

## PROJECT MEMORANDUM SYCAMORE-PEÑASQUITOS 230-KV TRANSMISSION LINE PROJECT

Date: April 13, 2018  
To: Billie Blanchard, CPUC Project Manager  
From: Sheila Hoyer, CPUC Monitoring Supervisor  
Subject: Weekly Report #66 – April 2 to April 7, 2018

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### INTRODUCTION

This report provides a summary of the construction and compliance activities associated with the SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project for the week of April 2 to April 7, 2018.

A summary of the Notices to Proceed, Minor Project Refinement, and Temporary Extra Workspace Requests are provided in Tables 1, 2, and 3, respectively. A summary of Non-compliance, Project Memoranda and Incidents is provided in Table 4. Daily Inspection Reports are provided in Appendix A.

**CPUC/Panorama Environmental Monitors (EMs): David Flietner**

### STAGING YARDS

Summary of Activity:

**Stonebridge Staging Yard:**

1. Delivering equipment; inspecting BMPs; and demobilizing equipment.

**Driving Range Staging Yard:**

1. Delivering equipment and inspecting BMPs.

**Vulcan Staging Yard:**

1. Maintaining BMPs; delivering materials and equipment; and delivering, sorting, and removing spoil material from night excavations.

**Crestmar Point Staging Area:**

1. Delivering materials and equipment; and inspecting BMPs.

**Underground Transmission Line:**

1. Nighttime construction activities: No activity.
2. Daytime construction activities occurred west of I-15 in Segment 5 in Sections 20 and 21 (approximately at Stations 399+00 to 401+00): Trenching; installing conduit; backfilling; and paving.
3. Daytime construction activities occurred east of I-15 in Segment 3 in Sections 7 through 15 (approximately at Stations 528+00 to P05): Installing and splicing cable; mandreling; excavating; installing conduit; encasing; and backfilling.

**I-15 Crossing**

1. Construction activities in Segment 5 (approximately at Station 402+50): Mobilizing the tunnel boring equipment in the sending bore pit located at the end of the Kearny Mesa Road cul-de-sac.
2. Construction activities in Segment 3 in Section 21 (approximately at Station 412+50): Auguring holes at the receiving bore pit east of I-15.

**Overhead Transmission Line:**

1. P03: Termination splicing.
2. P04: No activity.
3. P05: No activity.
4. P06: No activity.
5. CC MM CP: No activity.
6. E48: Overhead work.

**Peñasquitos Substation:**

1. Mobilizing equipment.

**Sycamore Substation:**

1. Building racks for new 230-kV and 138-kV lines.

**Environmental Compliance:**

1. All pavement was kept clean during this reporting period. No winds occurred that were higher than 20 mph. All off-road diesel-powered construction equipment met a minimum of EPA Tier 3 standards or had due diligence documentation provided to CPUC for it.
2. Nesting bird surveys were conducted on April 9, 2018 for proposed trenching activities on Pomerado Road, Segment 3, Section 1, between stations 415 and 421. No nesting birds were observed during the survey. During this reporting period daily nest monitoring was conducted on a pair of common ravens building a nest near the west side sending bore pit, Segment 4, West of I-15. Nest monitoring will continue until it is determined that the young have fledged. No work occurred in the vicinity of the three house finch nests that are located on structures E41 through E43 within the western overhead alignment. Monitoring for special-status species was implemented to avoid and minimize impacts to biological resources. No other special-status species were observed during the monitoring period. All project equipment arrived clean and free of mud and/or vegetation.

3. During this reporting period, the Qualified Archaeologist recommended no further monitoring of trenching activities between stations 679+00 to 677+00 due to the low potential for cultural resources to occur. Cultural monitoring teams will continue spot-checking drilling activities east of I-15 and, if the soil composition changes, full-time monitoring may be recommended by the Qualified Archaeologist. Cultural monitoring teams and paleontological monitors observed trenching along Kearny Mesa Road, and drilling on the east side of I-15. No cultural or paleontological resources were observed during the monitoring effort this reporting period.
4. No hazardous materials releases were recorded during this reporting period.
5. All construction activities occurred in accordance with the approved Construction Fire Prevention Plan. All construction vehicles were equipped with the required fire tools. No fire incidents were reported during this reporting period.
6. No nighttime construction activities occurred during this reporting period. Daytime underground construction activities occurred Monday through Saturday, from 8:00 am to 4:00 pm. Daytime construction activities occurred in accordance with the City of San Diego approved Traffic Control Permits and Noise Permits.
7. Project personnel parked their personal vehicles within a designated personal vehicle parking area within the project limits within the Stonebridge Staging Yard. Workers parked within the work limits of the Driving Range Staging Yard or parked on the adjacent public street. Traffic Control Permits were obtained from the City of San Diego.
8. The QSP conducted required daily inspections during this reporting period. The QSP conducted a pre-rain inspection on April 5, 2018, for an anticipated rain event on April 7, 2018. The forecasted rain did not occur. Additionally, the Environmental Inspectors inspected equipment to ensure that drip pans were being placed under equipment by the contractor. On April 4, 2018, the CPUC environmental inspector notified the Lead Environmental Inspector that a drip pan was missing under a piece of equipment parked along Padgett Road. The drip pan was located and placed back under the equipment on the same day. All trash receptacles were covered daily, ingress/egress areas were hand-swept, a street sweeper was used in and around work areas, and regular BMP maintenance and installation was conducted throughout the week.
9. All construction and compliance personnel on site during this reporting period completed the Project Safety and Environmental Awareness Program (SEAP). To date, approximately 1,802 project personnel have received the required SEAP training, and 1,698 project personnel have received the UXO training.
10. There were no Compliance Level incidents during this reporting period.
11. No complaints were received during this reporting period.
12. Agency Representatives during Construction (other than CPUC EMs): None

## CPUC NOTICES TO PROCEED (NTPs)

Table 1 summarizes the CPUC NTP activity for the SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project to date.

**Table 1 CPUC NTPs**

NTP #	Date Submitted	Date Issued	Segment #	Description
1	12/05/16	12/29/16	N/A	Mobilize and begin operations at the construction staging yards.
2	01/23/17	02/07/17	Segment B	Construct the underground portion of the Project from Sycamore Substation to Structure P03, and from Structure P05 to Structure CC MM CP.
3	02/03/17	02/27/17	Segment A Segment C	<ol style="list-style-type: none"> <li>Overhead construction from Sycamore Substation to Structure P06</li> <li>Overhead construction from Structure CC MM CP to the Peñasquitos Substation</li> <li>Deepwell AC mitigation installation</li> <li>Construction activities at Sycamore Canyon and Peñasquitos Substations</li> </ol>

## MINOR PROJECT REFINEMENT & TEMPORARY EXTRA WORKSPACE REQUESTS

Tables 2 and 3 summarize the Minor Project Refinements (MPRs) and Temporary Extra Workspace (TEWS) Requests have been submitted to date.

**Table 2 Minor Project Refinement (MPR) Requests**

MPR Request	Date Submitted	Date Issued	Segment #	Description
#1	12/06/16	1/11/17	Segment A	Underground 230-kV getaway from Sycamore Substation to Structure P03.
#2	01/17/17	01/24/17	Segment B	Realignment of the 230-kV underground transmission line from Miramar Road north on Black Mountain Road and west on Activity Road.
#3	03/06/17	03/08/17	Segment A	Provides temporary power to the SDG&E trailer at the Stonebridge Staging Yard through the existing power box located outside of the existing project boundary.
#4	04/18/17	04/20/17	Segment B	Modifies the approved 2.61-acre Vulcan Mine Yard location approximately 884 feet to the west to an approximately 1.71-acre paved area.
#5	07/10/17	07/11/17	Segment B	Establishes staging yards along southern perimeter of Pomerado Road and temporary work spaces north of P05 and P06
#6	08/03/17	08/04/17	Segment B	Establishes staging yards along southern and northern perimeters of Pomerado Road

MPR Request	Date Submitted	Date Issued	Segment #	Description
#7	08/25/17	08/28/17	Segments B, C	Establishes a staging yard at the southwest corner of the intersection of Pomerado Road and Avenue of Nations (previously approved in TEWS #1), and extends the temporary work space surrounding Structure E40
#8	09/12/17	Denied	South of Segment C	Adds temporary work areas around 16 poles and 14 guard structures south of Carroll Canyon Road and east of Interstate 805. The refinement area extends approximately 2 miles south of CC MM CP
#9	10/06/17	10/11/17	Segment B	Adds a paved, developed area off Crestmar Point for use as a staging area for vehicles and construction equipment.
#10	11/29/17	11/29/17	Segment B	Authorizes a newly identified underground route option for the crossing of Interstate-15, using a tunnel bore machine to install the 230-kV line
#11	11/22/17	11/29/17	Segment A	Adds approximately 0.13 acre of temporary work space to accommodate the installation of the 138-kV and 230-kV trench packages north of Sycamore Canyon Substation
#12	1/30/18	1/30/18	Segment B	Authorizes approximately 0.96 acre of additional temporary workspace located along Kearny Mesa Road and west of Interstate 15 for staging vehicles, equipment, and materials necessary for installing the 230-kV line under Interstate-15
#13	2/01/18	2/05/18	Segment B	Authorizes the installation of five guy wire anchors within an existing dirt access road between structures P05 and P06 to stabilize and support structure P05 during trenching and retaining wall construction activities
#14	3/29/18	3/30/18	Segment B	Authorizes an approximately 0.44 acre of additional temporary workspace located just northwest of structure CC MM CP

**Table 3 Temporary Extra Workspace (TEWS) Requests**

TEWS Request	Date Submitted	Date Issued	Segment #	Description
#1	06/29/17	07/05/17	B	Additional staging area located at the southwest corner of the intersection of Pomerado Road and Avenue of Nations
#2	07/19/17	07/19/17	B	Addition to approved temporary work area on Pomerado Road
#3	09/02/17	09/04/17	C	New location for temporary guard structure 06 in a paved parking lot at the intersection of Lusk Boulevard and Wateridge Circle
#4	12/13/17	12/14/17	C	Temporary Work Space for a helicopter landing zone located within an asphalt-covered parking lot at 6925 Lusk Boulevard

TEWS Request	Date Submitted	Date Issued	Segment #	Description
#5	12/27/17	12/29/17	A	Temporary Work Space to mobilize and stage a large crane that will be used to lift and install a vault located at station 676+00 on Stonebridge Parkway

## NON-COMPLIANCES, PROJECT MEMORANDA & INCIDENTS

No incidents occurred during this reporting period.

**Table 4 Non-Compliances, Project Memoranda, and Other Incidents**

Type	Date	Location	Description
Level 1	04/12/2017	Segment B	Potable water was used in a street sweeper
Memoranda	04/19/2017	Segment B	Traffic incident at Driving Range Staging Yard
Level 1	04/24/2017	Segment B	Presence of trash along the project alignment
Level 1	05/01/2017	Segment B	Working outside of City-approved hours
Memoranda	05/03/2017	Segment B	Traffic incident at Snapple/7-Up Plant
Memoranda	05/18/2017	Segment B	Traffic incident at Station 169+89
Memoranda	05/23/2017	Segment B	Unauthorized non-stormwater discharge
Level 1	06/08/2017	Segment B	Non-adherence to approved Fire Plan
Level 2	06/15/2017	Segment B	Non-adherence to approved Fire Plan
Memoranda	07/06/2017	Segment B	Traffic incident at Carroll Canyon Road
Level 1	07/20/2017	Segment B	Non-adherence to approved Fire Plan
Memoranda	07/20/2017	Segment B	Traffic incident at Miralani Drive
Memoranda	08/03/2017	Segment B	Traffic incident at Pomerado Road
Memoranda	08/10/2017	Segment B	Unauthorized non-stormwater discharge
Level 1	08/16/2017	Segment B	Staging equipment outside of approved limits
Level 3	08/28/2017	Segment B	Non-adherence to approved Fire Plan Non-adherence to SEAP training requirement Working outside of approved limits
Level 1	08/29/2017	Segment C	Driving equipment on non-approved access road
Memoranda	09/07/2017	Segment B	Unauthorized non-stormwater discharge
Memoranda	09/14/2017	Segment B	Spot fire on Pomerado Road caused by grinding activity spark
Level 1	01/14/2018	Segment C	Construction materials going outside of approved work limits
Memoranda	03/02/2018	Segment B	Traffic incident at Miramar Road

## ATTACHMENT A INSPECTION REPORTS

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# 2018-04-03 AM Inspection Report



## SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project: Daily Inspection Report

Inspection Date	2018-04-03
Start Time	12:35:00
End Time	14:51:00
Monitor Name	Dave Flietner
Organization	Panorama Environmental, Inc. (Panorama)
Summary of Construction Activities	Trenching, boring and work in pits for horizontal drilling, laying conduit at PO5 and vault work were the main activities.
Summary of Compliance Activities	A set of resource monitors was on hand for trenching at Kearney Mesa Road and at boring at I-15 pit site.
Were any issues encountered?	No

### Photo Log

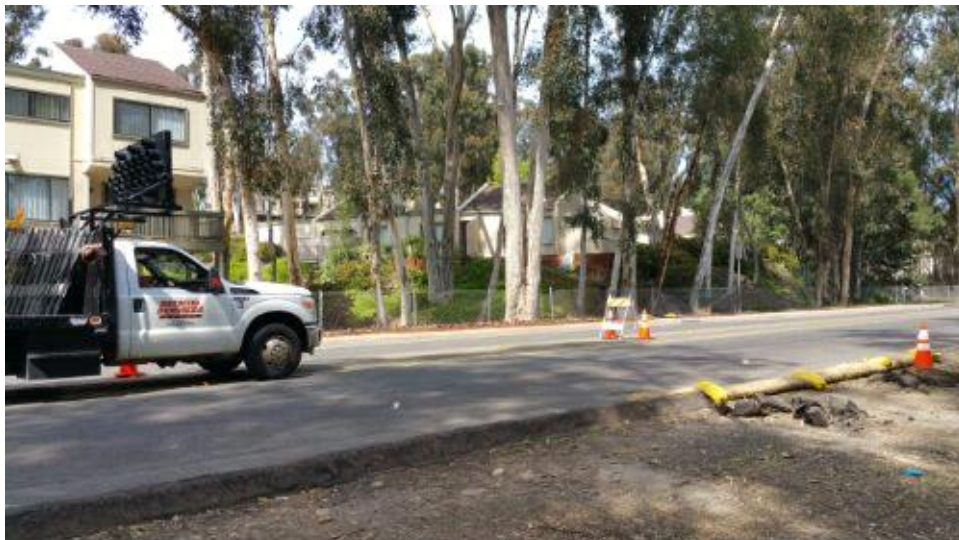
Photo



Caption Installing horizontal drill, sending pit site.

Photo Attributes Capture Date/Time: Tue Apr 03 2018 14:36:47 GMT-0700 (PDT)  
Coordinates: 32.894826, -117.117326  
View Direction: East

Photo



Caption Removing traffic cones on Pomerado Road.



Photo Attributes Capture Date/Time: Tue Apr 03 2018 14:21:17 GMT-0700 (PDT)  
Coordinates: 32.896216, -117.106419  
View Direction: Northeast

Photo



Caption Drains installed below Verdura wall at PO5.

Photo Attributes Capture Date/Time: Tue Apr 03 2018 14:01:41 GMT-0700 (PDT)  
Coordinates: 32.922438, -117.042405  
View Direction: North

Photo



Caption Placing conduit in PO5 access road.

Photo Attributes Capture Date/Time: Tue Apr 03 2018 13:54:58 GMT-0700 (PDT)  
Coordinates: 32.92238, -117.042841  
View Direction: East

Photo



Caption Splicing work site on Pomerado Road.

Photo Attributes Capture Date/Time: Tue Apr 03 2018 13:42:40 GMT-0700 (PDT)  
Coordinates: 32.908316, -117.075943  
View Direction: West

Photo



Caption Drain protection and rumble plates at east side I-15 sending pit work site.

Photo Attributes Capture Date/Time: Tue Apr 03 2018 13:18:54 GMT-0700 (PDT)  
Coordinates: 32.893761, -117.114639  
View Direction: Northeast

Photo



Caption Cultural and paleontology monitors at trench excavation, Kearney Mesa Road.

Photo Attributes Capture Date/Time: Tue Apr 03 2018 12:54:35 GMT-0700 (PDT)



Photo



Caption No drip pan beneath SC4B34 at Padgett Road staging area.

Photo Attributes Capture Date/Time: Tue Apr 03 2018 12:42:22 GMT-0700 (PDT)  
Coordinates: 32.895755, -117.127113  
View Direction: East

### Daily Checklist

Q1 – General Avoidance and Minimization: (a) Were the limits of work areas and access roads clearly marked? (b) Were construction activities limited to CPUC-approved work areas?	Met Requirements
Q2 – Air Quality/GHG: (a) Were dust avoidance and minimization requirements implemented and monitored adequately? (b) Was dust generation below required thresholds? (c) Were equipment and vehicles maintained and operated in a manner to limit emissions? (d) Was organic waste collected and separated from non-organic waste for appropriate composting or recycling, as appropriate?	Met Requirements
Q3 – Special-Status Plants: Were impact avoidance and minimization requirements for special-status plants implemented adequately (e.g., avoiding sensitive areas)?	N/A
Q4 – Wildlife (Non-Avian): Were impact avoidance and minimization requirements for wildlife implemented adequately (e.g., avoiding sensitive areas, covering excavations, and inspecting equipment/trenches)?	Met Requirements
Q5 – Nesting and Burrowing Birds: (a) Were active nests and occupied burrows identified and monitored during applicable seasons, as required? (b) Were impact avoidance and minimization requirements for any active nests or occupied burrows implemented adequately?	Met Requirements
Q6 – Water Features and Aquatic Habitat: Were water features avoided?	Met Requirements
Q7 – Stormwater, Erosion, and Sediment Control: (a) Were erosion and sediment control BMPs in place and functioning properly? (b) Were inactive or completed work areas stabilized and/or restored adequately?	Met Requirements
Q8 – Invasive Weed Control: Were procedures to prevent the spread of invasive weeds implemented adequately?	Met Requirements
Q9 – Hazardous Materials and Waste Management: (a) Were hazardous materials stored and labeled properly? (b) Was hazardous material waste disposed of appropriately? (c) Were any spills or leaks addressed adequately? (d) Was solid waste collected and disposed of adequately?	Corrections Required
Q9 Notes	One piece of equipment at the Padgett Road staging area had no drip pan. No drips observed, but this has been a persistent problem.
Q10 – Fire Management: (a) Were fire prevention procedures in place? (b) Was firefighting equipment available on site?	Met Requirements
Q11 – Cultural, Paleontological, and Tribal Resources: (a) Were cultural, paleontological, and tribal resources monitoring and impact avoidance occurring as required? (b) If potential resources or human remains were inadvertently discovered, were response procedures and protocols implemented as required?	Met Requirements
Q12 – Construction Noise: (a) Were noise minimization measures	Met Requirements

in place, as required? (b) If noise complaints were received, were they documented and addressed, as required?

Q13 – Maintain Access: (a) Was access to driveways (e.g., businesses, schools, residences) maintained as required? (b) Was access to recreational areas maintained and appropriate signage installed? (c) Was pedestrian and bicycle access maintained, or were detours clearly defined? Met Requirements

Q14 – Traffic Control (a) Were flaggers present at all times? (b) Were barriers, cones, and signs in place? (c) Were detours clearly marked? Met Requirements

Q15 – Helicopter Use (a) Were helicopter use restrictions implemented adequately? (b) Were helicopter take-off and landing sites within prescribed limits? Met Requirements

Q16 – Worker Training and Communication: Have all workers on site received the required environmental trainings for the project? Met Requirements

Q17 – MMCRP Implementation: (a) Were project activities consistent with the approved project as defined in the EIR and subsequent CPUC authorizations? (b) Were MMCRP procedures implemented adequately? Met Requirements

# 2018-04-05 AM Inspection Report



## SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project: Daily Inspection Report

Inspection Date	2018-04-05
Start Time	12:50:00
End Time	15:17:00
Monitor Name	Dave Flietner
Organization	Panorama Environmental, Inc. (Panorama)
Summary of Construction Activities	Boring began at the send bore pit site. Vault work took place on Pomerado Road and Stonebridge Parkway, and trench work was done at PO5.
Summary of Compliance Activities	No excavation (other than boring) so no special resource monitors on hand.
Were any issues encountered?	No

### Photo Log

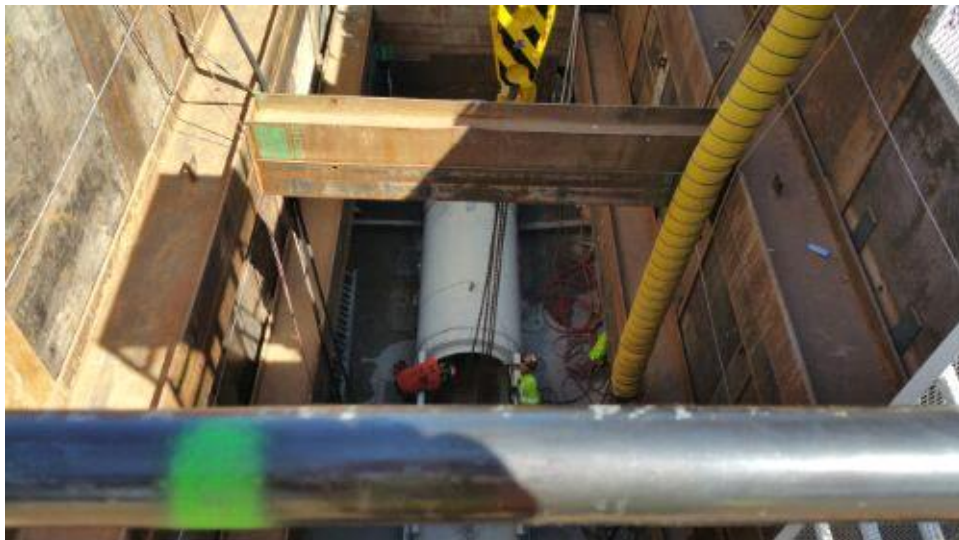
Photo



Caption Bored soils at the sending pit bore site.

Photo Attributes Capture Date/Time: Thu Apr 05 2018 15:06:03 GMT-0700 (PDT)  
Coordinates: 32.894776, -117.11745  
View Direction: North

Photo



Caption Placing bucket on bore rin the sending bore pit.  
Photo Attributes Capture Date/Time: Thu Apr 05 2018 15:03:58 GMT-0700 (PDT)  
Coordinates: 32.894773, -117.117439  
View Direction: East

Photo



Caption Filling trench at PO5.  
Photo Attributes Capture Date/Time: Thu Apr 05 2018 14:23:12 GMT-0700 (PDT)  
Coordinates: 32.922494, -117.04236  
View Direction: West

Photo



Caption Racking site on Stonebridge Parkway.  
Photo Attributes Capture Date/Time: Thu Apr 05 2018 14:13:04 GMT-0700 (PDT)  
Coordinates: 32.895831, -117.107626  
View Direction: East



Photo



Caption Mandreling site on Pomerado Road.

Photo Attributes Capture Date/Time: Thu Apr 05 2018 13:49:06 GMT-0700 (PDT)  
Coordinates: 32.895812, -117.107672  
View Direction: Northeast

Photo



Caption Construction materials no longer in use on Pomerado Road east of I-15. LEI said he would get them picked up.

Photo Attributes Capture Date/Time: Thu Apr 05 2018 13:42:49 GMT-0700 (PDT)  
Coordinates: 32.894086, -117.111355  
View Direction: West

Photo



Caption I-15 on-ramp closure sign.

Photo Attributes Capture Date/Time: Thu Apr 05 2018 13:28:49 GMT-0700 (PDT)



Photo



Caption Trench to Kearney Mesa Road sending bore pit.

Photo Attributes Capture Date/Time: Thu Apr 05 2018 13:18:18 GMT-0700 (PDT)  
Coordinates: 32.894842, -117.117816  
View Direction: East

Photo



Caption Sending bore pit site west of I-15.

Photo Attributes Capture Date/Time: Thu Apr 05 2018 13:09:19 GMT-0700 (PDT)  
Coordinates: 32.894659, -117.117831  
View Direction: Northeast

Photo





Caption Drip pans beneath equipment at Padgett Road yard.  
 Photo Attributes Capture Date/Time: Thu Apr 05 2018 12:48:03 GMT-0700 (PDT)  
 Coordinates: 32.89585, -117.126922  
 View Direction: Southwest

**Daily Checklist**

Q1 – General Avoidance and Minimization: (a) Were the limits of work areas and access roads clearly marked? (b) Were construction activities limited to CPUC-approved work areas?	Met Requirements
Q2 – Air Quality/GHG: (a) Were dust avoidance and minimization requirements implemented and monitored adequately? (b) Was dust generation below required thresholds? (c) Were equipment and vehicles maintained and operated in a manner to limit emissions? (d) Was organic waste collected and separated from non-organic waste for appropriate composting or recycling, as appropriate?	Met Requirements
Q3 – Special-Status Plants: Were impact avoidance and minimization requirements for special-status plants implemented adequately (e.g., avoiding sensitive areas)?	N/A
Q4 – Wildlife (Non-Avian): Were impact avoidance and minimization requirements for wildlife implemented adequately (e.g., avoiding sensitive areas, covering excavations, and inspecting equipment/trenches)?	Met Requirements
Q5 – Nesting and Burrowing Birds: (a) Were active nests and occupied burrows identified and monitored during applicable seasons, as required? (b) Were impact avoidance and minimization requirements for any active nests or occupied burrows implemented adequately?	Met Requirements
Q6 – Water Features and Aquatic Habitat: Were water features avoided?	Met Requirements
Q7 – Stormwater, Erosion, and Sediment Control: (a) Were erosion and sediment control BMPs in place and functioning properly? (b) Were inactive or completed work areas stabilized and/or restored adequately?	Met Requirements
Q7 Notes	
Q8 – Invasive Weed Control: Were procedures to prevent the spread of invasive weeds implemented adequately?	Met Requirements
Q9 – Hazardous Materials and Waste Management: (a) Were hazardous materials stored and labeled properly? (b) Was hazardous material waste disposed of appropriately? (c) Were any spills or leaks addressed adequately? (d) Was solid waste collected and disposed of adequately?	Met Requirements
Q9 Notes	Drip pans in place at Padgett Road site. I noted a small spill (1 oz) of primer from a tipped can at the sending bore pit site and the dirt was immediately picked up for removal to Nancy Ridge Yard.
Q10 – Fire Management: (a) Were fire prevention procedures in place? (b) Was firefighting equipment available on site?	Met Requirements
Q10 Notes	Fire gear at all work sites.
Q11 – Cultural, Paleontological, and Tribal Resources: (a) Were cultural, paleontological, and tribal resources monitoring and impact avoidance occurring as required? (b) If potential resources or human remains were inadvertently discovered, were response procedures and protocols implemented as required?	Met Requirements
Q11 Notes	No monitors needed.
Q12 – Construction Noise: (a) Were noise minimization measures in place, as required? (b) If noise complaints were received, were they documented and addressed, as required?	Met Requirements
Q13 – Maintain Access: (a) Was access to driveways (e.g., businesses, schools, residences) maintained as required? (b) Was access to recreational areas maintained and appropriate signage installed? (c) Was pedestrian and bicycle access maintained, or were detours clearly defined?	Met Requirements
Q14 – Traffic Control (a) Were flaggers present at all times? (b) Were barriers, cones, and signs in place? (c) Were detours clearly marked?	Met Requirements
Q15 – Helicopter Use (a) Were helicopter use restrictions implemented adequately? (b) Were helicopter take-off and landing sites within prescribed limits?	N/A
Q16 – Worker Training and Communication: Have all workers on site received the required environmental trainings for the project?	Met Requirements
Q17 – MMCRP Implementation: (a) Were project activities consistent with the approved project as defined in the EIR and subsequent CPUC authorizations? (b) Were MMCRP procedures	Met Requirements

implemented adequately?