

Exhibit D



DEPARTMENT OF THE ARMY
HEADQUARTERS, JOINT BASE LEWIS-MCCHORD
1010 LIGGETT AVENUE, BOX 339500, MAIL STOP 14A
JOINT BASE LEWIS - MCCHORD, WASHINGTON 98433-9500

REPLY TO
ATTENTION OF

August 5, 2015

Public Works

Mr. Brian Dixon
WA Department of Ecology
Central Regional Office
15 W Yakima Avenue, Suite 200
Yakima, Washington 98902-3452

Dear Mr. Dixon:

Enclosed for your review is one paper copy of the final Land Use Control Plan Yakima Training Center, Yakima, Washington. An electronic version of the report will also be e-mailed to you. All comments included in Ecology emails dated 24 January and 30 January 2015 regarding the first draft of the Yakima Training Center Land Use Control Plan have been addressed in this document.

If you have any questions or need clarification, please contact myself at (253) 477-3742.

Sincerely,

A handwritten signature in cursive script, appearing to read "William W. Myers".

William W. Myers
Installation Restoration Program Manager

CF: Mr. Greg Caron, WA Department of Ecology

LAND USE CONTROL PLAN

YAKIMA TRAINING CENTER, WASHINGTON

FORMER PESTICIDE HANDLING AREA (SWMU 5)

FORMER ASP BURN PITS (SWMU 27)

1969 – 1994 LANDFILL (SWMU 51)

1954 – 1968 LANDFILL/BURN PITS (SWMU 57)

FORMER FIRE TRAINING PIT (SWMU 59)

BUILDING 218 (AOC 7)

TVR/OLD MATES

CENTRALIZED FUELING POINT

UST SITES: BUILDING 301 (AOC 14), BUILDING 319 (AOCS 15 AND 16), BUILDING 321 (AOCS 19 AND 20), BUILDING 323 (AOCS 17 AND 18), BUILDING 833 (AOCS 24, 25, 26), AND BUILDING 845-1 (AOC 27)

PREPARED FOR:

Joint Base Lewis-McChord Public Works – Environmental Division

IMLM-PWE

MS 17 Box 339500

Joint Base Lewis-McChord, Washington 98433

PREPARED BY:

Versar, Inc

12050 N. Pecos

Suite 300

Westminster , CO 80234



August 2015

TABLE OF CONTENTS

List of Acronyms and Abbreviations	ii
1. Introduction	1
1.1 Purpose	1
1.2 Background	2
2. Description and Implementation of LUC Mechanisms.....	2
2.1 Overview of LUC Mechanisms.....	2
2.2 LUC Data Layer in Geographic Information System	2
2.3 LUC Overlay for Real Property Master Plan	4
2.4 LUC Overlay for YTC Environmental Review Procedures.....	4
2.5 LUC Incorporation in Water System Plan	4
2.6 LUC Overlay for Digging Permit Approval	4
2.7 Installation Access.....	5
3. Monitoring and Reporting.....	5
4. Recordkeeping.....	6
5. Enforcement	6
6. Financial Assurance	7
7. Future Property Conveyance	7
8. Termination or Modification of LUCs	7
9. References	8

Figure 1. Environmental Land Use Control Sites, Yakima Training Center

Table 1. Summary of LUCs

APPENDICES

APPENDIX A Real Property Master Plan Brochure (on attached DVD)

APPENDIX B Army Regulation AR-210-20 (on attached DVD)

APPENDIX C YTC NEPA Standard Operating Procedures (on attached DVD)

APPENDIX D Fort Lewis Regulation FLR 200-1 (on attached DVD)

APPENDIX E. YTC LUC Monitoring Checklist.

LIST OF ACRONYMS AND ABBREVIATIONS

AOC	Area of Concern
AR	Army Regulation
ASP	Ammunition Storage Point
DD	Decision Document
Ecology	Washington Department of Ecology
FLR	Fort Lewis Regulation
GIS	Geographic Information System
IC(s)	Institutional Control(s)
IRP	Installation Restoration Program
JBLM	Joint Base Lewis-McChord
LUC(s)	Land Use Control(s)
MATES	Mobilization and Training Equipment Site
MTCA	Model Toxics Control Act
NEPA	National Environmental Policy Act
PLAN	Land Use Control Plan
PW	Public Works
RCRA	Resource Conservation and Recovery Act
SOP	Standard Operating Procedure
SWMU	Solid Waste Management Unit
SWSMP	Small Water System Management Plan
TVR	Tracked Vehicle Repair
UST	Underground Storage Tank
WAC	Washington Administrative Code
YTC	Yakima Training Center

1. INTRODUCTION

1.1 Purpose

This Land Use Control (LUC) Plan documents how the Joint Base Lewis-McChord (JBLM) Installation Restoration Program (IRP) intends to implement, monitor, report, and keep records for Land Use Control (LUC) remedies at the Yakima Training Center (YTC). This LUC plan is being implemented in accordance with Model Toxics Control Act (MTCA) regulations in Washington Administrative Code (WAC) 173-340-440.

LUCs are defined as engineering, institutional, and other governmental or administrative controls that restrict use or limit access of property, including subsurface portions such as groundwater. At YTC, LUCs are applied to areas in which soils were remediated but still exceed the MTCA unrestricted use cleanup level for constituents of concern specific to that site.

Sites included in this LUC Plan are:

- Former Pesticide Handling Area (Solid Waste Management Unit [SWMU] 5);
- Former Ammunition Storage Point (ASP) Burn Pits (SWMU 27);
- 1969 – 1994 Landfill (SWMU 51);
- 1954 – 1968 Landfill/Burn Pits (SWMU 57);
- Former Fire Training Pit (SWMU 59);
- Building 218 (Area of Concern [AOC] 7)
- Tracked Vehicle Repair (TVR) / Old Mobilization and Training Equipment Site (MATES);
- Centralized Fueling Point; and
- Former Underground Storage Tank (UST) Sites:
 - Building 301 (Area of Concern [AOC] 14)
 - Building 319 (AOCs 15 and 16)
 - Building 321 (AOCs 19 and 20)
 - Building 323 (AOCs 17 and 18)
 - Building 833 (AOCs 24, 25, and 26)
 - Building 845-1 (AOC 27)

1.2 Background

The 14 sites addressed in this Plan are Resource Conservation and Recovery Act (RCRA) corrective action sites. RCRA corrective sites in the State of Washington are addressed using MTCA regulations per WAC 173-303-646(3). MTCA regulations have been promulgated by the Washington Department of Ecology (Ecology) in WAC 173-340.

A LUC remedy was selected for five IRP sites included in this Plan: SWMU 5, SWMU 27, SWMU 57, SWMU 59, and TVR/Old MATES in Decision Documents (DD) for each site referenced in this plan (see section 9). LUC remedies were selected for the nine CCP sites included in this plan: SWMU 51, AOC 7, AOC 14 and the six former UST sites (Versar, 2015). LUCS were also selected for the Centralized Fueling Point as documented in a DD for the site. Although none of the sites pose an unacceptable risk or hazard given current and anticipated future land use, LUC remedies were selected at the sites because current MTCA regulations require an institutional control (IC) whenever a contaminant concentration is above its MTCA Method A/B cleanup level. A summary of the selected LUC remedies is presented in Table 1. LUC boundary locations are presented on Figure 1. All LUC boundaries are within the YTC installation boundary.

2.0 DESCRIPTION AND IMPLEMENTATION OF LUC MECHANISMS

2.1 Overview of LUC Mechanisms

LUC mechanisms presented in this plan are a collection of LUC overlays on top of existing planning tools, procedures, permits, and regulations that ensure the LUCs in Table 1 are being implemented. Moreover, this collection of LUC mechanisms provides redundant protection for the relatively simple LUCs in Table 1. For instance, most of the LUC mechanisms included in this Plan are redundant for preventing future residential land use as long as the Real Property Master Plan does not contain provisions for initiating future residential land use at YTC.

2.2 LUC Data Layer in Geographic Information System

A Geographic Information System (GIS) data layer created by JBLM IRP and the JBLM Public Works (PW) GIS Lab is a LUC mechanism that is designed to support all LUCs in Table 1. The LUC data layer is available for use by Army staff. The LUC data layer in GIS contains the specific LUC locations at YTC and the specific LUCs in Table 1 for each location. The JBLM PW GIS Lab is

responsible for long-term storage of the LUC data layer in GIS. JBLM IRP has provided both the JBLM and the YTC PW GIS Labs with a copy of the LUC data layer.

2.3 LUC Overlay for Real Property Master Plan

The JBLM Real Property Master Plan delineates the major uses of real property and represents the formal decision process for the use of all land at JBLM and its YTC sub-installation. A LUC overlay on the Master Plan is designed to ensure that the Master Plan is not changed in the future to allow residential development without considering the LUCs. There is no current or anticipated future residential land use within YTC in according to the JBLM Real Property Master Plan. A copy of the JBLM Real Property Master Plan summary brochure that includes information regarding YTC, is included in Appendix A. A copy of the applicable sections of Army Regulation (AR) 210-20, which requires maintenance of the Real Property Master Plan and LUC overlay, is included in Appendix B. The JBLM Master Planner in the JBLM PW Planning Division is responsible for maintaining the Real Property Master Plan as well as a variety of other long-range land use planning activities at YTC. The JBLM IRP has provided the JBLM Master Planner with a copy of this LUC Plan and access to the GIS LUC data layer to overlay with the Master Plan.

2.4 LUC Overlay for YTC Environmental Review Procedures

A LUC overlay on the YTC environmental review procedures is a LUC mechanism that is designed to ensure all LUCs in Table 1 are satisfied. Proposed YTC projects with potential environmental impacts such as construction and demolition projects are required to undergo environmental review in accordance with the July 2005 Standard Operating Procedures (SOP) for Implementation of the National Environmental Policy Act (NEPA) at YTC contained in Fort Lewis Regulation (FLR) 200-1. A copy of the YTC NEPA SOP is included in Appendix C. A copy of the applicable portions of FLR 200-1 are included in Appendix D. These environmental review procedures are in place to ensure that all environmental considerations, including LUCs, are accounted for and adequately addressed during the preliminary project planning process.

The YTC Natural Resources Program Manager is responsible for implementing the YTC NEPA SOP and for conducting NEPA review actions. The JBLM IRP has provided the YTC Natural Resources Program Manager with a copy of this LUC Plan and access to the GIS LUC data layer to overlay with the environmental review procedures. The JBLM IRP has also provided copies of this LUC Plan and

access to the GIS LUC data layer to the YTC Staff Engineer, YTC Environmental Compliance Program Manager, YTC Environmental and Natural Resources Division Chief, and YTC PW Director.

2.5 LUC Incorporation in Water System Plan

Incorporating the LUCs into the next update of the YTC Cantonment Area Small Water System Management Plan (SWSMP) is a mechanism designed to ensure that a new drinking water well is not installed within the Former Fire Training Pit site boundary or 1000 feet of the TVR/Old MATES site boundary without an approved monitoring plan. These two LUC boundaries are within the service area boundary of the YTC Cantonment Area Water System. A SWSMP is the primary planning tool for all small water systems and is typically used to plan future construction, including installation of new drinking water wells. SWSMPs are required to be updated every six years in accordance with Washington Department of Health regulations in WAC 246-290-105. The Washington Department of Health will not approve installation of a new drinking water well without adequate documentation of the need for a new well in the SWSMP as well as adequate incorporation of the proposed well in the Wellhead Protection Program portion of the SWSMP.

The YTC Staff Engineer within YTC PW is responsible for maintaining the SWSMP as well as a variety of other planning, design, and operation tasks related to the YTC Cantonment Area Water System. The JBLM IRP has provided the YTC Staff Engineer with a copy of this LUC Plan and access to the GIS LUC data layer to incorporate the Former Fire Training Pit and TVR/Old MATES LUCs in the next SWSMP update, which is currently scheduled for 2010. For redundant layering of institutional knowledge at YTC, JBLM IRP has provided a copy of this LUC Plan and access to the GIS LUC data layer to the lead YTC Water System/Wastewater System Operator who is responsible for many water system operation and maintenance tasks.

2.6 LUC Overlay for Dig Permit Approval

A LUC overlay on the YTC Dig Permit approval process is a LUC mechanism that is designed to ensure all LUCs in Table 1 are satisfied. Before any digging or excavation activities are undertaken at YTC, a YTC Digging Permit must be obtained in accordance with Appendix S of FLR 200-1. The applicable portion of FLR 200-1 is included as of D of this Plan. Thus, LUCs will be considered

(along with existing overlays such as utilities and culturally-sensitive locations) before a Digging Permit is issued.

The YTC Cultural Resources Program Manager within YTC PW is responsible for reviewing and approving digging permit applications for the Cantonment Area (where all of the LUC boundaries described in this Plan are located). The JBLM IRP has provided the YTC Cultural Resources Program Manager with a copy of this LUC Plan and access to the GIS LUC data layer to overlay with the digging permit approval process. For redundant layering of institutional knowledge at YTC, JBLM IRP has provided a copy of this LUC Plan and access to the GIS LUC data layer to the lead YTC Water System/Wastewater System Operator who is responsible for several utility locations as part of the digging permit approval process.

2.7 Installation Access

YTC is a controlled military installation that limits access to authorized personnel. Although these security measures are not a remedial LUC mechanism because the mechanisms have not been specifically modified to accommodate LUC data, the installation access restrictions do support the LUCs by keeping the general public and unauthorized personnel (i.e., children) out of YTC. This is important because MTCA Method A/B cleanup levels are based on residential exposure assumptions for children.

3. MONITORING AND REPORTING

The JBLM IRP will conduct annual monitoring of the LUC remedy described in this Plan. The monitoring will consist of interviews with Army staff responsible for maintaining LUC overlays and a visual field inspection of property usage. The YTC LUC Monitoring Checklist in Appendix E will be used to conduct and document the annual monitoring. JBLM IRP will provide a copy of the completed YTC LUC Monitoring Checklist to Ecology for review.

JBLM IRP will also conduct a periodic review of the LUC remedy every five years. JBLM IRP will review the annual monitoring reports and re-evaluate this Plan to ensure the LUC mechanisms are working properly to satisfy the LUCs and that the remedy is still protective of human health and the environment. The five-year review will also be a time to update this LUC Plan as necessary to document any minor changes to the LUC mechanisms over time.

In addition to the routine monitoring and five-year reviews, JBLM IRP will notify Ecology immediately upon discovery of any land use activity that is inconsistent with the LUCs in Table 1. JBLM IRP and Ecology will work together to determine a plan of action to rectify such a situation (e.g., conduct a project-specific risk assessment). It should be noted that a temporary failure in a single LUC mechanism is unlikely to compromise the protectiveness of the LUC remedy since 1) another mechanism would likely detect and prevent the possible failure and 2) the maximum length of time of the failure would be one year (in the interim between annual monitoring events) compared to the 6 year child exposure duration assumed in calculation of MTCA Method A/B cleanup levels.

4. RECORDKEEPING

Recordkeeping will help provide the necessary durability to ensure the LUC remedy outlasts personnel changes, government reorganizations, and LUC mechanism changes. This Plan, all subsequent Plan modifications, annual LUC checklists, and five-year reviews will be included in the JBLM IRP administrative record. In addition, the LUC remedy will be recorded in the Army Environmental Command's AEDB-R and AEDB-CC databases.

5. ENFORCEMENT

The JBLM IRP Manager is responsible for managing the LUCs for the Army as stipulated in Table 1 of this LUC Plan. LUC non-compliance that is out of the authority of the IRP Manager will be immediately communicated to the Ecology through appropriate Army Command channels. If the LUC implementation, monitoring, reporting, or recordkeeping by JBLM IRP is not consistent with the LUC remedy, then Ecology can enforce the provisions of the pending RCRA permit to guarantee the long-term reliability and effectiveness of the LUC remedy. However, it is expected that most, if not all, potential disputes can be resolved through early problem identification and informal communication.

The requirements for JBLM IRP to implement, monitor, report on, and keep records of LUC remedies as described in this Plan will be effective immediately following Ecology concurrence with

the ERP DDs, the YTC RCRA Corrective Action Completion Report, and this Plan as well as Ecology issuance of a RCRA Permit.

6. FINANCIAL ASSURANCE

The MTCA requirement to provide financial assurance for long-term maintenance of ICs does not apply to a federal facility that is implementing, monitoring, and reporting on internal LUCs with Army staff.

7. FUTURE PROPERTY CONVEYANCE

Property conveyance includes leaseholds, easements, and land transfers. The Army will notify Ecology prior to any property conveyance that affects the LUCs in Table 1. As necessary, JBLM IRP will re-evaluate the appropriateness of the selected LUC remedies and will revise this LUC Plan. A transfer of YTC land to private ownership or to a federal agency outside of the Department of Defense is highly unlikely given the importance of YTC for Department of Defense training. In the unlikely event of a land transfer, the Army shall include all applicable LUC restrictions as part of a deed notice and will work with Ecology and the future landowner(s) to ensure that appropriate LUCs and mechanisms are also in place to ensure protection of human health and the environment.

8. TERMINATION OR MODIFICATION OF LUCS

The LUCs described in this Plan are intended to be in place until the concentration of hazardous substances in soil are reduced to levels that allow for unlimited use and unrestricted exposure. If JBLM IRP determines in the future that there are changes to site conditions, hazardous substance concentrations, MTCA cleanup levels for residential land uses, and/or MTCA IC regulations (which currently require ICs whenever a contaminant concentration exceeds a MTCA Method A/B cleanup level regardless of actual risk), JBLM IRP will seek to terminate or modify a LUC objective as appropriate. For instance, if contaminants naturally attenuate or MTCA cleanup levels are adjusted such that contaminant concentrations are less than MTCA cleanup levels for residential land uses, the LUC will be terminated or modified if Ecology approval and modification of the RCRA permit is

obtained. If a LUC is terminated or modified in the future, JBLM IRP will undo the respective LUC mechanism to avoid future confusion about the status of previously implemented LUCs.

9. REFERENCES

- JBLM 2013. Decision Document for Selected Remedy at the Centralized Fueling Facility. December.
- JBLM ERP, 2007. Decision Document for Selected Remedy at Former Pesticide Handling Area (SWMU 5). March.
- JBLM ERP, 2007. Decision Document for Selected Remedy at ASP Burn Pits Site (SWMU 27). March.
- JBLM ERP, 2007. Decision Document for Selected Remedy at 1954 – 1968 Landfill/Burn Pits (SWMU 57). March.
- JBLM ERP, 2007. Decision Document for Selected Remedy at Former Fire Training Pit (SWMU 59). March.
- JBLM ERP, 2007. Decision Document for Selected Remedy at Tracked Vehicle Repair/Old MATES Area (AOCs 5 & 2), March.
- Versar, 2013. Yakima Training Center Corrective Action Completion Report. Prepared by Versar, Inc. for Public Works Environmental Division, JBLM, WA 98433. September.



Figure 1. Environmental Land Use Controls
Yakima Training Center

0 0.125 0.25 0.5 Miles



TABLE 1 - Summary of LUCs
Yakima Training Center, Washington

Site Name	Document Requiring LUC	Applicable Site Area	LUC
Former Pesticide Handling Area (SWMU 5)	March 2007 DD	Site boundary	Prevent residential land use
Former ASP Burn Pits (SWMU 27)	March 2007 DD	Site boundary	Prevent residential land use Prevent unplanned excavation of contaminated soil
1969 – 1994 Landfill (SWMU 51)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Landfill boundary	Prevent residential land use Prevent unplanned excavation of contaminated soil
1954 – 1968 Landfill/Burn Pits (SWMU 57)	March 2007 DD	Landfill/burn pits boundary	Prevent residential land use Prevent unplanned excavation of contaminated soil
Former Fire Training Pit (SWMU 59)	March 2007 DD	Site boundary	Prevent new drinking water wells without approved monitoring plan
Building 218 (AOC 7)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Building 218	Address as necessary potential discarded military munitions under building if building is deconstructed
TVR/Old MATES	March 2007 DD	1000 feet around site boundary	Prevent new drinking water wells without approved monitoring plan
		Building 843	Address as necessary potential contamination under building if building is deconstructed
Centralized Fueling Point	January 2014 DD	Soil under concrete hard stand	Prevent unplanned excavation of contaminated soil Address as necessary potential contamination under hard stand when it is removed
Building 301 Former UST Site (AOC 14)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Building 301	Address as necessary potential contamination under building if building is deconstructed
Building 319 (AOCs 15 and 16)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Building 319	Address as necessary potential contamination under building if building is deconstructed
Building 321 (AOCs 19 and 20)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Building 321	Address as necessary potential contamination under building if building is deconstructed
Building 323 (AOCs 17 and 18)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Building 323	Address as necessary potential contamination under building if building is deconstructed
Building 833 (AOCs 24, 25, and 26)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Building 833	Address as necessary potential contamination under building if building is deconstructed
Building 845-1 (AOC 27)	Pending RCRA Corrective Action Completion Report (Versar, 2015)	Building 845-1	Address as necessary potential contamination under building if building is deconstructed

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- Appendix A. Real Property Master Plan Brochure (on DVD)**
 - Appendix B. Army Regulation AR210-20 (on DVD)**
 - Appendix C. YTC NEPA SOP (on DVD)**
 - Appendix D. Fort Lewis Regulation FLR 200-1 (on DVD)**

Appendix E. YTC LUC Monitoring Checklist

LUC Monitoring Checklist
Yakima Training Center, Washington

A. FIELD INSPECTION

Site	Question	Answer
Pesticide Handling Area	1. Any family housing within site boundary?	Yes / No
Former ASP Burn Pits	2. Any family housing within site boundary?	Yes / No
	3. Any obvious recent construction/excavation in site boundary?	Yes / No
1969 – 1994 Landfill	4. Any family housing within landfill boundary?	Yes / No
	5. Any obvious recent construction/excavation within landfill?	Yes / No
1954 – 1968 Landfill/Burn Pits	6. Any family housing within landfill boundary?	Yes / No
	7. Any obvious recent construction/excavation within landfill?	Yes / No
Former Fire Training Pit	8. Any apparent new drinking water wells within site boundary?	Yes / No
Building 218	9. Has Building 218 been torn down?	Yes / No
Bldg 301	10. Has Building 301 been torn down?	Yes / No
Building 319	11. Has Building 319 been torn down?	Yes / No
Building 321	12. Has Building 321 been torn down?	Yes / No
Building 323	13. Has Building 323 been torn down?	Yes / No
Building 833	14. Has Building 833 been torn down?	Yes / No
Building 845-1	15. Has Building 845-1 been torn down?	Yes / No
TVR/Old MATES	16. Any apparent new drinking water wells within 1000 ft of site boundary?	Yes / No
	17. Building 843 been torn down?	Yes / No
Centralized Fueling Point	18. Has hard stand been penetrated?	Yes / No
	19. Any obvious excavation within boundaries of the hard stand?	Yes / No

20. Any comments (required for "Yes" answers from Field Inspection)? **YES or NO** If yes, describe Notes:

Signature _____ Date _____

LUC Monitoring Checklist
Yakima Training Center, Washington

B. INTERVIEWS

Position	Name	Question	Answer
JBLM PW GIS Lab	Theresa Hansen	21. Are you still storing LUC data layer in GIS?	Yes / No
		22. Is LUC data layer still available to GIS users?	Yes / No
YTC PW GIS	Dave Thierl	23. Do you still have LUC data layer in GIS?	Yes / No
JBLM Master Planner	Gary Stedman	24. Do you still have access to LUC data when you need it?	Yes / No
		25. Are you still using the LUC data for a Master Plan overlay?	Yes / No
		26. Any plans for future family housing at YTC?	Yes / No
		27. Any plans for property conveyance in YTC Cantonment Area?	Yes / No
YTC Natural Resources Program Mgr	Pete Nissen	28. Do you still have access to LUC data when you need it?	Yes / No
		29. Are you still using the LUC data as environmental review overlay?	Yes / No
		30. Any plans to take down Buildings 218, 301, or 843?	Yes / No
YTC Staff Engineer	Loreto Calimlim	31. Do you still have access to LUC data when you need it?	Yes / No
		32. Are you still aware that relevant LUC data needs to (be added / remain) in future SWSMP updates?	Yes / No
		33. Any plans for new drinking water wells in Cantonment Water System?	Yes / No
		34. Any plans for property conveyance in YTC Cantonment Area?	Yes / No
YTC Cultural Resources PM	Randy Korgel	35. Do you still have access to LUC data when you need it?	Yes / No
		36. Are you still using the LUC data for a digging permit overlay?	Yes / No

37. Any "No" answers from Interview Questions 17-21, 24-25, 27-28, 31-32 require comments on back

38. Any "Yes" answers from Questions 22,23,26,29,30 require comments on back

39. Any changes noted about how LUC mechanisms are executed? **YES or NO**

If yes, describe on back

40. Interview Dates:

C. CERTIFICATION

Based on this monitoring, LUC mechanisms appear to be working and achieving LUCs.

Signature _____

Date _____

