



May 15, 2016

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Michelle Hook, Director of Public Relations  
Millennium Pipeline Company, LLC  
One Blue Hill Plaza, 7th floor  
PO Box 1565  
Pearl River, NY 10965  
**VIA EMAIL:** hook@millenniumpipeline.com

RE: Millennium Eastern System Upgrade Project, PF16-3

Dear Ms. Bose and Ms. Hook,

The Delaware Riverkeeper Network is troubled that the Millennium Pipeline Company (Millennium) has not fulfilled its community outreach obligations as mandated by the Federal Energy Regulatory Committee (FERC) process regarding the proposed Eastern System Upgrade project, and that Millennium is failing to honor the written and verbal commitment to address these issues through a more appropriately accessible and informative public meeting.

**Millennium has failed to fulfill its Pre-Filing obligation regarding public outreach; this is a failing that must be remedied.**

As outlined by FERC under the *Pre-filing procedures and review process for LNG terminal facilities and other natural gas facilities prior to filing of applications*, 18 C.F.R. § 157.21, applicants are required to conduct open houses and meetings with all affected stakeholders during the pre-filing process. The intent and purpose of the this process, as further explained in FERC's Suggested Best Practices for Industry Outreach Programs to Stakeholders, is to "engage ... stakeholders to identify and resolve issues at the earliest stages of project development," and to do so through "constructive discussions about potential issues and environmental concerns."<sup>1</sup>

In an attempt to fulfill its open house obligation, Millennium Pipeline Company held three consecutive open houses during the week of March 28<sup>th</sup>, 2016 in the three counties facing the brunt of the proposed upgrade project's impacts. But Millennium's absolute failure to make available full and accurate information during the open houses, its failure to have staff available that were able to provide full and accurate answers to questions, and the fact that many Millennium representatives provided false, misleading and inaccurate information over the course of each and every open house were a clear, obvious and intentional failure to fulfill the letter and spirit of the open house obligation.

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<sup>1</sup> Federal Energy Regulatory Commission (FERC). July 2015. Office of Energy Projects, Division of Gas Environment and Engineering, *Suggested Best Practices for Industry Outreach Programs to Stakeholders*.  
<https://www.ferc.gov/industries/gas/enviro/guidelines/stakeholder-brochure.pdf>.

When the Delaware Riverkeeper Network and others in attendance objected to the inaccurate, false, misleading, and lack of information during the course of the open houses and requested that a public meeting at which knowledgeable Millennium staff and materials would be available to provide full and accurate information regarding the proposal and its impacts, and that Millennium representatives present would be able to fully and accurately answer all questions asked, Ms. Hook assured us that such a meeting would be organized and forthcoming in order to remedy the obvious and video recorded deficiencies of the original open houses.

Specifically, we had requested and Millennium's representative Ms. Hook had preliminarily agreed that the company would organize and hold a new public meeting that would: 1) include appropriate experts who could clearly and accurately answer the public's questions in regard to the project and its environmental and health impacts; 2) be held at a location that was accessible to those living nearby the proposed compressor station site in Highland, NY and at a venue that can accommodate the large number of stakeholders affected and concerned by the many aspects of the Eastern System Upgrade Project including its environmental and health impacts; and 3) be conducted so as to provide clear and cohesive information to a large public audience through powerpoint presentations and Question & Answer sessions.

This commitment illustrated a seemingly good faith effort on behalf of Millennium to fulfil FERC's pre-filing obligations and Suggested Best Practices for Industry Outreach to Stakeholders and to respond to the concerns of affected stakeholders. We have now learned that this commitment to remedy the failure to fulfill the open house obligation has been rescinded.

Millennium has now stated that it would rather meet with smaller groups in smaller venues than have a larger public event.<sup>2</sup> This strategy does not properly fulfill the public outreach obligation. Meetings with smaller groups in smaller venues would create the same deficiencies and problems that affected stakeholders have identified in the failed open house meetings—if not more so:

- There will more likely be a lack of appropriate experts. Appropriate experts were not available to answer questions at the open houses. It is highly unlikely that appropriate Millennium experts will repeatedly travel to the project area for multiple small meetings.
- They result in a lack of accountability to stakeholders. When experts are not held accountable by large public groups, as well as fellow peer experts, answers can more easily be false—as is demonstrated by the misinformation and contradictory information given at the open houses. As a result, public understanding is not increased and concerns are not addressed, but instead stakeholders are left more confused or frustrated, or falsely placated by inaccurate information. There is no “narrative consistency,”<sup>3</sup> as one commenter put it.
- Information is diffused. Even if a valuable answer is given, it is only given to one person or a small group of people at a time. The public cannot benefit from the questions and answers of their fellow affected stakeholders. In a large, inclusive public process, different stakeholders will bring different levels of understanding and different concerns to the table, allowing all to benefit from the cohesive process. This allows for more accurate and efficient exchanges and dissemination of information, for both the stakeholders and the company experts.
- Such events are less accessible in that they require individuals to have the knowledge and capacity to request and organize such a meeting; and/or for individuals to become aware that the small, closed meetings are happening and find the appropriate contact to secure the right to attend.

<sup>2</sup> Email correspondence from Michelle Hook to Maya van Rossum on April 22, 2016.

<sup>3</sup> Comment provided to DRN by local resident who attended the March 31<sup>st</sup>, 2016 open house.

The request, for one large public meeting, held in a question and answer format and moderated by a local party—to which you have previously committed—is not at all unusual or above and beyond industry best practices. FERC’s *Suggested Best Practices for Industry Outreach Programs to Stakeholders* states that:

Stakeholders routinely request that the companies themselves hold a formal question and answer meeting to address their questions during the early stages of a project. Commission staff believes this is beneficial. Often a local elected official or a local agency will conduct these meetings; the company and FERC staff may attend to answer stakeholder questions, as appropriate. These types of meetings are generally productive when hosted and moderated by a local entity acting as/serving as a neutral party.<sup>4</sup>

In a recent letter sent on behalf of Millennium to FERC, the company claims that “Millennium’s Open Houses, and the notices it provided thereof, were fully consistent with—and exceeded—the Commission’s pre-filing regulations and its Suggested Best Practices for Industry Outreach Programs to Stakeholders.”<sup>5</sup> However, the recent retreat on your commitment to hold such a meeting is evidence that Millennium is not, in fact, acting in a way consistent with or at all in exceedance of FERC’s suggested best practices, as they claim.

The federally regulated pre-filing procedures to engage all stakeholders in a timely manner, early on and throughout the pre-filing process, exist for a reason. The proposed project has serious implications for the economic, psychological, and general wellbeing and health of stakeholders who own property in proximity to the proposed project sites; who regularly breath the air or rely on the water in the Delaware River Watershed that will be polluted by the construction, constant emissions, and inevitable leaks that the project would bring; or those who are concerned for the extremely delicate endangered species and habitats that the project would disturb. Because the stakes faced by affected parties are so great, it is both a moral responsibility and a federally regulated obligation to properly engage stakeholders and accurately inform them on the project.

We send this letter to FERC to demand that you enforce the open house obligation with regards to the Eastern System Upgrade Project and to urge Millennium to honor its commitment to provide this remedy in the format discussed verbally and via email as described above.

In the absence of such a remedy the regulatory obligation for open houses remains unfulfilled.

**Comments submitted to the Delaware Riverkeeper Network document the many deficiencies of the Millennium Open Houses and its failure to fulfill its public outreach obligation.**

The Delaware Riverkeeper Network (DRN) represents, through our members, a significant portion of stakeholders who stand to be affected by the proposed project. As such, we have received comments from members and concerned citizens expressing their frustration, concern, and confusion resulting from the open houses. In addition to the comments submitted to DRN that are referenced in this letter, several comments in the same vein have also been submitted to the docket by individuals following the open houses, as well

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<sup>4</sup> Federal Energy Regulatory Commission (FERC). July 2015. Office of Energy Projects, Division of Gas Environment and Engineering, *Suggested Best Practices for Industry Outreach Programs to Stakeholders*. <https://www.ferc.gov/industries/gas/enviro/guidelines/stakeholder-brochure.pdf>.

<sup>5</sup> Millennium Pipeline Company, LLC. April 13, 2016. Letter to FERC Re: Millennium Pipeline Company, L.L.C., Docket No. PF16-3-000; Response to Comment on Inadequate Notice for Open Houses.

those who submitted directly to FERC at the open houses.<sup>6</sup> For the record, the following comments characterize the experiences of many who attended to the Open Houses held to date.

**The “station” format of open house meetings diffuses information and confuses stakeholders.**

One of the primary complaints heard from affected stakeholders who attended the open houses is of the “information station” format of the meetings, as Millennium refers to it in their Public Participation Plan<sup>7</sup>—where Millennium employees, contractors, and FERC representatives are spread throughout a room, talking one-on-one or with small groups to stakeholders. The issues identified with the format range from noise issues to being continuously redirected to other staff, which ultimately leads to a confusing, inefficient process in which there is no accountability for Millennium staff to provide accurate, consistent answers—if any. This experience was not the exception, but the rule, as can be seen in stakeholders’ comments on the meeting format:

The noise level in the room was so loud that I could not hear unless uncomfortably up against the speakers; who all seem to be speaking in soft voices.

– Stakeholder who attended the Sullivan County open house

The "open house" forum does not facilitate having questions answered—if that is FERC's intent. Millennium personnel often said that another staff person was the appropriate party for the question. [It was] too noisy at times for a meaningful conversation. Despite two hours, [there was] inadequate opportunity to have anywhere near all questions responded to. Far better for the community would be to have a panel of Millennium personnel and the opportunity for all attendees to ask and also hear each other's' questions and the responses thereto.

–Karen London; Smallwood, NY

The forum should have been a Q&A with experts in the field answering questions from a concerned public. The convention-style format diffused the information.

– Stakeholder who attended the Sullivan County open house

The outreach meeting has to be completely redone. The forum was a trade show format; it was passive. It was not a full, open presentation of the project by the pipeline company. There was not narrative consistency; and answers were repeatedly argued away 'we'll get back to you on that'; 'go ask so and so, they might know the answer.'

– Stakeholder who attended the Sullivan County open house

**The absence of qualified experts at open house meetings led to a lack of information, misinformation, and contradictory information.**

In conjunction with the format of the open houses, the lack of qualified experts with awareness and understanding of the specific project and local realities led to Millennium’s inability to answer stakeholders’ questions at all in some cases, and to provide false information in others. Often, stakeholders received extremely different answers regarding basic information on the project from different staffers within the event. It was not uncommon for Millennium representatives to provide patently false information—like the assertion that the Highland compressor station would provide no emissions—and then when challenged by individuals with specific knowledge said it would provide very low emissions that were fully regulated (as was stated to a group of individuals, including the Delaware Riverkeeper Maya van Rossum, and recorded on video).

<sup>6</sup>See Comments of Shawn Cahill, Docket No. PF16-3-000. Mar. 30, 2016; Comments of Teresia Parker, Written comments from the public at Open Houses for the Eastern System Upgrade Project (CP14-96) on March 30-31, 2016; Comments of Brandi Merolla, Docket No. PF16-3-000. April 21, 2016; among others

<sup>7</sup> Millennium Pipeline Company, LLC. January 2016. Draft Resource Report 1, Appendix 1E: *Public Participation Plan*.

Many comments from stakeholders point to the inability of Millennium staff to answer questions at all or provide any information of value:

I was frequently told, "I don't have that information, but you can look on our website, or give me your email address"

—George Billard; Eldred, NY

I was either referred to others or my more difficult questions were answered evasively. I engaged the head of operations (he told me) very pleasantly in conversation...saying, truthfully, I had just moved to the area and had heard rumors about health problems at Minisink...did he know about this? He said he had heard about that but didn't know for sure. I said it sounded serious, with children experiencing nosebleeds, asthma et al, and I had heard people even abandoned their expensive homes because of the health problems associated with the compressor. He indicated he didn't know if that was accurate, but he had many times personally opened the valves for the blow-offs and he was fine. I asked him if he also stayed for any period of time in the near area as the residents do...of course not. His evasiveness led me to say to him that if I were head of operations, I would make it my business to find out the facts.

—Valerie Lucznikowska; Warwick, NY

Pipeline spokesperson to spokesperson gave vague answers to very specific questions. Not one Millennium representative had a business card on them for distribution making follow-ups impossible. I'd ask the same questions over and over and got varying answers each time.

— Stakeholder who attended the Sullivan County open house

Most of the people I talked to told me to talk to the FERC desk, which was stationed by what looked like three college interns. They handed out brochures and told us to leave comments. No one was able to provide accurate information on contaminants in the air.

—Jess Irish; Smallwood, NY

They were not [in reference to whether their questions were answered fully or accurately]. On numerous occasions throughout the presentation/event, pipeline representatives were engaged and pushed to answer questions directly. They consistently danced around specific queries. For instance, 'what exactly is in the emissions from a compressor?' General answer- its 'natural gas'. That is evasive and not an answer.

— Stakeholder who attended the Sullivan County open house

One commenter detailed his experience of receiving no meaningful information when asking straightforward, important questions about the basic operations of the proposed compressor station in Highland, and the ways in which the project would impact his health and safety:

I asked the "Community Outreach" staff person why Highland was selected as a "host" community when the town's zoning had clearly prohibited compressor stations. Even if local law is pre-empted, if Millennium is concerned about community acceptance, did it even review the town's zoning? He did not seem aware of this and responded that the engineers determined where the compressor station needed to be sited.

I noted that the towns have all-volunteer emergency personnel and unlikely to have the man-power, equipment and training to address fires or explosions at the proposed compressor station. The response was a generic "we will work with the local emergency services" to get adequate response. I was also told that Millennium has 32 emergency personnel for NYS but, when I noted that 32 for a state the size of NY did not seem adequate, Millennium personnel was unable to tell me how many of those 32

employees were within even an hour of Highland or how long it would take to get such personnel to our proposed site.

I also inquired whether Millennium has or will undertake modelling specific to this proposed site to determine emissions impacts taking into account topography, the nearby reservoirs and weather patterns (especially wind). I was told that was a good question and one that should be submitted to the FERC docket.

I inquired whether there will be infrared cameras installed that would provide the public with real-time web-based monitoring of emissions. I was told doing so might present a security risk (as if no one would otherwise know that a compressor station was sited there!) but that maybe local officials might be provided access and that, again, that should be submitted as a FERC comment.

We should know whether Millennium evaluated and adequately considered any alternative sites that would have enabled an electric compressor station. Millennium personnel only responded that an "electric compressor station would be worse" and would entail cutting down a lot of trees but without noting any particular alternative site evaluated.

We should secure all documentation on frequency and duration of blow-downs, scheduled and accidental, on Millennium compressor stations in particular and on compressor stations, in general, if that information is even compiled. John Arron (operations) told me that there is only one scheduled blow-down a year for maintenance and that only lasts a few minutes but then I heard of a partial blow-down scheduled in Hancock today and another full (annual) blow-down at Hancock scheduled for April 12th.

–Karen London; Smallwood, NY

This demonstrates a clear lack of awareness and understanding of the local, but vital, particularities of the project on the part of the “experts” on hand. Such knowledge of the project is necessary to engage in “constructive discussions about potential issues and environmental concerns”<sup>8</sup> It also demonstrates a lack of accountability of the company to its project stakeholders, when important questions are not answered but instead continually referred to the FERC docket. Most concerning, it reveals the contradictory and outright false information that was given to stakeholders—in this case in reference to the frequency and intensity of compressor blowdowns, information that is vital for the community in understanding the direct impacts of the project on their health and air quality.

### **Misinformation and contradictory information.**

Many other attendees point to instances of false or contradictory information given at the open house:

Many of the Millennium representatives were not actual employees, but outside contractors who did not have the information requested. In addition, there were several printed presentations that were deliberately misleading, that only through rigorous questioning were shown to be false.

–George Billard; Eldred, NY

Most spokespeople talked about the project like it was still in the conceptual stage, which is a outright falsehood. They have existing plans are far along in the process, planning to file in a matter of weeks. The most egregious lie was from the "Wetlands expert" who promised all of the water run off would be professionally treated. When I asked the planner about the ponds on the site plans, he explained those were standing pools with "vegetation" to do the treatment. I was shocked. For a parcel so close to both the Delaware River and several protected habitats, this is an outrage.

<sup>8</sup> Federal Energy Regulatory Commission (FERC). July 2015. Office of Energy Projects, Division of Gas Environment and Engineering, *Suggested Best Practices for Industry Outreach Programs to Stakeholders*. <https://www.ferc.gov/industries/gas/enviro/guidelines/stakeholder-brochure.pdf>.

–Jess Irish; Smallwood, NY

I asked how often Eldred should expect to experience blow-downs. Michelle Hook said once every 4-5 years while an operation manager said one time yearly was required, but when unforeseen problems arise, blow-downs can be done several times a year.

– Stakeholder who attended the Sullivan County open house

Here are some quotes I recall that I very much doubt are true: "emissions are almost 100% clean natural gas, like what comes out of your stove". That is an absurd statement, as gas is toxic and again the ratios are vague. "Millennium will be paying \$900,000" in local taxes." I find this hard to believe, especially as the company was just purchased by a Canadian company and will likely export its goods overseas. "All of the run-off water will be treated according to DEC standards." By a planting of vegetation around standing pools as diagrammed in their site plan? Please.

–Jess Irish; Smallwood, NY

The position/location map of the compressor had no roads indicated on it giving the impression it was in the middle of nowhere. Also Dr. Richard Malenky found the position dot to be incorrect. In either case I found this information useless and very deceptive... In the Air quality we were told that the facility would have zero (0) emissions. That is impossible, as even a single 100 hp automobile or lawn mower has emissions and a 22,400 hp machine has plenty... From another Millennium spokesperson, we were told that an emergency employee was within an hour away from any facility; And yet Millennium has no record of creating any local employees. According to the IDA, they have created no employees of the 17 they had promised. "

– Stakeholder who attended the Sullivan County open house

Another local resident felt misled when she was told by Millennium representatives that the proposed holding ponds naturally treated waste water and had no possibility of contamination—"This is very serious as this project is in a MAJOR watershed area. Spills/leaks from holding ponds could cause significant water quality impacts."

Many stakeholders who were able to attend the open houses took audio and video recording of the responses to document falsehoods and contradictory responses.

In Millennium's recent letter to FERC regarding the open houses, they stated that "at each Open House, Millennium staff was on hand to educate the public about the planned Project and answer all questions one-on-one from members of the interested public." It is clear, however, from the public's feedback, that the public did not feel educated or that all of their questions were answered.

### **The open house meetings were not accessible to affected stakeholders.**

It is impossible for Millennium to fulfill this obligation of informing stakeholders if the affected stakeholders are not able to access the meetings. The open house forum on March 31<sup>st</sup>, that was intended to focus on the proposed Highland compressor station, was held 30 miles north of the proposed site, at a time that many indicated was inconvenient for the daily realities of those affected. Millennium's poor choice of location and timing for the open house meetings further adds to the failure of the company in meeting its obligation. Those who were able to attend noted:

"The forum was far from town and very inconvenient. For people with families it was impossible as it was a school night during the dinner hour."

–George Billard; Eldred, NY

"The location of the open house put the local community at a huge disadvantage. It was very far away from the proposed compressor site itself. When asked about why this was the case, the PR woman said it was because she knew the community was already in opposition. Not a very "open" way to communicate with the affected community. While this may have made her job easier, it is a very disingenuous way to offer "information."

–Jess Irish; Smallwood, NY

The location was 30 miles from the proposed compressor station site and that dramatically limits attendance.

–Stakeholder who attended the Sullivan County open house

This presentation was simply too far from proposed site. If a project is going to happen in a township, the outreach should happen in that township—not approx. 30 miles away. Many people could not make it to the presentation due to distance/time.

– Stakeholder who attended the Sullivan County open house

In regard to the company's announcement and advertisement of the events—which were addressed in their April 13, 2016 letter to FERC<sup>9</sup>—we do not believe that they provided sufficient notice or adequate visibility of the event, or truly made a good faith effort to get the word out to all affected stakeholders, as demonstrated by comments made on the record already and additional comments submitted to DRN.

One attendee noted:

The "forum" was so poorly attended, I wonder what actual outreach they did beside one mention in the newspaper. Most of the people who attended were—although I moved here only a few months ago - people I recognised and knew to be opposed to the projects because of documented health risks.

–Valerie Lucznikowska; Warwick, NY

In addition, the Delaware Riverkeeper Network received a phone call the week after the open houses from a concerned landowner who believes that the proposed compressor station in Highland would be within sight of her family home. She had received no notice or information regarding the project or the open house meeting—and only found out about the project through the press regarding the opposition at the open houses. This is a clear violation of 18 C.F.R. § 157.21 (f)(3), which requires that all applicants using the pre-filing process, "Within 14 days [of pre-filing approval], contact all stakeholders not already informed about the project, including all affected landowners." Affected landowners are defined in paragraph § 157.6(d)(2) of the same section as including landowners whose property "Is within one-half mile of proposed compressors." FERC officially approved the Eastern System Upgrade project for pre-filing on February 5, 2016.

### **Adverse impacts of proposed projects are too serious to ignore.**

In regards to how the proposed project would impact them, commenters repeatedly mentioned concerns over air emissions and associated health problems for their families, real estate values in the township, impacts on local economy and tourism, and impacts on wildlife:

[I'm] concerned about pollution in the vicinity of my home and adverse impacts upon wildlife, property values and Sullivan County as tourism destination.

–Karen London; Smallwood, NY

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<sup>9</sup> Millennium Pipeline Company, LLC. April 13, 2016. Letter to FERC Re: Millennium Pipeline Company, L.L.C., Docket No. PF16-3-000; Response to Comment on Inadequate Notice for Open Houses.

As a resident of Tusten, I live 5 miles from the proposed site and I am very concerned with air quality and emissions in the local area for residents, wildlife and the planet.

– Stakeholder who attended the Sullivan County open house

Possibly my health and certainly the value of our property and quality of the community will all be downgraded. As they say Location, Location

– Stakeholder who attended the Sullivan County open house

One commenter expressed concern of the troubling impacts that nearby Minisink and Hancock compressor stations, also owned by Millennium, have had on the local community:

“The Millennium compressor in Minisink is causing health problems for that community. This has been documented, as have problems with air quality directly related to the Millennium compressor. In Hancock, residents living near the compressor have seen their property values plummet, and banks unwilling to finance sales. Our community is deeply dependent on 2nd homes and tourism, and we can ill afford to have this kind of negative impact on our health, real estate and public image as a nature destination. Despite the emphasis of 1/2 mile perimeter, the last time I checked air does not stay contained. Millennium refers to us as a "host community", but that implies that they were invited. They were not, and they are not wanted here.”

–George Billard; Eldred, NY

Two other stakeholders, who live within close proximity of the proposed Highland compressor station, pointed to concerns over the potentially intensified health impacts of compressor emissions on themselves and their family members—as children and people with asthma and other preexisting health conditions have been identified as being more vulnerable to emissions.

Myself, my wife and my daughter are in close proximity to the project. Further, my daughters school is in close proximity to this project. I have asthma by which I take medication daily. This project will NOT help that condition.

– Stakeholder who attended the Sullivan County open house

We live within five miles of the planned compressor, and already struggle with health issues such as asthma, headaches and skin cancers. We are very opposed to any industrial operation that would further compromise both our health and the beauty of the local landscape. This is why we live here!

–Jess Irish; Smallwood, NY

### **Millennium must fulfil its legal obligation and hold a large public meeting as promised.**

Millennium was approved for the pre-filing process for the expressed purpose, in the company’s own words, of facilitating “the early identification of affected parties and environmental issues and the timely resolution of concerns in consultation with Commission Staff and Project stakeholders.”<sup>10</sup> The purpose of the pre-filing process is not to avoid any differing of opinions and shield company employees from challenging questions—but rather to identify and address all concerns and issues before the application process begins. We do not believe the open houses held by Millennium have done this, nor were they opportunities for “constructive discussions about potential issues and environmental concerns.”<sup>11</sup> Holding several small meetings at small venues would not address these issues, and would not fulfill Millennium’s obligation or commitment to its stakeholders.

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<sup>10</sup> Millennium Pipeline Company, LLC. January 19, 2016. *Request for Pre-Filing Review*.

<sup>11</sup> Federal Energy Regulatory Commission (FERC). July 2015. Office of Energy Projects, Division of Gas Environment and Engineering, *Suggested Best Practices for Industry Outreach Programs to Stakeholders*. <https://www.ferc.gov/industries/gas/enviro/guidelines/stakeholder-brochure.pdf>.

These impacts that will result from approval of the Eastern System Upgrade Project are serious and significant. Irreversible impacts to the environment, harm to individual and family financial security, serious risk of illness, major threats to community safety and emergency response, and the resulting psychological harm from such threats cannot be ignored by Millennium and must be addressed in an open, informative public meeting. This is not only a moral responsibility, but an obligation federally mandated by FERC that Millennium has failed to fulfill—as demonstrated in this letter. As such, we expect that you will ensure that Millennium uphold the promise that was made to us and hold a large public meeting that resolves each of the issues we've explained here with the remedies we've described.

Sincerely,

A handwritten signature in blue ink that reads "Maya K. van Rossum". The signature is fluid and cursive, with a long horizontal line extending to the right.

Maya K. van Rossum  
the Delaware Riverkeeper

Document Content(s)

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