The Native Plant Society of Oregon opposes growing Arundo donax in Oregon.

Key Points:

- *Arundo donax* is a catastrophic invasive species in other areas
- Arundo donax is likely to become a catastrophic invasive species in Oregon
- ODA's Risk Assessment understates the risk of Arundo donax for at least five reasons
- Arundo donax should be classified as a noxious weed and listed

This plant is extremely aggressive, one of the fastest growing weeds in the world. In areas where it becomes established, it alters river ecology and drastically reduces populations of native plants and animals.

There is still a question whether Arundo will become invasive in Oregon's climate. However, if it grows well enough to be successful as a biofuel, it will become invasive.

No regulations can be strong enough to prevent this plant from escaping cultivation when it is planted on a large scale for biofuel production.

(PGE estimates as many as 50,000 to 90,000 acres could be needed to feed the Boardman power plant.)

Once Arundo is present in Oregon on a large scale, the danger of its escaping is permanent, and this will certainly happen with time.

Future Oregonians will be saddled with the high cost of trying to slow the spread of Arundo whether or not it provides any benefit as an energy source.

There is a larger issue facing Oregonians. ODA's permanent rule allows any entity to plant industrial sized stands of Arundo donax.

The current issue of the Sierra Clubs magazine provides some interesting context.

"It's high yielding. It's fast growing. And it's drought tolerant," enthuses Wil Glenn, spokesman for the Biofuels Center of North Carolina. It's called *Arundo donax*, or giant reed, and biofuel promoters believe it could be the miracle feedstock they've been waiting for.

Next year, the Italian company Chemtex International will open a commercial cellulosic ethanol plant in Clinton, North Carolina-one of several under construction. The factory is expected to produce 20 million gallons of biofuel a year, a third of it from 100,000 tons of locally grown arundo.

... But the weed's hardiness is a mixed blessing. Native to India, it has been labeled as an invasive plant or a noxious weed in eight states. It grows as much as 10 inches a day. It can resprout from root fragments buried nine feet deep. Fire won't kill it, and floods tend to spread it. In California, where it was planted for erosion control in the 1800s, it clogs river channels, sucking up vast amounts of water, squeezing out native plants and wildlife, and costing the state up to \$25,000 an acre to eradicate it."

PGE wants to exploit Oregon's non-extractive natural resource-based economy, including rural jobs.

HB2813 is the only way the potential invasion of Arundo donax can be prevented. Otherwise, ODA's permanent rule will allow any and all widespread commercial plantings of this catastrophic invasive species.