



*Charlestown Waterfront Coalition  
P.O. Box 290533  
Charlestown, Massachusetts 02129*

Mr. John Wassam  
Department of Energy Resources  
100 Cambridge St Suite 1020  
Boston, MA 02114

Mr. Wassam:

May 28th, 2019

Re: proposed updates to Dept. of Energy Resources (DOER) RPS Class I, & RPS Class II regulations.

Dear Sir:

We urge DOER to remove the proposed addition in eligibility criteria for hydropower under Class I in 225 CMR 14.05 (1)(a)(6) which reads: "A Generation Unit that has received a certification from LIHI and a Statement of Qualification from the Department shall not be required to obtain a recertification from LIHI in order to retain its Statement of Qualification."

Removing a requirement for recertification from the Low Impact Hydropower Institute (LIHI) would effectively undermine a hydropower operator's motivation to improve their systems and minimize their environmental impact over time on rivers. A qualified project would effectively receive a lifetime qualification regardless of any environmental changes or technological advances that would prompt updated conditions to protect river stems.

Sincerely,

Mary Boucher    Nancy Krepelka    Ivey St John    Bruce Swanton  
                         Paul Sullivan    Jean Wilson

CWC Steering Committee