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February 20, 2013

Federal Energy Regulatory Commission
Attn: Ken Hogan

RE: Northfield Mountain Pumped Storage Project
FERC No. 2485-063

The Western Massachusetts Climbers' Coalition respectfully submits the following scoping comments with regards to the Northfield Mountain Pumped Storage Project. The Western Massachusetts Climbers' Coalition (WMCC) is a 501(c)(3) non-profit organization representing over 500 members and whose primary mission is to advocate for the protection and preservation of the unique and valuable outdoor rock climbing resources in western Massachusetts. As such, we request that three additional issues be considered in the scoping document for the Project.

First, we request that rock climbing be considered as a valid and important outdoor recreational opportunity within the Project boundaries. The Northfield Mountain Pumped Storage Project property contains two of the most significant rock climbing resources in southern New England, Rose Ledge and Farley Ledge (aka Rattlesnake Mountain). These two cliffs have been attracting New England based climbers, adventure programs and school groups since the 1940's. These sites represent significant historical resources for the sport. As the popularity and interest in rock climbing continues to grow, high quality and accessible climbing resources close to major population centers become increasingly important.

Second, we request that a change in the collection and evaluation of recreational survey data. We feel that methodologies should be expanded to include online surveys and/or surveys distributed through, or with the help of, organizations such as the WMCC who have a better understanding of the ways in which their members and supporters use and access the available resources. Particular site conditions, weather, timing and access points are generally different for each user group and without an understanding of those specific environments, a large percentage of recreational is potentially ignored.

Lastly, we request that additional protection efforts be considered for important and valuable resources currently within Project boundaries that are otherwise unprotected. The environmental resources that comprise Farley Ledge and its immediate surrounding have been identified by the Massachusetts Natural Heritage and Endangered Species Program as Core Habitat area containing a Priority Natural Community and Species of Special Concern. These resources include valuable animal habitats such as that of the peregrine falcon. This species has - with the help of the WMCC - reestablished itself on the cliffs, making Farley the first natural nesting habitat in Massachusetts for

the species since the 1970's. Additionally, the vegetative community found among the cliffs has been identified as an Acidic Rock Cliff Community and an Acidic Talus Forest/Woodland. This unique combination of plants and flora is one of only six identified in the state. We are requesting that FERC and First Light consider additional protection efforts and conservation restrictions, with the help of the WMCC and other agencies, to ensure the protection of these valuable natural resources in perpetuity.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey Squire", with a long horizontal line extending to the right.

Jeffrey Squire
President
Western Massachusetts Climbers' Coalition