



**MUNICIPAL COUNCIL AGENDA
TEMPORARY CITY HALL
141 OAK STREET, TAUNTON, MA 02780**

~
JULY 19, 2016 – 7:00 PM

**INVOCATION
ROLL CALL
RECORDS**

HEARING:

Petition submitted by Aggregate Industries Northeast Region Inc., 1715 Broadway, Saugus for the renewal of their Earth Removal Permit for Pit No. 35 located at 203 Fremont St., Taunton for the removal of stone and they are also requesting extended hours of operation.

- Com from City Engineer dated April 26, 2016
- Earth Removal Permit dated August 7, 2007
- Com. from City Engineer – Submitting recommendations

COMMUNICATIONS FROM THE MAYOR

APPOINTMENTS

COMMUNICATIONS FROM CITY OFFICERS

- Pg. 1 Com. from Executive Director of Retirement – Notifying of a retirement
- Pg. 2 Com. from Executive Director of Retirement – Notifying of a retirement
- Pg. 3 Com. from Budget Director – Requesting votes to begin process with Department of Revenue
- Pg. 4-5 Com. from Director, Taunton Public Library – Requesting to expend a donation
- Pg. 6-24 Com. from City Solicitor – Project First Light Resort Casino – Federal Litigation vs. U.S. Secretary of the Interior et al. United States District Court, Dist. Of Massachusetts, Civil Action No. 1:16-cv-10184

COMMUNICATIONS FROM CITIZENS

- Pg. 25 Com. from The Kelly Family – Expressing gratitude to Councilor McCaul

RECEIVED
CITY OF TAUNTON OFFICE
2016 JUL 15 A 10:58
TAUNTON, MA
CITY CLERK

Pg. 26-27 Com. from Paul Boudreau, St. Thomas Episcopal Church, 111 High St.,
Taunton – Requesting to host their annual “Haunted Hayride”

PETITIONS

Billiard Table License

Petition submitted by Peter Hebert, 30 Avalon Dr., Taunton requesting a **RENEWAL** of his Billiard Table License for Baha Bros. Pub & Restaurant, Inc. –dba- Sandbar Grill located at 64 Weir Street, Taunton. **(2 Tables)**

Kennel License

Petition submitted by Joshua Pimental, 12 Cooper Street, Taunton requesting a **NEW** Personal Kennel License, Grade 1-4-6 Dogs. **(Public Hearing Required)**

Claims

Claim submitted by Antonio Moniz, 30 Lilac Way, Taunton seeking reimbursement for damages to his automobile from hitting raised manhole cover while driving on Plain Street, Taunton.

Claim submitted by Howard and Denise Beard, 11 Windsor Court, East Taunton seeking reimbursement for damages to their leaching field from a fire truck driving over it while extinguishing a truck fire in June.

COMMITTEE REPORTS

UNFINISHED BUSINESS

ORDERS, ORDINANCES AND RESOLUTIONS

NEW BUSINESS

Respectfully submitted,



**Rose Marie Blackwell
City Clerk**

Hearing



CITY of TAUNTON
DEPARTMENT OF PUBLIC WORKS
ENGINEERING DIVISION

141 Oak Street
Taunton, Massachusetts 02780-3430
Phone: 508-821-1027, Fax: 508-821-1336, coteng@tmlp.net



Mark B. Slusarz, P.E.
City Engineer

April 26, 2016

Mayor Hoye and the
Taunton Municipal Council
141 Oak Street
Taunton, MA 02780

CITY OF TAUNTON
MAY 17 2016
IN MUNICIPAL COUNCIL

Refer to the
City Clerk to
Schedule a
Hearing - Cou. Corr

Re: Earth Removal Permit Renewal
Aggregate Industries, Pit No. 35

Dear Mayor and City Council Members;

Made a motion for the most
current agreement & for the Earth Removal

The Earth Removal Board received a renewal application for earth removal from Aggregate Industries on February 3, 2016. The purpose for earth removal is to continue quarry operations at the Aggregate site on 203 Fremont Street. The applicant is requesting a new five-year permit with the only modification being extended hours of operation, as follows:

	<u>Crushing Current</u>	<u>Crushing Proposed</u>	<u>Hauling Current</u>	<u>Hauling Proposed</u>
Mon-Fri	7:00am - 5:00pm	7:00am - 7:00pm	6:30am - 5:00pm	6:30am - 7:00pm
Saturday	N/A	7:00am - 7:00pm	6:30am - 5:00pm	6:30am - 7:00pm

Board
to
be
Present
at
hearing

After a review of the application package, the Earth Removal Board met with the applicant on March 29th at the DPW office. In addition to discussing the current conditions and the proposed hours of operations, the status of the haul road was discussed. It was mentioned that the City would like to bring the roadway up to standards for possible acceptance as a public way. Aggregate said it would be willing to partner with other stakeholders to complete the process. The Board then voted to recommend approval of the permit with all of the current conditions (see attached) with the following revisions and addition:

- Condition 2. Hours of Operation, To be revised per the table, above.
- Condition 5. Because the fence has been completed, shall read: "The wire fence enclosing the excavation shall be inspected at least annually and maintained in good repair.
- Condition 9. Shall be supplemented as follows: "unless prior approval from the Taunton Fire Department is granted."

R. M. [Signature]
City Clerk

Hearing

Additional Condition 20. Aggregate Industries shall initiate discussion regarding the reconstruction of the haul road. Aggregate Industries shall contact the Mayor of Taunton and all other stakeholders for the purpose of reaching an agreement that spells out how and when the roadway reconstruction shall be funded. The purpose of this is to bring the haul road up to standards acceptable to the City for the possible acceptance as a public way.

Aggregate Industries has also invited members of the Municipal Council to take a tour of the facilities.

It has been suggested that the provisions of Condition 20 are beyond the purview of the Earth Removal Board, and after further consideration I would have to agree.

Per Section 14-37(b)(7) of the Ordinances, the Municipal Council now must decide whether the renewal constitutes a major change requiring a public hearing, or a minor change that does not require a public hearing. Because of the size of the earth removal operations at the quarry and its proximity to surrounding neighborhoods, I recommend that the changes be rules as major, and a public hearing on the matter be scheduled.

Sincerely,
City of Taunton



Mark B. Slusarz, P.E.
City Engineer

CC: Earth Removal Board
Attachments.

Hearing

**DECISION OF THE CITY OF TAUNTON MUNICIPAL COUNCIL
ON THE PETITION FOR AN EARTH REMOVAL PERMIT
August 7, 2007**

PETITIONER
Aggregate Industries Northeast Region, Inc.
1715 Broadway
Saugus, MA 01906

Earth Removal Permit for the removal of stone associated with Local, State and Federal Contracts

SECTION 1 - FINDINGS

On or about May 8, 2007, the Petitioner filed with the City of Taunton Municipal Council a petition for an Earth Removal Permit. As required by law, copies of the petition and plans submitted therewith were submitted to the applicable City boards and departments.

The Earth Removal Board met and discussed the application.

On June 26, 2007 the Municipal Council held a public hearing after proper notice as required by Massachusetts General Laws, Chapter 40, Section 17 and the City's revised local ordinances, specifically Section 14-35 through 14-37 and continued said hearing until August 7, 2007.

The Municipal Council invited into the Chambers the petitioner, Aggregate Industries Northeast Region, Inc. and also invited and considered comments from the general public, and specifically asked whether anyone present wished to speak in favor or against the merits of the petition. Several people speaking in favor of the petition and in opposition of the petition;

Petition granted subject to the conditions set forth by the Earth Removal Board and conditions set forth by the Municipal Council as follows:

1. Routinely and regularly report the quality (on a quarterly basis), quantity and frequency/duration (times)(on a monthly basis) of pumping activities and provide records of their past pumping activities (at least the records that were kept "voluntarily");
2. Provide the City of Taunton with copies of all required and current permits pertaining to the quarry operation and keep those copies up to date and current.
3. All gates are to remain closed until 6:30 AM each morning, Monday - Sunday and trucks must adhere to the stop signs prior to entering city streets.

Hearing

SECTIONS II - DECISION

Accordingly, in accordance with the Massachusetts General Laws Chapter 40, Section 17 and the applicable revised ordinances of the City of Taunton, specifically Section 14-35 through 14-37, the Municipal Council, having voted in favor of the motions to grant the petition subject to conditions (SEE SECTION III BELOW), hereby grants the Earth Removal Permit subject to the conditions and requirements set forth in Section III below.

SECTION III - CONDITIONS

1. The term of the permit is 5 years, the same term as the current permit. Since it is expected the removal will not be completed after 5 years, the filing of a new permit shall be made six months prior to the expiration the approved permit. Timely submission of a renewal application shall automatically extend the term of the existing permit until the City Council has issued a final decision on such application;
2. The hours of operation of the crusher shall be limited to Monday through Friday, 7:00 AM to 5:00 PM. The hours of loading and use of the northerly access road (through the industrial park) shall be limited to Monday through Saturday, 6:30 AM to 5:00 PM;

A bond or other acceptable surety in an amount of \$75,000.00 shall be posted with the City Treasurer and remain in effect for one year after the expiration of this permit. The bond shall be used for the restoration of the site;
4. During the term of this permit, the grantee continues to develop a restoration and reuse plan to be incorporated into any future permit. Aggregate shall also meet with the neighborhood committee (formed during pervious permits) on the restoration plan and present the plan to the City Council by the end of 5 year permit;
5. The excavated area shall be enclosed by a wire fence and continuously monitored and repaired;
6. No earth material of any kind shall be brought onto the site;
7. Permission, upon request, shall be granted to members of the Earth Removal Board to enter the site for observation purposes. Any such observations shall follow a 24-hour notice to Aggregate Industries, shall be conducted during normal business hours with Aggregate personnel escorting the observers, and shall conform to any facility health and safety requirements;
8. Dust control measures shall be employed at all times and for all trucks;
9. The blasting shall be limited to once a day, and in conformance with the current approved blasting plan;

Hearing

10. All truck traffic shall continue to use the established routes as noted below:

North Taunton and Non-Local

Exit site through haul road, crossing Fremont Street to access road to John Hancock Road to Myles Standish Boulevard to Bay Street at I-495. Enter site by reverse route. Should the route become unavailable, new routes shall be established with City approval.

Emergency Access and Egress Only

Exit site along railroad easement, crossing Warren Street to right turn on Whittenton Street to right turn on Bay Street to left turn on East Britannia Street, then to local destination. There should be no need for trucks to turn left onto Broadway or for any trucks to be on Monroe Street.

11. The City shall first notify Aggregate in writing of any such nuisance conditions, and absent an imminent threat to public health or safety, allow Aggregate 72 hours to abate any such nuisance conditions.
12. ~~Vegetation shall be maintained to enhance corner sight distance where the haul road intersects City streets;~~
13. The applicant shall forward all written complaints to the Council;
14. The applicant shall fund the installation of "TRUCKS CROSSING" warning signs on the Fremont Street approaches, and pavement markings that may be appropriate.
15. Prohibit the placement (during the time of this Earth Removal Permit) of an asphalt plant with the extent allowed by law;
16. A seismograph shall be placed at the property of 750 Whittenton Street;
17. Any neighbor, who requests a pre-blast survey, shall be granted the request;
18. Submit to the Taunton Conservation Commission monthly reports on water volume and quality.
19. The applicant is subject to stop-work orders, calling of the bond, or fines, or any combination of the three, for any violation of the above conditions.

Respectfully,


Rose Marie Blackwell
City Clerk

Cc: Earth Removal Board

Hearing



Denise J. Paiva, Secretary

TAUNTON PLANNING BOARD

City Hall

15 Summer Street

Taunton, Massachusetts 02780

Phone 508-821-1051

Fax 508-821-1665

April 8, 2016

Honorable Mayor Thomas Hoye and
Members of the Municipal Council
141 Oak St., City Hall
Taunton, Ma. 02780

C/O Rosemarie Blackwell, City Clerk

RE: Earth Removal Permit - Pit #35 - 203 Fremont St.

Dear Mayor Hoye and Members of the Municipal Council:

Please be advised that on April 7, 2016 the Taunton Planning Board reviewed the renewal of an Earth Removal Permit for property located at 203 Fremont Street.

The Taunton Planning Board voted (4 members in favor, 1 member opposed, 1 member absent) to forward a **positive** recommendation to the Municipal Council on this renewal to include the Earth Removal Board's recommendation with the following modification:

1. **Crushing & Hauling hours on Saturday: 9 AM - 2 PM**

Respectfully yours,

Robert P. Campbell (opp)

Robert P. Campbell, Chairman
Taunton Planning Board

RPC/djp

Hearing



CITY of TAUNTON
DEPARTMENT OF PUBLIC WORKS
ENGINEERING DIVISION

141 Oak Street
Taunton, Massachusetts 02780-3430
Phone: 508-821-1027, Fax: 508-821-1336, coteng@tmlp.net



Mark B. Slusarz, P.E.
City Engineer

July 12, 2016

Mayor Hoye and the
Taunton Municipal Council
141 Oak Street
Taunton, MA 02780

Re: Earth Removal Permit Renewal
Aggregate Industries, Pit No. 35

Dear Mayor and City Council Members;

The Earth Removal Board received on Tuesday, July 12, 2016 to forward a recommendation to the Municipal Council. Present were Mark Slusarz, chair; Tony Abreau, DPW; Kevin Scanlon, City Planner; Michele Restino, Conservation Agent, and Kevin Duquette, Board of Health. The board took into consideration a number of factors which included provisions of the previous permit, Aggregate's request, and the Planning Boards recommendation. The board voted unanimously to approve renewal of Aggregates permit as requested, with the following amendments:

1. Restrict Saturday crushing hours to 9:00 am to 2:00 pm, per Planning Board recommendation,
2. Keep Saturday hauling hours at to the current 6:30 am to 5:00 pm,
3. Absent an agreement to reconstruct the haul road per the approved Planning Board plan within 12 months of the renewal date, Aggregate must overlay the haul road, full width and full length, with four inches of binder course hot mix asphalt.

Sincerely,
City of Taunton

Mark B. Slusarz, P.E.
City Engineer

CC: Earth Removal Board



**BOARD OF
RETIREMENT**

CHAIRMAN
Ann Marie Hebert

Peter H. Corr
Dennis M. Smith
Gill Enos
Barry J. Amaral

CITY OF TAUNTON
Contributory Retirement System
104 Dean St., Suite 203
Taunton, Massachusetts 02780
(508) 821-1052
Fax (508) 821-1063

**EXECUTIVE
DIRECTOR**
Paul J. Slivinski

**ASSISTANT
DIRECTOR**
Kathy A. Maki

July 11, 2016

Taunton Nursing Home Board of Directors
350 Norton Ave.
Taunton, MA 02780

Dear Ms. Swartz:

Please be advised of the retirement for Superannuation of John A. Brennan, an employee of the Taunton Nursing Home on July 31, 2016 under the provisions set forth in Section #5 of Chapter 32 of the General Laws of Massachusetts.

Please pay regular compensation and accumulated benefits up to and including the date of retirement.

If you have any questions, please feel free to contact our office.

Respectfully yours,


Karen Medeiros
Administrative Assistant

cc: J. Brennan
Treasurer
Auditor
HR
City Clerk
file

retirement letter



2.

CITY OF TAUNTON
Contributory Retirement System
104 Dean Street, Suite 203
Taunton, Massachusetts 02780
(508) 821-1052 Fax (508) 821-1063
www.tauntonretirement.com

**BOARD OF
RETIREMENT**

Chairperson:

Ann Marie Hebert, City Auditor

Elected member: Dennis M. Smith

Elected member: Peter H. Corr

Mayoral appointee: Gill E. Enos

Board appointee: Barry J. Amaral

STAFF

Executive

Director:

Paul J. Slivinski

Assistant

Director:

Kathy A. Maki

July 8, 2016

Hon. Thomas C. Hoye, Jr, Mayor
Taunton Municipal Council
141 Oak St.
Taunton, MA. 02780

Dear Mayor Hoye and Councilors:

Please be advised of the retirement for Accidental Disability of Susan Dykas, an employee of the Taunton Police Dept., effective July 8, 2016 under the provisions of section 7 of Chapter 32 of the General Laws of Massachusetts.

Please pay accumulated benefits up to and including the date of retirement.

Respectfully yours,

Paul J. Slivinski, CPP
Executive Director

cc: Susan Dykas
Ed Walsh, Police Chief
Human Resources
City Auditor
City Treasurer
City Clerk
File

31

City of Taunton
Office of the Mayor

Thomas C. Hoye, Jr
Mayor

Alyssa Haggerty
Chief of Staff

Gill E Enos
Budget Director



141 Oak Street
Temporary City Hall
Taunton, MA 02780
Tel. (508) 821-1000
Fax (508) 821-1005

July 13, 2016

Mayor Thomas C Hoye, Jr and
Members of the Municipal Council
City of Taunton
Temporary City Hall
Taunton, Ma 02780

As part of the Fiscal Year 2017 process and to begin the process with Department of Revenue, the following votes must be taken:

From TMLP in lieu of taxes to reduce tax rate.....	\$2,900,000.00
From Title V to offset Debt & Interest Sewer Enterprise Budget.....	\$ 68,892.00
From Cable TV Education to offset Library Budget.....	\$ 13,690.00
From Cable TV to offset Municipal Access Budget.....	\$ 19,500.00
From Wetlands Protection to offset Planning/Conservation Budget.....	\$ 20,000.00
From Airport Revolving Account to offset Airport Budget.....	\$ 11,000.00
From Parking Garage to offset Parking Commission Budget.....	\$ 13,440.00
From On Street Parking to offset Parking Commission Budget.....	\$ 344,000.00
From Stabilization for various City Departments.....	\$ 4,784,554.37

Please keep in mind that these numbers could change during the Supplemental Budget process and if so, I will present the modification to the City Council at that time. If you have any further questions regarding this matter, please do not hesitate to contact me.

Regards,

Gill E. Enos
Budget Director



SUSANNE COSTA DUQUETTE
Director

Taunton Public Library

12 PLEASANT STREET
TAUNTON, MASSACHUSETTS 02780
(508) 821-1410 • (508) 821-1411
FAX (508) 821-1414



July 14, 2016

Council President Quinn, Mayor Hoye, and Members of the Municipal Council,

The Taunton Public Library is in receipt of a donation from the estate of patron Jeffery Baker in the amount \$8,698.28. This donation represents IRA holdings from the late Mr. Baker.

In compliance with the Mass. General Law Chapter 44 Section 53A and as directed by City Auditor Ann Hebert, the Library presents documentation (attached) from Mr. Baker's legal financial team on the conditions of this gift and seeks the City Council's permission to expend these funds for the purpose of improving library services.

Sincerely,

Susanne Costa Duquette, Director

Taunton Public Library

Christopher A Fraga, JD, CFP®, CLTC, CRPC®
Counsellor at Law



FRAGA
LAW OFFICE

51

July 1, 2016

Taunton Public Library
Attn: Susanne Costa Duquette
12 Pleasant Street
Taunton, MA 02780

RE: IRA of Jeffrey R. Baker

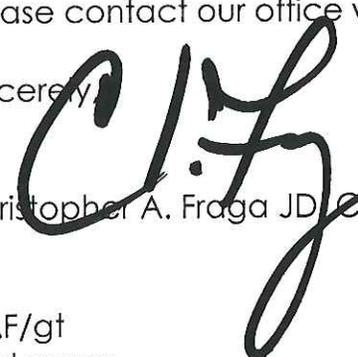
Dear Susanne:

Enclosed please find a check, in the amount of \$8,698.28, payable to the Taunton Public Library. These funds represent the funds remaining in the IRA of Jeffrey R. Baker, where the library was named as the primary beneficiary. Also enclosed is a Receipt Agreement, which requires your signature. Please sign and return to our office.

Please be advised that these funds are being distributed to the Taunton Public Library outright, as primary beneficiary of Mr. Baker's IRA, and may be used by the library at their discretion. Mr. Baker had not placed any restrictions or contingencies on these funds.

Please contact our office with any questions.

Sincerely,


Christopher A. Fraga JD, CFP®, CDFATM, CLTC, CRPC®

CAF/gt
Enclosures



City of Taunton

LAW DEPARTMENT

141 Oak Street
Taunton, Massachusetts 02780
Phone (508) 821-1036 Facsimile (508) 821-1397



Thomas C. Hoye, Jr.
MAYOR

Jason D. Buffington
CITY SOLICITOR

Daniel F. de Abreu
ASST. CITY SOLICITOR

July 15, 2016

Honorable Mayor Thomas C. Hoye, Jr.
Members of the Taunton Municipal Council
141 Oak Street
Taunton MA 02780

**RE: Project First Light Resort and Casino
Federal Litigation vs. U.S. Secretary of the Interior et al.
United States District Court, Dist. of Massachusetts, Civil Action No. 1:16-cv-10184**

Dear Mayor Hoye and Members of the Municipal Council:

On June 9, 2012, a referendum was held to determine whether the City of Taunton should approve the Mashpee Wampanoag's proposed tribal gaming establishment. 12,271 Tauntonians cast a ballot¹. 63% of them voted "yes."

Subsequently, twenty-five (25) individuals filed the above-referenced lawsuit against the federal government with the intent to stop the project. The City is not a party to that litigation. Due to the electorate's overwhelming support for the Project, and the City's strong interest in the outcome of the case, the Law Department determined that it was clearly in the City's interest to file an *amicus curiae* brief so that the Court can be apprised of the City's position on the issues before it.

On July 7, 2016, the City filed a motion with the Court for permission to file its *amicus curiae* brief. Lawyers for the 25 Plaintiffs filed a 9-page written opposition in which they told the Court that "the City of Taunton Has Nothing to Offer...."

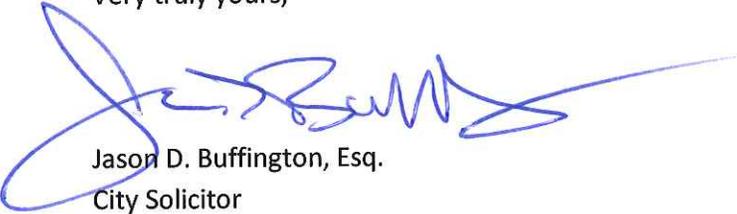
¹ More people voted in the June 9, 2012 special election than all five of the last city general elections: (in 2007 there were 11,061 ballots cast), (2009 – 7,573 ballots), (2011 – 9,736 ballots), (2013 – 6,844 ballots), (2015 – 6,754 ballots).

7.

On July 12, 2016, the U.S. Federal District Court allowed the City's motion over the objections of the Plaintiffs. On July 14, 2016, the Law Department filed its *amicus curiae* brief with the Court so that the decision of the electorate could be heard by the Court when it decides this important matter.

A copy of the City's brief is enclosed herewith. Thank you, as always, for allowing the Law Department to be of service to you and the citizens of Taunton.

Very truly yours,



Jason D. Buffington, Esq.
City Solicitor

8.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DAVID LITTLEFIELD, et al.,

Plaintiffs,

vs.

UNITED STATES DEPARTMENT OF THE
INTERIOR, *et. al.*,

Defendants.

CIVIL ACTION NO.: 1:16-cv-10184-
WGY

Memorandum of Reasons in Support of
Defendants' Motion for Summary
Judgment

(Leave to file granted on July 12, 2016)

**AMICUS CITY OF TAUNTON, MASSACHUSETTS,
MEMORANDUM OF REASONS IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

/s/ Jason D. Buffington
Jason D. Buffington (BBO # 644804)
City Solicitor
City of Taunton, MA
141 Oak Street
Taunton, MA 02780
jbuffington@taunton-ma.gov

/s/ Michael J. Schaller
Michael J. Schaller
Taft Stettinius & Hollister LLP
111 East Wacker Drive
Suite 2800
Chicago, IL 60601
(312) 836-4005
mschaller@taftlaw.com

Attorneys for Amicus City of Taunton, MA

9.

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Introduction

The City of Taunton, Massachusetts (“City”) appreciates the Court’s consideration of this amicus brief and requests that the Court grant the Defendants’ partial motion for summary judgment. The voters of the City overwhelmingly approved the First Light Project (“Project”) through a well-publicized referendum. The Project will result in much-needed economic stimulus for the residents of the City in the form of construction and long-term jobs, infrastructure improvements, and substantial revenues for the City. Moreover, the City took great care to ensure the public was duly notified, informed, and had the opportunity to participate in the deliberative process leading up to the Record of Decision (“ROD”).

Interests of Amicus City of Taunton

Mayor Thomas C. Hoye, Jr. of Amicus City expressed the City’s “strong support” for the Project of the Mashpee Wampanoag Tribe (“Tribe”) in a September 10, 2012, letter to the Bureau of Indian Affairs (“BIA”), Department of the Interior. *See* ROD, p. 126, AR __.¹ The Mayor noted that the City was founded in 1637 along the Taunton River, an important waterway used by the Wampanoag Indians to traverse their historic territory. Thus, the Mayor viewed “the Tribe’s acquisition and establishment of an initial Indian reservation in Taunton as a fitting return of the Tribe to one of its ancestral homes.” AR __. The ROD, which Plaintiffs ask this Court to set aside, is the legal prerequisite for this historic return in that it announced the BIA decision to place the land

¹ All documents cited herein were submitted to or produced by the Department of the Interior as part of its deliberations on the Tribe’s land-into-trust application. As a result, all cited documents are necessarily a part of the administrative record herein. However, because of the shortness of time between the filing of the administrative record (“AR”) and the due date of opening briefs, the City cannot provide the parallel citations to the administrative record for the cited documents. Amicus City of Taunton will file an errata sheet with those parallel citations as soon as possible following the filing of the administrative record.

//.

into trust and establish the gaming eligibility of those lands.² The City has vital governmental and economic interests in the Tribe's return to Taunton and seeks leave to appear as amicus to express those interests.

The City's governmental interests are memorialized in the Intergovernmental Agreement ("IGA") between the City and the Tribe executed on May 31, 2012. The IGA was the result of a lengthy process during which the City was advised by subject matter experts on gaming and mitigation matters. As a condition of the IGA, the City was required to hold a referendum³ among City voters to approve the Project. IGA, Sec. 20.L.

The IGA specifies numerous mitigation measures, including, but not limited to: (1) a one-time payment of \$1.5 million to the City; (2) the payment of 2.05% of the Project's net slot machine revenues to the City on a continuing basis (with a minimum annual guarantee of \$8 million); (3) the annual payment, in-lieu-of-property-taxes, in an amount based upon the assessed value of the Project site to the City; (4) the payment of up-front and continuing infrastructure costs necessary to mitigate adverse impacts on the City and its residents and to provide services for the Project, including costs for police, fire, water, sewer, wastewater, administration, schools, and roads; and (5) the establishment of a tribal-city advisory board that will include City residents authorized to make recommendations regarding the operation of the Project. IGA, Secs. 5, 6, 7, 9, and 10.

² The City is affected by the ROD insofar as it announces a decision to place into trust and establish the gaming eligibility of specified parcels located in the City. The City observes, however, that Plaintiffs' suit seeks to set aside the ROD and revoke the trust status of parcels located in Mashpee and used for governmental purposes by the Tribe in addition to those parcels in the City to be used for the Project. As a result, Plaintiffs seek to undo the Tribe's reservation in its entirety – both in Mashpee and Taunton.

³ The ballot question in the referendum read: "Shall the City of Taunton, pursuant to section 91 of Chapter 194 of the Acts of 2011, approve the operation of a tribal gaming establishment proposed by the MWT [(the Tribe)] to be located east of Route 24 in the immediate vicinity of the intersection of Route 24 and Route 140?" Scoping Report, 1.2.4, AR __.

The IGA further obligates the Tribe to adopt building, health and safety codes that are at least as restrictive as those of the City and to allow access to the Project by the City's health inspectors, police department, and fire department to determine compliance with the tribal codes. IGA, Sec. 12. The City held the referendum on June 9, 2012 and 63% of the voters approved the proposed Project. As a result the IGA is now in effect. Final Environmental Impact Statement ("FEIS"), p. 2-5, AR ___. The Tribe subsequently made the \$1.5 million one-time mitigation payment to the City as required by the IGA on August 22, 2012. ROD, p. 125, AR ___.⁴

The City also has economic interests in the Project that extend far beyond the mitigation and government service payments required by the IGA. The Project is located in and adjacent to an area zoned as commercial by the City in 2003 for the purpose of generating economic development opportunities. ROD, p. 128, AR ___. The ROD found that the Project will indeed generate significant economic opportunities for the Tribe and the City, thereby satisfying this pre-Project objective. ROD, p. 134, AR ___. Specifically, the Project will create: 300 full-time equivalent jobs during the construction period, with direct compensation totaling approximately \$123.8 million; 3,500 permanent full- and part-time jobs during operation of the Project, with direct compensation totaling approximately \$93.2 million annually; indirect and induced employment and economic growth in the City and surrounding areas, including 271 full-time equivalent jobs during the construction period and 1,720 permanent jobs during operations, for a total of approximately \$836.5

⁴ The City's governmental interests in the Project are also asserted through indirect means. For example, the City works with the Tribe and the Massachusetts Department of Transportation on the Mitigation Monitoring and Enforcement Plan for the Project. ROD, Attachment III, AR . In addition, there is a Compact between the Tribe and the Commonwealth of Massachusetts required by the Indian Gaming Regulatory Act, 25 U.S.C. § 2701, *et seq.*, (1988), that is in effect. *See* 79 Fed. Reg. 6,213 (Feb. 3, 2014). The Compact provides that the Commonwealth of Massachusetts may exercise criminal jurisdiction over any person at the gaming facility and that the Tribe shall exercise criminal jurisdiction over its members at the gaming facility concurrent with the Commonwealth, effectively authorizing a role for the City in law enforcement at the Project. Compact ¶17.

13.

million of economic activity during construction and \$511.8 million of economic activity annually during operations. ROD, p. 135, AR ___. This economic activity would increase the number of jobs available in the City alone by 12.3%. ROD, p. 27; AR ___.⁵

There is much at stake in this litigation not just for the Tribe, but also for the City and its approximately 56,789 residents.⁶ The City appears as amicus on Defendants' motion for summary judgment to reflect the overwhelming view of its voters in support of the Project.

Argument

The Court's standard of review of the ROD is limited under the Administrative Procedure Act ("APA"), 5 U.S.C. § 706, which was invoked by Plaintiffs. It is well-established that the Court is not to substitute its own judgment for that of the BIA as expressed in the ROD. *Citizens Awareness Network, Inc. v. U.S. Nuclear Regulatory Comm'n*, 59 F.3d 284, 290 (1st Cir. 1995). Rather, the ROD is entitled to a presumption of regularity and can only be set aside if it is arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law. *Id.*; 5 U.S.C. § 706(2)(A). In addition, where, as here, a statute is susceptible to one or more constructions, the court defers to the agency's construction that administers the statute so long as that construction is a reasonable one. *Craker v. DEA*, 714 F.3d 17, 26-28 (1st Cir. 2013); *Massachusetts Audubon Society, Inc. v. Daley*, 31 F. Supp. 2d 189, 194 (D. Mass. 1998). Here, the ROD reflects carefully considered, deliberative and reasoned administrative decision-making by the BIA. Also, the BIA's construction of the governing statutes, principally the Indian Reorganization Act ("IRA"), is reasonable and

⁵ Although the Tribe would extend a hiring preference to its members, the Tribe has also agreed in the IGA to "work in good faith to employ City residents and patronize local vendors" in the construction and operation of the Project. IGA, Sec. 16.

⁶ U.S. Census Bureau, Quick-Facts: Taunton City, Massachusetts, <http://www.census.gov/quickfacts/table/PST045215/2569170> (last visited July 7, 2016) (estimate of 56,789 residents in the City as of July 1, 2015).

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reflects the BIA's unique and substantial subject matter experience in these matters. This is especially so in light of the alternative construction proposed by Plaintiffs.

I. Plaintiffs' claims are based on an improper and flawed analysis of federal statutes and authority governing Indian affairs.

Indian affairs is a uniquely federal field of law. The leading treatise traces the antecedents of federal supremacy and complete occupation of the field back to a 1763 Proclamation of King George and then through the Articles of Confederation, the Constitution, and early bedrock Supreme Court cases on the exclusivity of federal authority and federal protection of tribal sovereignty. *Cohen's Handbook of Federal Indian Law*, ¶2.01[2] (2012 ed.) This exclusive, protective federal role is the framework within which the issues raised by Plaintiffs' claims must be resolved. *McClanahan v. Arizona State Tax Comm'n*, 411 U.S. 164, 172 (1973).⁷

Plaintiffs misapprehend this pre-emptive federal law. For example, Plaintiffs suggest the BIA erred in its 2007 decision to extend federal recognition to the Tribe. *See* Amended Complaint, ¶¶ 101-106, Plaintiffs' Motion for Preliminary Injunction or Writ, pp. 17-18.⁸ Plaintiffs are wrong. The BIA did not err. The BIA's statutory authority over tribal existence is quite broad, founded in the general statutes delegating authority to promulgate regulations governing Indian affairs. 25 U.S.C. §§ 2, 9 (2016). It is well-settled that the decisions made by the BIA under these statutes are entitled to deference by the courts. *Muwekma Ohlone Tribe v. Salazar*, 813 F. Supp. 2d 170, 189 (D.D.C. 2011); *Miami Nation of Indians of Indiana, Inc. v. Babbitt*, 887 F. Supp. 1158, 1163 (N.D.

⁷ The deeply ingrained right of tribal self-government and federal policy in support of tribal development is such that a different rule on the pre-emptive scope of federal statutes applies to determine whether state authority over a tribe or tribal territory is pre-empted. Unlike in other fields of federal law, state authority can be pre-empted even in the absence of an explicit congressional statement to that effect. *White Mountain Apache Tribe v. Bracker*, 448 U.S. 136, 144 (1980).

⁸ Plaintiffs present this issue by indirection for the obvious reason that a direct challenge to the decision is time-barred under the six-year statute of limitations applicable in APA actions. *Trafalgar Capital Association, Inc., v. Cuomo*, 159 F.3d 21, 34 (1st Cir. 1998).

15.

Ind. 1995). Moreover, even when federal recognition of a given tribe is not continuous, it remains effective once federal recognition was initially extended. *United States v. John*, 437 U.S. 634, 653 (1978). Further, neither a state's prior assertions of authority over a tribe nor a tribe's geographic location within one of the original thirteen colonies diminishes or lessens federal authority over a tribe. *United States v. Holliday*, 70 U.S. 407, 419 (1865) ("Neither the constitution of the State nor any act of its legislature, however formal or solemn, whatever rights in [sic] may confer on those Indians or withhold from them, can withdraw them from the influence of an act of Congress which that body has the constitutional right to pass concerning them."); *Oneida Indian Nation v. County of Oneida*, 414 U.S. 661, 670 (1974) ("It is true that the United States never held fee title to the Indian lands in the original States as it did to almost all the rest of the continental United States...[b]ut this reality did not alter the doctrine that federal laws, treaties, and statutes protected Indian occupancy and that its termination was exclusively the province of federal law."); *Joint Tribal Council of the Passamaquoddy Tribe v. Morton*, 528 F.2d 370 (1st Cir. 1975).⁹

Plaintiffs also misapply the rules of construction to interpret and enforce the applicable federal Indian statutes. There are specific canons of construction that apply to federal Indian statutes, such as the IRA, which Plaintiffs simply ignore. In the words of the Supreme Court: "We have consistently admonished that federal statutes and regulations relating to tribes and tribal activities must be 'construed generously in order to comport with ... traditional notions of [Indian] sovereignty and with the federal policy of encouraging tribal independence.'" *Ramah Navajo School Board v.*

⁹ It is also noteworthy that the Department of the Interior has consistently applied the IRA to tribes located in the eastern United States, particularly to those tribes in occupation of tribal lands even in the absence of continuous federal supervision over those lands. 2 Op. Sol. 1163 (Aug. 25, 1942) (discussing federal authority over the Eastern Band of Cherokee in North Carolina, notwithstanding the history of state jurisdiction over the band); 2 Op. Sol. 1255 (Mar. 20, 1944) (discussing federal authority over the Catawba Tribe of South Carolina, notwithstanding state trusteeship over that tribe's reservation); see also *South Carolina v. Catawba Tribe, Inc.*, 476 U.S. 498, 501 (1986).

16.

Bureau of Revenue, 458 U.S. 832, 846 (1982) (quoting *Bracker*, 448 U.S. at 144)). This rule of liberal construction in favor of the tribes applies specifically when, as here, a court is faced with two possible constructions of a federal Indian statute. The United States Supreme Court has instructed: “When we are faced with these two possible constructions [of a statute], our choice between them must be dictated by a principle deeply rooted in this Court’s Indian jurisprudence: ‘[S]tatutes are to be construed liberally in favor of the Indians, with ambiguous provisions interpreted to their benefit.’” *County of Yakima v. Confederated Tribes & Bands of the Yakima Indian Nation*, 502 U.S. 251, 269 (1992) (quoting *Montana v. Blackfeet Tribe*, 471 U.S. 759, 766 (1985)); see also *Citizens Exposing Truth About Casinos v. Kempthorne*, 492 F.3d 460, 471 (D.C. Cir. 2007).

This rule of generous construction applies with particular force to the IRA. The Supreme Court has explained that the IRA was intended to “rehabilitate the Indian’s economic life and to give him a chance to develop the initiative destroyed by a century of oppression and paternalism.” *Mescalero Apache Tribe v. Jones*, 411 U.S. 145, 152 (1973) (quoting H.R. Rep. No. 1804, 73d Cong., 2d Sess., 6 (1934)); *Bracker*, 448 U.S. at 143, n.10. In fact, the IRA was the “crowning achievement” of the New Deal and “designed to improve the economic status of Indians by ending the alienation of tribal land and facilitating tribes’ acquisition of additional acreage and repurchase of former tribal domains.” *Cohen’s Handbook of Federal Indian Law*, §1.05 at 86 (2012 ed.). The BIA appropriately relied on this congressional policy in the ROD at issue here. ROD, p. 81, 91-91; AR

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¹⁰ The liberal rule of construction applicable to Indian statutes is the exact opposite of the rule of lenity applied in federal deportation statutes. There, ambiguities are resolved against the government because of the drastic remedy of deportation. *Castaneda v. Souza*, 952 F. Supp. 2d 307, 320 (D. Mass. 2013). Here, the remedial nature of federal Indian statutes requires that ambiguities be resolved in favor of asserted federal authority.

17.

These discrete rules confirm the correctness of the BIA's construction of Section 479 of the IRA at issue here. 25 U.S.C. § 479. By construing the three categories of eligible Indians in the section as encompassing independent and distinct groups, the BIA has given the statute the required liberal and generous construction and has fulfilled congressional policy. ROD, p. 81; AR ___. The BIA's construction of the IRA is also consistent with the structure of Section 479 itself. See *Castaneda v. Souza*, 952 F. Supp. 2d 307, 311 (D. Mass. 2013) (statutory structure must be examined along with wording). Section 479 clearly enumerates three categories of eligible Indians. There is no question that the first and third categories are distinct and separate. The second category must be similarly construed as separate and comprehending a group of eligible Indians distinct from the first and third.¹¹

History shows the wisdom and justice of applying the rule of generous statutory construction here. As noted at the outset, the Project lands are within the Tribe's territory. The Tribe lost its territory originally through a combination of overreach by the Commonwealth of Massachusetts and the neglect of the United States. The Tribe was reduced over time from the twenty-five mile square area it once held to only 17,000 acres in the Town of Mashpee. Proposed Finding, p. 32; AR ___. Even as the Commonwealth attempted to extinguish the Tribe's title to Mashpee in 1869 and 1870, the Tribe remained in occupation and control of the Town of Mashpee for one hundred years afterwards. *Id.*, p. 44; AR ___. As a result, the Tribe was effectively in occupation of a reservation in 1934. See *Minnesota v. Hitchcock*, 185 U.S. 373, 389-90 (1902). Now, the United States has acted

¹¹ Plaintiffs cannot avoid the natural reading of Section 479 based upon its structure by suggesting that the second category remains distinct, in part, because of the need to reach after-born Indians described in the first category. It has been settled for generations that tribes have the inherent power to define their own membership, including after-born members. *Cohen's Handbook of Federal Indian Law*, §4.01[2][b] 215-16 (2012 ed.). Therefore, the first category in describing eligible Indian tribes necessarily includes after-born members of those tribes. To follow Plaintiffs' construction would render the second category of eligible Indians to be meaningless and a statute cannot be read to render language meaningless.

18.

in the ROD to provide for the economic and governmental renewal of the Tribe, precisely as contemplated by the IRA. The modicum of long over-due justice for the Tribe embodied in the ROD must stand.

II. The ROD is based on substantial evidence and the result of the BIA's considered, deliberative, and rational exercise of its authority.

The Plaintiffs' contention that the BIA's decision-making in this case was arbitrary or capricious is belied by the overwhelming record. As the United States demonstrates in its motion for partial summary judgment, the BIA acted with appropriate authority under the IRA to place the Project lands and others into trust for the Tribe. Apart from that issue, the focus of the Court's review under the arbitrary or capricious standard is on process; that is, whether the ROD takes into account all relevant considerations and is supported by substantial evidence. *Craker*, 714 F.3d at 26; *Sig Sauer, Inc. v. Brandon*, No. 15-2230, 2016 WL 3409869, at *2 (1st Cir. June 21, 2016). Here, the ROD is the result of the BIA's detailed review of all relevant considerations, including those raised by the public generally and by Plaintiffs then and now. The ROD is overwhelmingly supported by substantial evidence obtained through a fair and deliberative process.

Perhaps the two most deliberative and protracted processes leading to the ROD were environmental reviews based on federal and state law: the Final Environmental Impact Statement ("FEIS") and the Final Environmental Impact Review ("FEIR"), respectively. AR __. These processes began on May 31, 2012, with the announcement by the BIA of its intent to prepare an Environmental Impact Statement ("EIS") on the Tribe's request that land be taken into trust in Taunton for gaming purposes and in Mashpee for governmental, housing and other tribal purposes. 77 Fed. Reg. 32132 (May 31, 2012).

Public meetings were duly noticed and held on the scope of environmental review on June 20 and June 21, 2012, at Taunton and Mashpee High Schools, respectively. The Tribe published notices

of the hearing in local papers and solicited public comment. Scoping Report, p. 1.2, AR ___. Beginning at the same time and throughout the ensuing process, the City also hosted a page on its municipal website informing its residents of relevant Project matters including plans regarding and opportunities to comment on the Project. The City also sponsored events on May 8, 2012 to solicit public input and determine relevant issues to be considered as part of the environmental review, and conducted a special City Council public meeting on May 24, 2012, for the same purpose. *Id.* The resulting Scoping Report identified a number of alternatives to consider, including full development of the Project as proposed by the Tribe, smaller development projects, or no development at all.

On July 2, 2012, the Tribe filed an Environmental Notification Form that triggered a parallel environmental review under the Massachusetts Environmental Policy Act. Following due notice, another public hearing was held on July 24, 2012 to solicit public comments on the Project. Scoping Report, p. 1.2.6, AR ___. These various public hearings resulted in written comments by 78 members of the public. ROD, p. 9, AR ___. In addition, oral comments were made by members of the public at the hearings, including statements by eight individuals who are now the Plaintiffs in this matter.¹²

Significant issues identified by the public at these hearings included traffic, wetlands, water supply and wastewater, potential Project impacts on water quality and flooding, and changes in community character. As a result, all of these and other matters were analyzed in the draft EIS, published on November 15, 2013. Hard copies of the draft EIS were made available to the public at the City's office and public libraries.

¹² Plaintiffs David Littlefield (tr. 231), Kathleen Lewry (tr. 74), Michelle Littlefield (tr. 7, 17), Veronica Casey (tr. 68), Cora-Dorothy Peirce (tr. 137), David Lewry (tr. 231), and Carol Murphy (tr. 82) testified at the June 20 hearing. Counsel for Plaintiffs, Adam Bond, also testified at the June 20 hearing (tr. 108). Plaintiffs Michelle Littlefield and Francis Legace also testified at the June 22 hearing.

20.

The publication triggered a 45-day comment period and during this time the BIA sent letters to all individuals, including some of Plaintiffs who had commented at the scoping hearing, advising of their opportunity to comment on the draft EIS. ROD, p. 9, AR __. Public hearings were then held on the draft EIS on December 2 and December 3, 2012 at Mashpee and Taunton High Schools, respectively. ROD, p. 10, AR __. The BIA extended the comment period through January 17, 2014 and, by the close of the comment period, the BIA had received 44 comment letters in addition to the 20 comments made at the public hearings. ROD, p. 10, AR __.¹³

On September 5, 2014, the BIA published the final EIS. 79 Fed. Reg. 53,077 (Sept. 5, 2014). The final EIS identified each comment on every subject and included a response to each, except for those matters beyond the scope of environmental review such as general objections to the conduct of gaming. FEIS, AR __. A thirty-day waiting period ended on October 6, 2014, during which time additional comments were received. These comments were addressed in Attachment IV to the ROD. See ROD, p. 10; AR __. At the end of this lengthy and comprehensive environmental review, the BIA adopted the Tribe's proposed Project as the preferred development alternative.

At the same time that this extensive and public environmental review took place, the BIA also considered whether the Project, if selected as the preferred alternative in the final EIS, would qualify as Indian land within the meaning of the Indian Gaming Regulatory Act and regulations found at 25 C.F.R. Part 292. ROD, p. 53; AR __. The relevant considerations for an initial reservation, the category of eligibility for tribes that had been recognized through the administrative acknowledgment process, are proximity of the land to the tribe's headquarters and whether the tribe has significant historical ties to the land. 25 C.F.R. § 292.6(d). In making this determination, the

¹³ Some of the Plaintiffs commented on the draft EIS, including Francis Lagace (tr. 53), Michelle Littlefield (tr. 65), and David Littlefield (tr. 70) and also submitted written comments on the draft EIS: Jill and Francis Lagace; Robert Lincoln; David Littlefield; and Dorothy Peirce. DEIS, AR .

21.

BIA relied upon the substantial record developed on the Tribe's petition for federal acknowledgment. ROD, p. 59; AR ___. In addition, the BIA received and considered an opposing historical report. ROD, p. 67. The BIA assessed and acted well within its discretion when it rejected the opposing historical report and concluded that the Project qualified for gaming at the Tribe's initial reservation, if placed into trust. ROD, p. 67-77, AR ___.

To complete its analysis of the Project, the BIA also considered another set of factors; that is, those factors that all applications for trust land must meet as set out at 25 C.F.R. Part 151. These regulations require that the BIA assess its authority under the IRA to place land into trust for the particular tribe, the Tribe's need for the land, the purposes for which the land will be used, the impact on local governments, and the BIA's ability to administer the lands. The first factor, addressed at length by the BIA, is the subject of the parties' cross-motions for partial summary judgment. ROD, pp. 80-120. The BIA properly found that the remaining factors uniformly counseled in favor of the proposed trust acquisition, in large measure because of the Tribe's positive working relationship with the City and other local governments. ROD, pp. 121-130; AR ___.

As a result of these extensive deliberations and analyses, undertaken over the course of nearly four years, the BIA announced the ROD on September 18, 2015, and accepted the land into trust on November 10, 2015. Amended Answer, ¶ 82. In its final required act, the BIA noticed its intention to declare the trust lands to constitute the Tribe's initial reservation on December 31, 2015. 81 Fed. Reg. 948 (Jan. 8, 2016).

All relevant factors in this decision-making process were identified, with help in part from a number of the Plaintiffs. These factors were analyzed and weighed with the help of several substantial comment periods from the public. All governing regulations were properly applied. In the end, the BIA agreed with the City and the Tribe that the Project is appropriate and authorized. Indeed, it is fitting that the federal policy underpinning the IRA has been applied and will ultimately

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result in substantial and long-term economic resurgence of the Tribe and the City, as the Tribe's partner. There is no genuine question of material fact here; the BIA did not act in an arbitrary or capricious manner in issuing the ROD. The City urges that the Court grant Defendants' motion for summary judgment.

Conclusion

Plaintiffs' claims face an insurmountable burden against the uncontested facts, the law, the rules of construction, common sense, and careful decision-making by the BIA in this matter. The City urges the Court to grant Defendants' Motion for Partial Summary Judgment.

23,

DATED: July 14, 2016

Respectfully submitted,

/s/ Jason D. Buffington

Jason D. Buffington (BBO # 644804)

City Solicitor

City of Taunton, MA

141 Oak Street

Taunton, MA 02780

jbuffington@taunton-ma.gov

/s/ Michael J. Schaller

Michael J. Schaller

Taft Stettinius & Hollister LLP

111 East Wacker Drive

Suite 2800

Chicago, IL 60601

mschaller@taftlaw.com

Attorneys for City of Taunton, MA

24.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) on July 14, 2016.

/s/ Jason D. Buffington

25.
Dear Mayor, Council President and Council;

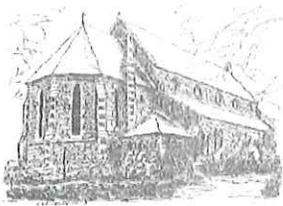
We would like to thank Councilman John McCaul for stepping up and following through on a problem we brought to his attention.

He is a man who does alot for the community and the people of Taunton and he is greatly appreciated. He came through when no one else would. His kindness is overwhelming.

We'd like to thank him for all his done on our quest to get Emmitt back. We hope we've caused him no trouble and that you understand how appreciated he is. He did his job to a T. His actions speak volumes of his character.

If Chuck Moser had the integrity of John McCaul, we wouldn't be going through this. Emmitt may be cold-blooded but he belongs to a warm-hearted family.

John did the job he was elected to do and we thank him.
Sincerely, The Kelly Family



St. Thomas Episcopal Church

111 High Street-P.O. Box 149
Taunton, MA 02780
Phone: (508) 824-9595
Fax: (508) 822-5263
www.StThomasTaunton.Com



July 8, 2016

The Honorable Mayor Thomas Hoye Jr.,
& Municipal Council Members
141 Oak Street
Taunton, MA 02780

Dear Mayor Hoye Jr., and
Municipal Council Members,

On Saturday October 22, 2016, the Episcopal Church of St. Thomas, located at 111 High St. Taunton Ma, would like to host a "Haunted Hayride" in the downtown area of Taunton as part of our annual Church Fair.

The 30ft trailer with hay bales will be towed by a seven passenger van. The tour will be guided by local book authors Ed & Yolanda Lodi.

We propose doing three, 35-45 minute tours (10:00am, 12:00pm & 2:00pm) which will follow the route attached with this letter.

This information has been given to Chief Walsh for his initial input and approval.

Thank you for your time and consideration in this matter.

Sincerely,
Paul S. Boudreau
Paul S. Boudreau
Episcopal Church of
St Thomas

27.

Taunton road map & Taunton street view

City:

Taunton maps Taunton satellite view Jobs in Taunton Taunton photos

Taunton Geographical data

City Name: Taunton
 State/County: Massachusetts
 Bristol County
 Country: United States
 Capital: Washington
 Population: 57,160

Geographic coordinates:
 Latitude: 41.9° N
 Longitude: -71.09° W
 Elevation: 15 m

Taunton Weather Forecast

Date/Time: [Click to Update!](#)

Weather conditions:
 Temperature:
 Wind (speed & direction)
 Humidity: (%)
 Atmospheric pressure: (hPa)
 Cloudiness: (%)

Nearest localities:

- Attleboro road map
- Berkley road map
- Bridgewater road map
- Brockton road map
- Dighton road map
- East Bridgewater road map
- Easton road map
- Fall River road map
- Foxborough road map
- Freetown road map
- Mansfield road map
- North Lakeville road map
- Norton road map
- Ocean Grove road map
- Raynham road map
- Raynham Center road map
- Rehoboth road map
- Somerset road map
- Swansea road map
- Warren road map
- West Bridgewater road map
- Whitman road map

8+1 0

Taunton Massachusetts road map & Taunton street view - view streets, roads, routes, places, buildings...

- Ne
- South Boston road
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 - Cambridge road
 - Worcester road
 - Lowell road
 - Manchester road
 - Springfield road
 - Hartford road
 - New Haven road
 - Waterbury road
 - Concord road

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- Ottawa road
 - Havana road
 - Mexico City road
 - Washington road

[Business](#)
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 - トーントン (Japanese)
 - 汤顿 (Chinese)
 - 론탄 (Korean)

Reference Link
<http://en.wikipedia>

Search Hotels

Where?
e.g. city, region, district or specific hotel

Check-in
Day Month

Check-out
Day Month

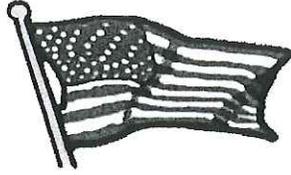
I don't have specific dates yet

Guests
2 adults in 1 room

Taunton Massachusetts road map is the best place to start exploring Taunton: accommodation, rent a car, real estate, business, jobs, ads and much more...

Recommended hotels in Taunton MA area

5 star hotels:	4 star hotels:	3 star hotels:	2 star hotels:	1 star hotels:
0 hotels	1 hotel	13 hotels	8 hotels	2 hotels
	Comfort Inn & Suites Fall River 360 Airport Road, Fall River, , United States >>	Residence Inn Boston Brockton 124 Liberty Street, Brockton, , United States >>	Extended Stay America Hotel Foxboro Norton 280 S. Washington Street, Norton (Massachusetts), , United States >>	Quality Inn Raynham 164 New State Hwy, Raynham, , United States >>
	Country Inn & Suites Brockton 50 Christy's Drive, Brockton, , United States >>	Westgate Hotel and Conference Center 195 Westgate Drive, Brockton, , United States >>	Quality Inn Brockton 1005 BELMONT STREET, Brockton, , United States >>	Super 8 Somerset/Fall River Area 537 Riverside Avenue, Somerset (Massachusetts), , United States >>
	Hampton Inn Raynham-Taunton	Gilbert's Bed & Breakfast Rehoboth (Massachusetts) 30 Spring Street, Rehoboth, , United States >>	Super 8 Motel Brockton 385 Westgate Dr., Brockton, , United States >>	Holiday Inn Express



JULY 19, 2016

HONORABLE THOMAS C. HOYE, JR., MAYOR
COUNCIL PRESIDENT JEANNE M. QUINN
AND MEMBERS OF THE MUNICIPAL COUNCIL

RECEIVED
CITY OF ENFIELD OFFICE
2016 JUL 15 10 58
TOWN OF ENFIELD
CITY

PLEASE NOTE: **THE FOLLOWING COMMITTEE MEETINGS HAVE BEEN SCHEDULED FOR TUESDAY, JULY 19, 2016 AT 6:30 P.M. AT THE TEMPORARY CITY HALL AT MAXHAM SCHOOL, 141 OAK STREET, TAUNTON, MA. 02780, IN THE CHESTER R. MARTIN MUNICIPAL COUNCIL CHAMBERS**

6:30 P.M.

THE COMMITTEE ON FINANCE & SALARIES

1. MEET TO REVIEW THE WEEKLY VOUCHERS & PAYROLLS FOR CITY DEPARTMENTS
2. MEET TO REVIEW REQUESTS FOR FUNDING
3. MEET TO REVIEW MATTERS IN FILE

PLEASE NOTE: **A "MEETING" OF THE ENTIRE MUNICIPAL COUNCIL, AS SAID TERM IS DEFINED IN MASS. GEN. L. C. 30A, §18 MAY OCCUR CONCURRENTLY WITH THIS COMMITTEE MEETING**

RESPECTFULLY,

A handwritten signature in cursive script that reads "Colleen Ellis".

COLLEEN M. ELLIS
CLERK OF COUNCIL COMMITTEES