

Nyanza Trustee Council
c/o MassDEP
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108



Attn: Karen Pelto

Dear Ms. Pelto,

On the behalf of the SuAsCo Cooperative Invasive Species Management Area (CISMA), I would like to express support for the proposed Nyanza Superfund site draft natural resources restoration plan. In particular, the SuAsCo CISMA supports the focus on aquatic weed control in the Sudbury River watershed, and appreciates being identified as the entity to coordinate invasive species mapping, management and control. Invasive species pose one of the greatest threats to the ecological integrity of the SuAsCo watershed. Our organization is committed to working collaboratively to combat invasive species across jurisdictional boundaries. Having the SuAsCo CISMA lead the coordination of the proposed projects is a sound strategy to effectively remediate the project areas. The proposed projects fall within our mission for the organization and will allow us to build upon our existing partnerships and create new ones. We have successfully implemented projects similar to those being proposed in the Nyanza plan. We have the expertise within our membership and the required structure to successfully execute and complete the proposed projects for mapping and control of *Trapa natans* (water chestnut) and *Lythrum salicaria* (purple loosestrife) and to partner with MassWildlife to restore *Zizania aquatica* (wild rice) populations.

Since the formal adoption of our founding Memorandum of Understanding by the 23 original members in 2009, the SuAsCo CISMA has grown and currently is made up of 37 members which include federal, state, nonprofit, and municipal organizations. The group has secured over \$150,000 in grant support, and has tracked and distributed those funds to the appropriate partners through our fiscal agent, Mass Audubon.

Our partners have expertise in the types of projects proposed in the restoration. CISMA members, including Mass Audubon, U. S. Fish and Wildlife Service, Sudbury Valley Trustees, New England Wild Flower Society, Organization for the Assabet, Sudbury and Concord Rivers, and The Trustees of Reservations have extensive experience mapping invasives in wetland systems and on large conservation properties. In 2010, CISMA members, led by Sudbury Valley Trustees, successfully reared 36,500 *Galerucella spp.* beetles and released them at 5 different sites within the watershed to control purple loosestrife.

Our CISMA coordinator successfully coordinates invasive control projects for the U. S. Fish and Wildlife Service which includes manual harvesting of water chestnut along the Sudbury and Concord Impoundments and coordinating a multi-partner effort with the Towns of Sudbury, Lincoln and Concord, the Hop Brook Association and the Concord Land Conservation Trust to use an aquatic harvester to mechanically remove water chestnut. These organizations are all CISMA members. We also work with the Wayland Surface Water Quality Committee, and can easily coordinate the continued treatment of water chestnuts in Heard Pond with that committee.

In the plan itself, please update the number of CISMA project partners - it is now 37, not 20. Also, please clarify the year in which you would expect the assessment of water chestnut infestation to be completed. It is listed at 2010 in the plan. We assume that this would be changed to 2013 or 2014, as we believe it will be impossible to complete this in 2012 since the specific details of how this effort will be funded and accomplished have yet to be worked out. Additionally, due to rises in costs to the proposed equipment for purchase, we believe that the amounts submitted with our proposals in 2008 are now low. We request flexibility in working with the Trustees to slightly re-allocate funds from within the aquatic weeds project if necessary to purchase the required equipment.

Thank you for providing the opportunity to provide comments on this draft restoration plan. We look forward to working closely with the restoration project representatives and improving the aquatic resources of the Sudbury River.

Sincerely,

A handwritten signature in black ink, appearing to read "Amber Carr", written over a horizontal line.

Amber Carr
SuAsCo CISMA Coordinator