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WeConservePA.org



Voting Member Organizations

Allegheny Land Trust
Armstrong Trails
Allegheny Valley Trails Association
Appalachian Trail Conservancy
Armstrong County Conservancy
Berks Nature
Brandywine Conservancy
Brandywine Red Clay Alliance
The Buck Hill Conservation Foundation
Central Pennsylvania Conservancy
Centre County Farmland Trust
Chesapeake Conservancy
Chestnut Hill Conservancy
ClearWater Conservancy
The Conservation Fund, Pennsylvania Office
Countryside Conservancy
Delaware Highlands Conservancy
Earth Conservancy
Edward L. Rose Conservancy
Evergreen Conservancy
Farm and Natural Lands Trust of York County
Foundation for Sustainable Forests
Fox Chapel Area Land Trust
French & Pickering Creeks Conservation Trust
French Creek Valley Conservancy
Glade Run Lake Conservancy
Hawk Mountain Sanctuary Association
Heritage Conservancy
Hollow Oak Land Trust
Independence Conservancy
Keystone Trails Association
Lackawanna Valley Conservancy
Lake Erie Region Conservancy
Lancaster Conservancy
Lancaster Farmland Trust
Land Conservancy of Adams County
Land Trust of Bucks County
Lebanon Valley Conservancy
London Britain Land Trust
Manada Conservancy
Merrill Linn Land & Waterways Conservancy
Mid-Atlantic Karst Conservancy
Mokoma Conservancy
Montour Trail Council
Natural Lands
Neighborhood Gardens Trust
North American Land Trust
North Branch Land Trust
Northcentral Pennsylvania Conservancy
Open Land Conservancy of Chester County
Pennsbury Land Trust
Pennsylvania Recreation & Park Society
Pennypack Ecological Restoration Trust
Pine Creek Land Conservation Trust
Pine Creek Valley Watershed Association
Pocono Heritage Land Trust
The Radnor Conservancy
Regional Trail Corporation
Schuylkill County Conservancy
Schuylkill River Greenways
Somerset County Conservancy
The Nature Conservancy
The Trust for Public Land
The Wallace Trust
Tinicum Conservancy
Western Pennsylvania Conservancy
Westmoreland Conservancy
Westmoreland Land Trust
Wild Waterways Conservancy Inc.
Wildlands Conservancy
Willistown Conservation Trust
Wissahickon Trails

February 5, 2024

Re. **SB 831 Carbon Capture
Harmful as Drafted**

Dear Senator:

On behalf of the 75 member organizations of WeConservePA and their more than 100,000 Pennsylvania members, I write to express WeConservePA's concerns with aspects of SB 831 (PN 921), the Carbon Capture and Sequestration Act.

The member organizations of WeConservePA have made substantial long-term investments in conserving land to provide a variety of benefits for the people of the commonwealth. Sixty-eight land trusts own 122,868 acres of land; another 293,806 acres are protected with conservation easements purchased by or donated to these organizations. As owners of real property interests, land trusts have a stake in the final form and outcome of this legislation.

Rising atmospheric carbon levels pose a serious threat to humanity. However, establishing a regulatory framework for carbon dioxide capture and sequestration should not result in damage to decades of conservation achievements that protect water quality, wildlife habitat, biodiversity, and other conservation values.

Section 5(a)(2) of the bill outlines a unitization mechanism by which surface property interest owners would be compelled to participate in a carbon storage project if 60% of the pore space owners provide written consent. This forced approach could indiscriminately impose surface infrastructure development on conserved land, diminishing the public benefits provided by any number of properties conserved over the last several decades.

We respectfully urge you to revise the bill to address adverse consequences of unitization as presently designed, such as by including language that would respect the property rights of landowners, allowing carbon dioxide injection well infrastructure to be sited only where landowners are willingly participating in the project, and taking other measures that would reduce or eliminate the potential harm to the conservation values of protected land.

Thank you for your consideration.

Sincerely,


Andrew M. Loza
Executive Director

cc: member organizations