



W. Noxious Weed Management Plan

For

Williams Creek Generating Station



NOXIOUS WEED MANAGEMENT PLAN

for

***Williams Creek Generating Station
El Paso County, CO***

PREPARED FOR:

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EXECUTIVE SUMMARY

Bristlecone Ecology, LLC (“B.E.”) was retained by Colorado Springs Utilities (“CSU”) to prepare a Noxious Weed Management Plan (“Plan”) for the proposed Williams Creek Generating Station (WCGS or “Project”), located in unincorporated El Paso County (EPC), Colorado.

This Plan is a project-specific document that has been designed to set forth project-level regulations to prevent and control the spread of noxious weeds within the Project area and vicinity. Noxious weeds are defined as those non-native plants that aggressively invade and are detrimental to native vegetation communities and ecosystems. The *Colorado State Noxious Weed Act* (Colorado Revised Statute 35-5.5-103) developed a list of plants considered noxious in the state of Colorado that should be targeted for control by various methods dependent on list category (A, B, or C). This Plan is to align with the requirements set forth by the EPC Noxious Weed Management Plan (2017a), which contains guidelines for the control and treatment of noxious weeds found in the County. EPC requires that residential projects which include ground disturbing activities must submit a Project-specific noxious weed management plan. This Plan provides methods to prevent and control the spread of noxious weeds at construction and post-construction phases of the Project.

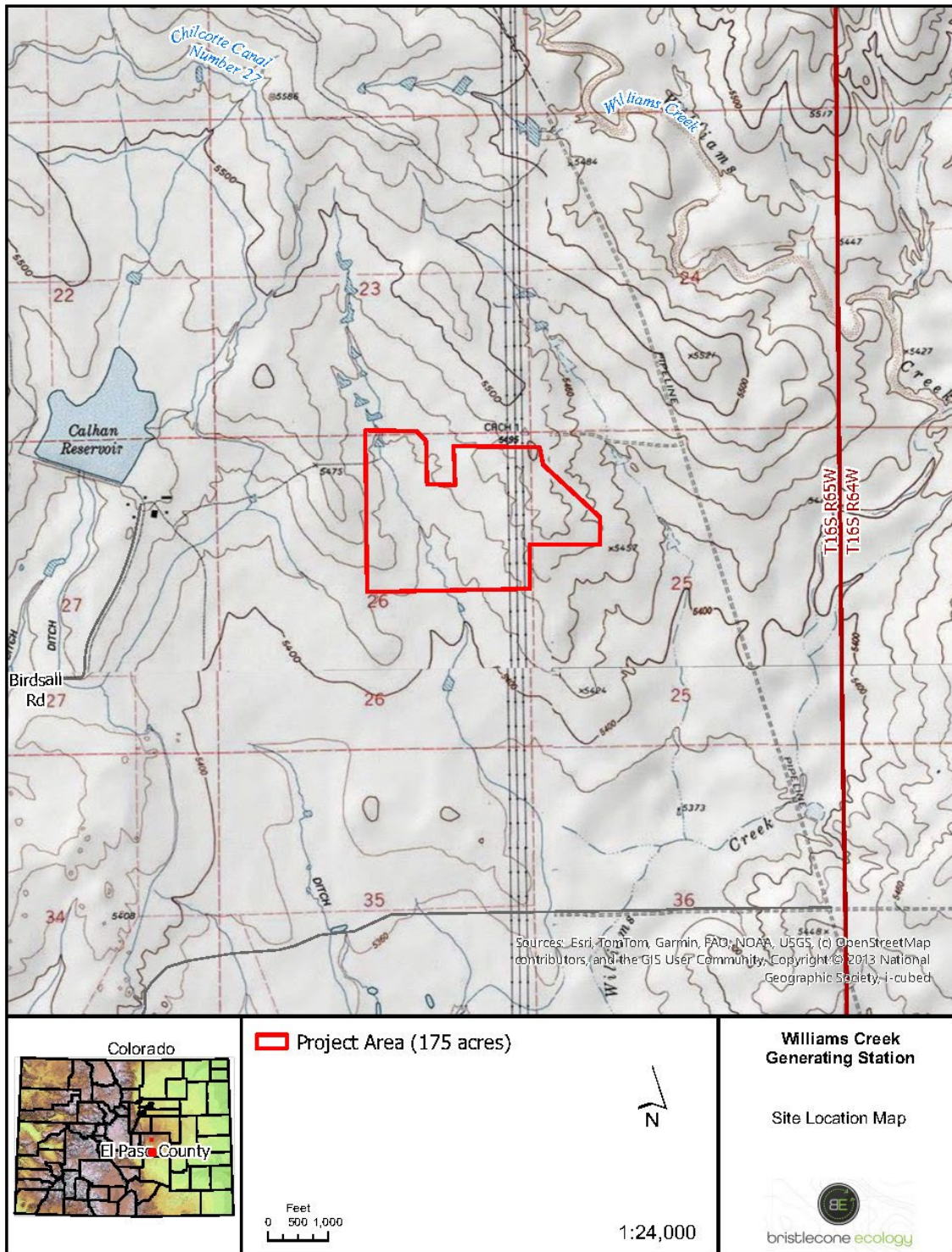
B.E. surveyed the site to look for noxious weeds on September 10th, 2026. Few noxious weeds are present on the site, with only a few concentrations of those that are. Field bindweed (*Convolvulus arvensis*), a List C species, is the main noxious weed present, and is generally spread throughout the site in small-to-medium concentration areas; other noxious weed species present were the List B species Canada thistle (*Cirsium arvense*) and common teasel (*Dipsacus fullonum*), which were both found very rarely throughout the site, with no areas of concentration. The site generally contains limited populations of noxious weeds, and treatment of the few weeds that are present should be effective via hand pulling or limited chemical treatment. Recommendations for chemical treatments can be found at the links in the References section. There may be additional noxious weeds present on the site, and a full site inventory during the growing season would be needed to catalog all populations prior to construction.

1.0 INTRODUCTION AND PROJECT LOCATION

Colorado Springs Utilities (“CSU”) retained Bristlecone Ecology, LLC (“B.E.”) to prepare a Noxious Weed Management Plan (“Plan”) for the proposed Williams Creek Generating Station (WCGS; “Project”) to be constructed in El Paso County, Colorado. The site is located north of Irradiance Drive and east of Calhan Reservoir, in portions of Section 25 and 26 in Township 16S, Range 65W, and can be found on the U.S. Geological Survey’s (USGS) Fountain and Fountain NE 7.5-minute quadrangles (USGS 2023; **Figure 1: Site Location Map**). Elevations within the Project Area range between approximately 5,420 and 5,456 feet above mean sea level (AMSL).

The Project area is located within the Piedmont Tables and Plains Level IV ecoregion in Colorado (Chapman et al. 2006). The Piedmont Plains and Tablelands Ecoregion is composed of irregular and dissected plains dominated by shortgrass prairie. Dominant species in the ecoregion include buffalograss (*Bouteloua dactyloides*), blue grama (*Bouteloua gracilis*), western wheatgrass (*Pascopyrum smithii*), galleta grass (*Pleuraphis gamesii*), alkali sacaton (*Sporobolus airoides*), sand dropseed (*Sporobolus cryptandrus*), sideoats grama (*Bouteloua curtipendula*), and soapweed yucca (*Yucca glauca*., Chapman et al. 2006). The site supports all of these species to some degree, and is predominantly vegetated with sand dropseed and blue grama, as well as western wheatgrass, alkali sacaton, and annual ragweed (*Ambrosia artemisiifolia*). There were no shrubs or trees within the site.

Figure 1: Site Location Map



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2.0 NOXIOUS WEED MANAGEMENT BACKGROUND

The spread of invasive species roughly mirrors the rise in human travel and commerce (Mack *et al.* 2000 and Sheley *et al.* 1996). Many noxious weeds have been identified as aggressive, weather resistant escaped ornamentals from residential landscapes (Westbrooks 1998). The *Federal Noxious Weed Act* (7 U.S.C. 2801 et seq.; 88 Stat. 2148) was enacted in 1975 in an effort to halt the spread of noxious weeds across the country. Following guidelines set forth by the *Federal Noxious Weed Act*, Colorado passed the *Colorado Noxious Weed Act* (“Act”; C.R.S. 35-5.5-103) in 1990. The Act identified noxious weeds particular to the landscape of Colorado. As defined in the Act, noxious weeds are any non-native plant that:

- aggressively invades or is detrimental to economic crops or native plant communities;
- is poisonous to livestock;
- is a carrier of detrimental insects, diseases, or parasites;
- or is detrimental, either by direct or indirect effects, to the environmentally sound management of natural or agricultural ecosystems.

The Act was amended in 2002 to require counties to establish individual management plans relevant to local municipalities. EPC developed the *El Paso County Noxious Weed Management Plan* in 2003 (updated in 2017) to identify county-level noxious weed management practices that would preserve the economic and environmental value of EPC lands (EPC 2017a). Disturbed areas are vulnerable to infestation from noxious weeds due to the aggressive nature by which noxious weeds can spread. Construction activities including clearing, grading, and excavation allow for the establishment of noxious weed species before native vegetation can reestablish within the cleared area. As such, the *EPC Noxious Weed Management Plan* requires integrated management plans for any activities requiring dirt moving activities within El Paso County (EPC 2017a). Project-specific integrated management plans should include methods to prevent, control, and monitor the spread of noxious weeds and should take into account the multiple methods by which noxious weeds germinate. Annuals typically reproduce through seed which can easily attach to equipment during construction activities. Perennials often propagate through an extensive root system. Ground disturbing activities have the potential to redistribute root sections that could quickly propagate in other areas. Because of the multiple methods by which noxious weeds spread and propagate, integrated management plans should outline education and native revegetation methods, in addition to chemical control methods (EPC 2017a).

Additionally, the CSU Noxious Weed Management Program provides a structured, adaptive framework to identify, control, and deter invasive plant species across CSU-controlled lands, watersheds, corridors, and operational facilities. Guided by the Colorado Noxious Weed Act and state environmental regulations, the program operates on a 5-step strategic cycle—combining systematic property surveys, risk-based prioritization, site-specific treatment, and long-term monitoring with preventative land management practices. Administered jointly by Environmental Services and Watershed Planning, the program utilizes licensed contractors to execute noxious weed surveys, multi-season treatments, and ensure detailed GIS and compliance reporting. Ultimately, the program



protects local ecosystems, preserves watershed health, and mitigates wildfire and operational risks to safeguard critical utility infrastructure and support community resilience.

3.0 NOXIOUS WEED MANAGEMENT PLAN

3.1 Purpose and Goals

Upon completion, the Project will consist of the construction of a generating station and its associated roads and other facilities. It is anticipated that noxious weeds will concentrate along roadsides, any temporary construction staging areas, and other highly trafficked areas within the site. As such, this integrated management plan includes construction and maintenance methods to prevent, control, and monitor the spread of identified noxious weed populations within the Project. It will be the responsibility of CSU to prevent and control the spread of noxious weeds. If site ownership/responsibility were to change hands, it will be the responsibility of the new landowner/site controller to inventory and treat any noxious weeds on the site. Typically, the responsible party will contract a licensed herbicide applicator to seasonally survey and spray for noxious weeds throughout their property as necessary. Integrated management methods shall include the following:

- surveys to inventory and map established noxious weed populations;
- sharing of data with EPC to aid in EPC level inventory;
- physical, biological, and or chemical treatment of all identified noxious weed populations;
- and periodic post-construction treatment as needed, implemented by the landowner or other responsible entity.

Management methods identified within this Plan will comply with *Chapter 6: General Development Standards of the EPC Land Development Code* (EPC 2017b), the *EPC Noxious Weed Management Plan* (EPC 2017a) and the Act (Colorado Revised Statutes 35-5.5-103). Biological control methods are not included due to the prohibition of their use on plants targeted for eradication by the Colorado Weed Management Association (CWMA) (2015). Noxious weed species targeted would be those identified in the Act, with special consideration for those species listed in the *EPC Noxious Weeds and Control Methods* (EPC 2018).

The WCGS site will be incorporated in the CSU Noxious Weed Management Program and will include a minimum of three consecutive years of noxious weed treatment post construction and long-term vegetation monitoring.

3.2 Regulated Species

The Act identifies three levels of priority for control of noxious weeds throughout the State of Colorado ("State"). The CWMA maintains an updated list of noxious weeds known to occur in the State. CWMA also maintains a "watch list" of noxious weeds that occur in proximity to State borders and/or those species with a distribution that is not yet understood (**Appendix A: Colorado State Noxious Weed List**). List A noxious weeds are those species targeted for eradication. List A noxious weed populations are typically isolated in nature or rare throughout much of the State (Colorado Revised Statutes 35-5.5-103). Eradication and reporting of List A populations is required by law (Colorado Department of Agriculture [CDA] 2006). List B species are discretely distributed throughout the State and must be eradicated, contained, or suppressed (Colorado Revised

Statutes 35-5.5-103). EPC requires control of all List B noxious weed populations located within the Project area (EPC 2017a). List C noxious weed populations are widespread and well established. EPC requires control of List C species through education of the public and/or chemical control (EPC 2017a).

3.3 Construction

Noxious weed management protocols during construction include prevention and treatment. Prevention and treatment will be executed at the Project through surveys of construction easements, followed by primary mechanical and/or chemical treatments. An initial, general presence survey has been performed but no treatment has occurred.

Noxious weed surveys are to be conducted by a qualified ecologist within all construction easements and footprints prior to any ground disturbing activities; the ecologist shall use GPS to collect data on and locate noxious weed populations. Data collected for List C populations is to include species and general coordinates of population; data collected for List A and List B populations will include species, coordinates for the approximate center of each identified population, and the approximate radius of the infestation. EPC will receive a map of identified noxious weed populations within the Project. Should surveyors locate List A species, the specific data collected will be formally communicated to EPC. Treatment type is to be selected depending on the priority rank of the noxious weed species (List A, B, or C), and the location and density of the infestation. Chemical treatment protocols for herbicide application are described below.

List A species must be eradicated by law (USDA 2006). Should surveyors identify List A species, a plant sample is to be collected for positive identification through EPC's Environmental Division. Upon positive confirmation of a List A species, hand pulling of the population shall be performed to remove the mechanism for creation of a seedbank. Chemical treatment is to be applied to the area and will be selected in compliance with the *EPC Noxious Weeds and Control Methods* (EPC 2018). List B species shall either be mechanically treated (i.e. hand pulled) or chemically treated with an herbicide selected in compliance with the *EPC Noxious Weeds and Control Methods* (EPC 2018). Herbicide selection may vary depending upon the time of year and the life cycle of the plant. All herbicides are to be applied concurrently with initial ground disturbing activities. The herbicide applicator will treat noxious weed populations with EPC recommended chemicals (EPC 2017a). Generally, B.E. recommends avoiding not treating List C noxious weeds. List C noxious weeds are well established and difficult to treat since many have hardy seed beds that are not affected by herbicide application. Rather than completely eradicating List C populations, herbicide applicators manage their populations with continued seasonal treatments. A more efficient protocol is to avoid List C weeds to the greatest extent possible during construction to minimize potentially spreading their seeds, and to treat weeds only where disturbance is unavoidable. It is anticipated that CSU will treat all noxious or weedy species within development areas immediately prior to ground disturbance during construction, including List C species, and will maintain a weed-free landscape within the Project.

Additional construction phase noxious weed management protocols will include prevention and maintenance. Contractors are to prevent the spread of noxious weeds through the use of clean equipment and thorough treatment of all List A and List B populations concurrent with initial ground disturbing activities. Heavy equipment used on the site is to be washed and sprayed before mobilization on the Project. Doing so helps ensure that soil and seeds are not transported from other sites. Noxious weed treatment is to occur in areas slated for ground disturbance or immediately after initial ground disturbance activities. Doing so will ensure that active List A and List B noxious weed populations will become inactive and/or effectively managed throughout the construction phase of the Project.

3.5 Post-Construction

Post-construction noxious weed management protocols will be limited to maintenance treatment, as needed and as determined by CSU as the responsible entity. B.E. notes that any existing List A and List B noxious weed populations should be treated concurrently with construction. Treatment of the site concurrent with initial ground disturbing activities may halt the spread of List A and List B noxious weeds in the immediate vicinity of the Project. However, noxious weed populations may persist on the Project's periphery. It will be CSU's responsibility to identify and treat any persistent noxious weed populations on the Project site.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Few noxious weeds are present on the Project, mostly as scattered populations. Noxious weeds that were detected during the site reconnaissance included:

List B

- Canada thistle (*Cirsium arvense*)
- Common teasel (*Dipsacus fullonum*)

List C

- Field bindweed (*Convolvulus arvensis*)

Field bindweed was the most common noxious weed throughout the site, found spread throughout much of the site. There were no large concentrations of noxious weed species; they were found sporadically throughout the site, mainly along the existing roadways and other disturbed areas. The El Paso County Community Service Department's Environmental Division recommends herbicide application or mechanical removal for the List B species and provides detailed application rates and timing (EPC 2018). Recommended treatment of field bindweed is limited, as hand-pulling has a negligible effect unless the plants are cut below the surface in the early seedling stage (Colorado Department of Agriculture, n.d.). Herbicide is also not recommended, as field bindweed grows by vining around other plants, including native plants. If bindweed is found in areas where ground disturbance will occur, and all vegetation will be removed, herbicidal treatments are recommended prior to ground disturbance. Herbicide recommendations for the few occurrences of the other species can be found at the links provided in the References section below (EPC 2018); hand pulling may also be effective as there are few occurrences of Canada thistle and common teasel on the site.

It is possible that additional noxious weed populations may be present on the site. As such, EPC may recommend a further site inventory be performed to catalogue and map all populations on the site prior to construction. Generally, identification and treatment can occur just prior to ground disturbance. Controls for List A or List B species identified within the Project area would be required following the management plan outlined here and EPC's recommended control methods (EPC 2018).

This Noxious Weed Management Plan was written to comply with guidelines in the Colorado Noxious Weed Act (Colorado Revised Statutes 35-5.5-103) and the EPC Noxious Weed Management Plan. B.E. recommends that CSU treat any List A and List B noxious weed populations observed within the Project area. Surveys and treatment can be performed prior to construction. Typically, mechanical treatment can occur at any time, while chemical treatment is applied between late spring and early fall depending on the recommended treatment protocols for each species (EPC 2018).

Should you have any questions regarding this or any other matter, please feel free to contact our office at dmaynard@bristleconeecology.com.

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APPENDIX A

COLORADO STATE NOXIOUS WEED LIST

List A Species (27)

Common	Scientific
African rue	(<i>Peganum harmala</i>)
Bohemian knotweed	(<i>Fallopia x bohemicum</i>)
Camelthorn	(<i>Alhagi maurorum</i>)
Common crupina	(<i>Crupina vulgaris</i>)
Cypress spurge	(<i>Euphorbia cyparissias</i>)
Dyer's woad	(<i>Isatis tinctoria</i>)
Elongated mustard	(<i>Brassica elongata</i>)
Flowering rush	(<i>Butomus umbellatus</i>)
Giant knotweed	(<i>Fallopia sachalinensis</i>)
Giant reed	(<i>Arundo donax</i>)
Giant salvinia	(<i>Salvinia molesta</i>)
Hairy willow-herb	(<i>Epilobium hirsutum</i>)
Hydrilla	(<i>Hydrilla verticillata</i>)
Japanese knotweed	(<i>Fallopia japonica</i>)
Meadow knapweed	(<i>Centaurea x moncktonii</i>)
Mediterranean sage	(<i>Salvia aethiopis</i>)
Medusahead	(<i>Taeniatherum caput-medusae</i>)
Myrtle spurge	(<i>Euphorbia myrsinites</i>)
Orange hawkweed	(<i>Hieracium aurantiacum</i>)
Parrotfeather	(<i>Myriophyllum aquaticum</i>)
Purple loosestrife	(<i>Lythrum salicaria</i>)
Rush skeletonweed	(<i>Chondrilla juncea</i>)
Squarrose knapweed	(<i>Centaurea virgata</i>)
Tansy ragwort	(<i>Senecio jacobaea</i>)
Ventenata grass	(<i>Ventenata dubia</i>)
Yellow flag iris	(<i>Iris pseudacorus</i>)
Yellow starthistle	(<i>Centaurea solstitialis</i>)

List B Species (38)

Common	Scientific
Absinth wormwood	(<i>Artemisia absinthium</i>)
Black henbane	(<i>Hyoscyamus niger</i>)
Bouncingbet	(<i>Saponaria officinalis</i>)
Bull thistle	(<i>Cirsium vulgare</i>)
Canada thistle	(<i>Cirsium arvense</i>)
Chinese clematis	(<i>Clematis orientalis</i>)
Common tansy	(<i>Tanacetum vulgare</i>)
Common teasel	(<i>Dipsacus fullonum</i>)
Cutleaf teasel	(<i>Dipsacus laciniatus</i>)
Dalmatian toadflax, broad-leaved	(<i>Linaria dalmatica</i>)
Dalmatian toadflax, narrow-leaved	(<i>Linaria genistifolia</i>)
Dame's rocket	(<i>Hesperis matronalis</i>)
Diffuse knapweed	(<i>Centaurea diffusa</i>)
Eurasian watermilfoil	(<i>Myriophyllum spicatum</i>)
Hoary cress	(<i>Lepidium draba</i>)

List B Species (38) continued

Common	Scientific
Houndstongue	(<i>Cynoglossum officinale</i>)
Jointed goatgrass	(<i>Aegilops cylindrica</i>)
Leafy spurge	(<i>Euphorbia esula</i>)
Mayweed chamomile	(<i>Anthemis cotula</i>)
Moth mullein	(<i>Verbascum blattaria</i>)
Musk thistle	(<i>Carduus nutans</i>)
Oxeye daisy	(<i>Leucanthemum vulgare</i>)
Perennial pepperweed	(<i>Lepidium latifolium</i>)
Plumeless thistle	(<i>Carduus acanthoides</i>)
Russian knapweed	(<i>Rhaponticum repens</i>)
Russian-olive	(<i>Elaeagnus angustifolia</i>)
Salt cedar	(<i>T. chinensis</i>)
Salt cedar	(<i>Tamarix. ramosissima</i>)
Scentless chamomile	(<i>Tripleurospermum inodorum</i>)
Scotch thistle	(<i>O. tauricum</i>)
Scotch thistle	(<i>Onopordum acanthium</i>)
Spotted knapweed	(<i>Centaurea stoebe ssp. micranthos</i>)
Spotted x diffuse knapweed hybrid	(<i>Centaurea x psammogena</i>)
Sulfur cinquefoil	(<i>Potentilla recta</i>)
Wild caraway	(<i>Carum carvi</i>)
Yellow nutsedge	(<i>Cyperus esculentus</i>)
Yellow toadflax	(<i>Linaria vulgaris</i>)
Yellow x Dalmatian toadflax hybrid	(<i>Linaria vulgaris x L. dalmatica</i>)

List C Species (18)

Common	Scientific
Bulbous bluegrass	(<i>Poa bulbosa</i>)
Chicory	(<i>Cichorium intybus</i>)
Common burdock	(<i>Arctium minus</i>)
Common mullein	(<i>Verbascum thapsus</i>)
Common St. Johnswort	(<i>Hypericum perforatum</i>)
Downy brome, cheatgrass	(<i>Bromus tectorum</i>)
Field bindweed	(<i>Convolvulus arvensis</i>)
Halogeton	(<i>Halogeton glomeratus</i>)
Johnsongrass	(<i>Sorghum halepense</i>)
Perennial sowthistle	(<i>Sonchus arvensis</i>)
Poison hemlock	(<i>Conium maculatum</i>)
Puncturevine	(<i>Tribulus terrestris</i>)
Quackgrass	(<i>Elymus repens</i>)
Redstem filaree	(<i>Erodium cicutarium</i>)
Siberian elm	(<i>Ulmus pumila</i>)
Tree of Heaven	(<i>Ailanthus altissima</i>)
Velvetleaf	(<i>Abutilon theophrasti</i>)
Wild proso millet	(<i>Panicum miliaceum</i>)

Watch List Species (18)

These species are not regulated by the Noxious Weed Act/Rule.

Common	Scientific
Baby's breath	(<i>Gypsophila paniculata</i>)
Caucasian bluestem	(<i>Bothriochloa bladhii</i>)
Common bugloss	(<i>Anchusa officinalis</i>)
Common reed	(<i>Phragmites australis</i>)
Garden loosestrife	(<i>Lysimachia vulgaris</i>)
Garlic mustard	(<i>Alliaria petiolata</i>)
Himalayan blackberry	(<i>Rubus armeniacus</i>)
Hoary alyssum	(<i>Berteroa incana</i> L.)
Meadow hawkweed	(<i>Hieracium caespitosum</i>)
Onionweed	(<i>Asphodelus fistulosus</i>)
Perennial Sweet Pea	(<i>Lathyrus latifolius</i>)
Scotch broom	(<i>Cytisus scoparius</i>)
Swainsonpea	(<i>Sphaerophysa salsula</i>)
Syrian beancaper	(<i>Zygophyllum fabago</i>)
Tall Oatgrass	(<i>Arrhenatherum elatius</i>)
White bryony	(<i>Bryonia alba</i>)
Yellow bluestem	(<i>Bothriochloa ischaemum</i>)
Yellow mignonette	(<i>Reseda lutea</i>)