

Comments on the proposed EPA rule shared with the National Wildlife Federation, October 2012:

We study the impacts of invasive plants. Propagule pressure (seed input, etc.) is a major factor. Fields of Arundo will increase the number of propagules (seeds, bits of rhizome) dispersing into other sites, making the impacts of this invasive species much worse.

*Normal Fowler, Ph.D.,
University of Texas*

The negative impacts of Giant Reed on Texas' riparian ecosystems are numerous. Policy decisions need to be made hand in hand with the best available information from natural resource experts.

*Jason Hodges, Master of Landscape Architecture
Texas Tech University*

We would all be better served if existing giant reed (arundo donax) were removed and placed on the national noxious weed list. If the biofuel people want to use it, they need to first harvest what exists and blocks many waterways and replaces native flora. We have a group of volunteers (Balcones Satellite of the Texas Invaders) who remove this stuff and know first hand the havoc it wreaks on the environment. My first thought when I read about this was: "Are these people out of their minds?"

Lonnie and Judith Shockley, Texas Invaders

I am 68 years old and have observed, over the years, great damage done by invasive, exotic plants and animals. As an individual I spend a lot of time and money trying to control exotics on my own little 10 acres. I see that other landowners, including government entities as well as private citizens, must do the same. Invasive, exotic plants are a drain on the economy and a destructive force in the environment. They work against biodiversity. Anything that promotes the spread of exotic invasive plants is a serious mistake.

Pauline Singleton, Baytown, TX

I have a great deal of experience managing invasive plant species. Most were brought here for useful purposes. Most proved to be much more environmentally and economically impactful than the original purpose for which they were imported. Simple fix to another such problem - Take Arundo off the EPA's list of advanced biofuel feedstock.

James E. Moyers, Panama City, FL

I am a citizen scientist with the Balcones Satellite chapter of the Invaders of Texas program. I have eradicated Arundo Donax in local creekways, and have seen first-hand the devastating effects of Arundo on restricted water flow and habitat destruction.

I agree that it has great potential for use as a biofuel, however, please consider removing the existing arundo along our creeks and rivers as part of a combined effort to eradicate the invasive plant and restore habitat.

It is unconscionable to purposely cultivate *Arundo donax* when its invasive behaviors are so clearly apparent. The unintended consequences of cultivation are dire.

Thank you.

*Cheryl Hamilton
Citizen Scientist,
Balcones Satellite, Invaders of Texas program*

I have experience with *Arundo donax* and with other non-native plants which have created environmental problems. Please be particularly cautious in using non-native plants in bioenergy applications.

*Charles G. Tubbs, M.D.
Canyon Lake, TX*

As the president of the Quinault Queets Cooperative Weed Management Area (WRIA 21), I would strongly oppose the intentional cultivation of *Arundo donax* as a biofuel.

Could focus be shifted to harvesting the plentiful fuels on state and local public lands in a way that removes existing noxious weeds while not spreading them, while restoring these lands to a proper condition? Take a look at the Scotch broom on the intertidal lands, from Moclips Washington to the California border? Add gorse to that list, as well as French and Spanish brooms!

*Nancy Ness
President QQCWMA &
Grays Harbor Noxious Weed Control Board coordinator*

Please add my name to the petition/letter regarding the EPA's pending proposal of allowing *Arundo donax* (giant reed), to be approved for use as a biofuel. I'm highly opposed to this. Thanks for your efforts to stop this.

*Debbie Newman
Natural Areas Preservation Specialist'
IL Nature Preserves Commission
P.O. Box 356
Ava, IL 62907
618-684-3840*

You can add me to the list in opposition of Giant Reed.

*Matt Haas
550 E Theodore Ln
Itasca, IL 60143*

Stop incentives for invasive Giant Reed.

Lynora Jensen
556 Webford Ave
Des Plaines, IL 6001

I just received a communication about the EPA plan to recommend/use this species for biofuel. I am very opposed to this and hope it is not too late to communicate this. I just returned from traveling in the Abruzzo region of Italy and found this plant to be present in most places I drove through or visited, highly invasive and spoiling a beautiful landscape. The possibility of this species escaping into natural areas, and even along roadsides, if cultivated here are probably very high.

Please let me know if there is more I can contribute to this discussion.

Susanne Masi
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Plants of Concern Coordinator
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Please add my name to the list of those concerned about the deliberate cultivation of the invasive Giant Reed (*Arundo donax*.)

I am the elementary science specialist on my campus in San Antonio, Texas, and a Texas Certified Master Naturalist in the Alamo Chapter.

Working with my elementary students and their families during community habitat restoration service projects, our efforts are primarily targeted toward planting native trees. However, we must first remove invasives that have overrun and degraded the biodiversity of the site. From first hand observations *A. donax* clogs waterways, even those that only run seasonally, where it forms dense thickets that effectively and permanently displaces the native plants and their community of native animals. The seed production is so prolific, mats sometimes coat the banks of waterways everywhere in the vicinity of the *A. donax* infestation. They seem to blow in the wind, but stick in any damp spot.

In the Texas Hill Country, where I most frequently see the gradually spreading colonies of *A. donax*, it eventually engulfs the most diverse and valuable habitats wherever water is traced up into sheltered canyons, gullies, and seep springs. In a land with too little water, *A. donax* is already a serious problem

despite volunteer efforts by organizations such as the Texas Master Naturalists to control the spread of it in our natural areas.

Please choose wisely.

Best regards,

Kent Page

Science Academic Support Teacher

Peggy Carnahan ES, Northside ISD

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My name is Bob Hostettler. I am the volunteer steward of Kloempken Prairie, 100+ acres of prairies and woodlands that are part of the Forest Preserve District of Cook County, in suburban Chicago. For 21 years, my volunteers have been working for free out of love of the land to preserve and increase the diversity of native plants on the site we manage.

I am distressed to learn that there are plans to have an incentive for growing *Arundo donax*, giant reed, as “advanced biofuel feedstock.” It is an invasive species that without much doubt will go the way of many other invasives, and invade our preserves and destroy plant and animal habitat.

Because there are thousands more acres in need of management in Cook County, for example, than there are people to manage them, invasives have a way of taking up residence in unmanaged areas and on private land. Then they begin invading the managed sites. At Kloempken Prairie, European buckthorn took hold decades ago, and I’ve battles reed canary grass for many years ,but in recent years I’ve seen purple loosestrife and teasel move closer to and then into my site, thus diverting time and energy from nourishing the native plants to killing of the invaders.

Surely there must be alternatives, such as switch grass, to the invasive giant reed.

Please do not establish the rule that will encourage giant reed.

Thank you.

Bob Hostettler

Volunteer Steward, Kloempken Prairie

773-338-5377

Watched this one invade many wetland areas over my career.

Jack LeClair, M.S.

Texas A&M-Kingsville

A ban on growing new stands should be enacted coupled with promotion of harvesting existing wild stands of *Arundo donax*.

Joseph R. Jarrett
College Station, TX

Arundo donax is one of the, if not the, most difficult invasive plants to eradicate once it takes hold in the wild. It has already done great damage to native ecosystems in Texas. To grow this plant deliberately, and thus give it the chance to escape cultivation, is highly irresponsible, if not criminal.

Yates Barreda
Austin, TX

Arundo Donax moved into our area of South Texas innocently enough and has rapidly taken over lowland areas around our wetlands. These wetlands provide critical habitat for migrating species such as the endangered Whooping Crane, various species of ducks and geese, etc. It can be seen in every barge ditch along Texas highways, competing for water with our Texas natives.

Claire Barnhart, Certified Master Naturalist
Bernhart Ranch
Berclair, TX