



RESPONSE TO COMMENTS MEMO

TO: Shannon Palmer @ Hingham Conservation Commission
FROM: Brad Holmes @ ECR
DATE: January 28, 2026
RE: 9 Porters Cove Road, Hingham – DEP #034-1551

1. The Project Narrative lists “recreational access to the coast” as a goal of the project however this is not consistent with the WPA eligibility criteria for ecological restoration limited projects. Please clarify and expand upon plans for recreational access upon management of Phragmites.

Response – The Project Narrative lists:

The objective of the management program is to control the growth of non-native invasive Common Reed (Phragmites australis), to improve and maintain wildlife habitat, maintain water quality, promote growth of less pervasive native plant species, and provide safe recreational access along the coast.

Access along the coast is an added benefit to the ecological restoration project, but it is not the main objective of the project. The main objective is to remove the invasive species from the site to restore the Salt Marsh to a native state, which will then bring the added benefits as noted in the statement above. The Project Narrative has been revised to remove recreational access along the coast.

2. The Narrative did not include performance standards analysis for impacts to resource areas under the WPA and HWR.

Response - This application has been filed as an Ecological Restoration Notice of Intent, which is classified as a Limited Project. The limited project provisions allow for the issuance of an Order of Conditions for certain projects that occur within resource areas and are exempt from their associated performance standards. Per the 310 CMR 10.12 and 10.13 see below:

Notwithstanding the provisions of 310 CMR 10.25 through 10.35, 10.54 through 10.58, and 10.60, an Ecological Restoration Project shall be permitted by a Restoration Order of Conditions provided that the project meets all applicable eligibility criteria in 310 CMR 10.13.

As stated on the WPA Form 3, Appendix A, the project meets the applicable eligibility criteria and confirmed by DEP through the issuance of a DEP file number of DEP #034-1551.

3. The proposal includes the use of a mechanical mower deck for cutting larger stands of Phragmites. In other similar projects, a low pressure Marsh Mower was proposed for the aquatic environment to minimize impacts to soils and vegetation. Was this considered?

Yes this was considered. The restoration contractor is proposing to use a Ventrac utility tractor. It is selected for its ability to work in sensitive environments such as the project area at low tide. It is



equipped with 8 low flotation turf tires which exert 6 pounds of pressure per square inch which qualifies it for being in the low ground pressure category.

4. Staff has concerns about the use of gas powered equipment in such a sensitive ecological area (Weir River ACEC). Please discuss how potential impacts will be avoided.

Gas powered equipment would consist of the mower deck described above, or hand held gas powered brush saws. Any fueling of the equipment would be done off site.

5. The Narrative includes several references to inland (lakes and ponds) guidelines in the chemical recommendations. As this is a coastal area with tidal and other considerations, please confirm if the chemical recommendations and efficacy is comparable.

The herbicide guidelines is comparable between inland and coastal areas. All herbicide products are EPA approved and would be applied by a licensed herbicide applicator. The preference is to use a wetland-approved glyphosate based herbicide such as Rodeo herbicide or equivalent. The herbicide product information would be coordinated with the Conservation office prior to use.

6. On page 6 of the Project Narrative, it states the project site is not within a designated Priority Habitat Area. Please correct.

The Project Narrative has been revised to correct this.

7. Please expand upon what precautions will be taken to minimize impacts to non-target species from foliar spray in this ecologically sensitive area.

Foliar applications would only be performed in dense stands of Phragmites without the presence of non-target species. If non-target species are in or near the proposed treatment area, then only the targeted application methodology would be performed.

8. Please indicate measures of success in Section 7.0 for each treatment year, as applicable, for the Commission to evaluate progress (i.e. expected percent eradication of Phragmites and re-establishment of native species.) Also indicate the overall restoration goal for control of Common Reed (percentage).

The Project Narrative has been revised to include more detail in Section 7.0 as noted above.

9. It is not clear if the mulched phragmites will remain in place or be removed. Task 4 includes "clean up" of treated Phragmites. Please specify how this will be done with consideration for minimizing additional disturbance to resource area.

The mowing or mulching proposes to leave the mowed material on site rather than removing it. This methodology was performed several years ago (2020) on a nearby property (12 Boulder Glen Road) and it was very effective. The mowed phragmites material is quite small and degrades very quickly once on the ground. In our opinion it is not necessary to remove the phragmites once it has been mowed. However, if excessive material remains after mowing, hand raking could be performed, where necessary.

ECR

Environmental Consulting & Restoration, LLC



10. Will treatment be restricted by tides and if so, please include in Section 7.0

Yes, treatment would occur during low tides only. The Project Narrative has been revised to include this information.

11. In the event that the native marsh vegetative community does not re-establish after management of Phragmites, staff recommends a restoration plan be considered.

*If it is observed that the Salt Marsh is not revegetating during the ongoing monitoring events, then a restoration planting plan using Salt Marsh plugs will be prepared and submitted to the Conservation Commission as a special condition to the anticipated Order of Conditions. Salt Marsh plugs would consist of a mix of lower Salt Marsh plugs (*Spartina alterniflora*) and upper Salt Marsh plugs (*Spartina patens*) hand planted to supplement the restoration area. Salt Marsh plugs typically come in trays of 50 plugs per tray. Each plug is approximately 2 inches in size. Salt Marsh planting would occur in mid summer through fall when the plug plants are available from the nursery.*

12. Monitoring reports after each growing season will be requested. Please include in Section 7.0

The Project Narrative has been revised to include this.

Please include this submittal with the Notice of Intent application under review. Upon review of this memo, please contact me at (617) 529 – 3792 or brad@ecrwetlands.com with any questions or requests for additional information.

Thank you,
Brad Holmes, Professional Wetland Scientist #1464
Manager