

Testimony of Rep. Denise Provost on Bill 146/House Bill 159

June 20, 2007

The Honorable Harriette Chandler
Committee on Community Development and Small Business, Senate Chair
State House, Room 312-D

The Honorable Anthony Petrucci
Committee on Community Development and Small Business, House Chair
State House, Room 26

Re: Comments on Senate Bill 146/House Bill 159: An Act Authorizing “Special Development Districts”

Dear Chairwoman Chandler and Chairman Petrucci:

Thank you for the opportunity to comment on Senate Bill 146/House Bill 159. I have organized my written testimony into two parts: part one is my analysis of the bill, illustrating points of concern, and part two consists of suggested amendments.

Part 1: An Analysis of the bill, with commentary, in what I hope will prove to be a reader-friendly question and answer format

-History of this Legislation

The Proposal to enact a new chapter 40T of the Massachusetts General Laws is not entirely new. A similar proposal was added as a Senate amendment (Section 41) to the Economic Stimulus Bill in the 2005-2006 legislative session. Section 41 was passed by both branches, unremarked upon, as part of the Economic Stimulus Bill, but was vetoed by the Governor.

The House overrode the Governor’s veto by a 109 to 46 vote on July 27, 2006. The Senate did not take up the veto override.

In the 2007-2008 session, S. 146/H. 159 was filed. This bill is very similar to last year’s Sec. 41, but has been revised to address some of the concerns raised during the House’s veto override debate. The legislation remains complex, contains a number of ambiguities and unanswered questions, and, in its blurring of traditional concepts of “public” and “private,” raises major policy questions for the commonwealth.

-What Would this Legislation Do?

This legislation would authorize each municipality in the commonwealth to establish one or more “development zones,” with or without concurrent “local improvement districts, each a body

politic and corporate and a political subdivision of the commonwealth.” (Sec. 2 (a)) Such zones and districts would be established by majority vote of a municipal governing body after public hearing, on petitions signed by at least 80% of the landowners in self-designated “development zones,” which set forth “improvement plans” (Sec. 2 (b)); see also definition of “improvement plan” in Sec. 1). These petitions would also be filed with the Massachusetts Development Finance Agency (hereinafter MassDevelopment), which would then characterize the projects planned therein as either “economic development projects” or “local improvement projects.”(Id.)

-Isn't this bill just what we need to finance the construction of public infrastructure?

It depends on your definition of “public.” If you are willing to re-define “public” infrastructure to include projects that historically would have been considered “private,” then the answer for you may be affirmative. If you still consider “public” to be those improvements which are constructed on public land, and/or are under public ownership and control, then you are likely to find this bill’s blurring of “public” and “private” interests as problematic as I do.

It is clear that 40T zones may be composed entirely of privately owned land. The infrastructure built through 40T—for example, roads, sewer and water lines, and utility cables—may be built for the purpose of creating a new residential development, to be subdivided and sold to other private owners. In contrast to more traditional, purely governmental kinds of special development districts— port authorities, turnpike authorities, convention authorities, airport authorities, and the like— 40T authorizes and fully contemplates profit to private persons.

By contrast, it is unclear whether publicly-owned land could even be part of a 40T district. Sec. 41 of last session’s Economic Stimulus Bill stated that “any real property owned by the commonwealth or any political subdivision thereof shall not be subject to the provisions of this chapter,” making it clear that 40T zones encompassed only private land. (Sec.41, sec. 2(b)(2).) This session’s bill, by contrast, provides that “any real estate owned by the commonwealth, or any agency thereof, or any political subdivision thereof included in the boundaries of the district shall not be included in the count of persons owning tax parcels or acreage of the development zone for the purposes of [obtaining the written consent of record owners of 80% of the acreage, plus 80% of the tax parcels in the zone].”(S. 146/H.159 (Sec.2 (b)(2).)

This change suggests that 40T zones could include public land, but that consent of the public landowners to the creation of the district would not be required, but would be exempt from the “written consent” provisions of this bill. I asked a project proponent about this change, and he told me that he thought it represented a drafting error. He could not explain the original intent of the change.

While it is presently ambiguous whether 40T zones could include publicly-owned land, it is definitely the case that the zone and its improvements are not required to be on public land, or publicly owned; nor are they even required to benefit the public. Unless otherwise required, 40T improvements would be “publicly owned” only to the extent that approval of a 40T zone creates a “body politic and corporate, and political subdivision of the commonwealth” – a new governmental body, but one privately initiated.

-What kind of “improvements” are authorized by this legislation?

The “improvements” contained in these petitions could be for the construction - or acquisition - and subsequent operation of, capital improvements such as: drains, sewers, and sewage treatment plants; roads, dams and bridges; streets, sidewalks, and traffic control systems; parking facilities, including garages; parks; recreational, cultural, and performing arts facilities; public safety or public works buildings; marine or transportation facilities or stations; telecommunications systems, electrical power and distribution systems – basically, all the infrastructure one would need to build one’s own city or town. In addition to these capital improvements, “services and programs” could also be provided (Sec. 1, definitions)

-How would these improvements be financed?

Construction or acquisition of capital improvements would be financed through issuance of tax-exempt government bonds. Principal and interest on the bonds, and administrative overhead and costs, would be recouped through assessments on the real property benefited by the improvements. In the case of commercial, industrial, or mixed-use projects, MassDevelopment would be the bond issuing agency. In the case of projects to benefit residential developments” and commercial facilities ancillary thereto,” a Local Improvement District (hereinafter LID) would issue the bonds. (Sec 1, definitions of “issuer”)

There is an additional financial “plus” that would be enjoyed by these districts, in addition to financing capital improvements through tax-exempt government bonds: “A local improvement district...and all its receipts, revenues, income and real and personal property shall be exempt from taxation...and the local improvement district shall not be required to pay any tax, excise, or assessment to or from the commonwealth or any of its political subdivisions...” (Sec. 7) Individuals, companies and property within the district would remain subject to taxation, but not the LID, or the property, income, and assets belonging to the district (Id.)

-How would these Local Improvement Districts be governed?

LIDs would be governed by “prudential committees” of 5 district landowners (or their designees), as set forth in the original petitions – a kind of board of directors. Prudential committee members would serve for terms not exceeding 5 years; their successors would be appointed by the local “municipal governing body”. Successor prudential committee members would presumably be selected from among the landowners in the district, although the bill does make such a requirement explicit. Unlike, say, members of a condominium association, prudential committee members would never be elected by district landowners from among the class of district landowners.

-What would be the powers and duties of these districts?

Each 40T project encompasses three kinds of activity: the issuance of bonds (or notes); the assessment and collection of “infrastructure assessments,” and the functions of a “public facilities owner,” varying, depending on what sort of facilities are contemplated (Sec.1, definitions). These duties may be consolidated among one or two entities, or split among three.

For instance, with a commercial project, MassDevelopment might be the issuer, a LID might be the facilities owner (and operator), and the municipality might be retained under contract to act as the assessing party.

On approval of petitions authorizing them, LIDs would have the power to: adopt rules and regulations, and fix, enforce, and collect penalties; maintain an office, and adopt a seal; enter in all manner of contracts; “purchase or acquire” or sell real and personal property, including real estate outside the district; construct operate, and administer improvements “for the benefit of the development zone;” borrow or invest money, and accept gifts “from any source, public or private,” and apply for grants; to sue and be sued; to “assess and collect infrastructure improvements;” to hire employees, including a “local improvement district superintendent;” to procure insurance, and to adopt an annual budget – in short , to operate very much like a municipal government, in scaled down form (Sec. 3(d)(6); Sec. 4(a)(1).)

-I notice that the list doesn't include the eminent domain power - if there's no exercise of the eminent domain power, what can be the problem?

Even in last session's bill, 40T districts did not themselves have eminent domain power. That bill gave 40T districts the ability “to acquire by eminent domain, with the approval of the municipal governing body...real and personal property located in the district.” (Sec.41, sec. 3(d)(5).) Under the present bill, 40T districts still have the right to “acquire” real and personal property – even outside the district.

There is no doubt that municipalities would have the power to take property by eminent domain on behalf of 40T districts, and to transfer property so taken to a 40T district. Under current federal and state law, a municipality – often on behalf of one of its political subdivisions, such as a redevelopment authority – has the power to take property by eminent domain to transfer to a private developer. A municipality may certainly exercise the eminent domain power on behalf of another “political subdivision of the commonwealth,” which a 40T district would be. The current bill just is drafted more artfully, to avoid use of the phrase “eminent domain,” and the alarm that it causes.

-Still, doesn't 40T provide a creative way to fund the construction of useful new infrastructure – even if it's not strictly “public”?

The bonding features of proposed Ch. 40T may indeed work well as a financing mechanism for capital improvements, and the commonwealth is already experimenting with the issuance of land-based debt to finance such improvements. Last session, this legislature adopted the so-called “I Cubed” bill (H. 5111, codified as Chapter 293 of the Acts of 2006), authorizing funding of certain capital improvements through issuance of bonds backed by a revenue stream of special assessments on property benefited by those improvements. “I Cubed,” however, sensibly limits this financing experiment to a maximum of five specific projects state wide.

Under “I Cubed,” MassDevelopment is the issuing agency for all bonds issued pursuant to the legislation .Municipalities are the collecting agencies for all infrastructure assessments. No new, separate political subdivisions are created under “I Cubed.” Moreover, the entire legislation has a

“sunset” date of 2012 for operation of this law. By contrast, Chapter 40T would have no numeric or temporal limits.

-What harm is there in brushing aside these complications, for the sake of building some valuable capital projects?

The most problematic thing for me about Ch. 40T is that, in order to enjoy the benefits of issuing tax-exempt government bonds, LIDs must effectively receive governmental status. (see, e.g., the Sec. 1 definition of “local improvement district;” see also Sec. 3(d),(1) through (19).) Federal law generally holds that, in order to qualify bonds as tax exempt, entities must have been delegated some share of a state’s “sovereign” powers, such as the taxing power, the police power, and/or the eminent domain power. See, e.g., *Commissioner of Internal Revenue v. Shamberg’s Estate*, 144 F.2d 998; 1944 U.S. App. LEXIS 4282 (1944) Cert. denied, 323 U.S. 792; 1945 U.S.LEXIS 2579 (1945) 40T effectuates a significant transfer of governmental sovereignty to unelected owners of private property. Such privatization of government – or governmentalization of private development, if you prefer – creates a hybrid form which is new to Massachusetts, the implications of which merit considerable thought.

-For instance?

On the more abstract side, consider that adoption of Ch. 40T would delegate to municipalities the power to establish political subdivisions of the commonwealth. Municipalities would thus be creating political and corporate entities which are, in some regards, co-equal with themselves. Though not entirely free of all municipal approval and relationship, these special development districts are free of many of the requirements and restrictions imposed on municipal government, and may in some respects enjoy a competitive advantage over their municipal patrons – as well as enjoying advantage over private developers who operate purely in the private realm, and finance their infrastructure with debt that does not enjoy tax-exempt status.

-What advantages over municipalities would 40T districts potentially enjoy?

As examples of potential advantages over municipalities in the finance realm: “infrastructure assessments” under 40T would be free from regulation by the Mass. Dept. of Revenue (Sec. 5(a), 3d paragraph), although both MassDevelopment and the IRS would consider such assessments to be taxes. Bonds or notes can be issued by resolution of the prudential committee at any time “for any of the purposes set forth in this chapter.” (Sec.6 (b)) Such bonds or notes could then be issued “without obtaining the consent of any department, division, commission, board, bureau or agency of the commonwealth or the municipality, and without any [further] proceedings....” (Sec. 6(l).)

Development zones and LIDs are exempt from the Civil Service Laws in their hiring; their disposition or acquisition of real property is exempt from the strictures of MGL ch. 30B, sec. 16, and only certain sections of the laws governing public construction projects apply to development zones. (Sec. 3(d)(6)). While prevailing wage laws would apply to workers constructing or repairing 40T projects, it appears that the attorney general would not have the power to inspect workplaces for such violations, or to enforce them (See Sec.3 (d)(6), which

includes MGL ch.149, secs.26-27F, secs. 44A-44H, “and the violation and penalty provisions in Section 44J,” [which relate to bid-splitting], but omits MGL ch.149, secs. 2 and 3). The prevailing wage law would not apply to maintenance or cleaning contractors in “public” buildings operated pursuant to 40T: parking garages, public safety and public works buildings, recreational facilities and performing arts centers, transportation stations, etc.(See Sec. 3(d)(6), which similarly omits MGL ch. 149, sec. 27H)

Another interesting advantage of 40T projects over their municipal counterparts could occur in the realm of electrical power generation. This bill would authorize such districts to acquire or construct “facilities to produce and distribute electricity, including alternate energy sources such as co-generation and solar installations...” and to provide “services and programs” in connection with such facilities. (Sec.1, definitions of “improvements” and “improvement plan.”) At present, municipalities are constrained from establishing new municipal light companies by statutory strictures. If pending bill H. 3319, which would liberalize the statutes authorizing new “munis,” is not adopted, then 40T districts will have substantial advantage over municipalities in setting up power generating facilities, and in acquiring existing infrastructure to serve the district.

40T districts enjoy advantages in the realm of disclosure and transparency. The commonwealth’s conflict of interest law, MGL Ch. 268A, is limited in its application to such districts. It categorizes prudential committee members, and the officers, employees, and consultants of LIDs to be “special municipal employees,” limiting the potential application of MGL Ch. 268A. That statute does not apply to prudential committee members who disclose their financial interests in improvement plans (Sec. 1, definition of “improvement plan;” Sec. 10). Since prudential committee members will by definition be district land owners or their agents, their financial interest in improvement plans will be almost a foregone conclusion.

Instead of the potential public inspection of its books, to which the Public Records law subjects a municipality, it appears that only a “record owner of land within a development zone” has a right to inspect the accounts of a LID (Sec. 9) Not even a tenant who may, under a lease agreement, being paying the full amount of the special assessments, appears to have a right to inspect the books. (Id.). It does not appear that the Public Records law has any general application to a 40T district.

The substantive provisions of this bill confer many advantages to 40T zones and districts. The full scope of such advantage, can only be fully measured in practice, however, as municipalities – and the state – discover the limits to which the courts may find such districts to be subject, or to be exempt , from various provisions of other laws. Sen.146/H.159 contains a ‘conflict of laws’ provision that provides that, in case of inconsistencies between 40T and “any general or specific law, administrative order, or regulation, or any resolution or ordinance of the municipality, this chapter shall be controlling.” (Sec. 13 (a))

-What about advantages over purely “private” developers?

Besides funding its projects through tax free bonds, another advantage 40T development zones enjoy over conventional development is the same limited tort liability enjoyed by the

commonwealth and its cities and towns under MGL Ch. 258. Moreover, only the revenues pledged for the repayment of notes or bonds is subject to attachment or execution. Real estate in the development zone is exempt from judgement or execution – compared to a private development, it’s almost judgment proof, for purposes of tort liability (Sec. 3(d)(13)). Then, too, as previously noted, the assets and income of the LID are exempt from state and local taxes (Sec.7) – an advantage the “private” sector would surely appreciate.

Another advantage is one that the bonds and notes issued for a 40T project would enjoy in the marketplace. This bill declares such bonds and notes to be “securities in which all public officers and public bodies of the commonwealth and its political subdivisions, all insurance companies, [etc.] may properly and legally invest funds...” (Sec. 6(i)). Not only does this provision work to the advantage of 40T districts over private companies, it could greatly harm retirement boards or other public investors, should such districts go belly up – though that is a topic for another heading.

-Aren’t we talking about capital investments that benefit the public? Aren’t all these objections kind of picky?

The improvements contemplated by Ch. 40T are generally of the kind that government builds for the benefit of the public – but not exclusively so. Some of the improvements contemplated by 40T are of a kind that is more usually constructed and operated by the private sector: parking garages, electricity generating facilities, and golf courses, for instance. Unlike “I Cubed,” S. 146/H.159 has no requirement that 40T improvements be publicly owned. After all, these petitions are designed to be initiated by owners of private property.

-Can’t a community just say “no” to a 40T petition that it does not think is a good idea?

It’s true that municipalities are free simply to deny petitions to create these development zones. Such an assertion glides over two important truths that apply here: one, is that municipalities vary tremendously in the amount of resources and sophistication they possess for evaluating development proposals, and for negotiating with developers – and by the voting stage, a community may already have invested considerable resources in evaluating a 40T proposal. The other is that municipalities seldom want to say “no” to infrastructure improvements – they more typically want the know-how and processes that will allow them to make privately initiated capital improvement projects work.

S.146/H. 159 provides for a straight up-and-down, majority municipal vote, after public hearing, on petitions which are presented. (Sec. 3(b),(c)) The bill has no provisions that allow the municipal governing body to impose conditions on its approval of such petitions, as it would with an application for a Special Permit, for example. It requires municipalities to make findings that these development projects are “not inconsistent” with any local master plan, and are “compatible with” local and regional infrastructure – but do not give the local planning boards any role to play in the review and approval of these petitions.

Most municipalities are likely to need technical assistance to evaluate and act on 40T projects. The introduction in S.146/H. 159 of a role for MassDevelopment to review projects, and to act as

issuing authority for commercial/industrial projects, is a great improvement over last year's bill. Yet MassDevelopment's financing role in these projects does not help a community faced with a petition to create a LID for a primarily residential project, or to create a LID to act as the owner/manger of facilities for which MassDevelopment is simply the issuing agency.

-Still, if the taxpayers aren't paying the cost of the improvements, where's the down side?

First of all, taxpayers indirectly subsidize the tax-exempt government bonds used to finance 40T projects. It is a small subsidy, spread over a large population, but represents the loss of revenues that would otherwise be paid as taxes. The fact that the improvements constructed with these funds would be exempt from state and local taxes creates another subsidy, by keeping these improvements out of the general tax levy for the community.

There is also the greater issue of how much land-secured debt it is prudent to authorize within the commonwealth. Since each municipality will be independently authorizing the creation of 40T districts, there is no state oversight of how much total debt is issued. 40T proponents claim that financial institutions will not issue bonds where debt ratios are not sustainable – but if it were true that the private market is possessed of such wisdom, we would not be having the current epidemic of foreclosures on residential property.

It is also worth considering that special district bond financing, such as that authorized by proposed Chapter 40T, is itself a response to the federal Financial Institutions Reform Recovery and Enforcement Act (FIRREA). That law, enacted in 1989 as a response to the Savings and Loan crisis, has made banks more reluctant to provide loans for large private infrastructure projects. There is nothing in S.146/H.159 that addresses what happens if a district defaults on its bonds.

Abandoned infrastructure projects could prove a burden on municipalities, just as foreclosed-on properties, empty malls, and abandoned buildings generally become local headaches. To the extent that public entities, like retirement boards, have invested in 40T bonds or notes which are subsequently not honored, public entities and their employees and retirees could suffer, just as some did in the Savings and Loan crisis. Nor does proposed 40T require that the terms of bonds be coterminous with the life of the improvements they finance – that responsibility, too, is left with the private market, which can be overly optimistic, or overly ambitious.

-What's the harm in creating these districts, though? If they don't work out, can't a community just vote to de-authorize them?

Alas, it is not so simple. 40T districts terminate 40 years after their establishment – if at all. Municipalities can vote to “extend the existence” of a LID, but not end it at will. 40T districts can terminate only “provided that the LID is no longer administering, or maintaining any improvements,” and provided that the district has no “bonds, notes, or other obligations” outstanding. (Sec. 15) As we have seen, the district itself has unilateral control over when and whether it issues bonds, and so can keep itself going in perpetuity if it chooses.

The technique of regularly issuing new bonds was one which Robert Moses used to perpetuate his fiefdom of quasi-governmental authorities which constructed and operated numerous public works projects in New York City during his tenure there. (See Robert A. Caro, (1974) The Power Broker: Robert Moses and the Fall of New York; New York, Alfred A. Knopf). Alternatively, if a 40T district decides to wind up its affairs, it can plan to do so after 40 years of operation, and its property “shall be deemed to be transferred to the municipality.” Thus, the improvements are turned over to the municipality well after the term of useful life contemplated by the issuance of bonds maturing at “times not to exceed 35 years from the date or dates...as determined by the issuer...”(Sec. 6 (b)) – at which time, the municipality may have to provide the capital funds to extend the useful life of these improvements.

In either case, it is the 40T district, and not the municipality that is in charge, once the municipal governing body has voted to authorize the district.

Part 2: Suggested amendments to S. 146/H. 159:

- 1.) Initially limit use the 40T structure by allowing for a few demonstration projects, and “sunsetting” the legislation, as the “I Cubed” bill did.
- 2.) Alternatively, the state legislature can retain its power as the body which authorizes each such project on its individual merits, through special legislation. H. 156, for instance, would authorize a single such project.
- 3.) According to the website of one of 40T’s proponents, a LID “will be deemed a limited-purpose political subdivision of the municipality by the Internal Revenue Service, thus making the interest on the [development district’s] bonds eligible for tax-exempt treatment.” If the IRS deems them to be political subdivisions of municipalities, then we should so treat them under our legislation. Only the legislature should create political subdivisions of the commonwealth – we should not delegate that power wholesale to municipalities.
- 4.) We need to look more closely at which laws applying to municipalities will and won’t apply to LIDs. There must be a more level playing field between real government, and privatised government – assuming we get over the philosophical hurdle of whether we should allow the chartering of such privatized governments at all.
- 5.) All provisions of Ch. 149 should be applicable to LIDs, for the protection of workers and the public. To do otherwise compromises the future integrity of projects which the public has subsidized, through issuance of tax-exempt bonds, and the provision of tax-exempt status for capital projects constructed pursuant to 40T. As it is, the provisions that allow 40T districts to “acquire,” rather than construct, infrastructure already allows for the possibility that these projects will be privately constructed, free from public bid, prevailing wage, and other laws, then “acquired” –using tax free financing – by entities clothed with governmental status.

- 6.) This bill also purports to give 40T development zones and LIDs the right “to enter upon and dig up any private land within the development zone for the purpose of constructing said improvements and of repairing the same.” (Sec. 3(d)(6).) This would appear to be a grant of construction and permanent easements to the “public facilities owner” without either due process or compensation to the private land owner. As such, it would seem to be unconstitutional, and should be struck.
- 7.) While bonds issued by MassDevelopment are probably safe investments for public entities, bonds issued by LIDs are not, and should not be included in the blanket investment authorization of Sec. 6 (i).
- 8.) Provide communities with resources for evaluating and acting upon 40T petitions. Explicitly allow municipalities to negotiate with these petitioners, if necessary, and place their own conditions on approvals. Build capacity within the regional planning organizations to provide such technical assistance. Allow municipalities to escrow funds from developers to study and evaluate their proposals – S.146/H.159 now only provides for the reimbursement to a community of “costs incurred by it in establishing the development zone.” ((Sec. 2(b)(8)).

In addition to obvious need, there is precedent for providing such assistance: The amendments to MGL Ch. 43D adopted session provided that, even to designate a single development parcel for expedited permitting, a municipality must get approval from the state. Similarly, the State Treasurer must review and approve all “I Cubed” projects. Municipalities are eligible to get technical assistance grants from the state to review and manage these expedited projects. Additional funding was allocated to regional planning organizations to provide technical assistance to municipalities for such projects.

- 9.) There are features of the 40T approval process which should be improved upon. Municipalities have 81 days from public hearing to make a final vote on a 40T petition. (Sec. 3(b), (c)) Under “I Cubed,” a community has 100 days from public hearing to make such a decision. Although objections last session to allowing selectmen to make all 40T approvals have been partially addressed, S. 146/H. 159 still gives selectmen, and not town meeting, approval power at several important junctures: e.g., issuance of recommendations after public hearing (Sec. 3(b)); final approval if 100% of landowners have signed the petition (Sec. 1 definitions: “municipal governing body”); the power to appoint successor prudential committees for LIDs (Sec. 2(b)(3)); and the power to remove prudential committee members “for just cause” (Sec. 4(b)). There should also be provisions for giving written notice of pending 40T petitions to abutters of the zone, as well as tenants within the zone, as there are presently no provisions for such notice.
- 10.) There is nothing presently in S.146/H.159 – apart from the requirement of municipal approval - to prevent already powerful land owning entities, such as private universities, or federally recognized tribes, from taking advantage of 40T status and financing. It is agreeable to think that no municipality would authorize the establishment of such a district against the long-term interests of the municipality or its residents. In practice, the offer of “free” infrastructure improvements, the threat of losing an important local

employer, or other exigencies may leave municipal officers feeling that they have no choice but to approve a 40T district. It is a drafting challenge beyond my skills to redraft this bill so as to free municipalities from potential coercion by powerful land owners.

- 11.) There should be a separate vote of the municipality – at minimum – on every single bond issue by a LID. It is probably also prudent to have some state agency evaluating at intervals the total amount of land-based debt being issued in the commonwealth.

Thank you for your thoughtful consideration and kind attention to my testimony.

Warm Regards,

Denise Provost

CC: Senator Brian Joyce
Senator Thomas McGee
Senator Stephen Buoniconti
Senator James Timilty
Senator Robert Hedlund
Representative James Welch
Representative Jennifer Callahan
Representative James Eldridge
Representative Barbara L'Italien
Representative Carl Sciortino
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