



Cayuga Lake Watershed Intermunicipal Organization

Intermunicipal cooperation for watershed protection

April 24, 2024

Office of the New York State Attorney General
The Capitol
Albany NY 12224-0341

Honorable Attorney General Letitia James,

The Cayuga Lake Watershed Intermunicipal Organization (CWIO) brings watershed municipalities together to work collectively and collaboratively on monitoring, protecting, and restoring the health of the watershed. CWIO works with municipalities and our non-profit partners to identify water quality threats, recommend actions and strategies to address these threats, and take actions to protect and preserve the watershed. CWIO strongly supports the work of the Finger Lakes Land Trust (FLLT) and other organizations that purchase lands important to the protection of water quality, such as vegetated land buffers to waterways throughout the watershed, important wetlands which absorb and filter stormwaters, and sloping lands that when left wooded help prevent erosion of soils and nutrients into waterways.

CWIO is writing in support of the Finger Lakes Land Trust's request to improve the pace of acquisition of conservation land by the State of New York. More specifically, CWIO supports the call to increase staffing in the Real Property Bureau and the Office of General Counsel at the New York State Department of Environmental Conservation (DEC) and within the Real Property Bureau at the Office of the Attorney General.

The Finger Lakes Land Trust (FLLT) has a backlog of land acquisition projects with the state of New York. FLLT today owns 19 properties with a market value of more than six million dollars that are awaiting transfer to the State of New York. While some are recent purchases, one of the properties has been awaiting transfer since 2012. The FLLT is not alone in this regard. New York land trusts are currently holding over 100,000 acres of land that was acquired upon the request of the state, with a market value of over \$150 million.

In addition, the state's current approach to property title review involves a higher standard than is typical in the private sector and does not include the acceptance of title insurance to

resolve title issues. One immediate step that can be taken to increase the pace of land protection is to use private title insurance as a means of achieving marketable title. Such an allowance would be consistent with common real estate practice, as well as allowable practices in virtually all other state and federal land acquisition programs.

Thank you for your consideration.

Roxanna Johnston

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cc:

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Senator Tom O'Mara
Senator Lea Webb
Assemblyman Jeff Gallahan
Assemblywoman Anna Kelles
Assemblyman Philip Palmesano