



Department of Horticulture and Crop Science

226 Kottman Hall
2021 Coffey Road
Columbus OH 43210-1086

Phone: (614) 247-6258
Fax: (614) 292-7162
E-mail: barker.169@osu.edu

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Ms Delane Richardson
Director of Research
Chemtex International Inc
6951 Ridge Road
Sharon Center, OH 44274

Dear Ms Richardson

Pursuant to our phone conversation this morning, I have reviewed the document “Voluntary Best Management Practices for Energy Crops – Minimizing the Risk of Invasiveness” published by North Carolina State University, the North Carolina Department of Agriculture and the Biofuels Center of North Carolina, and agree that the practices they propose for a) information gathering, b) planting and field management, c) harvesting, d) transportation, and e) storage, are feasible for the commercial cultivation of *Arundo donax* as a biofuel crop. These practices minimize the chance of *Arundo donax* escaping from cultivated plantings.

I have conducted experimentation in Ohio with *Arundo donax* for three years and have some experience regarding its biology; namely:

- (i) *Arundo donax* has a high yield potential (up to 20 tons/ac under ideal conditions), and as such, has potential for use as a biofuel crop in Ohio.
- (ii) *Arundo donax* has been used widely as an ornamental species throughout Ohio, but has not been observed or documented to have “escaped” from these plantings. Although we have not measured the response of *Arundo donax* to cold temperature, I believe the cold winters in Ohio are a significant factor in preventing the dispersal of *Arundo donax* that is observed and reported in southern USA states.
- (iii) I have a ¼ acre nursery plot of *Arundo donax* in Columbus Ohio that is approximately 12 years old. This area grows within 50 feet of a stream, but is separated from the stream by a regularly mowed grass buffer strip. We have not measured nor observed any spread of *Arundo donax* plants from this nursery area into the stream.
- (iv) *Arundo donax* produces short rhizomes, however we have not observed spread of plants by more than 2 feet per year. This rate of spread makes it unlikely that *Arundo donax* will escape managed stands.
- (v) Although *Arundo donax* produces a spectacular flower head, we do not see any evidence of seed production from these seed heads, nor have observed any propagation of seedlings from seed. I believe this species is sterile.

Yours sincerely

Dr David Barker
Associate Professor, Grassland Ecology