

**Maine Coast Heritage Trust**  
*A Statewide Land Conservation Organization*

October 11, 2017

Walter Whitcomb, Commissioner  
Department of Agriculture, Conservation and Forestry  
Harlow Building  
18 Elkins Lane  
Augusta, ME 04333

Dear Commissioner Whitcomb,

In July, the Maine Legislature amended the conservation easement registry to allow the Department to better track the amount of fee owned conservation lands in the state. While we support the legislative intent of changes to the registry, we have concerns that the current version of the fee lands section of the registry, unveiled on October 1, is unworkable in its current format and needs to be revised before land trusts, the State, or any conservation landowner can comply with the new law.

As you know, this statutory change to the registry, which MCHT supported at the time, called for the Department to collect the following four pieces of information from public and private conservation landowners:

1. Book and page number(s) from a property's deed(s)
2. Municipality(ies) where the property is located
3. Size of the property in terms of acres
4. How many acres of the property, if any, are tax exempt under Title 36, section 652 and for which the landowner is not making payments in lieu of taxes

We are concerned that, in your letter dated September 25, the Department is asking conservation landowners to complete many additional information requests, including items that go beyond the requirements of the law, use undefined terms, have unclear purposes, and that rely upon "required" fields that cannot always be answered, thus blocking the registrant's ability to complete the registration. Adding to our confusion, and to the confusion of many other land trusts, is the fact that we have received this notice prior to any consultation by the Department with the land trust community. Normally a state agency implementing entirely new provisions of law would undertake such a consultation and provide an opportunity for feedback on any proposed changes to existing requirements from affected stakeholders.

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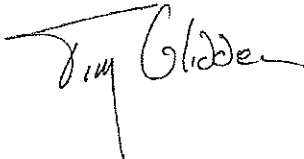
MCHT continues to believe that public knowledge of this information is beneficial. We are sincerely interested in working with the Department to amend the conservation lands registry to ensure it is consistent with the law enacted by the legislature in July, while providing important information to the public in a way that does not unduly burden conservation landowners.

MCHT is proud of our work and want more people to understand what land trusts are doing across Maine to increase public access to the outdoors, strengthen the tourism economy, support natural resource jobs, and enhance communities by offering educational opportunities, completing wetlands restoration projects, growing crops to supply food banks, helping the state and municipalities manage their public lands, connecting people to the outdoors, and many other public benefits.

We are committed to ensuring Maine people understand the work that we are doing, how our work is benefiting local communities and the economy, and where conservation lands are located. MCHT stands ready and is prepared to work with the Department and others to provide this information to Maine people through a workable conservation lands registry.

I would appreciate hearing your thoughts on this matter at your earliest convenience.

Sincerely,

A handwritten signature in black ink that reads "Tim Glidden". The signature is written in a cursive style with a long horizontal line above the name and a vertical line extending downwards from the end.

Tim Glidden  
President

Cc: Members, Joint Standing Committee on Agriculture Conservation and Forestry  
Via Hand-delivery