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PROJECT MEMORANDUM

ANTELOPE-PARDEE PROJECT, SEGMENTS 1, 2 AND 3A

To: John Boccio, Project Manager, CPUC
Justin Seastrand, Project Manager, ANF
From: Vida Strong, Aspen Project Manager
Date: January 13, 2009
Subject: Weekly Reports # 48 and 49: December 7 to December 20, 2008.

INTRODUCTION

This report provides a summary of the construction and compliance activities associated with the SCE Antelope-Pardee 500 kV Transmission Project, Segment 1, and SCE Antelope Transmission Project, Segments 2 and 3A. A summary of the Notices to Proceed with construction and Variance Request activity are also provided (see Tables 1 and 2, respectively, near the end of this report). Finally, a summary of Temporary Extra Workspace and non-compliance activity are provided in Tables 3 and 4, respectively.

SEGMENT 1

The Antelope-Pardee Project, Segment 1, is comprised of three sections:

- Section 1: Pardee Substation to the ANF boundary.
- Section 2: ANF
- Section 3: ANF Boundary to the Antelope Substation

During the subject period, construction activity continued under Notice to Proceed (NTP) #7 for construction of Section 1 and NTPs #2 and #11 for construction of Section 3, including the Antelope Substation. In addition, work continued under NTP #18 and the Special Use Permit (SUP) for construction of Section 2, Angeles National Forest. Equipment, materials, and office trailers are being staged in approved construction yards.

SECTION 1

CPUC/Aspen Environmental Monitors (EM): Jenny Slaughter and Arturo Ruelas.

Summary of Activity:

The Shoofly (temporary bypass line) of the Antelope Pardee Transmission Line Project authorized under NTP #5 was energized on May 10th. The lattice tower structures originally supporting the line are being replaced to accommodate construction of the new Antelope Pardee 500 kV structures within the Shoofly corridor.

NTP #7 for Section 1 of Segment 1 was issued by the CPUC on May 8th. Construction activities approved under NTP #7 in Section 1 include the removal of the Saugus-Del Sur 66 kV line and towers, the construction of the new 500 kV lattice towers, and the removal of the existing 220 kV Santa Clara Vincent line and towers. Construction activities under NTP #7 during the subject week consisted of the following activities.

1. Wire stringing in Section 1 has been completed between towers NC 2 and NC 11. Wire installation between towers 12 and 16 will take place during an adjacent SCE line outage in January.
2. Along the Saugus-Del Sur 66 kV line, all but two towers have been dismantled and removed in Section 1. These are planned to be removed concurrent with the tower removal in Section 2 in 2009.



Environmental Compliance:

1. PAR crews have discontinued use of the Lower Pumpkin Yard along Bouquet Canyon Road accessed across a crossing of Bouquet Creek. Permission to access this yard is conditioned by the CDFG and the CPUC only when stream flows were not present in Bouquet Creek, which is potential habitat for an endangered fish species. If water is present, crews are not permitted to cross the drainage and are required to notify CDFG and the CPUC. Given recent rain events, intermittent flows of the creek are occurring and as a result, PAR has decided to discontinue use of the yard for now.
2. On December 11, the CPUC EM, Burns & McDonnell and PAR environmental staff conducted a field visual verification of erosion control measures (silt fencing, jute netting and straw wattles). BMP's (Best Management Practices) were in place in most areas of Section 1. Erosion control devices will be installed in needed areas prior to the forecasted storm.

No CPUC Non-Compliance Reports (NCR) or Project Memoranda (PM) were issued during the subject period for Section 1 construction. Non-Compliance activities for the project to date are summarized in Table 4.

Agency Representatives during Construction:

None.

SECTION 2, ANF & ADJACENT YARDS

ANF Representatives: Justin Seastrand, George Geer, Mike Roberts, Janet Nickerman, Katie VinZant
CPUC/Aspen Environmental Monitors (EM): Jenny Slaughter and Art Ruelas

Summary of Activity:

On October 23, 2008, the Angeles National Forest issued a Special Use Permit for construction of the new 500 kV towers and the removal of the existing 66 kV towers on National Forest System lands; NTP #18 from the CPUC was issued on October 27th. The 66 kV conductor removal has been completed and was permitted by a separate SUP issued by the ANF and NTPs issued by CPUC.

Construction of Section 2 on the ANF began on November 12th. Crews assemble each morning at the Pottery Yard on Bouquet Canyon Road at 6am. Crews plan to work 6 days a week if Project Activity Levels (PAL) allow. PAL levels for the week are summarized below:

Date	Project Activity Level (PAL)	Activity Allowed/Conducted
Sunday, December 7	C	Work is allowed
Monday, December 8	C	Work is allowed
Tuesday, December 9	C/Red Flag	No work is allowed
Wednesday, December 10	C/Red Flag	No work is allowed
Thursday, December 11	C/Red Flag	No work is allowed
Friday, December 12	C	Work is allowed
Saturday, December 13	B	Work is allowed
Sunday, December 14	A	Work is allowed. Roads are closed; flying in only.
Monday, December 15	A	Work is allowed. Roads are closed; flying in only.
Tuesday, December 16	A	Work is allowed. Roads are closed; flying in only.
Wednesday, December 17	A	Work is allowed. Roads are closed; flying in only.
Thursday, December 18	A	No work due to weather conditions; snowing.
Friday, December 19	A	Work is allowed. Roads are closed; flying in only.
Saturday, December 20	A	Work is allowed. Roads are closed; flying in only.

1. On December 17, a Swanson Group K-Max Helicopter was involved in an incident that resulted in the fatality of a Swanson Group Mechanic. When the helicopter was spooling up on the ground, a gust of wind estimated at approximately 50 mph hit the craft, resulting in it flipping over. While the craft was flipping over, it hit the Swanson Group Mechanic, killing him instantly. The pilot was able to walk away from the craft without any injuries. There were no other injured personnel. In addition to the helicopter damage, the Swanson Group Fuel Tanker cab was badly damaged by the rotor blades and one of the saddle diesel tanks was sliced open resulting in the spill of jet fuel, diesel, and other hydrocarbons. All appropriate parties were notified of the incident including Los Angeles County, the Federal Aviation Administration, National Transportation Safety Board, OSHA, California OES, and appropriate project personnel.
2. Construction of the new temporary access roads to Towers 33, 41, and 88 continued using an excavator and a dozer. A Level 1 change for road realignment was made and approved during construction of Spur Road 41 after an ANF botanist realigned and flagged the road in order to avoid a nearby community of *Calochortus* (see Figure 1). Topsoil salvage took place along portions of the new roads on gradients less than 10% slope. Additional erosion control measures were installed in areas of the new road construction, especially where the access crosses Riparian Conservation Areas (see Figure 2). After building the spur road to the leg of Tower 33, it was necessary to widen the road to fifteen feet in order to provide access for equipment. This was done without having to flatten the hairpin turn as requested by the ANF road specialist.
3. Brush clearing crews cleared disturbance areas at several tower sites including Towers 31, 32, 34 38, 40, 43, 44, 88, and 89. Many of these tower sites are only accessible by helicopter.
4. Footing preparation crews hand dug footing bases at tower locations 31, 38, and 40. The hand excavations are taking place prior to the mobilization of the micropiling crews. As directed by the ANF Permit Administrator, the holes were fenced and covered at the end of each day to prevent wildlife from becoming trapped in the holes. Also, measures are being taken to keep dust to a minimum.
5. Micropile crews mobilized drilling equipment to Towers 29, 30, 32, 34, 36, 56, and 83 to begin micropile verification tests. Micropile equipment, including drill rigs and grout, are being transported by helicopter.
6. Brush clearing of Landing Zones 7 and 9 occurred during the subject weeks.

Environmental Compliance

1. All vehicles and equipment are being washed before entering ANF lands at the Pumpkin Yard wash station. The wheel wash, which is on the north side of Bouquet creek, does not require use of the stream crossing for access and therefore will remain in its current location.
2. On December 6, approximately 12 ounces of diesel fuel was spilled near structure 34. It was determined that this was caused by an off-site overflow of the fuel tank and not an on-site fueling. All contaminated materials were cleaned up by crews and proper notifications were given to all the proper agencies.
3. Marking of Landing Zones with paint has been discontinued until documentation of prior approval or supporting documentation has been provided such as; name brand of paint, estimated quantity it will take to mark each landing site, and MSDS sheet on the paint.
4. Use of Spunky/Edison Road for helicopter landing areas has been discontinued. SCE was reminded that helicopter landing on the Forest System road was never authorized.

5. Several woodrat nests (middens) were found during the construction of Spur Road 41. After consulting with the CDFG/ANF biologists, it was recommended that a biologist dismantle the nests if they could not be avoided by construction. Biological monitors must make sure any woodrats that are nesting at any sites be shooed away and middens dismantled prior to vegetation clearance to avoid direct mortality. Once this is done, brush clearing work can proceed.

No CPUC Non-Compliance Reports (NCR) or Project Memoranda (PM) were issued during the subject period for Section 2 construction. Non-Compliance activities for the project to date are summarized in Table 4.

Agency Representatives during Construction (in addition to ANF):

Dan Blankenship, CDFG, regarding the Lower Pumpkin Yard creek crossing.

SECTION 3, ANTELOPE SUBSTATION, & ADJACENT YARDS

CPUC/Aspen Environmental Monitor (EM): Jenny Slaughter and Arturo Ruelas.

Summary of Activity:

Section 3 includes the construction of the 500 kV towers, the dismantling of the Saugus–Del Sur 66 kV transmission line, the construction of the 12 kV distribution line, and the Antelope Substation expansion for the Antelope Pardee Project.

NTPs #10 (for the 12 kV component of Section 3 of Segment 1) and #11 (for the 500 kV tower construction and dismantling of the 66 kV transmission line) were issued by the CPUC on June 25th. Construction activities approved under NTP #2 continued for the Antelope Substation expansion work. Construction of the 12 kV distribution line as authorized under NTP #10 has been completed, and the line was energized on September 2nd.

Construction activities under NTPs #2, #10, and #11 during the subject period consisted of the activities noted below. PAR Construction is responsible for constructing the 500 kV structures.

1. The 12 kV underground component has been completed. The CPUC EM granted a TEWS in order for crews to access six wood poles to remove them from the property. Once this work was completed, the underground component was energized.
2. Grading, foundation drilling, and set-up of the 500kV towers started on August 20th. During the subject period, tower assembly took place on several lattice towers near the Antelope Substation. On Section 3, a combination of single circuit lattice towers and tubular steel poles are used to support the new 500 kV line. All of the foundations have been poured for the lattice and tubular steel poles, 100% of the tubular steel poles have been erected and approximately 70% of the lattice towers have been installed.
3. Grading, grounding, and fencing of the Antelope Substation expansion area has been completed. An earthen berm was constructed surrounding the expansion area to assist in drainage. Crews continue the construction of the new substation components within the expansion area.

Environmental Compliance

No CPUC Non-Compliance Reports (NCR) or Project Memoranda (PM) were issued during the subject period for Section 3 construction. Non-Compliance activities for the project to date are summarized in Table 4.

Agency Representatives during Construction:

None.

SEGMENT 2

Summary of Activity:

The Notice to Proceed for Segment 2 construction (NTP #14) was issued by the CPUC on September 30th. Segment 2 involves the construction of a new 21.0-mile single-circuit 500 kV transmission line initially to be energized at 220 kV and 0.6 miles of a new 220 kV transmission line connecting SCE's Antelope Substation in the City of Lancaster to the Vincent Substation in incorporated Los Angeles County. Segment 2 also includes demolition and relocation of 4.4 miles of existing 66 kV sub-transmission line to accommodate construction of the new 500 kV transmission line in the right-of-way and modifications to the Vincent Substation.

1. SCE crews continued with the relocation of a 66 kV line on wood poles to accommodate the new 500 kV structures (see Figure 3).
2. No construction has occurred on the other portions of Segment 2 to date.

Environmental Compliance:

1. As conditioned in the NTP, all sensitive resources were flagged for avoidance and verified by the CPUC EM on Friday, December 19th for portions of the 66 kV line under construction.
2. Protocol level surveys for Western burrowing owls in portions of Segment 2 identified in the LSA Burrowing Owl Survey Report are required within 30 days of the initiation of construction.

No Non-Compliance Report were issued by the CPUC EM for the subject period for work being conducted within Segment 2. Non-Compliance activities for the project to date are summarized in Table 4 near the end of this report.

Agency Representatives during Construction:

None.

SEGMENT 3A

The NTP for Segment 3A (NTP #17) was issued by the CPUC on October 22, 2008. Segment 3A involves the construction of a new 25.6-mile 500 kV transmission line initially energized at 220 kV connecting SCE's Antelope Substation in the City of Lancaster to the new Windhub Substation on Oak Creek Road in the Tehachapi area of Kern County. The NTP for the new Windhub Substation (NTP #19) was issued by the CPUC on December 1. Several properties in Segment 3 are in the condemnation process. No construction activities have taken place to date.

Summary of Activity:

1. Archaeological testing of CA-KER-2821/H has been completed. A second site (PL-SCE-Techachapi-38) was tested on October 31st. A plan documenting the results of the testing has not been submitted to the CPUC. This document has to be received prior to work in these areas.
2. Protocol level surveys for Western burrowing owls have been postponed in Segment 3A, because construction is not planned until March or April 2009. The surveys are required within 30 days of construction.

Agency Representatives during Construction:

None.

CPUC NOTICES TO PROCEED (NTPS) & ANF PERMITTING

Table 1 summarizes the CPUC Notice to Proceed and ANF permitting activity for the Antelope-Pardee Project, Segments 1, 2, and 3, to date.

TABLE 1
CPUC NTPs & ANF PERMITTING
 (Updated 01-13-08)

NTP #/ Permit	Date Requested	Date Issued	Segment #	Description
CPUC NTPs				
#1	10/10/07	10/16/07	1 & 3	Mojave Marshalling Yard. Per the request, the yard will primarily be used to store construction equipment and materials for the project.
#2	11/16/07	12/10/07	1	Antelope Substation construction and expansion, as well as the use of two adjacent contractor laydown yards.
#2 Mod	12/21/07	01/02/08	1	Allow grading activity at the Antelope site/yards and replacement of an existing 80-foot microwave tower with a new 120-foot tower immediately outside of the communications room within the fenced area of the Antelope Substation.
#3	01/10/08	01/16/08	1	Use of five contractor laydown yards as named Pumpkin Yard, Pottery Yard, Pardee Substation Yard, Mechanics Yard and Avenue I Yard.
#4	01/29/08	02/04/08	1 & 3	Use of the Racetrack Marshalling Yard.
#5	02/19/08	02/28/08	1	Shoofly Construction, Section 1.
#5 Mod #1	03/11/08	03/19/08	1	Use of a new soil disposal site for the Shoofly construction, Section 1.
#5 Mod #2	03/24/08	03/26/08	1	Removal of the 66 kV conductor on the Saugus-Del Sur line during the outage scheduled for March 27, 2008.
#6	03/19/08	03/29/08	1	Use of three additional construction yards, Rodeo, Blue Cloud, and Pumpkin expansion. Rodeo yard approved under NTP #9.
#7	04/03/08	05/08/08	1	Section 1 Construction.
#8	05/01/08	05/09/08	1	10 acre marshalling yard near Antelope Substation.
#9	03/18/08	06/18/08	1, 2, 3	Rodeo Yard
#10	06/02/08	06/25/08	1	12 kV line (Hughes Lake Distribution Line).
#11	06/03/08	06/25/08	1	Section 3 construction.
#12	06/27/08	07/08/08	1	Hydrant Yard
#13	07/17/08	07/18/08	1	Removal of the 66 kV conductor within the ANF, Phase 1, from tower 7-3 (near southern Forest boundary) to 16-3 (near Bouquet Reservoir).
#14	Initial submittal 07/11/08	09/29/08	2	Segment 2 construction.
#15	09-24-08	09/24/08	1	Removal of the 66 kV conductor within the ANF, Phase 2.
#16	10/01/08	10/09/08	1	Section 3, Reitano Marshalling yard.
#17	Initial submittal 09/12/08	10/22/08	3	Segment 3A construction
#18	10/24/08	10/27/08	1	Section 2 construction (Angeles National Forest)
#19	10/31/08	12/01/08	3	Windhub substation construction.

NTP #/ Permit	Date Requested	Date Issued	Segment #	Description
ANF PERMITTING				
	11/29/07	12/14/07	1	Radio Repeater – installation of a temporary radio repeater site on Sierra Pelona Ridge to provide communication during construction activities tied to the project. Improvement installation began Jan. 11
	09/27/07	12/14/07	1	Geotechnical testing – 23 geotechnical borings are authorized on National Forest lands to provide additional information that will be used in the design of the transmission towers. Notice to proceed was signed Jan 31 to begin work the week of Feb. 3
		07/14/08	1	Removal of the 66 kV conductor within the ANF, from tower 7-3 (near southern Forest boundary) to 16-3 (near Bouquet Reservoir) Phase I.
		09/23/08	1	Removal of the 66 kV conductor within the ANF, Phase II
		10/23/08	1	Construction of the 500 kV transmission line and wreck out of the 66 kV towers in the ANF, Section 2.

VARIANCE & TEMPORARY EXTRA WORKSPACE REQUESTS

Variance Requests and Temporary Extra Workspace (TEWS) Requests submitted to date are summarized in Tables 2 and 3, respectively.

TABLE 2
VARIANCE REQUESTS
(Updated 01-13-08)

Variance Request	Date Requested	Date Issued	Segment #	Description
VR #1	04/01/08	04/03/08	1	Change in construction of an overland travel road to Shoofly pole 18, to a temporary road construction method.
VR #2	04/18/08	04/19/08	1	Several expanded stringing sites, new staging areas, and guard pole installation sites for the removal of the 220 kV line.
VR #3	04/24/08	05/25/08	1	Weekend work along the Shoofly portion of Section 1, within the City of Santa Clarita and Los Angeles County, and at the Antelope Substation, Avenue J, in the City of Lancaster.
VR #4	05/08/08	05/09/08	1	Weekend work along the 66 kV line in Section 1
VR #5	07/15/08	VR will be submitted as separate requests		Expansion of guard pole structure areas in Haskell Canyon, New wire stringing site between NC 11 and 12, and crane pad near NC 20.
VR #6	07/30/08	07/30/08	1	Modification to the notice and review requirements under Mitigation Measures L-5 and L-6.
VR #7	08/12/08	08/16/08	1	Wire Stringing site in Section 1 between NC 11 and 12.
VR #8	08/20/08	08/27/08	1	Guard poles at Haskell Canyon outside of approved disturbance areas.
VR #9	08/19/08	09/09/08	1	Valuzet Movie Ranch Helicopter Landing Zone, Section 1.
VR #10	08/21/08	08/27/08	1	Permission to leave one tower foundation in place at wreck-out tower 24/2 in Section 1, due to likelihood of slope failure.
VR #11	09/12/08	09/16/08	1	New temporary road construction to NC 97 in Section 3.

Variance Request	Date Requested	Date Issued	Segment #	Description
VR #12 (revised)	09/17/08	Withdrawn	2	Permanent access roads for Segment 2 (see NTP #14).
VR #13	09/16/08	09/17/08	1	Turn around for equipment at NC 28 in Section 1.
VR #14	09/18/08	Denied 09/25/08	2	Permanent and temporary access roads in excess of 10% gradient on Segment 2 (see NTP #14).
VR #14 (revised)	10/03/08	Withdrawn	2	Temporary access roads in excess of 10% gradient on Segment 2.
VR #15	9/20/08	9/26/08	1	Access road changes, Section 3.
VR #16	09/26/08	Withdrawn	3	Permanent access roads for Segment 3A.
VR#17	10/14/08	10/15/08	1	Extended weekend work hours between NC 22 & 23 Haskell Canyon utility crossing.
VR#18	10/15/08	10/16/08	1	Wreck out Tower 25/5 disturbance area and access road and footing removal. Segment 1 section 3.
VR #19	11/05/08	11/14/08	1	Use of existing disturbance areas as helicopter landing zones, Section 1.
VR #20	11/05/08	11/20/08	1	Use of existing disturbance areas as helicopter landing zones, Section 3.
VR #21	11/24/08	12/10/08	1	Approval to leave two foundations in place at wreck out tower 25/1
VR #22	12/08/08	12/10/08	2	Use of existing disturbance areas as helicopter landing zones, Segment 2.
VR #23	01/07/09	01/12/09	1	Additional disturbance area near Construction Tower 25 and WSS14 on Section 1.
VR #24	01/08/09	Under review	1	Underground Fiber Optic Line for Tower 13 on Section 1
VR #25	01/13/09	Under review	1	Work on Sunday, Jan 18, during LADWP outage over Haskell Canyon.

TABLE 3
TEMPORARY EXTRA WORKSPACE (TEWS) REQUESTS
(Updated 01-13-08)

TEWS Request	Date Requested	Date Approved	Segment #	Description
TEWS 1	05/15/08	05/16/08	1	Extra Workspace for steel placement outside of disturbance limits adjacent to New Construct tower (NC 3) in Section 1.
TEWS 2	05/19/08	05/21/08	1	Extra Workspace for steel placement adjacent outside of disturbance limits to New Construct tower (NC 12) in Section 1.
TEWS 3	05/20/08	05/20/08	1	Extra Workspace for equipment parking outside of disturbance limits along shoulder of private road adjacent to New Construct tower (NC 2) in Section 1.
TEWS 4	05/27/08	05/27/08	1	Access for crew trucks to 66 kV wreck out tower 6-1.
TEWS 5	07/03/08	07/16/08	1	Extra Workspace for steel placement and tower assembly near NC 12.
TEWS 6	09/04/08	09/04/08	1	Use of Staging area adjacent to NC 2 in Section 1.
TEWS 7	09/04/08	09/04/08	1	Use of dirt road adjacent to ten acre yard, Section 3.
TEWS 8	09/11/08	09/11/08	1	Helicopter landing site, Section 3.

TEWS Request	Date Requested	Date Approved	Segment #	Description
TEWS 9	09/18/08	09/18/08	1	Use of 3 acres of disturbed land adjacent to the Lower Pumpkin Yard.
TEWS 10	10/03/08	10/03/08	2	Use of 2 acres of disturbed land in the Lane Ranch for parking equipment, Segment 2.
TEWS 11	12/05/08	12/05/08	1	Overland travel access in disturbed areas for 12 kV pole removals.

NON-COMPLIANCES & INCIDENTS

A summary of Project Memorandum, Non-Compliance Reports, and other incidents to date are provided in Table 4.

TABLE 4
NON-COMPLIANCES, PROJECT MEMORANDA, AND OTHER INCIDENTS
(Updated 01-13-08)

Type	Date	Location	Description
Project Memorandum	March 25, 2008	Segment 1, Section 1	Deposition of soil into drainage at Soil Disposal site.
Project Memorandum	April 18, 2008	Segment 1, Section 1	Encroachment into Environmentally sensitive area during stringing operations.
Project Memorandum	April 30, 2008	Segment 1, yards	No clearance surveys of construction yards being conducted during bird nesting season.
Project Memorandum	May 21, 2008	Segment 1, Section 1	Inaccurate and incomplete resource maps.
Project Memorandum	August 26, 2008	Segment 1, Section 3	Completion of 12 kV wreck-out of 21 poles outside of disturbance area prior to Variance approval.
Incident	Sept.10, 2008	Segment 1, Section 3	Spill resulting from overturned cement truck. Incident report documenting spill amounts submitted on October 15.
Incident	October 13, 2008	Segment 1, Section 1	Spill resulting from overturned portable toilets at the Pottery Yard during high winds. The CPUC EM was not notified until a spill report was submitted on October 30. Spill was not cleaned up until the next day.
Incident	October 15, 2008	Segment 2, 66 kV	66 kV crews delivered materials to the right-of-way before disturbance areas had been flagged and biologically surveyed.
Incident	October 16, 2008	Segment 1, Section 3	Spill resulting from a broken hydraulic hose. Incident report pending.
Incident	November 6, 2008	Segment 1, Section 3	12 kV underground crews began work before disturbance areas had been flagged and biologically surveyed.
Incident	November 18, 2008	Segment 1, Section 2	No topsoil was separated prior to grading near NC 33.
Non-Compliance	December 1, 2008	Segment 1	Construction vehicles crossing through flowing waters of Bouquet Creek to access the Pumpkin Yard.
Non-Compliance	December 3, 2008	Segment 2	SCE 66 kV crews working without notifying Environmental staff and no disturbance areas had been flagged.
Incident	December 17, 2008	Segment 1, Pumpkin Yard	Jet fuel, diesel, and other hydrocarbon spill resulting from helicopter accident. Incident report submitted December 29.

PROJECT PHOTOS



Figure 1: Community of Calochortus (Mariposa Lilies), Spur Road 41 realignment.



Figure 2: Building of Spur Road 41 with erosion control measures (straw wattles and rip rap).



Figure 3: Realignment of the existing 66 kV line to accommodate the new 500 kV towers.