

| Comment No.  | Comment  | Response   |
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| <b>Colorado Department of Public Health &amp; Environment (CDPHE) Comments</b> |  |  |
| <b>General Comments</b>  |  |  |
| None   |  |  |
| <b>Specific Comments</b>   |  |  |
| 1  | <p>Section 10.1 – Although this appears to be a summary and may not need to include an in depth discussion of all concerns or issues, it is a concern that there is no discussion about the exceedances in the BZ OU shown on Figures 10.2 and 10.4. There is no recognition that other actions may be required based on surface water and ground water exceedances in the future, such as at SW056.</p> | <p>Section 10.0 (now 11.0) provides a detailed analysis of alternatives for the specific areas and analytes that were determined to be an environmental concern based on the results of the RFI/RI and the comparison to RAOs and ARARs in Section 9.0 (now 10.0). Table 9.3 (now in revised Section 9.0, Summary and Conclusions of the RI) discusses exceedances in the BZ OU shown on Figures 10.2 and 10.4. The conclusion drawn in Section 9.0 was even though there are isolated subsurface soil sampling locations where volatilization PRGs were exceeded (Figures 9.3 and 10.2) and isolated UHSU groundwater sampling locations where composite MCLs were exceeded (Figures 9.5 and 10.4) no remedial actions were necessary for these locations.</p> <p>Section 10.0 (now 11.0) is not a summary, but rather is intended to specifically identify and analyze alternatives that address the environmental concerns identified based on the results of the RFI/RI and the comparison to RAOs and ARARs in Section 9.0 (now 10.0). The recognition that other actions may be required in the future is not appropriate in the detailed analysis of alternatives section; however, whether additional actions are required in the future can be evaluated in the CERCLA 5-year review.</p> |
| 2  | <p>Section 10.1 (p. 10-1, third paragraph) – The EC ARAR has not been met in the IA OU.</p>  | <p>The first sentence in the third paragraph of Section 10.0 (now 11.1) will be deleted and replaced with the following:</p> <p>“Four RAOs (groundwater RAO 2; groundwater RAO 3; soil RAO 1; soil RAO 3) are not met in the Central OU. Two RAOs (surface water RAO; soil RAO 2) are met under current site</p>   |

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|             |  | <p>conditions; consequently, institutional controls are needed to ensure that these RAOs will continue to be met. All applicable or relevant and appropriate requirements (ARARs), except for the environmental covenant ARAR, are met in the Central OU as long as the land surface is not disturbed; consequently, institutional controls are needed to ensure that some ARARs will continue to be met.”</p>  |
| 3           | <p>Section 10.2.1 – This section, especially the last paragraph on p. 10-2, should be revised to state that a FS is required for residual hazardous constituent contamination exceeding <math>1 \times 10^{-6}</math> or HI of 1, as described in nature and extent section; a FS is also required to address ICs consistent with WRW/WRV exposure scenarios and residual subsurface soil contamination. The text should explain why no FS was required for the COCs that exceeded <math>10^{-6}</math>.</p> | <p>The third paragraph in Section 10.2.1 (now 11.2.1) will be deleted to keep this section focused on the environmental concerns requiring an FS as identified based on the results of the RFI/RI and the comparison to RAOs and ARARs in Section 9.0 (now 10.0).</p> <p>The following footnote will be added to Section 10.2.1 (now 11.2.1), second paragraph, first sentence:</p> <p>“CDPHE guidance requires evaluation of contaminant concentrations on a solid waste management unit or release site basis. As discussed in Section 1.2.3, this was implemented at RFETS on an IHSS-by-IHSS basis during the accelerated action process. As noted in Section 1.4.3, by addressing cumulative impacts from multiple release sites, the CRA’s exposure unit approach complements, but does not supplant, the CHWA’s emphasis on individual release sites. Because the parties had anticipated using institutional controls consistent with the anticipated future use of the site, CDPHE determined that a post-remediation analysis of residual risk on a release site basis was not necessary.”</p> <p>The FS text will be revised as follows:</p> <p>“Because the CRA does not evaluate an unrestricted scenario, but instead evaluates potential risk to the anticipated future user</p> |

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|             |   | <p>(WRW and wildlife refuge visitor), the assumptions used in the CRA human health calculations, including the assumptions used in calculating WRW PRGs, need to be embodied in an institutional control. The detailed analysis of alternatives will evaluate alternatives that include the underlying assumptions used in the CRA human health calculations as an institutional control.”</p> <p>The rationale for why selected COCs that exceed <math>10^{-6}</math> do not need a CMS/FS is explained in Section 7.0.</p> |
| 4           | <p>Section 10.2.1 – Please add a discussion of “areas” of soil and groundwater above volatilization PRGs. The figures do not appear to show any “areas”, only sample locations, at least two of which are located in the BZ OU. Explain why institutional controls are not necessary for these areas.</p>   | <p>The term “areas” will be deleted and replaced with “sampling locations.”</p> <p>Please see Table 9.3 for an explanation of what is causing the soil sampling locations outside of the Central OU boundary to be above the volatilization PRG. The RFCA Parties have agreed that these sampling locations do not need institutional controls. (Note: there are no groundwater sampling locations outside of the Central OU boundary above the volatilization PRG.)</p>   |
| 5           | <p>Section 10.2.2 – Please provide a discussion of issues associated with the MCL exceedances (as shown on Figure 10.4) occurring within the BZ OU.</p>   | <p>Please see Table 9.3 for an explanation of what is causing the groundwater sampling locations outside of the Central OU boundary to be above the MCLs. The RFCA Parties have agreed that these sampling locations do not need institutional controls.</p>   |
| 6           | <p>Section 10.3.1.1 – A) In the first sentence on page 10-5, the “no further action” alternative cannot assume the existence of a response action that has not occurred. B) Alternative 1, #2, last bullet – The OLF cleanup was performed as an accelerated action on a SWMU that was not a regulated unit. Therefore, no covenant was required at the time of the accelerated action – instead, it was deferred until the final cleanup decision. So, the FS should not assume the existence of the covenant/ICs at this unit for the NFA alternative. C) Alternative 1, #1 - The 6th</p> | <p>A. This sentence will be deleted. B. The last bullet will be deleted.</p> <p>C. The bullet will be revised to:<br/>                     “Inspections, maintenance actions, and monitoring results that identify any adverse change in conditions will be reported to the regulatory agencies in a timely manner, otherwise results will be reported annually to the regulatory agencies; and”</p> <p>D. Alternative 1, #2, second bullet: Change made. The fourth bullet will be revised to:</p>                          |

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|             | <p>bullet should be modified to recognize that the regulatory agencies will be notified immediately of any adverse change in conditions and that this information will be reported regularly. D) Alternative 1, #2 – 2nd bullet – Add “(including uranium)” after “metals”. Also, the 4th bullet should be modified to recognize that the regulatory agencies will be notified immediately upon recognition of any upset condition, as well as providing this information annually. E) Alternative 1, #3 – The 4th bullet should be modified to recognize that the regulatory agencies will be notified immediately of any adverse change in conditions and that this information will be reported regularly. F) Alternative 1, #4 – This discussion should be modified to recognize that the regulatory agencies will be notified immediately of any adverse change in conditions and that this information will be reported regularly.</p> | <p>“Inspections, maintenance actions, and monitoring results that identify any adverse change in conditions will be reported to the regulatory agencies in a timely manner, otherwise results will be reported annually to the regulatory agencies; and”</p> <p>E. The fourth bullet will be revised to:<br/>                     “Inspections, maintenance actions, and monitoring results that identify any adverse change in conditions will be reported to the regulatory agencies in a timely manner, otherwise results will be reported annually to the regulatory agencies; and”</p> <p>F. Alternative 1, #4, the sentence following the bullets will be revised to:<br/>                     The results of the IMP monitoring will be reported quarterly to the regulatory agencies. Any adverse change in conditions will be reported to the regulatory agencies in a timely manner.</p> |
| 7           | <p>Section 10.3.1.2 – The text needs to better distinguish between the 2nd and 3rd bullets. Also, please modify the discussion of physical controls to remove the bias for signage over fences, as no specific agreement on this has been reached. Rather, it is our understanding that, at a minimum, fencing will be constructed around the landfills and treatment systems, if not around the entire “reconfigured” IA OU. In addition, please modify as appropriate to recognize that the regulatory agencies will be notified immediately of any violation of restrictions or damage to the physical controls.</p>  | <p>The second bullet will be deleted.</p> <p>The following will be added to Section 10.3.1 (now 11.3.1):<br/>                     “Regardless of which alternative is selected for the final remedy, DOE will construct, for land management purposes, a barbed wire fence. It is anticipated that DOE and the US Fish and Wildlife Service will agree that the Central OU boundary equates to the DOE-retained lands. This fence is not part of the final remedy.”</p> <p>The following sentence will be added to Section 10.3.1.2 (now (11.3.1.2):<br/>                     “The regulatory agencies will be notified in a timely manner of any violations of restrictions or damage to physical controls.”</p>  |
| 8           | <p>Section 10.3.1.2 – The paragraph on page 10-7 beginning, “In the future...”, could be deleted, as it is unnecessary, speculative, and overly broad (ICs are required for reasons other than to meet SW standards or to prevent indoor air volatilization problems).</p>   | <p>The paragraph will be deleted.</p>  |

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| 9           | Section 10.3.1.2 – The paragraph on page 10-7 starting “Physical controls” – There need to be signs or monuments delineating the PLF.  | The RFCA Parties need to decide what physical controls are needed for the remedy.   |
| 10          | Section 10.3.1.3 – A) This action would remove soil to a depth sufficient to remove Pu concentrations above 9.8 pCi/g, rather than only the top 6 inches. B) Explain what is meant by “removal of the bulk of contamination.” Does this mean that remediation has occurred to removed contamination above 50pCi/g or that the “bulk” of contamination above 9.8 pCi/g has already been removed?  | A. The top 6 inches of soil is intended to be a guideline so that a cost estimate can be prepared for the alternative.<br>B. The phrase “the bulk of” will be deleted.  |
| 11          | Section 10.3.3.1 (p. 10-9, first paragraph) – Alternative 1 is not protective of human health and the environment, because it does not include any institutional controls. The CRA conclusions are based on exposure assumptions for the WRW and WRV that need to be (but are not yet) reflected in land use restrictions (e.g., building prohibition, ground water use prohibition, excavation restrictions). Also, the conclusion that SW standards will continue to be met is based in part on assumptions that there will be no widespread land disturbance. Again, this requires use restrictions that are not in place. Finally, under the CHWA risk management policies mentioned in preceding comments, there are areas of residual subsurface contamination that will require use restrictions. Paragraphs 4 and 5 should be modified in light of this comment. | Please see response to CDPHE specific comments 2 and 3.   |
| 12          | Section 10.3.3.1 – A) #3 should be expanded to also discuss monitoring results at the POMs and POEs as well as the POCs. Also, any discussion of compliance at the POCs needs to include recognition of the remedial effects of the ponds, which cannot be relied on as a remedy for upstream exceedances. In addition, this discussion of analytes should be modified to discuss AOIs or the potential contaminants of concern, and actually reach a conclusion. If the As seen in surface water is natural rather than site-generated, then it can be dismissed as such. Is  | A. The clarification for the surface water is:<br>“Surface water quality standards are met at all surface water POCs, but surface water sample results do not always meet Colorado surface water quality standards for some analytes at some on site monitoring locations upstream of the terminal ponds. Alternative 1 does not actively prevent the use of this surface water”<br><br>In the past, the system of retention ponds has been used as a |

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|             | <p>benzo(a)pyrene or other contaminant generated from asphalt really a concern needing to be discussed? B) Please discuss the removal of site contamination in both the BZ OU and IA OU during the accelerated actions that have removed/reduced the contamination remaining. C) The first sentence in #6 should be re-written to clarify what is meant by “groundwater action” and “captured groundwater.” The phrase, “to protect groundwater”, implies that RFETS groundwater is available for all uses. D) Does the discussion for #7 mean that there will be additional monitoring for sediments, air, and ecology, as well as for groundwater and surface water? Should the IMP be modified to include these additional monitoring needs?</p> | <p>surface water management tool; however, these ponds will not be relied on as part of the final remedy for the site. No change made.</p> <p>B. The RI/FS Report presents data after the accelerated actions are complete. Accelerated actions are discussed in Section 1.0. It is not appropriate to include a discussion of the accelerated actions completed at RFETS in this section of the report. No change made.</p> <p>C. #6 (now #5) will be revised as follows:<br/>Groundwater actions are operating as designed to remove contamination in captured groundwater to meet appropriate surface water quality standards at surface water POCs. Actions to address threats to surface water quality have included source removal and passive groundwater collection and treatment. The passive groundwater collection and treatment systems will continue to operate and be monitored to protect surface water quality.</p> <p>D. #7 (now #6) will be revised as follows:<br/>Monitoring of the RFETS groundwater, and surface water will provide the environmental data to verify that the site continues to be protective of human health and the environment. This monitoring will also include environmental monitoring at the Present and Original Landfills and performance monitoring of the three groundwater treatment systems.</p> <p><u>These proposed monitoring changes may need to be revised pending the final CRA.</u></p> |
| 13          | <p>Section 10.3.3.2 – A) #1 should be modified to discuss the concerns with meeting water quality standards at the POMs and POEs as well as at the POCs, per previous comments. B) The</p>  | <p>A. Please see response to CDPHE specific comment 12.<br/>B. #2. The phrase “. . . no additional feasible action can be taken” will be revised to “. . . no additional actions can</p>   |

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|             | <p>second sentence in #2 should conclude that, "... all feasible actions have been taken. Also, please include a discussion of the fate of groundwater from the IA and the quality of groundwater at the facility boundaries. D) In the last sentence of #6, it might be clearer to state that the "annual dose limits for the unrestricted user would also not be exceeded." E) #9 – The EC ARAR has not been met. Creation of a use restriction (a response action) in the no action alternative cannot be assumed.</p>  | <p>reasonably be taken." The following will be added to the paragraph: "Groundwater from the former industrial area discharges to surface water in the drainages upgradient of the terminal ponds. Water quality at area of concern and sentinel wells represent any potential impact from groundwater to surface water. Groundwater impacted by site activities discharges to surface water upgradient of the site boundary."<br/>                     D. Change made.<br/>                     E. The EC ARAR text will be revised as follows:<br/>                     "The ARAR is met at the Present Landfill, but the ARAR is not met for the remainder of the reconfigured IA OU."</p> |
| 14          | <p>Section 10.3.3.3 – A) #1 – Some accelerated actions only involved treatment, not removal. The soil treatment and replacement that was part of the Ryan’s Pit and Trenches T3/T4 accelerated actions is an exception. B) The assumption in the last sentence of #3 is an example of the document assuming the existence of ICs that are not in place to reach conclusion that the no action alternative is effective in the long term. The conclusion that "Alternative 1 exhibits a high degree of long-term effectiveness", therefore, cannot be justified. C) In #4 there should be some recognition of possible future concerns with additional areas such as SW056. D) In #8, per previous comments, please clarify that sediment, air, and ecology monitoring is actually anticipated.</p> | <p>A. The sentence will be revised to remove "all" and replace it with "most." The parenthetical will be deleted from the sentence.<br/>                     B. The sentence will be deleted.<br/>                     C. Please see response to CDPHE specific comment 1.<br/>                     D. Please see response to CDPHE specific comment 1 2D.</p>  |
| 15          | <p>Section 10.3.3.4 – This section should also include a discussion of the contaminant reduction through addition of HRC.</p>  | <p>The addition of HRC was done as a one-time enhancement at some locations of the site and was not done as treatment. No change made.</p>  |
| 16          | <p>Section 10.3.3.6 – Please also discuss the sediment and ecological monitoring that is mentioned in previous sections.</p>   | <p>Please see response to CDPHE specific comment 1 2D.</p>  |
| 17          | <p>Section 10.3.3.7 – Please identify the air monitoring requirements that will be implemented and include these in the IMP or provide the appropriate information to be included in this document. Also, please add costs and appropriate information</p>   | <p>Alternative 3 is the only alternative that could require air monitoring and the associated costs are included in that alternative.</p>   |

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|             | and requirements associated with the sediment and ecological monitoring previously mentioned.   | Please see response to CDPHE specific comment 12D. If it is determined that sediment and ecological monitoring are required as part of the remedy, the cost information will be updated.  |
| 18          | Section 10.3.4.1 - The controls listed are anticipated for the DOE-retained lands. Also, please indicate that "at a minimum" signage will be installed.   | Please see the response to CDPHE specific comment 7.  |
| 19          | Section 10.3.4.2 (p. 10-16) – The point of the last sentence is unclear in the context of this section.   | The sentence will be deleted.   |
| 20          | Section 10.3.4.3 (p. 10-16, first paragraph) – Alternative 2 significantly increases the long-term effectiveness and permanence of the accelerated actions.   | The first sentence will be revised to change "incrementally" to "significantly."  |
| 21          | Section 10.3.4.5 – Suggest adding a discussion as to why Alternative 2 does not put workers or public at risk. This might include no further soil disruption, no major equipment use, etc.  | The implementation of institutional controls is an administrative effort and does not require the use of earthmoving or transportation equipment. The implementation of physical controls may require work in the field. Depending on the final resolution of what physical controls are needed for the final remedy, the conclusion in Alternative 2 may need to be revised. No change made. |
| 22          | Section 10.3.4.6 – Should also include fencing.   | Please see the response to CDPHE specific comment 7.  |
| 23          | Section 10.3.4.7 – This should also include cost for fencing. According to table A1.13, the vast bulk of the capital expenditures for Alternative 2 relate to the physical controls (signs/monuments), not to the institutional controls. | Please see the response to CDPHE specific comment 7.  |
| 24          | Section 10.4.1 –The absence of ICs renders Alternative 1 not protective. Also, the last bullet under this section incorrectly assumes that the OLF ICs (a response action) will be in place under a no-action alternative.                | The bullet will be revised as follows:<br>1. "The Present Landfill RFCA decision document requires institutional controls to be put in place at the time the post-closure period begins. However, institutional controls for the Original Landfill are not in place."   |
| 25          | Section 10.4.2 (p.10-20) – Only alternatives 2 and 3 meet all ARARs.  | Please see response to CDPHE specific comment 2.  |
| 26          | Section 10.4.2 (paragraph top of p. 10-21) – Again, cannot  | Please see response to CDPHE specific comment 2.  |

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|             | assume implementation of a response action (imposing ICs) as part of no action alternative.   |  |
| 27          | Section 10.4.2 (p.10-21) – This paragraph describes only some of the benefits of the ICs that are under consideration. They will also prohibit exposure to other residual subsurface contamination, and help maintain compliance with surface water standards.  | The third paragraph of Section 10.4.2 (now 11.4.2) will be deleted.  |
| 28          | Section 10.4.3 (p. 10-21) – The absence of use restrictions does not allow Alternative 1 to be particularly effective in the long term. The discussion of the manner in which Alternative 2 enhances long-term effectiveness should be expanded to include the other benefits noted above. The section should also note that Alternative 2 ranks second after Alternative 3 in long-term effectiveness. | Please see response to CDPHE specific comment 24.<br><br>A sentence will be added as follows:<br>“Alternative 2 is ranked second only to Alternative 3 in long-term effectiveness.”  |
| 29          | Section 10.4.4 (p. 10-21) – Cost-effectiveness is not part of the analysis of this criterion.   | The last sentence will be revised as follows:<br>“ All of the alternatives are equivalent because the only treatment considered in any of the alternatives occurs in the groundwater systems, which remain the same through all of the alternatives.”  |
| 30          | Section 10.4.6 – This discussion should also include fencing as well as signage.  | Please see the response to CDPHE specific comment 7.   |
| 31          | Section 10.4.7 – It is suggested that the statement “is not justifiable” should be modified and properly supported with additional text.  | The sentence will be revised as follows:<br>“Alternative 3, provides only a small incremental benefit (reducing potential risk from $2 \times 10^{-6}$ to less than or equal to $1 \times 10^{-6}$ ) and entails high costs and high short-term risks (increased worker-risk and mobilization of contaminants).” |
| 32          | Table 10.1 should be modified as appropriate based on previous comments for Section 10. Although the discussions in this section indicate that sediment monitoring will be performed, no costs or other information as to this monitoring appear to be provided. In association with alternative 3, cost should also be identified for additional air monitoring as well as surface water               | Table 10.1 (now Table 11.1) will be revised based on final resolution of the comments by the RFCAs Parties.  |

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|   | and sediment sampling. In addition, based on surface water exceedances seen at GS 10 during soil remedial actions, it should be considered that there could be additional actions and costs needed to prevent exceedances at the POCs if alternative 3 is implemented. This could include new POC locations in drainages associated with the disturbed areas along Indiana Street. |  |
| 33  | Figure 10.1 – The data used as the basis for this figure should be provided. This needs to be defined, since this map does not agree with previous maps presenting similar data, such as the January 31, 2000 Pu distribution in surface soil Kriging analysis map.  | The data used as the basis for this figure is the same data used for the Nature and Extent of Soil Contamination collected through August 22, 2005. The data can be found in Section 3 Attachment 1.   |
| 34  | Figures 10.2 & 10.4 – As previously requested, these maps should show the exceedances that are natural vs. those that are anthropogenic, as well as those that are from materials defined as inert material such as blacktop (PAHs), or non-continuous sample results (not seen as a continuous event during numerous samples).  | Table 9.3 provides information for each groundwater sample location where MCLs were exceeded in the reconfigured BZ OU. Known information regarding whether an exceedance may be caused by actual site-derived contamination vs. naturally-occurring exceedances, or otherwise not associated with site-generated contamination (such as from well casings), is provided in the table. |
|   | <b>Editorial Comments</b>  |  |
| 1   | Add “(Section 10.3.3.4)” to the end of the sentence in Section 10.3.4.4.   | Change made.   |
| <b>Environmental Protection Agency (EPA) Comments</b> |  |  |
| <b>General Comments</b>                               |  |  |
| 1   | Based on previous EPA comments regarding discussion of AOIs and ecological risk, it is recognized that Sections 8 through 10 will require modification; therefore, comments on that issue have not been submitted for Sections 8-10.   | A response will be provided pending resolution of the issue.   |
| 2   | Surface water is cited as being above standards at various locations throughout the site. RFCA says surface water standards needs to be met everywhere on the site. Therefore, surface water needs to be carried forward in the FS.  | Please see response to CDPHE specific comment 11.  |

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| 3                        | Because asbestos remains in the Present Landfill (PLF), please include text that provides for ongoing containment of asbestos.  | This issue is addressed in the ARARs discussion. The following will be added to Section 10.3.3.2 (now 11.3.3.2):<br><br>“National Emission Standards for Asbestos: This ARAR is met at the Present Landfill because any asbestos-containing waste material was covered with at least 60 centimeters of compacted nonasbestos-containing material. The cover provides for ongoing containment of asbestos-containing waste material.” |
| 4                        | In Section 10, when discussing the CERCLA criterion "Reduction of Toxicity, Mobility and Volume Through Treatment" it should be made clear that all of the alternatives are equivalent, because the only treatment considered in any of the alternatives occurs in the GW systems and enhancements, which remain the same through all 3 alternatives. While removal of contamination pursuant to alternative 3 impacts the toxicity, mobility and volume of contamination relative to this site, the impact is not due to treatment, but rather due to offsite disposal. Additionally, this criterion is focused on the statutory preference for treatment, and should discuss whether the preference is met. | Please see response to CDPHE specific comment 29.  |
| <b>Specific Comments</b> |   |  |
| 1                        | Page 10-5, Section 10.3.1.1. In the discussion of the Present and Original Landfills for Alternative 1, the last bullets note that institutional controls (ICs), required by the landfill decision documents, are included in Alternative 1. However, most of this section only discusses monitoring. The discussion of Alternative 2 "... adds the implementation of ICs and physical controls to Alternative 1." It should be clarified which ICs are included in Alternative 1, and which additional ICs are added in Alternative 2.   | Please see response to specific CDPHE comment 24.  |
| 2                        | Page 10-21, Section 10.4.4, Last Sentence. This section discusses "Reduction in Toxicity, Mobility, and Volume Through Treatment". Therefore, the conclusion on cost effectiveness is not appropriate for this criterion and should be  | Please see response to CDPHE specific comment 29.  |

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|  | <b>Editorial Comments</b>  |   |
| 1  | Several figures in Sections 8, 9, and 10 are repeats from Section 7 and previous sections. Please consider removing redundant figures as these sections of the document are revised. | The figures that are repeated were considered key to understanding proposed OU boundary changes and what institutional controls were needed without having the reader flip back and forth between these key sections. Because there are not many figures and the information contained on them is vital to understanding the alternatives considered by the RFCA Parties, no change will be made. |
| <b>U.S. Fish and Wildlife Service's (USFWS) Comments</b> |  |   |
|  | <b>General Comments</b>  |   |
|  | None   |   |
|  | <b>Specific Comments</b>   |   |
|  | None   |   |
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|  | None   |   |