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Florida EPPC

Scott Ditmarsen, Chair
Dow AgroSciences LLC

5030 Ashington Landing Drive
Tampa, FL 33647
(813)866-7090
scditmarsen@dow.com

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Mr. Richard Gaskalla, Director
Division of Plant Industry
Florida Department of Agriculture
and Consumer Services
PO Box 147100
Gainesville, FL 32614

Dear Mr. Gaskalla:

As Chair and on behalf of the Florida Exotic Pest Plant Council (FL EPPC), I am writing to urge the Division of Plant Industry to use diligent precaution as bioenergy crop species are proposed for cultivation in Florida. As I believe you know, FL EPPC is a not-for-profit organization of professional land managers, researchers, consultants, and others who share the objective to support the recognition and management of invasive exotic plants in Florida's natural areas.

While I understand that the Biomass Rule (5B-57.011) stipulates both efforts to prevent spread of propagules from the cultivated areas and a bond or certificate of deposit to be used if biomass plantings are abandoned without removal of the plant material, I am concerned that these safeguards are insufficient if the species used are likely to become invasive in Florida's conservation areas. For example, the rule requires no removal of the species beyond the cultivation areas, which is not covered by the bond. Our membership represents the State's experts in understanding and addressing the difficulties and expense of controlling invaders as they spread into natural areas. The rule offers no authority or resources to address that eventuality. As a result, FL EPPC is particularly concerned that some species should **not** be permitted for cultivation over the acreages necessary for biofuel generation.

Examples of three species that we believe should not be cultivated in Florida because of potential inability to develop best management practices that would avoid escape from the cultivation site are *Arundo donax*, *Jatropha curcas*, and *Pennisetum purpureum*. While our concerns are not limited to these species, I cite them here as clear examples of risks we believe DPI should not ignore. As you know, we are still waiting for your decision on our petition

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of March 12, 2007 to list *A. donax* as an invasive plant in Florida. It is critical to consider this petition prior to permitting any cultivation of this species for biofuel.

Further discussion of the latter two species is warranted. *Jatropha curcas* is currently being heavily promoted in Lee and other southwestern Florida counties. I assume that DPI has already permitted the planting of this species, as we are aware of existing cultivation efforts. As I believe you know, the IFAS Invasive Plant Working Group is currently considering requiring that this species be evaluated using the Predictive Tool, which would result in the conclusion that the species has a high probability of becoming invasive in Florida. This species has already started to colonize Florida's natural areas from its limited horticultural use over the last century. FL EPPC does not now regard it as a threat to our natural resources; however, the significant increase in propagule pressure as a result of biofuel planting in coastal and wetland areas similar to those in which it has become invasive in many other countries (e.g., Australia, Brazil, southeast Asia, Tonga) causes us significant concern. Consistent results from the Weed Risk Assessment, whether undertaken in Australia, Hawaii and the Pacific, or Florida, support the conclusion that permitting cultivation of this species poses a clear risk that it will become a major invader here, as it has elsewhere.

Pennisetum purpureum is another species currently under investigation as a biofuel. FL EPPC lists this species as a Category I invader in Florida's natural systems. Similarly, the IFAS Assessment recommendation is not to plant it in south Florida because of current impacts, with insufficient information about its status in central and north Florida to draw a clear conclusion. Considering the cultivation of a known invader with negative impacts in natural areas seems again to put Florida's resources at irresponsible risk.

We ask that you please send a clear message to the bioenergy industry that renewable energy generation will only be permitted by DPI for native species and those non-natives that have low probability of becoming invasive. FL EPPC, like many others, is fully in favor of pursuing energy sources that will significantly reduce Florida's contribution to greenhouse gases. However, we caution against trading one environmental impact for another. Invasive plants negatively affect our native species, which adds to the other stresses threatening their viability under changing climate and rising sea levels. Control of invaders requires use of equipment, herbicides, and materials that contribute to carbon releases and have other impacts. Floridians are dependent on DPI to make thoroughly considered decisions as we advance into new biofuel-based technologies. FL EPPC could not urge you more strongly to protect Florida's natural resources while you encourage the use of alternative energy sources.

Thank you for your attention to these concerns. We look forward to hearing that DPI will not permit the use of species with high probability of being invasive in Florida.

Sincerely,

Scott Ditmarsen
Chair

Cc: FDACS Commissioner Bronson
UF-IFAS Dean Arrington
UF-IFAS Dean McLellan