



Attachment C

Noxious Weed Management Plan and Communication

**Weed Management Plan
Longspur Wind Project
Morton and Mercer Counties, North Dakota**

Prepared for:

Minnesota Power

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Duluth, Minnesota 55802

Prepared by:

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January 8, 2026



Confidential Business Information

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1 INTRODUCTION

Minnesota Power is considering the development of the Longspur Wind Project (Project) in Morton County, North Dakota (Figure 1) with additional transmission line development in Mercer County. At the request of Minnesota Power, Western EcoSystems Technology, Inc. (WEST), prepared the following Weed Management Plan (Plan) as part of the conditions of the Wildlife Conservation Strategy, to provide guidance for preventing and controlling the spread of state- and/or county-listed noxious weeds on lands owned, leased, and managed by the Project, while complying with state and local noxious weed management regulations, as applicable.

Noxious weeds are spread by a variety of means including vehicles, construction equipment, livestock, and wildlife. Physical disturbance and chemical alterations of the soil create opportunities for the introduction, infestation, and spread of noxious weeds. Implementation of preventative measures is the most cost-effective management approach to control the spread of noxious weeds. This Plan has been developed using information and guidance from several State resources, as well as existing noxious weed management plans and experience gained from other noxious weed control programs in Wyoming, Colorado, South Dakota, and North Dakota. Monitoring and treatment of weeds both prior to construction and during the operational phase, as applicable, will ensure that goals to achieve the Project's vegetation performance standards by reducing and controlling weeds. Noxious weed control measures will be established during Project development, implemented during construction and operation of the Project, and refined through adaptive management.

2 PROJECT DESCRIPTION

The Project is anticipated to consist of 45 4.5-megawatt (MW) turbines, with a nameplate generation capacity of approximately 202.5 MW, and a planned commercial operation date of 2027. Additional infrastructure at the Project will include 19.5 miles (mi) of new access roads, 52.1 mi of underground electrical collector lines and cables, 5.1 acres (ac) of facility substations, an interconnection substation, a 2.7-mi 230-kilovolt transmission line interconnecting to the Tri County Substation, one permanent meteorological tower, and one operations and maintenance facility.

The Project Area encompasses 25,933 ac in southwestern North Dakota, approximately four mi north of Glen Ullin in Morton County, along with the transmission line that extends north of the Project Area approximately 0.3 mi into Mercer County (Figure 1). This Plan applies to all areas of the Project footprint that are anticipated or have been disturbed with the focus being weed management.

The Project Area is within the Missouri Plateau Level IV Ecoregion, which consists of semi-arid rolling plains punctuated by buttes and badlands (US Environmental Protection Agency [USEPA] 2012, 2013). The Missouri Plateau Ecoregion's rolling to somewhat flat topography was mostly unaffected by glaciation, with natural vegetation primarily consisting of semiarid grasses, including western wheatgrass (*Pascopyrum smithii*), green needlegrass (*Nassella viridula*), blue grama (*Bouteloua gracilis*), and buffalograss (*B. dactyloides*; Bryce et al. 1998). Although large areas of the Missouri Plateau Ecoregion have been converted to agricultural crop production, areas of unbroken native grasslands remain, which are typically used for livestock grazing (USEPA 2012, 2013).

Topography within the Project Area is gently rolling to flat (USA Topo 2021). Cultivated crops and grassland/herbaceous make up approximately 89% of the Project Area (National Land Cover Database [NLCD] 2024). Shrub/scrub, hay/pasture, developed land cover types make up approximately 10% of the Project Area; wooded areas and wetlands compose the remainder cover within the Project Area (NLCD 2024).

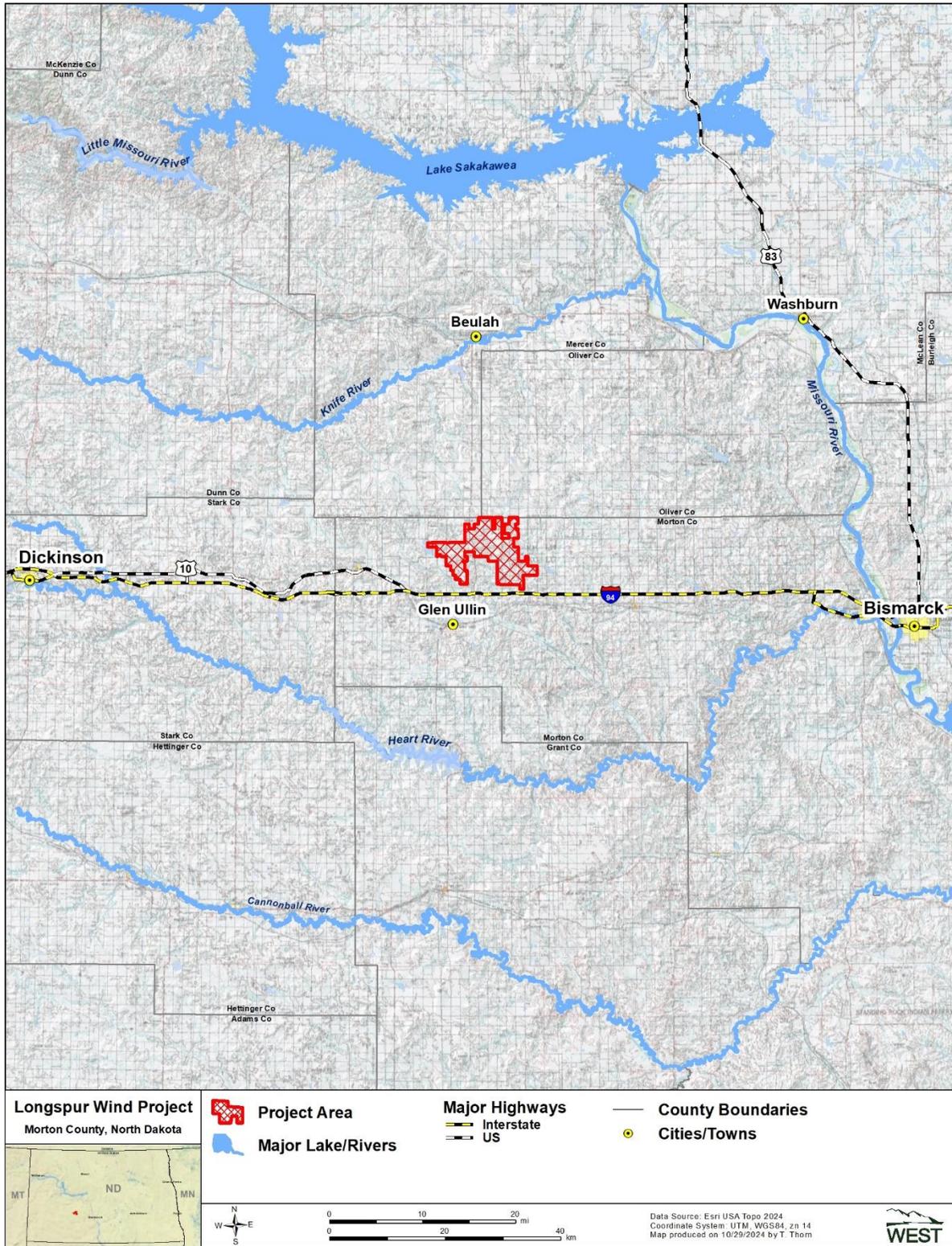


Figure 1. Location of the Longspur Wind Project Area in Morton County, North Dakota.

3 STATE AND LOCAL REGULATIONS

North Dakota Century Code (NDCC) §4.1-47, *Noxious Weed Control*, defines noxious weed as “a plant propagated by either seed or vegetative parts and determined to be injurious to public health, crops, livestock, land, or other property” by the North Dakota Agriculture Commissioner or by a county or city weed board (NDCC §4.1-47-01). The North Dakota Department of Agriculture (NDDA) also identifies the following 13 species as state-declared noxious weeds: absinth wormwood (*Artemisia absinthium*), Canada thistle (*Cirsium arvense*), dalmatian toadflax (*Linaria genistifolia* subsp. *dalmatica*), diffuse knapweed (*Centaurea diffusa*), houndstongue (*Cynoglossum officinale*), leafy spurge (*Euphorbia esula*), musk thistle (*Carduus nutans*), Palmer amaranth (*Amaranthus palmeri*), purple loosestrife (*Lythrum salicaria* and *L. virgatum*), Russian knapweed (*C. repens*), saltcedar (*Tamarisk* spp.), spotted knapweed (*C. maculosa*), and yellow toadflax (*Linaria vulgaris*; NDDA 2021).

Under North Dakota law (NDCC §4.1-47-02) every person is required to “do all things necessary and proper to control the spread of noxious weeds” and the NDDA coordinates with county and city weed boards for weed control programs (NDDA 2021). State law also allows counties and cities to adopt additional noxious weed species if they are approved through the statutory process. Morton and Mercer counties maintain active county weed boards responsible for implementing and enforcing the state noxious weed law but based on the most recent *County and City Listed Noxious Weed* (NDDA 2023), neither county has adopted any additional noxious weed species beyond the 13 species designated at the state level. Morton County incorporates noxious weed control into its zoning requirements, including a provision that noxious weeds on certain properties must be maintained at a maximum of 10 inches high; Mercer County does not have expanded ordinances beyond state requirements.

4 WEED MANAGEMENT

Noxious Weed field surveys for the Project have not been conducted; however, any of the 13 state-listed noxious weed species have the potential to be present within the Project Area and, therefore, are included in this Plan. Characteristics relevant for control and treatment options for each of these 13 noxious weeds are presented in Table 1; species characteristics and recommendations are based on information from *Invasive and Troublesome Weeds in North Dakota* (North Dakota State University [NDSU] and NDDA 2023), supplemented when applicable by the *North Dakota Weed Control Guide* (NDSU and NDDA 2025).

Herbicides should be used only in accordance with their registered use and shall be used or applied only by appropriately certified applicators according to federal and state laws and regulations. The treatment recommendations presented in Table 1 are not the direct recommendations of WEST but are based on information from sources including NDSU and NDDA.

Table 1. State-listed noxious weeds likely to be present within the Longspur Project Area in Morton and Mercer counties, North Dakota, and treatment methods.*

Common Name	Species Name	Life Form ¹	Treatment Method ²	Management Notes
Absinth wormwood	<i>Artemisia absinthium</i>	IPF	CH, MD	<ul style="list-style-type: none"> Apply herbicides when plants are at least 10 inches tall and actively growing. Herbicides can be used in fall, but plants should be mowed in early to mid-summer first to promote active regrowth before using herbicide. The following herbicides are effective for controlling this species: clopyralid, dicamba, aminopyralid, 2,4-D, picloram, and glyphosate. Small infestations can be controlled by digging up plants.
Canada thistle	<i>Cirsium arvense</i>	IPF	CH, MD, MM, BI, CU	<ul style="list-style-type: none"> The following herbicides are effective for controlling this species: glyphosate, clopyralid, picloram, dicamba, aminocyclopyrachlor, and aminopyralid. Herbicide application in the early bud growth stage (early summer) or to rosettes in the fall is most effective. Multiple years of treatment are recommended for control of this species. Cultivation in winter when temperatures are below 20 degrees Fahrenheit can be effective. Cultivate before plants are three inches tall and repeat after regrowth is less than three inches before the soil freezes. Repeated mowing can be effective at controlling this species. Mow several times per year before plants flower and as close to the ground as possible. Mowing for multiple years is recommended, along with following up with an herbicide application. There are biological control agents available for this species, but none of them are effective at reducing infestations on a large scale.
Dalmatian toadflax	<i>Linaria genistifolia</i> subsp. <i>dalmatica</i>	IPF	CH, BI	<ul style="list-style-type: none"> The following herbicides are effective for controlling this species when applied during flowering or late fall: picloram, imazapic, and chlorsulfuron. Maintain proper livestock stocking rates and do not overgraze to maintain competitive forage and reduce the spread of this species. Two biological control insects have been successful at reducing infestations of this species.
Diffuse knapweed	<i>Centaurea diffusa</i>	IPF	MD, CH, BI	<ul style="list-style-type: none"> Small infestations can be controlled by hand pulling (wear gloves) or by digging. Effective herbicides include: aminopyralid, picloram, and dicamba. Treat an additional area 10–15 feet around knapweed patches to control missed seedlings. Follow up treatments are essential for successful eradication. There are several biological control agents permitted for use on knapweed species and consultation with the North Dakota Department of Agriculture is recommended.

Table 1. State-listed noxious weeds likely to be present within the Longspur Project Area in Morton and Mercer counties, North Dakota, and treatment methods.*

Common Name	Species Name	Life Form ¹	Treatment Method ²	Management Notes
Houndstongue	<i>Cynoglossum officinale</i>	BF	CH, MD	<ul style="list-style-type: none"> • Products containing the active ingredient metsulfuron can be applied throughout the growing season. First-year plants can be treated with 2,4-D from late May to mid-June. Imazapic at high rates can be used for pre- and post-emergent treatments. • A root weevil has been released for control in Canada but has not been approved for release in the United States. • Small infestations can be controlled by digging up plants.
Leafy spurge	<i>Euphorbia esula</i>	IPF	CH, BG, BI, MM	<ul style="list-style-type: none"> • A combination of control methods is most effective for managing this plant. • Mowing or grazing followed by herbicide treatment can be effective at controlling this species • The following herbicides are effective for controlling this species: dicamba, quinclorac, aminocyclopyrachlor, and picloram. There are several herbicide combinations that have also shown effective control. • Glyphosate can be effective when applied after seed-filling in mid-summer or after fall regrowth but before a killing frost. • Grazing with sheep or goats can control top growth in pasture and rangeland areas; however, grazing alone will not eradicate this species. • Many species of biological control are available for this species, and six species are established within North Dakota.
Musk thistle	<i>Carduus nutans</i>	BF	CH, MM, BI	<ul style="list-style-type: none"> • Controlling plants prior to flowering is essential for successful management of this species. • Apply the following herbicides to rosettes in fall or spring for best results: aminopyralid, clopyralid, picloram, aminocyclopyrachlor, or dicamba. Metsulfuron is effective when applied in spring and can be applied when plants are bolting or budding. • Mowing can be effective if done repeatedly before plants are flowering. • There are two biological control insects and one rust fungus that provide control of this species; however, interstate transport of the insect species is not permitted.
Palmer amaranth	<i>Amaranthus palmeri</i>	IAF(W)	MP, CH	<ul style="list-style-type: none"> • This species is resistant to multiple classes of herbicides and modes of action. • Use preemergent herbicide. • The following herbicides are effective for controlling this species applied when growth reaches 2–3 inches in height: 2,4-D, atrazine, chloroacetamide, dicamba, diphenylethers, glufosinate, and glyphosate. • Pulling plants can also be effective if the infestation is small. • Mowing is not recommended.

Table 1. State-listed noxious weeds likely to be present within the Longspur Project Area in Morton and Mercer counties, North Dakota, and treatment methods.*

Common Name	Species Name	Life Form ¹	Treatment Method ²	Management Notes
Purple loosestrife	<i>Lythrum salicaria</i> , <i>Lythrum virgatum</i> , and all cultivars	IPF	MD, CH, BI	<ul style="list-style-type: none"> • Small infestations and younger plants can be controlled by digging up plants. • If plants are in or near water, use herbicides approved and labeled for aquatic use. • Apply glyphosate from July-September. • Triclopyr, aminopyralid and a combination of triclopyr and aminopyralid also provide effective control of this species. • There are three biological control insects that are effective at controlling purple loosestrife.
Russian knapweed	<i>Centaurea repens</i>	IPF	CH, BI	<ul style="list-style-type: none"> • Apply picloram following several hard frosts (mid-October). Application in mid-September or during flowering in midsummer provides shorter-term control than late applications. • Metsulfuron and aminopyralid are also effective. • Mowing and cultivation are not recommended. • There are two biological control insects available for control of Russian knapweed.
Saltcedar	<i>Tamarisk</i> spp.	T/B	CH	<ul style="list-style-type: none"> • Imazapyr is the most widely used herbicide for this species. Imazapyr can also be used in combination with glyphosate. Triclopyr applied in spring or late fall is also effective. • If plants are in or near water, use herbicides approved and labeled for aquatic use. • Do not remove top growth for three years following herbicide application to prevent resprouting. • Biological control of this species is not recommended in North Dakota.
Spotted knapweed	<i>Centaurea maculosa</i>	IPF	See diffuse knapweed	See diffuse knapweed.
Yellow toadflax	<i>Linaria vulgaris</i>	IPF	Not Applicable	<ul style="list-style-type: none"> • The following herbicides are effective for controlling this species: metsulfuron-methyl and picloram. • Planting competitive vegetation can help stop yellow toadflax from spreading in grazing lands. • Biological controls have not been effective in North Dakota.

¹ IAF(W) = introduced warm season annual forb; N/IPF = native/introduced perennial forb; BF = biennial forb; T/B = tree/bush.

² Mechanical methods: MM = Mowing; MP = Pulling; MC = Cutting; MD = Digging/Tilling.

Biological methods: BI = Insects; BG = Grazing Animals.

Chemical methods: CH = Herbicides.

Cultural methods: CU = Cultivate (uprooting young weeds and incorporating them into the soil).

* The North Dakota Department of Agriculture identifies the 13 species listed in this table as state-declared noxious weeds.

Source: North Dakota State University and North Dakota Department of Agriculture (2023, 2025), Agri Care Hub 2025.

4.1 General Weed Management Practices

Weed management is a long-term iterative process that considers site-specific physical, biological, and land use characteristics. Weed management must be accomplished through several integrated practices that include prevention, monitoring, and treatment to address noxious weed incidence, occurrence, and control (DiTomaso et al. 2013). The following best management practices are recommended to limit opportunities for weeds to enter the Project, get established, and/or spread during Project construction and operation:

- Follow all label instructions for recommended grazing practices following vegetation treatment and application of any herbicide.
- Delineate a “baseline” of large noxious weed infestations within construction areas that will need to be treated prior to disturbance.
- Minimize soil disturbance as much as possible and revegetate disturbed areas when possible.
- Excavations, placement of fill soil, or other areas of surface disturbance will be revegetated with appropriate site seed mix within 14 days of completion of the disturbance.
- Avoid driving through or over any untreated and marked noxious weed areas.
- Avoid noxious plant areas until after treated with the appropriate herbicides.
- A weed-resistant seed mix for restoration of temporarily disturbed areas consisting of a combination of competitive native grass and forb species (including pollinator plant species) will be used, to the extent possible.
- Soil from areas with noxious weed populations will not be removed or introduced to the construction site, to avoid transport of weed seeds or other propagules.
- All seed, soil, and mulch imported onto the Project site will be certified as weed-free.
- Preferentially salvage topsoil only for locations dominated by native vegetation; avoid known noxious weed infestation areas when salvaging topsoil to the maximum extent practicable.
- Store salvaged topsoil in a manner to discourage weed establishment, (e.g., by covering, mulching, or stabilizing with weed-free seed).
- Where practicable, use locally sourced topsoil if additional topsoil is needed.
- Train on site staff to identify noxious weed species for successful long-term vegetation management.
- Discourage weed establishment during construction through regular site inspections and targeted herbicide application as needed.
- Herbicide application will be by qualified applicators using approved herbicides.
- Herbicide applications will follow all instructions on the label including application rates and preparation and application requirements.

- Minnesota Power will require its contractors to:
 - Inspect vehicles and equipment undercarriages and tires for mud, dirt, plant materials, and seeds before entering work areas.
 - If vehicle or equipment is not clean, it must be cleaned with high-pressure washer equipment before entering the Project.
 - Use only designated cleaning station locations or commercial car wash facilities.
 - Soil from areas with noxious weed populations will not be removed or introduced to the construction site, to avoid transport of weed seeds or other propagules.
 - Where practicable, avoid or minimize travel through or parking in areas infested with noxious weeds to avoid spreading seeds or plant parts.

Minnesota Power will provide training to its contractors to maintain compliance with the weed management plan.

4.2 Post-construction Noxious Weed Monitoring

Monitoring noxious weed populations in impacted areas within the Project Area for up to three years post-construction is recommended to compare baseline and post-construction weed populations. A memorandum, reporting management actions and monitoring results, should be prepared each year when surveys occur and adaptive management implemented as necessary to control noxious weeds. Additional noxious weed treatment and monitoring may be required if eradication of noxious weeds is not successful. Consultation with Morton and Mercer counties weed boards are being performed to determine appropriate noxious weed control measures.

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Alex Luman (MP)

From: Cody Schnabel <cody.schnabel@mortonnd.gov>
Sent: Tuesday, January 20, 2026 11:45 AM
To: Alex Luman (MP)
Subject: [EXTERNAL MAIL] RE: Minnesota Power Longspur Wind Noxious Weed Management Plan Review



Freeze!

[EXTERNAL EMAIL] This email was sent from someone outside the company.

It may be cold out, but cyber-attacks don't slow down! Remember to freeze, think twice, and never click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Hi Alex,

I have reviewed the plan, and it looks pretty good so far. It lays out that the weeds will be monitored, and how to control each one of them, but I didn't see if it specifies who will be enforcing the policy, who will be doing the monitoring or who will be making herbicide applications where they are needed. A statement could be added for each of these steps such as, "When noxious weeds are discovered in the project area, a certified applicator / contractor will be hired to make herbicide applications."

Thanks.



CODY SCHNABEL

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From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Monday, January 19, 2026 3:32 PM
To: Cody Schnabel <cody.schnabel@mortonnd.gov>
Subject: Minnesota Power Longspur Wind Noxious Weed Management Plan Review

Hello Cody,

My name is Alex Luman I am with Minnesota Power on the Longspur Wind Project in Morton County. I'm following up on the voicemail I left on January 8.

I've attached our draft Noxious Weed Management Plan, Minnesota Power would like to ensure that its plan for controlling noxious weeds aligns with Morton County's goals and expectations. If you could review the plan and provide any feedback, that would be greatly appreciated.

Please let me know if you have any additional questions.

Thank you,
Alexander Luman
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