STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION AND FORESTRY
BOARD OF PESTICIDES CONTROL
28 STATE HOUSE STATION
AUGUSTA, MAINE 04333

JANET T. MILLS
GOVERNOR

AMANDA E. BEAL
COMMISSIONER

March 31, 2026

Wilkinson Ecological Design, Inc.
Dylan Brown
28 Lots Hollow Rd.
Orleans, MA 02653

RE: Variance permit for CMR 01-026 Chapter 29, Wilkinson Ecological Design, Inc., 24 Lanes Island Way, Freeport

Greetings,

The Board of Pesticides Control considered your application for a variance from Chapter 29. The variance is approved, provided that all products to be used are currently registered in the State of Maine or were registered at the time of purchase and that any application is made above the high-water line.

The Board authorizes the issuance of two-year permits for Chapter 29; therefore, this permit is valid until December 31, 2027, provided that the applications are consistent with the information provided in the variance request. Please notify the Board in advance of changes, particularly if you plan to use a different product from those listed.

Please bear in mind that your permit is based upon your company adhering to the precautions listed in Section X of your Chapter 29 variance request.

I will alert the Board at its next meeting that the variance permit has been issued. If you have any questions regarding this matter, please do not hesitate to contact me at (207) 287-2731.

Sincerely,

Alexander Peacock
Director

ALEXANDER PEACOCK, DIRECTOR
90 BLOSSOM LANE, DEERING BUILDING

PHONE: (207) 287-2731
THINKFIRSTSPRAYLAST.ORG

PESTICIDE VARIANCE APPLICATION

Department of Environmental Protection
Board Of Pesticide Control

INVASIVE VEGETATION MANAGEMENT
24 LANES ISLAND WAY
FREEPORT, MAINE

Prepared for:
Glen Thurlow

Prepared by:
Wilkinson Ecological Design

BOARD OF PESTICIDES CONTROL
APPLICATION FOR VARIANCE PERMIT
(Pursuant to Chapter 29, Section 6 of the Board's Regulations)

I. Dylan Brown (508) 246-7087
Name Telephone Number

Wilkinson Ecological Design SCF-2735
Company Name

28 Lots Hollow Road Orleans MA 02653
Address City State Zip

II. Dylan Brown CMA-6433
Master Applicator (if applicable) License Number

28 Lots Hollow Road Orleans MA 02653
Address City State Zip

III. **As part of your application, please send a revegetation plan and digital photos showing the target site and/or plants and the surrounding area, particularly showing proximity to wetlands and water bodies, to pesticides@maine.gov**

IV. Area(s) where pesticide will be applied:
Referring to the Wilkinson Ecological Design (WED) Phragmites Management Protocol, we will be applying herbicide to invasive phragmites and Japanese knotweed located between the southern lawn and coast line.

V. Pesticide(s) to be applied:(Including EPA Registration Number)
RoundUp Custom for Aquatic (524-343), Cidekick II Surfactant (Not EPA Registered)

VI. Purpose of pesticide application:
To control the invasive plant species found in treatment areas in section IV above.

VII. Approximate dates of spray application:
July 2026 - December 2026 & July 2027 - December 2027

VIII. Application Equipment:
Drip Bottle, Herbicide Dauber, Backpack sprayer, mechanical herbicide wiper.

IX. Standard(s) to be varied from:
Chapter 29, Standards for Water Quality Protection, Section 6, Part A

X. Method to ensure equivalent protection:
Majority of herbicide will be applied using a wiper to apply herbicide directly to the stems of the phragmites, minimizing movement of herbicide off the target plant. Follow up treatment is expected to be minimal, using drip bottles, daubers or backpack sprayers. Drip bottles and daubers will be applied directly to the phragmites and knotweed stems, minimizing herbicide drift. Sprayers will be use the maximum droplet size allowed by the nozzle and will not be used on days with wind over 10mph or on rainy days to reduce herbicide drift.

XI. Revegetation Plan (attach separately if necessary)
See WED Phragmites Management Protocol.
Summary: The area will be monitored for the native seed bank to sprout after treatment. WED's experience is that the native seed bank will grow back effectively and efficiently, decreasing the human disturbance in the resource areas. If found necessary, WED will reseed the area with a native seed mix to stabilize the soils and increase native vegetation cover.

Signed: _____ Date: 3/26/26

Return completed form to: **Board of Pesticides Control, 28 State House Station, Augusta, ME 04333-0028**
OR E-mail to: pesticides@maine.gov

Rev. 8/2013

WILKINSON
ECOLOGICAL DESIGN℠
28 Lots Hollow Road | Orleans, MA 02653
Tel:(508)255-1113 | Fax:(508)255-9477

PHRAGMITES & KNOTWEED MANAGEMENT PROTOCOL

24 Lanes Island Way (Map 25 Lot 61H)
Freeport, ME
March 23, 2026

Introduction

The project proposes management of the State-listed invasive common reed (*Phragmites australis*) currently located at the southern portion of the parcel. The State-listed invasive Japanese knotweed (*Reynoutria japonica*) is present in patches along the southern portion of the parcel, sitting between the lawn and phragmites. The project, shown on WED's Restoration Plan (dated 3/23/2026), will include invasive plant management of approximately 6,925 square feet (SF). The management will consist of treatment with a glyphosate-based herbicide, approved for use in wetlands, using one of the methods listed on page three. The methods to be used will depend on the density of the phragmites stand. All work being proposed will remain out of tidal waters, tidal waterfowl and wading bird habitat and outside of the highest astronomical and mean high tide. The images below show the dense and mature phragmites stalks and patches of knotweed that have grown throughout the 2025 growing season.

Phragmites Management Protocol

Method for sparse phragmites

- A hand-held sponge applicator will be used to apply herbicide directly to the stems. Because the treatment is targeted to individual stems, it does not produce any potential over-spray, or chemical drift associated with foliar herbicide applications.

Method for moderate or dense phragmites

- A mower will be used, followed by a wipe method for treatment. The phragmites will be cut within six inches (6") of the ground in late spring to early summer to allow for more effective treatment. After the phragmites reach an optimal height, treatment is applied directly to the stems using a mechanical weed wiper.

- If work begins in the later summer or early fall, a bundle cut and wipe technique will be used. In late summer or early fall, the phragmites will be tied in bundles, cut, and herbicide approved for use in a wetland will then be applied directly to the exposed stems. Spill-proof containers will be used, and all best management practices (BMPs) will be followed.

Both methods of treatment are targeted to individual stems; therefore, they do not produce any potential over-spray or drift associated with typical foliar herbicide applications. All herbicide applications will be performed by Maine licensed applicators experienced with applications in and near wetlands.

If natural regeneration is insufficient to achieve vegetative cover, reseeding or planting with appropriate native wetland species may be conducted to stabilize soils and promote native plant recovery.Based on WED's experience, native vegetation and seed banks typically re-establish naturally and rapidly following phragmites control. A series of photographs from two phragmites management projects, on pages five and six, depicts the re-growth of native vegetation following initial management.

Knotweed Management Protocol

Method for sparse knotweed with stems larger than 1/2"

- An injection applicator will be used to apply herbicide directly to the pith of the stems. Because the treatment is targeted to individual stems, it does not produce any potential over-spray, or chemical drift associated with foliar herbicide applications.

Method for moderate to dense knotweed with stems smaller than 1/2"

- A mower or hedgetrimmer will be used, followed by ultra-low foliar application or by using the "cut and wipe" method for treatment. If used, ultra-low foliar application will only be applied in calm and dry conditions, using larger droplet sizes to minimize drift. The knotweed will be cut within six inches (6") of the ground in late spring to early summer to allow for more effective treatment. After the knotweed reaches an optimal size, treatment is applied directly to the foliage and stems.

This state-listed invasive plant thrives in wetland habitats and disturbed areas such as roadsides and has the ability to form large colonies as it is beginning to in the case of the proposed project area. It spreads vigorously via underground rhizomes, forming dense thickets that exclude native vegetation. It also produces allelopathic chemicals that leave the ground layer barren. Although difficult to eradicate, Japanese knotweed can be successfully controlled by using the treatment protocol described above. All herbicide applications will be performed by Maine licensed applicators experienced with applications in and near wetlands.

Project Timeline

Spring/Summer 2026:

- Mowing of phragmites stalks and smaller knotweed to an approximate 6" height. The mowing will be followed by the wipe treatment method described above for moderate to dense phragmites and the method for moderate to dense knotweed with stems smaller than 1/2".

Fall 2026:

- Final mowing of the phragmites and knotweed. Follow-up treatment will be conducted if needed. See the below Follow-up Treatment section for further details.

2027:

- The work area will be monitored for phragmites resprouts. If resprouting is observed, 2026 work protocols will be repeated in 2027. The area will also be monitored to ensure native vegetation begins to establish in the project area.

Spring 2028:

- The work area will be monitored for phragmites resprouts. If resprouting is observed, 2026 work protocols will be repeated in 2028 prior to the closing of the PBR work period. The area will also be monitored to ensure native vegetation begins to establish in the project area.

Follow-up Treatment

If phragmites and knotweed are observed re-sprouting during the second mow in the fall of 2026, following the initial treatment, they will be managed using either the "cut-and-wipe" method or a hand-held sponge applicator to apply herbicide directly to the stems. Because these treatments target individual stems, they do not produce overspray or chemical drift associated with foliar herbicide applications.

Sample phragmites management project A

Fall 2015 - Image of phragmites following summer mowing, prior to initial treatment.

Spring 2016 - Regrowth of native plant species from existing vegetation and seed bank.

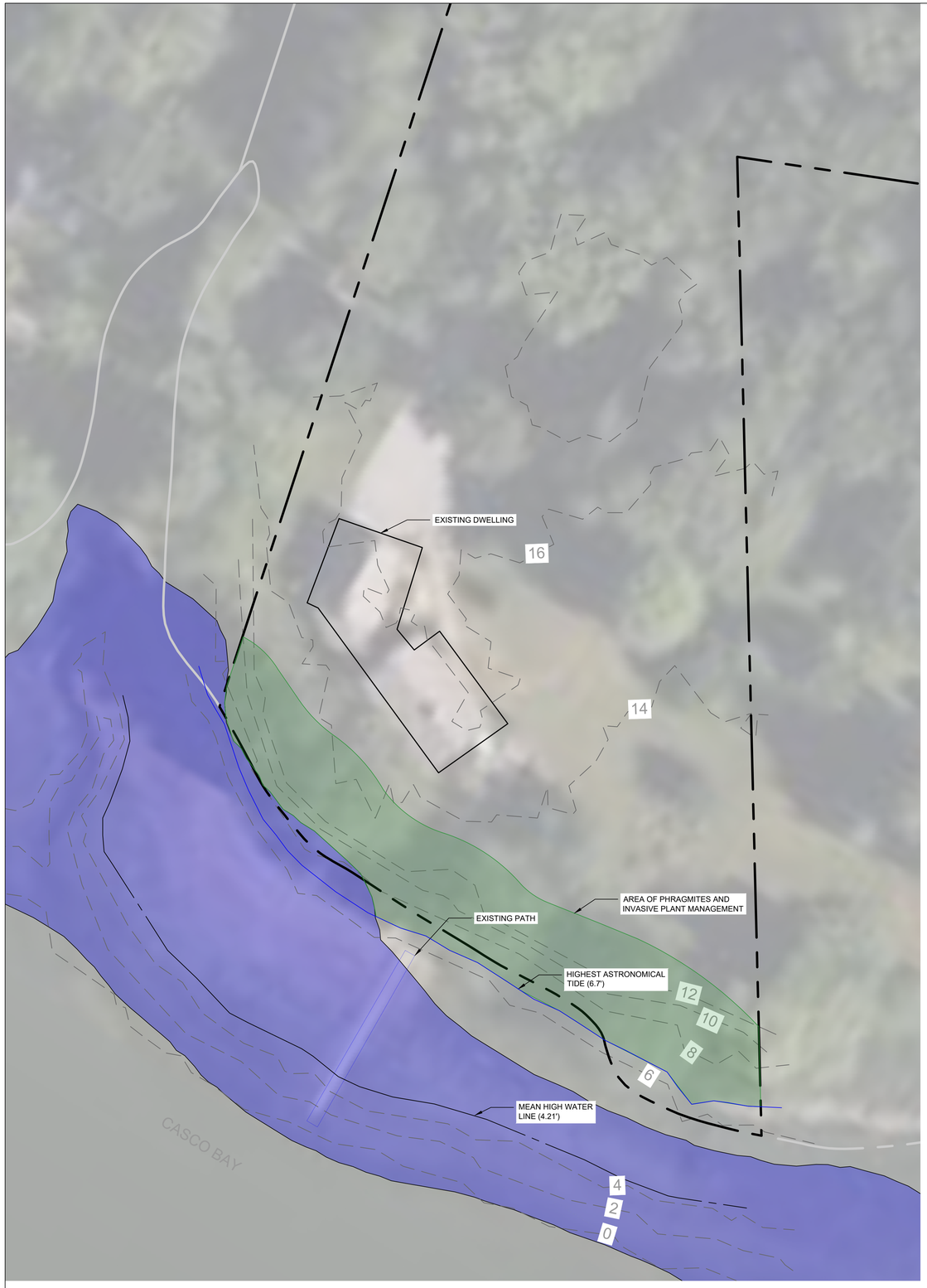
Summer 2017- Image of increased density and species of native plants revegetating management area.

Sample phragmites management project B

Summer 2015 - Image of 15′ tall phragmites stand prior to initial treatment. This was an example of the tallest and

Spring 2017 - Regrowth of native plant species from existing vegetation and seed bank had re-established over the entire wetland. Blue vervain is in full bloom in the photo.

Summer 2021- Five years following the initial management, phragmites has not re-invaded the project area and a spectacular show of swamp rose mallow blankets the wetland.



1 RESTORATION PLAN

0 20' 40'

SCALE: 1" = 20'

LEGEND

AREA OF PHRAGMITES MANAGEMENT AND INVASIVE PLANT MANAGEMENT (APPROXIMATELY 6,925 SF) PLEASE SEE WORK PROTOCOL FOR FURTHER INFORMATION.

TIDAL WATERFOWL AND WADING BIRD HABITAT

2 LOCATION MAP

NOT TO SCALE

WILKINSON
ECOLOGICAL DESIGN

28 Lots Hollow Rd., Orleans, MA 02653
TEL: (508) 255-1113 FAX: (508) 255-9477
www.wilkinsonecological.com

SURVEY PROVIDED BY:

PLAN IS BASED ON GIS INFORMATION SOURCED FROM THE MAINE GEOLIBRARY. MEAN HIGH TIDE LINE IS APPROXIMATE USING THE NAVD88 DATUM.

NOTES:

1. HERBICIDE APPLICATION WILL BE REQUESTED AS A VARIANCE THROUGH THE MAINE BOARD OF PESTICIDE CONTROL.
2. ALL HERBICIDES ARE TO BE APPLIED BY LICENSED INDIVIDUALS ONLY.
3. ALL WORK WILL REMAIN ABOVE AND OUT OF THE HIGHEST ASTRONOMICAL TIDE.
4. NO WORK WILL TAKE PLACE WITHIN TIDAL WATERS.
5. NO WORK WILL TAKE PLACE WITHIN TIDAL WATERFOWL AND WADING BIRD HABITAT

ABBREVIATIONS:

&	AND	LSCSF	LAND SUBJECT TO COASTAL STORM FLOWAGE
@	AT	MHW	MEAN HIGH WATER
Ø	DIAMETER	MLW	MEAN LOW WATER
#	POUND or NUMBER	NHESP	NATURAL HERITAGE AND ENDANGERED SPECIES PROGRAM
ACEC	AREA OF CRITICAL ENVIRONMENTAL CONCERN	NOI	NOTICE OF INTENT
APPROX	APPROXIMATE	NTS	NOT TO SCALE
AURA	ADJACENT UPLAND RESOURCE AREA	OC	ON CENTER
BLDG	BUILDING	OOC	ORDER OF CONDITIONS
BOB	BOTTOM OF BANK	PROP	PROPOSED
BVW	BORDERING VEGETATED WETLAND (IF APPLICABLE)	REV	REVISION
CY	CUBIC YARD	SC	SPECIAL CONDITION
DEP	DEPARTMENT OF ENVIRONMENTAL PROTECTION	SF	SQUARE FEET
EA	EACH	TOB	TOP OF BANK
EL	ELEVATION	UON	UNLESS OTHERWISE NOTED
EX	EXISTING	VEG	VEGETATION
LOW	LIMIT OF WORK	VZ	VELOCITY ZONE
		WED	WILKINSON ECOLOGICAL DESIGN, INC

REV	DATE	DESCRIPTION

THURLOW

24 LANES ISLAND WAY
FREEPORT, ME 04032

DATE: 03/23/2026	SCALE: 1" = 20'
DRAWN BY: MRS	CHECKED BY: IP

FOR PERMITTING PURPOSES ONLY
THIS DRAWING IS NOT INTENDED FOR CONSTRUCTION

RESTORATION PLAN

1 OF 1

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