



April 15, 2016

Joe Gibbens  
74920 NE Stevens Pass Hwy  
P.O. Box 305  
Skykomish, WA 98288

**RE: Index Shooting Range CERCLA Removal Action**

Dear Mr. Gibbens:

The Access Fund, American Alpine Club, American Whitewater, The Mountaineers, Washington Climbers Coalition (WCC), and Washington Trails Association are writing to comment on the proposed Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action at the Index Shooting Range. We strongly support the proposed action of tree clearing, excavation of lead-contaminated soil, and disposal at an offsite location, as outlined in the 2015 Data Gaps Investigation Report (2015 Report). If implemented, the action will pave the way for future public use of the Shooting Range property, which is an important asset for the Index region.

The Access Fund, American Alpine Club, American Whitewater, The Mountaineers, WCC, and Washington Trails Association are national and Washington state-based human-powered recreation organizations dedicated to recreation, access and conservation. Together, our organizations represent, educate, and mobilize over 30,000 who recreate in Washington State. Our organizations have a long history of working with the Forest Service in the Skykomish Valley and Highway 2 Corridor, working to preserve public lands and volunteering to take care of the places we climb, paddle, and hike. For more information about our organizations, see [accessfund.org](http://accessfund.org), [americanalpineclub.org](http://americanalpineclub.org), [americanwhitewater.org](http://americanwhitewater.org), [mountaineers.org](http://mountaineers.org), [washingtonclimbers.org](http://washingtonclimbers.org), and [wta.org](http://wta.org).

As the 2011 Engineering Evaluation/Cost Analysis (2011 EE/CA) identifies, the Index area is a regional recreational destination. The Shooting Range property is adjacent to the Index Lower Town Wall, which is one of the most popular rock climbing destinations in Washington. It also fronts the Skykomish River and a whitewater slalom site known as Llama Ledges, which is prized by whitewater enthusiasts.

Washington State Parks currently owns much of the land bordering and near the Shooting Range, including a portion of the Lower Town Wall, as part of the as-of-yet undeveloped Forks of the Sky State Park. The WCC owns the rest of the Lower Town Wall and intends to donate its

property to State Parks in the near future. The Shooting Range property is ideally located to serve as a potential parking area, river access site, and possibly even camping area for climbers and river users. We understand that with this potential in mind, the Forest Service has been considering exchanging the Shooting Range property to a state or local entity.

These potential uses, and any potential land exchange, depend on first cleaning up the property to meet unrestricted use standards under Washington's Model Toxics Control Act (MTCA). For this reason, we do not support the capping alternative identified as the proposed action in the 2011 EE/CA. This action would require ongoing institutional controls/use restrictions, monitoring, and maintenance in order to protect human health. We agree with the conclusion in the 2015 Report that when these ongoing costs are considered, the remove-and-dispose action is the more cost-effective alternative. The remove-and-dispose action will allow for beneficial public use of the property by providing for a permanent cleanup under both CERCLA and MTCA.

We strongly encourage you to choose the remove-and-dispose action as you have proposed. Thank you for the opportunity to comment on the proposed action.

Sincerely,

Joe Sambataro  
Northwest Regional Director  
Access Fund

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director  
American Whitewater

Eddie Espinosa  
Western States Manager  
American Alpine Club

Katherine Hollis  
Conservation & Advocacy Director  
The Mountaineers

Andy Fitz  
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Washington Climbers Coalition

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