials and on public information websites. While a portion of the information is accurate it does not tell the whole story. When *Arundo* was primarily used for erosion control, windbreaks and landscape ornamentation, the stakes were not high enough to expend the effort to correct the misperception as aggressively invasive.

The most visible information on *Arundo* does not describe *Arundo*'s normal naturalization when planted and managed in appropriate locations. *Arundo*'s reputation as an aggressively invasive species is based on studies exclusively focused on riparian habitats where human "cultivation" and "mismanagement" created the problem. *Arundo* is incapable of spreading due to its sterile nature, dense clumping and slow rhizome expansion.

The internet is flooded with information on the damage *Arundo* causes "once established." What is either left out entirely or its impact minimized are adequate references to just how it got "established" in the first place. Studies going back decades by respected scientists verify that *Arundo* is now and has been commercially cultivated for decades without incident. It is hard to understand why this information is not considered when evaluating the risk *Arundo* actually poses. Delete riparian, riverbanks, rivers, streams from invasive reports and see what is left of the risk.

How California inadvertently created such a problem. After use for erosion control without incident for hundreds and hundreds of years Californians changed how they interacted with the *Arundo* planted along waterways, and in riparian areas to stem erosion. With the objective of widening canals to accommodate increased flows the Army Corp of Engineers used bulldozers to knock stalks down, drove over them embedding them in mud while pushing chopped pieces into the river as they widened the canals.

Presumptions rather than facts have driven the creation of the problem and impeded efforts to eradicate and control *Arundo*. The problem didn't arrive so much from misunderstanding the information on *Arundo* as it did from not understanding it in a changing context. This has resulted in making the problem worse in California. A multimillion dollar industry sprang up to eradicate *Arundo*. Government entities pay millions of dollars to purchase ineffective methods to eradicate *Arundo* although there are proven strategies that really work when applied appropriately.

Commercially available as an ornamental plant in nurseries - *Arundo* is available for purchase as an ornamental plant in commercial nurseries across the US and has been for over 30 years. It has not spread as much as other species such as Kudzu which is frequently mentioned in reports on *Arundo*. Spanning several decades and across the globe you can easily find examples proving the ability to commercially grow, harvest and remove acres of *Arundo* without incident.

Does not fit invasive definition in Executive Order 13112 - The available verifiable facts do not support defining *Arundo* as an invasive species under Executive Order 13112 or the Invasive Species Definition Clarification & Guidance White Paper.

Passes the invasive species balancing test - Using the invasive species balance test set out in the above references *Arundo's* benefits greatly exceed the ecological costs. *Arundo* meets or exceeds all of the characteristics of an ideal biomass crop described in the National Biofuel Plan. BP's recent abandonment of its biomass program illustrates the challenges. *Arundo* addresses the four fundamental criteria BP says are required for a biofuel: it is sustainable and scalable, it provides substantial carbon savings, and it is capable of becoming competitive with crude oil over time without dependence on subsidies. High Yields per acre make *Arundo* one of our best options as an economically feasible biomass crop. Without *Arundo* the likelihood of the US reaching its cellulosic and advanced biofuels goals using currently available biomass crops are dismal.

Biomass feedstock for a wide variety of major industries - Unlike suspect species that provide little or no benefit *Arundo* has applications as a biomass feedstock for the pulp and paper, forage, composite materials, green coal, chemicals and green plastics industries with more coming as research continues. It is proving to be a versatile, environmentally friendly plant with properties that improve the environment on many fronts. New technologies provide growers a quick and economical method to propagate scalable quantities up to millions of acres.

There is substantial information in existence today drawing from experienced growers, historical records and scientific fact based studies to conclude that it is against public policy to block *Arundo*. *Arundo* will prove to be one of the most environmentally significant plants on the planet. Several countries are far ahead of us in embracing *Arundo* and using it as a major biomass crop. *Arundo* is essential in any biofuel plan implemented to reduce energy dependency. Whether we get on board at the present time or not - we will eventually.

For the sake of brevity and due to the short notice we did not include the references supporting the statements we make in this letter. We are happy to send them under separate cover if you are interested in reviewing them.

Sincerely,



Annette Mouton
Corporate Counsel