



AN ALLETE COMPANY

Attachment C

Grassland Addendum Memo



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The Project conducted a more specific review of a 32-ac parcel that contained an unbroken grassland, and contacted the landowner regarding possible tilling that may have previously occurred on the parcel. On June 19, 2025, the landowner responded in writing that the parcel in question had been previously tilled. This parcel was reclassified as “broken grasslands” and updated in the Wildlife Conservation Strategy (WCS) dated January 29, 2026. Further discussions in March of 2026, with the landowner and Longspur confirmed that the parcel was designated by the Farm Service Agency (FSA) as cropland. The landowner indicated that the parcel was planted with alfalfa and actively managed as a hay field. The combination of the FSA designation and the current use of the property as actively managed hay indicates that this parcel is more accurately represented as cropland. This change reduces the Project’s impact of turbines sited on grasslands and meets North Dakota Game and Fish Department’s (NDGFD) KeyWind Energy Development in North Dakota Best Management Practices to avoid siting turbines in nesting habitat within a two mile buffer from a Sharp Tailed Grouse Lek. The Project will meet NDGFD’s recommendation in the December 2, 2024 meeting.



TECHNICAL MEMORANDUM

Date: March 24, 2026

To: Alex Luman; Minnesota Power

From: Western EcoSystems Technology, Inc.

Subject: Addendum to 2024 Grassland Habitat Assessment for the Longspur Wind Project

BACKGROUND

On December 18, 2024, Western EcoSystems Technology, Inc. (WEST), completed and finalized a grassland habitat assessment for the Longspur Wind Project in Morton County, North Dakota. A 32-acre (ac) parcel along the western portion of the Project Area (Figure 1) was originally classified as “unbroken” grassland based on a combination of North Dakota Game and Fish Department’s “Native Prairie” layer (2022), aerial imagery review, and a cursory visual review in the parcel. Additionally, there was a slight modification of the Project Area from the 2024 report that increased the Project Area by approximately 167 ac. This was addressed in the Project’s Wildlife Conservation Strategy (WCS) dated January 29, 2026.

Minnesota Power conducted a more specific review of the 32-ac parcel and contacted the landowner. On June 19, 2025, the landowner responded in writing that the parcel in question had been previously tilled. This parcel was reclassified as “broken grasslands” and updated in the WCS dated January 29, 2026. Further discussions with the landowner and Minnesota Power provided context to the parcel confirming that the parcel was designated by the Farm Service Agency (FSA) as cropland. The landowner described farming practices currently on the parcel as planted with alfalfa and actively managed as a hay field.

The combination of the FSA designation and the landowner’s current management as an actively managed hay field but could be used for other crop types, confirms that this parcel is more accurately represented as cropland. This addendum reflects both the classification change to the original grassland report and the Project Area change. These updates are reflected in the WCS. Below are the updated calculations from the 2024 report of “broken” and “unbroken” grasslands along with an updated map.

UPDATED RESULTS

Within the current Project Area, approximately 1,252 ac of broken grasslands and 7,851 ac of unbroken grasslands were identified (Figure 1). Sixty-three ac of broken grassland and 110 ac of unbroken grassland habitat could not be verified in the field due to lack of access to private lands.

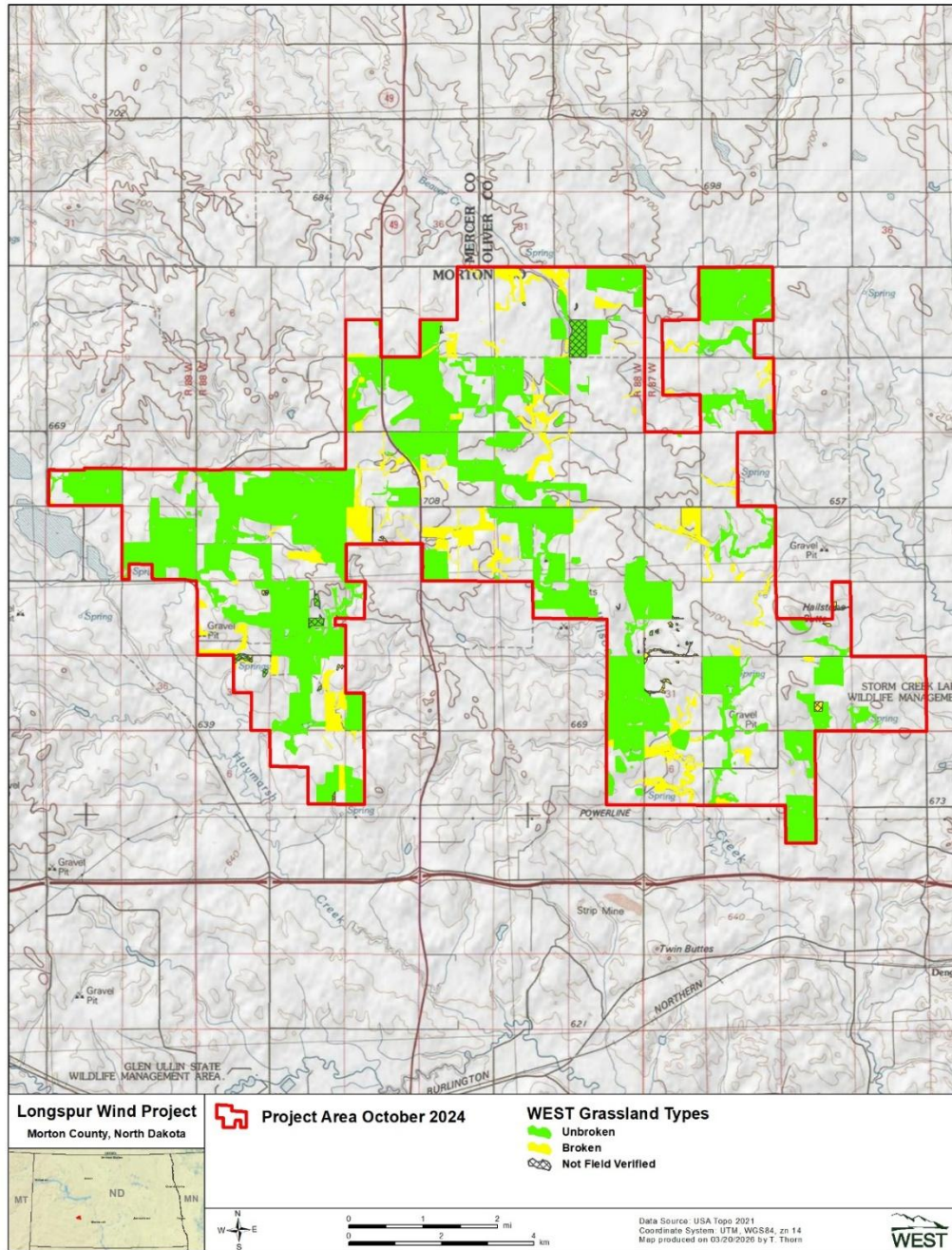


Figure 1. Grassland habitat assessment results for the Longspur Wind Project in Morton County, North Dakota.