§ 2049-nn. Exemption from taxes, assessments and certain fees. 1. It is hereby determined that the creation of the authority and the carrying out of its corporate purposes is in all respects for the benefit of the people of the counties and the state and is a public purpose and the authority shall be regarded as performing a governmental function in the exercise of the powers conferred upon it by this title and shall not be required to pay any taxes or assessments upon any property owned by it or under its jurisdiction, control or supervision or upon its activities, income and operations, or any filing, recording or transfer fees or taxes in relation to instruments filed, recorded or transferred by it or on its behalf provided, however, that the authority shall annually pay a sum in lieu of taxes to each of the municipalities in which any real property owned by or under its jurisdiction, control or supervision of the authority are located in an amount equal to the taxes and assessments which would have been levied upon such real property in an unimproved state had such real property been owned by a person whose real property is subject to taxation. The construction, use, occupation or possession of any property owned by the authority or the counties, including improvements thereon, by any person or public corporation under a lease, lease and sublease or any other agreement shall not operate to abrogate or limit the foregoing exemption, notwithstanding that the lessee, user, occupant or person in possession shall claim ownership for federal income tax purposes. Mortgages made or financed, directly or indirectly, by the authority shall be exempt from the mortgage recording taxes imposed by article eleven of the tax law.

2. Any bonds issued pursuant to this title together with the income therefrom as well as the property of the authority shall be exempt from taxes, except for transfer, and estate and gift taxes. The state hereby covenants with the purchasers and with all subsequent holders and transferees of bonds issued by the authority pursuant to this title, in consideration of the acceptance of any payment for the bonds, that the bonds of the authority issued pursuant to this title and the income therefrom and all revenues, moneys, and other property pledged to secure the payment of such bonds shall at all times be free from taxation, except for transfer, and estate and gift taxes.