

October 15, 2024

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Steven Kahl
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480

**RE: Harmony Solar ND, LLC's Application for a Certificate of Site Compatibility for the Harmony Solar Project in Cass County, North Dakota
Case No. PU-18-219**

Dear Mr. Kahl:

Enclosed for filing in connection with the above-referenced matter are an original and six (6) copies of the following documents, submitted by Harmony Solar ND, LLC:

1. Conditional Use Permit from Harmony Township;
2. Additional correspondence with the North Dakota Game and Fish Department; and
3. Additional correspondence with the United States Fish and Wildlife Service.

Electronic copies of the above-referenced documents and this letter were filed with the Commission today via e-mail, with hard copies sent to the Commission via Federal Express.

If you have any questions, please let me know.

Sincerely,



MOLLIE M. SMITH

MMS/84147306

Enclosures

cc: Alia Mohammad (w/ encls. via e-mail)
Monika Davis (w/ encls. via e-mail)

Harmony TOWNSHIP ZONING COMMISSION

PETITION FOR CONDITIONAL USE PERMIT

The undersigned, owner(s) of, (agent) for the property described below, do hereby petition to receive a conditional use permit for Harmony Solar, LLC, a Solar Energy Generating System. Legal description of property and number of acres Approximately 1,600 acres. See attachment for legal description of property.

Describe briefly the purpose for this use: A Solar Energy Generating System- up to 200 MW

Describe or list the uses within 1/2 mile of this site (attach a drawing from the latest plat book): Agriculture

Describe the layout of the land, access point and the utilities on or near the site: The project area is currently agricultural. The Bison Substation is located just south of the project.

I further state that if this request is granted, I will abide by all conditions set forth by the Zoning Commission. Site plan and documents and other information required are attached.

Existing zoning Agricultural Existing use of property Agriculture Signature of Applicant Date 3/6/2023

Action of Zoning Commission Approval Denial Date 3/21/23 Chairperson of Zoning Commission

Action of Board of Supervisors Approval Denial Date 3/21/23 Chairperson of Zoning Commission

TZH/LARDC©

The Harmony Solar ND, LLC CUP expires on December 31, 2025, unless the use is commenced, construction is underway, the permittee possesses a valid building permit, or the Board authorizes an extension of the CUP term.

PARCEL_ID	OWNER	ACREAGE	LEGAL_DESC
43-0000-06339-000	RODEN MARJEAN L	159.8494	10-140-51 NE 1/4 A 160.00
43-0000-06340-030	KASOWSKI SUZANNA B	79.705	10-140-51 N1/2 OF NW1/4 ACS 80.0 **01-12-94 COMB FROM 43-0000-06340-000 AND 43-0000-06340-010
43-0000-06340-040	KASOWSKI SUZANNA B	79.5503	10-140-51 S1/2 OF NW1/4 ACS 80.0 **01-12-94 COMB FROM 43-0000-06340-000 AND 43-0000-06340-020
43-0000-06341-000	PYLE FARMS INC	158.6367	10-140-51 SW 1/4 A 160.00
43-0000-06342-000	RODEN MARJEAN L	159.2308	10-140-51 SE 1/4 A 160.00
43-0000-06343-000	HENRY LIVING TRUST-RESIDUAL TRUST ETAL	159.5221	11-140-51 NE 1/4 A 160.00
43-0000-06344-010	TRUST-RESIDUAL HENRY LIVING TRUST	53.1379	11-140-51 N 53.00 AC OF NW1/4 □ **9-3-13 SPL FRM 43-0000-06344-000 PER WD#1396719 & TRUST DEED 1396720
43-0000-06344-030	RULIFFSON RUSSELL & RULIFFSON MELINDA	106.2118	11-140-51 S 107.00 AC OF NW1/4 □ **9-3-13 SPL FRM 43-0000-06344-000 PER TRD#1396720 & WD#1396719
43-0000-06345-000	RULIFFSON RUSSELL & RULIFFSON MELINDA	159.157	11-140-51 SW 1/4 A 160.00
43-0000-06346-010	RULIFFSON RUSSELL & RULIFFSON MELINDA	79.6894	11-140-51 80.24 AC □ N1/2 OF SE1/4 □ **3-25-13 SPL FRM 43-0000-06346-000 PER PLAT DOC#1381660
43-0000-06365-000	PYLE FARMS INC	160.9784	16-140-51 NE1/4 A 160.00
43-0000-06366-000	SINNER-BRESNAHAN LAND PTSHLP LLP	40.4186	16-140-51 W1/2 OF W1/2 OF NW1/4 A 40.00
43-0000-06366-010	SINNER-BRESNAHAN LAND PTSHLP LLP	121.0661	16-140-51 E1/2 OF NW1/4 A 120.00 & E1/2 OF W1/2 OF NW1/4
43-0000-06367-000	SINNER-BRESNAHAN LAND PARTNERSHIP LLP	80.321	16-140-51 E 1/2 OF SW 1/4 A 80.00
43-0000-06367-010	SINNER-BRESNAHAN LAND PARTNERSHIP LLP	40.2685	16-140-51 NW 1/4 OF SW 1/4 A 40.00
43-0000-06367-020	SINNER-BRESNAHAN LAND PARTNERSHIP LLP	40.179	16-140-51 SW 1/4 OF SW 1/4 A 40.00
43-0000-06368-000	SINNER-BRESNAHAN LAND PARTNERSHIP LLP	160.2622	16-140-51 SE 1/4 A 160.00



September 24, 2024

Elisha Mueller, Conservation Biologist
North Dakota Game and Fish
100 N. Bismarck Expressway
Bismarck, North Dakota 58501

RE: Proposed Studies for Harmony Solar in Cass County, North Dakota
NDPSC Case No. PU-18-219

Dear Ms. Mueller,

Harmony Solar ND, LLC (“Harmony”), a wholly owned subsidiary of National Grid Renewables Development, LLC (“National Grid Renewables”), proposes to develop the Harmony Solar project (Project) on a 1,662-acre site (Project Area) in Cass County, North Dakota. On February 26, 2019, the North Dakota Public Service Commission (NDPSC) issued a Certificate of Site Compatibility (CSC) to Harmony for the Project. As five years have passed since the issuance of the CSC, Harmony has submitted a Certification of Continuing Suitability (CCS) for the Project.

The North Dakota Game and Fish (NDGF) February 21, 2024 response highlighted general recommendations for renewable energy projects in North Dakota for consideration. In a follow-up meeting on June 13, 2024, NDGF confirmed that no additional pre-construction studies or surveys are needed.

Harmony completed site selection adhering to the criteria for exclusion and avoidance laid out in Section 69-06-08-01 of the North Dakota Administrative Code. The Project Area is predominately cultivated cropland (96.5 percent) with developed roadways and located within a larger agricultural landscape. Existing vegetation in the Project Area is limited to row crops.

Harmony completed site-specific studies to characterize the Project Area and the potential for habitat impacts. Harmony completed micro-siting in facility design to avoid permanent impacts to three identified farmed wetlands. No impacts to grasslands or woodlands were identified.

Taking the general recommendations provided by the NDGF as a foundation, Harmony developed a site-specific post construction fatality monitoring plan for the Project. Given the current land cover is crop agriculture and the overall low fatality rates of songbirds at PV solar facilities (Kosciuch et al. 2020), the study’s objective will focus on waterfowl-sized birds to provide data on potential effects on this species group. The monitoring is proposed for one year after which Harmony will coordinate with both the NDGF and the USFWS on the results. While it is anticipated that the results will confirm low levels of impact, Harmony will consider adjustments to monitoring should the results not align with expectations.



In addition to the proposed fatality monitoring study, Harmony has completed a bird use pre-construction study and will conduct a bird use post-construction study. How PV solar facilities function as bird habitat is an important research question and Harmony has voluntarily proposed to help fill that data gap. Harmony has collected pre-construction bird use data during the 2024 breeding season that showed a total of seven species present within the Project Area. We hypothesize the post-construction bird use surveys will demonstrate the revegetation of the solar facility increases bird use and diversity in an agricultural landscape, which will help inform future wildlife agency guidance for solar development and provide a better understanding of the potential impacts and/or benefits of solar development on wildlife.

The proposed targeted post construction fatality monitoring coupled with the pre- and post-construction bird use study will be useful in identifying both direct and indirect impacts for solar facilities sited in agricultural landscapes in the Prairie Pothole Region. Harmony Solar is also looking into a suggestion provided by the USFWS in their September 6, 2024 letter regarding participation in a national study studying avian interactions with solar facilities. Once we have more information regarding the study, we will determine whether to make any modifications to the study plan outlined above and will provide an update, as needed.

We appreciate your continued coordination and if you have questions regarding the Project, please contact me at 612-474-2681 or at amohammad@nationalgridrenewables.com.

Sincerely,

Alia Mohammad

Alia Mohammad, Permitting Specialist

Cc: Luke Toso, USFWS

From: [Alia Mohammad](#)
To: [Mueller, Elisha K.](#); luke_toso@fws.gov
Cc: [Amber Miller](#); [Gorman, Kim](#); [Kosciuch, Karl](#)
Subject: RE: [EXTERNAL] RE: REVIEW REQUESTED - PSC Case No. PU-18-219 - Harmony Solar, Cass County, North Dakota - Proposed Additional Studies
Date: Tuesday, September 24, 2024 9:10:06 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[NG_Renewables_Logo_Primary_RGB_small_b3464f9a-abea-443c-8d43-87fd96c8afec.png](#)
[LinkedInIcon_8e0cea1f-d234-405f-8a61-4afe010bf11b.png](#)
[TwitterIcon_ff6acde5-6940-4a01-92b6-0ef9db8c446d.png](#)
[WebIcon_e1c44bce-dc58-4738-94a6-8941e49d8897.png](#)
[20240924_Harmony_Solar_Proposed_Studies.pdf](#)

Good morning Elisha and Luke,

Please find attached our formal response letter. Thank you both for your time and consideration in reviewing our project.

Thank you,



952.988.9000



Alia Mohammad

Permitting Specialist

P 612.474.2681

M 315.706.4145

E amohammad@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

From: Mueller, Elisha K. <ekmueller@nd.gov>
Sent: Friday, August 2, 2024 1:15 PM
To: Toso, Luke B <luke_toso@fws.gov>; Gorman, Kim <Kim.Gorman@tetrattech.com>
Cc: Alia Mohammad <amohammad@nationalgridrenewables.com>; Melissa Schmit <melissa@nationalgridrenewables.com>; Kosciuch, Karl <Karl.Kosciuch@tetrattech.com>
Subject: RE: [EXTERNAL] RE: REVIEW REQUESTED - PSC Case No. PU-18-219 - Harmony Solar, Cass County, North Dakota - Proposed Additional Studies

Some people who received this message don't often get email from ekmueller@nd.gov. [Learn why this is important](#)

Hi again Kim,

Thank you for your patience and for sharing the proposed Post Construction Fatality Monitoring (PCFM) study plan with the Department. We appreciate National Grid Renewables willingness to do PCFM and would like to use this opportunity to share our comments and concerns on the study plan.

Methodology:

1. As mentioned previously, the Department recommends that two years PCFM take place (versus the one year proposed in the study plan).
2. It is proposed to only search for carcasses September 1 – October 31 as (you state in this plan) this has shown to be a time of higher fatalities at solar facilities. However, the paper referenced looks at bird mortality at utility scale solar facilities in the Southwestern US. We cannot be certain that trends will be the same in the prairie pothole region, a region that is immensely important to the Central Flyway, hosting many migratory birds in both spring and fall. This also does not capture any impacts that may be placed upon resident bird and bat

populations throughout the breeding / summer season. We recommend monitoring take place throughout the year and not just one season.

3. The methodology is based on the visible distance of large birds, but this does not account for smaller birds or bats. Both of these (small birds and bats) should be considered, and the methodology should be adjusted accordingly.
4. Finally, we highly encourage that the US Geological Survey and US Fish and Wildlife Service recommended methodology be used. This can be found here: <https://pubs.usgs.gov/of/2016/1087/ofr20161087.pdf>.

Thank you for considering our comments and feel free to reach out if you have any questions or would like to discuss further.

Elisha Mueller

Conservation Biologist

(701) 328-6348 • ekmueller@nd.gov • gf.nd.gov



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From: Toso, Luke B <luke_toso@fws.gov>

Sent: Thursday, July 25, 2024 2:52 PM

To: Mueller, Elisha K. <ekmueller@nd.gov>; Gorman, Kim <Kim.Gorman@tetrattech.com>

Cc: Alia Mohammad <amohammad@nationalgridrenewables.com>; Melissa Schmit <melissa@nationalgridrenewables.com>; Kosciuch, Karl <Karl.Kosciuch@tetrattech.com>

Subject: Re: [EXTERNAL] RE: REVIEW REQUESTED - PSC Case No. PU-18-219 - Harmony Solar, Cass County, North Dakota - Proposed Additional Studies

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Hi Kim -

Riding Elisha's coattails, we are in a similar boat and haven't had a chance to review yet. We will try and get comments back on the same schedule as the NDGF. I appreciate you following up to keep this top of mind.

Luke

Luke Toso

Deputy Field Supervisor

North Dakota Ecological Services

U.S. Fish and Wildlife Service

Cell: 720-793-6797

From: Mueller, Elisha K. <ekmueller@nd.gov>

Sent: Thursday, July 25, 2024 11:14 AM

To: Gorman, Kim <Kim.Gorman@tetrattech.com>; Toso, Luke B <luke_toso@fws.gov>

Cc: Alia Mohammad <amohammad@nationalgridrenewables.com>; Melissa Schmit <melissa@nationalgridrenewables.com>; Kosciuch, Karl <Karl.Kosciuch@tetrattech.com>

Subject: [EXTERNAL] RE: REVIEW REQUESTED - PSC Case No. PU-18-219 - Harmony Solar, Cass County, North Dakota - Proposed Additional Studies

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Hi Kim,

I understand that this is time sensitive, but we typically ask for more than a week to provide review. Especially this time of year, as it is very busy for many NDGFD staff with fieldwork, conferences, and the ND State Fair (NDGFD has an entire section in the fair we manage- archery, shooting, and fishing- which requires many of our staff to 'volunteer', pulling us away from our normal day to day duties). I would wager that USFWS is in the same boat, at least with field work and conferences this time of year!

As most of my team are currently out of the office, we will not be able to discuss the proposed studies until late next week at the earliest. As of now, our recommendations have not changed from our initial letter. I can also note that we have, internally, looked to USGS for guidance on mortality monitoring (<https://pubs.usgs.gov/of/2016/1087/ofr20161087.pdf>). Hopefully, this provides you a little clarity until we can fully review and comment on your proposed studies.

Elisha

From: Gorman, Kim <Kim.Gorman@tetrattech.com>

Sent: Thursday, July 25, 2024 10:31 AM

To: Toso, Luke B <luke_toso@fws.gov>; Mueller, Elisha K. <ekmueller@nd.gov>

Cc: Alia Mohammad <amohammad@nationalgridrenewables.com>; Melissa Schmit <melissa@nationalgridrenewables.com>; Kosciuch, Karl <Karl.Kosciuch@tetrattech.com>; Gorman, Kim <Kim.Gorman@tetrattech.com>

Subject: RE: REVIEW REQUESTED - PSC Case No. PU-18-219 - Harmony Solar, Cass County, North Dakota - Proposed Additional Studies

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Luke and Elisha,

Would you be able to provide a status of the review here? The Project is getting ready to submit the application and would like clarity on the NDGF review of the provided study plan for PCFM. I have attached it here again for your convenience.

Thank you in advance for your assistance!

Best,

Kimberely

****Note I will be out of the office from July 29 through August 2 and will return to the office on August 5.****

Kimberely Gorman | Vice President / Operations Manager

Pronouns: she, her, hers

Direct (612) 643-2224 | Business (612) 643-2200 | Mobile (612) 998-7468 | Fax (612) 643-2201 kim.gorman@tetrattech.com

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From: Gorman, Kim <Kim.Gorman@tetrattech.com>

Sent: Tuesday, July 23, 2024 4:19 PM

To: Toso, Luke B <luke_toso@fws.gov>; Mueller, Elisha K. <ekmueller@nd.gov>
Cc: Alia Mohammad <amohammad@nationalgridrenewables.com>; Melissa Schmit <melissa@nationalgridrenewables.com>; Kosciuch, Karl <Karl.Kosciuch@tetrattech.com>; Gorman, Kim <Kim.Gorman@tetrattech.com>
Subject: REVIEW REQUESTED - PSC Case No. PU-18-219 - Harmony Solar, Cass County, North Dakota - Proposed Additional Studies

Luke and Elisha,

I just left each of you a voicemail but wanted to follow up via email as well.

We are hoping to get your feedback on the post-construction fatality monitoring (PCFM) study plan submitted last Wednesday.

As noted below, this focused PCFM survey is in response to the NDGF guidance letter dated February 23, 2024, recommending PCFM.

We would like to confirm this study plan meets with your approval.

Thank you again for your assistance.

Best,

Kimberely

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Kimberely Gorman | Vice President / Operations Manager

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United States Department of the Interior



FISH AND WILDLIFE SERVICE
3425 Miriam Avenue
Bismarck, North Dakota 58501-7926

In Reply Refer to:
Harmony Solar Project

September 6, 2024

Melissa Schmit
National Grid Renewables Development, LLC
Via email: melissa@nationalgridrenewables.com
CC: kim.gorman@tetrattech.com

Dear Ms. Schmit:

The U.S. Fish and Wildlife Service (Service) would like to thank National Grid Renewables Development, LLC. (NGR) for providing two separate studies designed to look at interactions and potential impacts for the Harmony Solar Project (Project) proposed in Cass County, North Dakota. These two studies were designed primarily to address North Dakota Game and Fish (NDGF) comments in their February 21, 2024 letter requesting post construction fatality monitoring for two years following construction.

We understand the Project has been designed to reduce impacts to the Service's trust resources by siting the facility primarily in agricultural land. We commend NGR for avoiding native grasslands where migratory birds, bald and golden eagles, and species protected under the Endangered Species Act (ESA) may occur. Based on the Project location and habitat present, our primary trust resource that may be affected include migratory birds which are protected under the Migratory Bird Treaty Act (MBTA).

Since this is one of the first large solar developments in North Dakota, our primary question is: How do migratory birds interact with the proposed Project and solar facilities at large in North Dakota? Post Construction Monitoring (PCM) has been useful in determining both direct (e.g., mortality effects) and indirect (e.g., avoidance of nearby habitat) for wind facilities in our state. However, these wind facility effects are not as easily attributed to solar projects because of a lack of available information in the Prairie Pothole Region.

The two proposed studies NGR presented are helpful to start the process of filling our knowledge gaps. The NDGF has provided detailed feedback on these studies, in the spirit of addressing our core question, How do migratory birds respond to solar facilities in North Dakota? Though both studies contribute to our broader understanding of bird use, they do not directly address our question of how birds interact with solar facilities. In light of this, the Service would like to make NGR aware of a current national effort to study avian interactions with solar facilities, especially

within grassland habitats, that is looking for willing solar developers within our region. Participation in such a study would help to directly answer the Service's core question, while also contributing to a broader understanding of bird use and interactions with solar development at a national level.

The Service's primary recommendation is to consider participating in a broader national study to further knowledge of bird interactions with solar development, specifically within grassland dominated habitats. If this is of interest, please reach out to our office for more information. Our secondary recommendation is to proceed with the two studies, as proposed, in collaboration with the Service and the NDFG so we can discuss the possibility of adjusting the study parameters based on the findings of the first year of data collection. The Service's appreciates your willingness to voluntarily gather data and share results with us as we collaboratively work to conserve trust resources.

Sincerely,

Chris Swanson, Ph.D.
Field Supervisor
North and South Dakota Field Offices

From: [Toso, Luke B](#)
To: [Gorman, Kim](#); [Mueller, Elisha K.](#)
Cc: [Alia Mohammad](#); [Melissa Schmit](#); [Kosciuch, Karl](#); [Bruce Kreft](#)
Subject: Re: [EXTERNAL] REVIEW REQUESTED - PSC Case No. PU-18-219 - Harmony Solar, Cass County, North Dakota - Proposed Additional Studies
Date: Monday, September 9, 2024 3:39:16 PM
Attachments: [image001.png](#)
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[image003.png](#)
[image004.png](#)
[image008.png](#)
[image006.png](#)
[Harmony PCM Letter_FWS.2024.09.06.pdf](#)

You don't often get email from luke_toso@fws.gov. [Learn why this is important](#)

Hi Kim -

Thanks for your patience on this response. Our comments are attached. Looking forward to continued discussions on this project. Thank you!

Luke

Luke Toso
Deputy Field Supervisor
North Dakota Ecological Services
U.S. Fish and Wildlife Service
Cell: 720-793-6797

From: Gorman, Kim <Kim.Gorman@tetrattech.com>
Sent: Tuesday, July 23, 2024 4:19 PM
To: Toso, Luke B <luke_toso@fws.gov>; Mueller, Elisha K. <ekmueller@nd.gov>
Cc: Alia Mohammad <amohammad@nationalgridrenewables.com>; Melissa Schmit <melissa@nationalgridrenewables.com>; Kosciuch, Karl <Karl.Kosciuch@tetrattech.com>; Gorman, Kim <Kim.Gorman@tetrattech.com>
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Thank you again for your assistance.

Best,
Kimberely

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