Draft Final Resettlement Policy Framework of Lagos 4th Mainland Bridge Project

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LIST OF ACRONYMS

CDA	Community Development Association
CDC	Community Development Committee
CLO	Community Liaison Officer
DRN	Declared Road Network
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
FMEnv	Federal Ministry of Environment
GO	Grievance Officer
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HSE	Health, Safety and Environment
KAI	Kick Against Indiscipline
Km	Kilometre
LASEPA	Lagos State Environmental Protection Agency
LASPARK	Lagos State Parks and Gardens
LASPG	Lagos State Parks and Garages Management Committee
LASTMA	Lagos State Transport Management Authority
LCLO	Local Community Liaison Officer
LGA	Local Government Area
LSMOE&WR	Lagos State Ministry of Environment and Water Resources
LSMOWI	Lagos State Ministry of Works and Infrastructure
LSWC	Lagos State Water Corporation
LUA	Land Use Act
MDAs	Ministries, Departments and Agencies
MOT	Ministry of Transport
NGO	Non-Governmental Organisation
NURTW	National Union of Road Transport Workers
PAF	Project Affected Families
PAPs	Project Affected Persons
PAS	Project Affected Structure
PMU	Project Management Unit
PPP	Public-Private Partnership
RAG	Resettlement Advisory Group

RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
ROW	Right of Way
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
WBG	World Bank Group

EXECUTIVE SUMMARY

Background and Objectives

Nigeria is the most populous country in Africa and the eighth in the world with a population of over 220 million people. Nigeria is a regional power, listed among the next eleven economies of the world with membership of various international organisations including the Commonwealth of Nations. The economy of Nigeria is one of the fastest growing in the world. Following its recent GDP rebasing exercise that was fully supported by the World Bank, Nigeria is now recognized as Africa's largest economy valued at $440.8 billion in 2021.

With a population that is variously estimated at between 18 and 20 million and an annual growth rate of nearly 6%, Lagos is the most urbanised State in Nigeria capturing about 36.8% of the country's urban population. The population of Lagos has continued to grow six times faster than New York and Los Angeles with grave implication for its (urban) sustainability. The UN estimates that at its present growth rate, Lagos State will be third largest mega city in the world by Y2045 after Tokyo in Japan and Bombay in India.

Of this population, metropolitan Lagos, an area covering 37% of the land area of Lagos State is home to over 85% of the State population. This rapid urbanization, combined with inadequate or poorly executed development plans, has given rise to numerous transportation problems in the Lagos metropolis. These include increasing traffic congestion, worsening state of disrepair of roads, deteriorating physical attractiveness and comfort of road-based public transport. Others are continuous increase of transport fares, absence of effective rail and water mass transit transport system, rising levels of road accidents and increasing rates of traffic-related emission and atmospheric pollution, the growing menace of Keke Marwa (Tricycle) and other 2-stroke engine transporters.

The status of the state as Nigeria's economic, commercial and industrial hub has continued to impact further on the public transportation challenges given the huge transportation activities that are generated on a daily basis. With its vibrant local trading tradition, the city dominates the nation's commercial sector. Most of Nigeria's manufacturing outfits are concentrated in Lagos and 45% of the nation's skilled manpower is resident in the city. The foremost status of Lagos has continued to pressurize the existing inadequate infrastructure to breaking point. This has resulted in the need to continually support the seemingly inadequate and over-stretched physical and social infrastructure required to support the burgeoning population and the productive sectors.

According to research, the transportation inadequacies are further impoverishing the poor in urban Lagos as expenditure on transportation is about 20% of the household budget, second only to expenditure on food.

The main objective of the RPF is to describe and clarify the policies, principles and procedures that will be followed in minimizing and mitigating negative social and economic impacts caused by the 4th Mainland Bridge Project operations. The rationale for preparing the RPF is that: a) detailed SIA of the projects are yet to be carried out, consequently, a number of the impacts are not known. b) The bulk transport projects and sub-projects to be financed under the 4th Mainland Bridge Project have yet to be fully identified. c) The Lagos State Ministry of Works and Infrastructure (LSMOWI) found it useful to have a policy document establishing principles and procedures that will be followed in minimizing and mitigating negative social and economic impacts caused by the 4th Mainland Bridge Project development, to share with various stakeholders in the transport sector. The main project components under the 4th Mainland Bridge Project include; capacity building, road network efficiency improvement and road travel services enhancement.

Operational Procedures

In order to ensure that best practices in involuntary resettlement are adopted for the 4th Mainland Bridge Project projects, LASG will adopt procedures, which are consistent with the World Bank's Environmental and Social Standards ESS 5 throughout the implementation of the sub projects. This implies that among others, baseline surveys and a social impact assessment will be carried out based on which a Resettlement Action Plan (RAP) will be prepared and sent to the FMEnv for approval. In accordance with World Bank ESS, project designs will be reviewed to avoid or minimize involuntary resettlement where feasible. Project affected persons will be consulted and enabled to participate in the planning, implementation and monitoring of the resettlement.

Project design WB ESF requires the Proponent to demonstrate that involuntary land revocation or restrictions on land use are limited to direct project requirements for clearly specified project purposes within a clearly specified period of time. The Proponent will be asked to consider feasible alternative project designs to avoid or minimize land revocation or restrictions on land use, especially where this would result in physical or economic displacement, while balancing environmental, social, and financial costs and benefits, and paying particular attention to gender impacts and impacts on the poor and vulnerable.

Compensation and benefits for affected persons: When land revocation or restrictions on land

use (whether permanent or temporary) cannot be avoided, WB ESF requires the Proponent to offer affected persons compensation at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods.

Legal Frameworks

The legal framework for land revocation and resettlement in Nigeria is the Land Use Act CAP 202LFN 2004. The differences between the Land Use Act and World Bank ESS 5 mostly includes rehabilitation measures, which are neither proscribed nor mandated in the Act. Where there are conflicts between the National laws (Land Use Act) and the World Bank ESS 5, the World Bank ESS 5 will prevail for all sub projects under the 4th Mainland Bridge Project. LSMOWI will bridge the gaps between National Legislations and the requirements of Donor Agencies / Lending Institutions.

Lagos State Properties Protection Law 2016 This law prohibits forceful takeover of Land either by threat or violence in Lagos State

Institutional Frameworks

This section addresses the available institutional arrangements to implement resettlement activities associated with the 4th Mainland Bridge Project. Such institutions include the Federal Ministry of Environment, Lagos State Office of Public-Private Partnerships (OPPP), Lagos State Ministry of Transport, Lagos State Ministry of Works and Infrastructure (LSMOWI), Lagos State Transport Management Authority (LASTMA), Local Government Councils and the Parks and Garages. The aforementioned institutions including Ministry of Land, Ministry of Housing, Ministry of Physical Planning and Urban Development, Ministry of Environment and Water Resources, have been identified as some of the institutions for resettlement under the LSTMPP 1. Most of the institutions are related in function and in some cases have overlapping functions which are duly recognised by law or customary norms of Lagos State. While most of them do not have direct links with resettlement, some of them, by operation or functions, have related responsibilities with resettlement. However, the ultimate responsibility will rest with LSMOWI and the RAP Implementing Agencies (Ministry of Finance, Ministry of Justice, Ministry of Women Affairs and Poverty Alleviation, Ministry of Transport, Lands/Assets Valuation Committee). There is the potential need to enhance the capacity of each of the institutions involved in the resettlement process as detailed in the ESMF.

Assessment of Project Affected Persons

It is estimated that the implementation of the projects under the 4th Mainland Bridge Project would affect traders, artisans etc. From the experience of road construction and other linear

projects development in Nigeria, it is estimated that 3,200 persons along the proposed Project Alignment will be affected in the 4th Mainland Bridge Project in the following categories:

At this stage, it is not possible to get the baseline information of PAPs concerning their age, gender, health, education, incomes standard of living. This information can only be obtained during a detailed Socio-economic / RAP Studies which will include a detailed Census of persons and properties that will be affected by the Project. The cultural practices in Nigeria does not allow for such questions to be requested or given when there is no definitive or identified need

for such. Moreover, it could encourage an influx of 'fake' PAPs to move into the Project areas in a bid to get 'easy money'. The above not-withstanding, a substantial proportion of the estimated PAPs were women across all the settlements along the Road Alignment. It is only at the Island Section of the proposed Alignment that there are more men amongst the PAPs.

The estimated PAPs are mainly in the low- and medium- income category, with the exception of those living in the Abraham Adesanya – Oke Ira Nla axis who are in the Lower Upper Income Class. For those at Abraham Adesanya – Oke Ira Nla Axis, the most probable impact of the 4th Mainland Bridge Project will be the demolition of their structures that are within the existing ROW on the corridor and Monetary compensation will be required.

According to the World Bank estimates in World Databank of 2015, 33% of Nigerians were living below the National Poverty line in Nigeria. When cognizance is taken of the economic downturn in Nigeria as a result of the slump in Global Oil Prices since 2015 and its concomitant effect on living standards, we can adjust the figures to 55% for the current year. This is close to the estimations of the World Development Indicators of the World Bank in 2015 which reported that 53.47 of Nigerians lived below US$1.9 per day, with an additional 5% living between US$1.90 and 3.90 per day in 2015.

It is expected that these estimates will be reviewed when all the specific sub projects are fully identified and based on the realities on ground during the conduct of the site-specific ESIAs and RAP studies.

Organisational Procedures for Delivery of Entitlements

This section of the RPF defines the eligibility criteria required to effectively implement the resettlement. The criteria will be specified in each RAP and cover any person who suffers loss of or damage to an asset or loss of access to productive resources, as a result of carrying out of any of the projects under the 4th Mainland Bridge Project. Eligibility criteria will be informed by the three criteria given in Clause 10 of the World Bank's ESS 5:

❖ Those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country);

❖ Those who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets - provided that such claims are recognized under

❖ the laws of the country or become recognized through a process identified in the resettlement plan;

❖ Those who have no recognizable legal rights or claim to the land they are occupying.

Valuation Procedures

This section highlights the valuation procedures of all assets that will be affected as a result of the implementation of the programmes under the 4th Mainland Bridge Project. Valuation of assets affected by the 4th Mainland Bridge Project will be conducted by a qualified surveyor at the appropriate time. In conjunction with the LSMOWI Resettlement principles and WB's operational policy on involuntary resettlement, ESS 5, a general principle that will be adopted and the formulation of the compensation valuation is that lost income and assets will be estimated at their full replacement cost such that the project affected populations will experience no net loss. In line with the above principle, LSMOWI will conduct an all-encompassing survey and valuation of the assets and loss of income by the project affected persons (PAPs).

Sources of Funding

The 4th Mainland Bridge Project is planned to require minimal land revocation for the construction of the preferred alignment. Rehabilitation and judicious addition to existing ferry terminals might not entail land revocation for small ferry landings. To this end, LSMOWI will establish a resettlement funding to facilitate, when necessary, relocation of affected persons to other suitable locations. Funds for resettlement/rehabilitation will be provided by LSMOWI.

Consultation and Participation

This section addresses the consultation and participation of PAPs in resettlement, planning and implementation. Project Affected Persons, communities, NGOs and relevant stakeholders will be given opportunity to participate in the resettlement/rehabilitation process. The specific plans/mechanisms for consultation participation will be detailed in the RAP and will include resettlement committees for PAPs and communities and inter-agency committees for participating stakeholders. The Officials of the Lagos Parks and Garages Management Committee and Iyaloja of Lagos State and the President General of the Market Men and Women of Nigeria have been briefed of the 4th Mainland Bridge Project by Lagos State

Government / LSMOWI Officials at the Stakeholders Engagement of 29th September 2020. However, the full scope and Phases of the entire Project will be shared with a larger body of the Stakeholder Groups on each sub-Project representing the PAPs when the actual sequence of Project activities are known.

Monitoring and Evaluation

The RPF underscores the importance of monitoring and evaluation of the sub-projects under the 4th Mainland Bridge Project. It also highlights mechanisms for internal and external monitoring. The social safeguard unit of LSMOWI will undertake the internal monitoring of the resettlement/rehabilitation process following schedules itemized in the RAP, while an independent 'firm or organization will be engaged by LSMOWI to conduct periodic external assessments of resettlement progress.

Disclosure of Social Safeguard Instruments

This section of the Report addresses the issue of disclosure of the RPF and RAP. LSMOWI will disclose this RPF and the individual RAP by making copies available at its Office, relevant Local Government Council, Federal Ministry of Environment Offices at Abuja, Surulere (Lagos) and Abeokuta (Ogun State); the Ogun State Ministry of Environment, Lagos State Ministry of Environment & Water Resources, Eti-Osa & Ikorodu LGAs in Lagos State, Obafemi Owode LGA in Ogun State and other stakeholders.

CHAPTER ONE

1.0 Background and Objectives

This Resettlement Policy Framework (RPF) is developed for the 4th Mainland Bridge Project. The main objective of the RPF is to describe and clarity the policies, principles and procedures that will be followed in minimizing and mitigating negative social and economic impacts associated to the resettlement of population or activities and caused by the 4th Mainland Bridge Project.

The rationale for preparing the RPF is that: a) detailed designs of Road and Bridge Alignment are yet to be finalised, consequently, the full impacts are not known. b) The transport projects to be financed under 4th Mainland Bridge Project have yet to be fully identified, Lagos State Ministry of Works and Infrastructure (LSMOWI) found it useful to adopt a policy document establishing principles and procedures that will be followed by minimizing and mitigating negative social and economic impacts caused by the project operations, to share with various stakeholders in Lagos and Ogun States.

1.1 The 4th Mainland Bridge Project

The Lagos State Government, acting through its Ministry of Works and Infrastructure (LSMOWI) and the Lagos State Office of Public-Private Partnership (OPPP) intends to construct the 4th Mainland Bridge (4MB) under a Design, Build, Finance, Operate, Maintain and Transfer (D-B-F-O-M-T) arrangement.

The Project is a proposed PPP transport infrastructure development, which includes the construction and operation of a greenfield tolled road and bridge with a design speed of 120km/h.

It aims to relieve severe congestion on the existing 3rd Mainland Bridge, while opening new areas of the megacity for future development. 4MB is one of the priority solutions to relieve traffic and distribute social and economic growth across the State.

The 4MB Project has been an aspiration of the LASG for over 20 years, with different proposals being presented as regards the alignment route. It is aligned with the Lagos State Strategic Transport Master Plan and National Integrated Infrastructure Master Plan which aims to raise Nigeria's stock of Infrastructure from the current 20 – 25% of GDP to at least 70% of GDP by 2043.

CHAPTER TWO

2.0 Project Description

The preferred Alignment for the 4MB is he only one which has indicated connecting the Lagos – Ibadan Expressway to the Lekki – Epe Expressway through Ikorodu, which has a much bigger attraction to traffic flow.

The Project Corridor will span approximately 37 kilometres, starting from Abraham Adesanya Junction on the Et-Osa-Lekki-Epe corridor at the Abraham Adesanya Junction in Lekki where a 'free-flow' Interchange will be constructed as well as some traffic flow alterations to the existing Lekki – Epe Expressway so as to maintain traffic movements during construction.

The 2x4lane carriageway, the proceeds north towards the Lagoon passing through Ajah and Langbassa areas and crossing the existing Addo-Badore Road before arriving at the existing shoreline of the Lagoon. This route is the most practical shortest route from Abraham Adesanya Junction to the Lagoon where it the progresses out onto the proposed reclaimed section of the Lagoon to the first Toll Plaza for the project, with associated ancillary buildings and Maintenance Depot. Prior to this, it will cross the Asddo-Badore Road at grade and then progress to a divert a section of the existing Road so as to allow it cross over the proposed highway.

The proposed works to be carried out in the Lagoon area, include, but not limited to:

a. Reclaiming an area within the Lagoon so as to create a large 'construction platform' for the proposed main Lagoon Bridge.

b. The proposed Lagoon Bridge will launch out from the reclaimed area of the Lagoon and travel north towards the mainland and landing East of Baiyeku, which will have a total ''bridge length'' of 5.0km, between abutments.

c. Also included on the reclaimed section of the Lagoon area will be a proposed diverted alignment of the Addo-Badore Road.

d. The Lagoon reclaimed area will also facilitate the future interchange for the proposed Lagos Highway West and East from 4th Mainland Bridge.

e. The Lagoon area can then be reclaimed as indicated in phases as the potential development of the area grows. This area could form a new Commercial/Residential and Recreational area adjacent to the Lagoon in the Lekki area.

This proposed project will incorporate a new "Eastern Relief Road for Lagos City" which when completed will have the following:

- ❖ 32km of 4 lane Expressway – Land Based (operating at 100 or 120kph)
- ❖ 5km long Lagoon Bridge (5 lanes each way)
- ❖ 6 Interchanges installed initially
- ❖ 3 further Interchanges added at a "future date" to accommodate:
  - – Future Lagoon Highway
  - – Future Ikorodu Lagoon Highway
  - – Future Lagos-Abuja Direct Route Highway
- ❖ Designed to link to the "Coastal Road" at Lekki in the future
- ❖ 3 Mainline Toll Plazas
- ❖ Ramp "toll plazas" may be added depending on which Consortium is awarded the project
- ❖ Potential for 2 "service areas" with adjacent "trailer park facilities"
- ❖ A number of "online" sites have been located for controlled & specific development
- ❖ Will accommodate "Cyclists & Pedestrians" locally
- ❖ Will have provision for "BRT Corridor" on its outsides, so that the route complies with the STMP Report of 2012, for Greater Lagos (which indicated then a 240,000 passenger/day carry)
- ❖ Will provide additional pedestrian crossings along the route after public consultation.
- ❖ Access to 3 major "land development" areas facilitated within the design
- ❖ River Bridges & Culverts to be installed at key locations
- ❖ Alignment can be increased to accommodate 6 lanes each way in the future.

The corridor for the project generates 397,000 ADT (2019) and it is expected that the project will eventually carry up to 75% of that volume, when initially open.

The 4MB project include multiple sub-projects to be identified and assessed latest detailed design. Preparatory activities of these projects have highlighted among things the need for the preparation of RPF as safeguard issues will emerge through the need for subsequent threat to the standards of living the project affected persons. Also, lessons from previous projects suggest that, whenever transport plans are undertaken, there may be some kind of resettlement and rehabilitation issues to trigger the World Bank's Environmental and Social Safeguard Standards (ESS 5) on involuntary resettlement.

2.1 Screening by FMEnv:

The FMEnv analyses and classifies all potential projects into High, Substantial, Moderate or Low environmental and social risks, depending on the extent of the potential risks borne by the operation.

The classification takes into account:

- ❖ the nature and scale of the operation,

- ❖ the location and sensitivity of the affected area,
- ❖ the severity of the potential environmental and social risks and impacts,
- ❖ the client's capacity to manage them.

This classification aims to determine the nature and depth of the environmental and social assessment required and the level of environmental and social standards the project will be required to comply with, as well as the needs to engage stakeholders and the level of information required.

The project was screened using Internationally approved Checklists by the Environmental and Social Safeguards Consultant engaged by the Proponent as a High environmental and social risks project. This is in tandem with the conclusion of the FMEnv that the 4th Mainland Bridge will be a Category 1 Project.

The project being at Feasibility Stage, it was premature to prepare RAP for all the sub-projects and interchanges.

A Resettlement Action Plan (RAP) will be prepared for the proposed Road and Bridge and the interchanges at the detailed engineering studies stage, in view of the potential for involuntary resettlement across the length of the preferred project alignment.

RAPs will have to comply with World Bank Environmental and Social Standards (ESS 5).
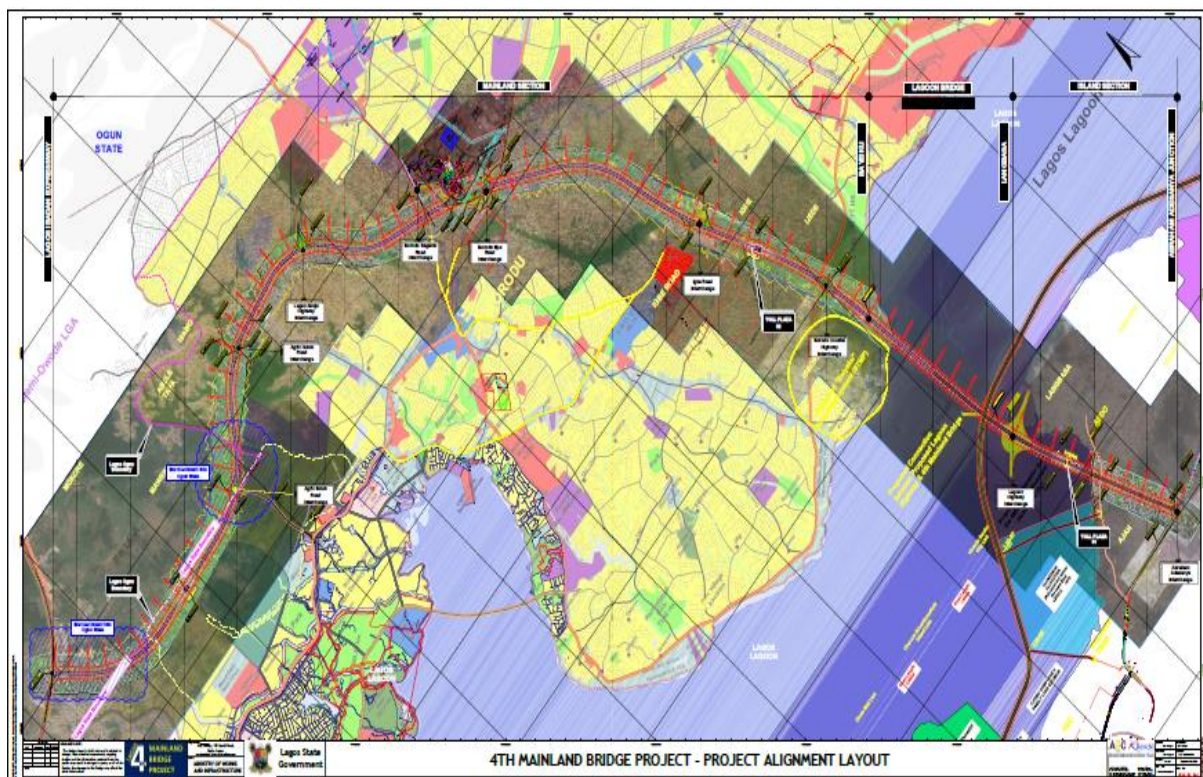
Figure 2.1: The 4MB Project Alignment Layout

The Coordinates data for the Project Right of Way and Immediate Construction Zone are presented in the Appendix.

In the light of the approach and methodology to be adopted in implementation 4th Mainland Bridge Project, and taking cognizance of the new World Bank Environmental and Social Framework, it has therefore become necessary to prepare a Resettlement Policy Framework to serve as a social safeguards instrument for the implementation of the 4th Mainland Bridge Project while also conforming to the new requirements by the World Bank ESF which has been adopted as the Benchmark.

The Resettlement Policy Framework (RPF) covers the following themes:

- ❖ Operational Procedures
- ❖ Legal Framework
- ❖ Institutional Framework
- ❖ Assessment of Project Affected Persons
- ❖ Eligibility Criteria and Establishing of entitlements
- ❖ Valuation Procedures
- ❖ Sources of Funding
- ❖ Consultation and Stakeholders' Participation
- ❖ Monitoring and Evaluation and
- ❖ Disclosure of Social Safeguards Instruments

CHAPTER THREE

3.0 Operational Procedures

World Bank ESS 5 applies to all projects for which Investment Project Financing is sought. ESS 5 establishes the importance of: (a) the Borrower's existing environmental and social framework in addressing the risks and impacts of the project; (b) an integrated environmental and social assessment to identify the risks and impacts of a project; (c) effective community engagement through disclosure of project-related information, consultation and effective feedback; and (d) management of environmental and social risks and impacts by the Borrower throughout the project life cycle. It requires that all environmental and social risks and impacts of the project be addressed as part of the environmental and social assessment conducted in accordance with World Bank environmental and social standards set out the obligations of the Borrower in identifying and addressing environmental and social risks and impacts that may require particular attention. These Standards establish objectives and requirements to avoid, minimize, reduce and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts.

For the involuntary resettlement issues, operational procedure to be followed during project identification, preparation and implementation is ESS 5 on involuntary resettlement.

A RAP will be prepared for each sub-project at the detailed engineering studies stage.

RAP preparation will be led by an Accredited Environmental and Social Consultant with 15 years experience on varied linear Projects.

3.1 Principles Governing the Resettlement Policy Framework

From the procedure discussed above, the principles underlying this Resettlement Policy Framework are summed up below:

1. Stakeholders will be engaged following World Bank ESS 5, including communication, consultations and grievance mechanism.

2. Involuntary resettlement would be avoided where possible and where population displacement is unavoidable, it would be minimized by exploring all viable project options.

3. Persons affected temporary should be adequately compensated. Loss of incomes associated with change in location due to the project would be given compensation/relocation assistance to enable the affected persons improve or at the least maintain their former standard of living.

4. LASG will compensate PAPs for lost assets at replacement cost and restore their livelihood

based on their existing incomes.

5. Project Affected Persons would be given full information on the qualified (eligibility), mode of compensation, the restoring plan of production and the project's progress and be involved in the enforcement and resettlement arrangements (community participation).

6. The land and/or property affected would be demolished only when the Project Affected Persons (PAPs) are satisfied with the compensation arrangements.

7. The implementing agency (LSMOWI) would supervise the resettlement activities including the payment of compensation as well as monitoring and evaluation.

3.2 Objectives of the Resettlement Policy Framework

The project being at Feasibility Stage, it was premature to prepare RAPs for 4th Mainland Bridge Project.

RAPs will be prepared for the 4th Mainland Bridge Project and its sub-projects at the detailed engineering studies stage.

The main objective of the Resettlement Policy Framework is to clarify the project's principles and procedures that will govern the mitigation of adverse social impacts induced by the 4th Mainland Bridge project operations. Specifically, the RPF is designed to ensure:

All types of losses are identified, clearly defined and properly categorized to reflect the nature of the loss.

A standard or measure for defining eligibility and entitlement in orders a fair basis for assessing compensation for the loss or impact suffered.

Compliance with provisions under the World Bank ESS 5: That resettlement activity would be conceived executed as development programs, providing sufficient investment resources to enable the PAPs to share in project benefits.

Displaced persons will be compensated for their losses at full replacement cost and provided assistance for disturbance prior to the beginning of works.

A comprehensive database, based on which values will be assessed and validated in the event of disputes and more importantly serve as a database for monitoring and evaluation of the resettlement instrument

The project affected persons would be consulted and given the opportunity to participate in the design, implementation and monitoring of the resettlement.

CHAPTER FOUR

4.0 Legal Frameworks

4.1 Introduction

This chapter identifies and discusses the National Laws, Policies, Framework and Strategies together with applicable World Bank Guidelines relevant to Land Revocation and Involuntary Resettlement. It will include

- Description of the legislative instruments in Nigeria and the World Bank guidelines along with applicable legal and administrative procedures including remedies available to displaced persons in the judicial process
- Power of compulsory revocation and imposition of land use restriction
- Comparative analysis of legislative instruments in Nigeria and the World Bank guidelines and recommendations to address the gaps.

4.2 Power of compulsory revocation and imposition of land use restriction

Section 44 of the Constitution of the Federal Republic of Nigeria 1999 (as amended) ("the 1999 Constitution") provides that no immovable property or any interest in or any right over an immovable

The Constitution of the Federal Republic of Nigeria prohibits revocation of title of property by the State without the prompt payment of compensation. It recognizes:

- The right to private property; to acquire and own property and to protection by the State,
- The right of access to a court of law or tribunal for the determination of interest in the property and the amount of compensation.

The Legal basis for land revocation and resettlement in Nigeria is the Land Use Act CAP 202, LFN 2004. Basic rights and directives governing land/ property-take under this Act include:

- All lands in the territory of a state are vested in the governor of that state, to be held in trust and administered for the use and common benefit of all Nigerians;
- Governors possess lawful authority to revoke a right of occupancy for overriding public interest.

The Land Use Act CAP 202, LFN 2004 (LUA), the Constitution of 1999 and the Public Lands Laws of the relevant states constitute the governing policy for land revocation in Nigeria. As is the case with most national and state laws on compulsory revocation of land in the public interest or for a public purpose, the legislation enables the State to acquire land (more precisely, to abrogate leases and other authorizations to occupy land). The Acts also specify the procedures the State must follow for revocation, compensation and subsequent removal of the

affected structure.

The LUA vests all land in the State under the control and management of the Governor of the State.

Under the LUA, there are two types of land rights (USAID, 2010):

- Statutory occupancy rights: Individuals and entities can obtain a statutory right for occupancy of urban land. Recipients of Certificates of Occupancy are obligated to pay the ground rent fixed by the State. Rights are transferrable with the authorization of the State Governor.

- Customary right of occupancy: Local Governments may grant customary rights of occupancy to land in any non-urban area to any person or organization for agricultural, residential, and other purposes, including grazing and other customary purposes ancillary to agricultural use. The term for customary rights (which is contained in the application form and not the legislation) is 50 years and may be renewed for a second 50-year term. Recipients of customary rights of occupancy must pay annual tax on the land and cannot transfer any portion of the rights without approval of the Governor (for sales of rights) or the local government (other transfers).

The LUA vests all land in the State under the control and management of the Governor of the State. Lagos State Government in 1981 had declared all lands in the State as Urban in line with section 3 of the LUA. The Governor of the State holds the land in trust for the people of the state and is solely responsible for the allocation of land in all urban areas to individuals who reside in the state and to organizations for residential, agricultural and commercial purposes. All other lands in other States are subject to conditions under the LUA is under the control and management of the local government. The Act divests traditional owners of land and vests such land in the state Governor for the benefit and use of all Nigerians. It provides the processes through which land may be acquired by the Federal Government.

- The holder and the occupier according to their respective interests of any customary right of occupancy revoked under sub-section (2) shall be entitled to compensation for the value at the date of revocation of their unexhausted improvements.

- Where land in respect of which a customary right of occupancy is revoked under this Act was used for agricultural purposes by the holder, the Local Government shall allocate to such holder alternative land for use for the same purpose.

- If a Local Government refuses or neglects within a reasonable time to pay compensation to a holder and an according to their respective interests under the provisions of subsection

(5), the Governor may proceed to the assessment of compensation under section 29 and direct the Local Government to pay the amount of such compensation to the holder and occupier according to their respective interests.

For community-owned land where ownership is not claimed by any one individual or family, the Governor will determine who receives the compensation. This might be the community or the chief or a community leader who can make use of the money according to customary law. Alternatively, money can be paid into a community fund. The Governor has the power to cancel the right that any person has to live on or make use of any piece of land, if the land is required for use in the interest of the public. This includes mining and oil pipelines. Rights to land cease with immediate effect upon receipt of notice from the Governor.

4.3 Remedies Available to Displaced Persons in Legal Framework

PAPs will be meaningfully consulted and engaged to continuously participate in all involuntary resettlement planning processes. Vulnerable persons among the PAPs will be identified and special assistance offered to them during the compensation implementation process. Criteria include: age above 65 years, physical/mental challenged, women headed households, widows, orphaned children, and bedridden or seriously sick persons.

4.4 Applicable Legal and Administrative Procedures

The Land Use Act CAP 202, LFN 2004, is the key legislation that has direct relevance to this project. Relevant sections of these laws that may relate to this project with respect to land ownership and property rights, resettlement and compensation are summarized in this section.

4.4.1 Constitution of the Federal Republic of Nigeria, 1999 (as amended)

The foremost laws regulating the revocation and ownership of lands and landed properties in Nigeria are the 1999 Constitution of the Federal Republic of Nigeria and the Land Use Act CAP 202 LFN 2004.

The provision of Section 43 of the Constitution affirms the fundamental rights of persons and communities to own and hold land or property. It stipulates that any authority taking such land must do so in accordance with a law made in that regard. Importantly, such authority is required to pay the affected party compensation. Additionally, they must afford the right of access to the relevant adjudicatory forum, where any grievances regarding the amount of compensation to be paid and/or interest to the land in question, can be raised and resolved.

Section 33 of the Constitution of the Federal Republic of Nigeria states that where a right of occupancy in respect of a developed residential building has been revoked, the Governor has the discretionary right to offer in lieu of compensation resettlement in another place by way of

reasonable alternative accommodation.

Where a person accepts resettlement in place of compensation, his right to compensation shall be deemed to have been duly satisfied and no further compensation shall be paid to such person as stated in Section 33(3) of the Land Use Act.

Section 44 of the Constitution ("the 1999 Constitution") provides that no immovable property or any interest in or any right over an immovable property shall be revoked for overriding public interest without prompt payment of compensation.

The right of people to freely acquire, use and dispose of property is the foundation not only of Prosperity but of freedom itself. This right to own and acquire immovable property anywhere in Nigeria is an inalienable right of all Nigerians. In view of the above, payment of compensation upon public revocation of land or revocation is a constitutional right.

4.4.2 Nigerian Land Use Act CAP 202, LFN 2004

The principal piece of legislation for the expropriation of land in Nigeria is the Land Use Act CAP 202, LFN 2004. The law establishes the legal framework for government expropriation of land from individuals and communities, when it is required for "overriding public interest/good". It prescribes the circumstances under which the State can revoke rights of occupancy to the land and the compensation provisions that are required.

The act vested all land in the hands of Governors, through relevant sections. According to the Land Use Act CAP 202, LFN 2004, the administration of land is categorized into "urban land and non-urban land". Urban land is under the control and management of the Governor of each State and non- urban land is under the control and management of Local Government. The project area is coming under the urban land.

The Act specifies that the State or Local Government should pay compensation to the owner or occupier based on the improvement on the land. Thus, the Act has no provision for resettling people without legal rights.

There were several key repercussions as a result of the Act:

- There is now a common Land Tenure System throughout the country;
- Control and management of land is in the hands of Government;
- A system of registration of titles has been introduced and paper titles (Certificates of Occupancy) are issued; and
- The process of acquiring land is deemed to have been simplified for developers

The most significant change in the land tenure system, brought about by the Land Use Act, is the empowerment of the Governor of a state to revoke rights of occupancy compulsorily, for

public purpose. Section 28(1) makes it lawful for the Governor to revoke a right of occupancy for "overriding public interest".

Sections 28 (2)(b) and (3)(a) define this to mean, among other things," the requirement of the land by the state for public purposes within the state" This means that a governor can revoke the right of occupancy to land (i.e. expropriate) for use either by the State, Local or Federal authority for overriding public interest. As per the provisions of the Land Use Act, this can include telecommunication, power projects, hospitals, market places, mining activities or agricultural use etc.

When rights of occupancy are subject to revocation in this way, holders of rights of occupancy are, under the Land Use Act, entitled to compensation. However, this compensation is for the value of land improvements ("unexhausted improvements") at the date of revocation (section 29). In other words, they are not entitled to compensation for the land itself, but rather for improvements made to that land. Depreciation is considered when assessing the value of these improvements. The term "unexhausted improvement" is defined in Section 51 of the Land Use Act as:

"anything of any quality permanently attached to the land directly resulting from the expenditure of capital or labour by an occupier or any person acting on his behalf and increasing the productive capacity the utility or the amenity thereof and includes buildings, plantations of long lived crops or trees, fencing, wells, roads and irrigation or reclamation works, but does not include the result or ordinary cultivation other than growing produce."

Where occupancy rights are not claimed by any one individual, the Act states that the recipient of the compensation may be:

  a. the community;
  b. the chief or leader of the community, to be disposed of by him for the benefit of the community in accordance with the applicable customary law; or
  c. a community fund, to then be utilized for the benefit of the community (section 29(3)).

All rights of occupancy whether granted by the State or Local authority are for a fixed tenure and not usually more than 99 years. A person may not be entitled to compensation if the leasehold has expired.

The Land Use Act has provisions for compensation in kind, rather than cash, through the provision of Resettlement Land. Section 33 of the Land Use Act (Option to accept resettlement in case of revocation of right of occupancy) stipulates:

Where a right of occupancy in respect of any developed land on which a residential building has been erected is revoked under this Act, the Governor or the local government, as the case

may be, may in his or its discretion offer in lieu of compensation payable in accordance with the provisions of this Act, resettlement in any other place or area by way of a reasonable alternative accommodation (if appropriate in the circumstances).

Where the value of any alternative accommodation as determined by the appropriate officer or the Land Use and Allocation Committee is higher than the compensation payable under this Act, the parties concerned may by agreement require that the excess in value in relation to the property concerned shall be treated as a loan which the person affected shall refund or repay to the Government in the prescribed manner.

Where a person accepts a resettlement pursuant to subsection (1) of this section, his right to compensation shall be deemed to have been duly satisfied and no further compensation shall be payable to such person.".

The following are selected relevant sections of the Act:

Table 4.1: Relevant Sections of LUA to 4th Mainland Bridge (4MB) Project of LSMOWI

Section	Provision of the Section
Section 1	Subject to the provisions of this Act, all land comprised in the territory of each State in the Federation are hereby vested in the Governor of each state and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provisions of this Act.
Section 2 (1)	All land in urban areas shall be under the control and management of the Governor of each State; and All other land shall be under the control and management of local government within the area of jurisdiction in which the land is situated.
Section 2 (2)	There shall be established in each State a body to be known as "the Land Use and Allocation Committee" which shall have responsibility for:- a. *advising the Governor on any matter connected with the management of land to which paragraph (a) of subsection (1) above relates;* b. *Advising the Governor on any matter connected with the resettlement of persons affected by the revocation of rights of occupancy on the ground of overriding public interest under this Act; and* c. *Determining disputes as to the amount of compensation payable under this Act for improvements on land.*
Section 5 (1)	It shall be lawful for the Governor in respect of land, whether or not in an urban area (a) to grant statutory rights of occupancy to any person for all purposes.
Section 6 (1)	It shall be lawful for a Local Government in respect of land not in an urban area, (a) to grant customary rights of occupancy to any person or organization for the use of land in the Local Government Area for agricultural, residential and other purposes; (b) to grant customary rights of occupancy to any person or organization for use of land for grazing purposes as may be customary in the Local Government Area concerned.
Section 6 (3)	It shall be lawful for a Local Government to enter upon, use and occupy for public purposes any land within the area of its jurisdiction, and for the purpose, to revoke any customary right of occupancy on any such land.

Section 6 (5)	The holder and the occupier according to their respective interests of any customary right of occupancy revoked under subsection (3) of this section shall be entitled to compensation, for the value at the date of revocation, of their unexhausted improvements.
Section 6 (6)	Where land in respect of which a customary right of occupancy is revoked under this Act was used for agricultural purposes by the holder, the Local Government shall allocate to such holder alternative land for use for the same purpose.
Section 28 (1)	It shall be lawful for the Government to revoke a right of occupancy for overriding public interest.
Section 29 (1)	If a right of occupancy is revoked, the holder and the occupier shall be entitled to compensation for the value at the date of revocation of their unexhausted improvements.
Section 29 (3)	If the holder or occupier entitled to compensation under this section is a community the Governor may direct that any compensation payable to it shall be paid (a) to the community or (b) to the chief or leader of the community to be disposed of by him for the benefit of the community in accordance with the applicable customary law (c) into some fund specified by the Governor for the purpose for being utilized or applied for the benefit of the community.
Section 29 (4)	Compensation under subsection (1) of this section shall be, (a) the land, for the amount equal to the rent, if any, paid by the occupier during the year in which the right of occupancy was revoked, (b) buildings, installation or improvements thereon, for the amount of the replacement cost of the building, installation or improvement, that is to say, such cost as may be assessed on the basis of the prescribed method of assessment as determined by the appropriate officer less any depreciation, together with interests at the bank rate for delayed payment of compensation and in respect of any improvement in the nature of reclamation works, being such cost thereof as may be sustained by documentary evidence and proof to the satisfaction of the appropriate officer, (c) crops on land apart from any building, installation or improvement thereon, for an amount equal to the value as prescribed and determined by the appropriate officer.
Section 33 (1)	Where a right of occupancy in respect of any developed land on which a residential building had been erected is revoked under this Act, the Governor or the Local Government, as the case may be, may in his or its discretion offer in lieu of compensation payable in accordance with the provisions of this Act, resettlement in any other place or area by way of a reasonable alternative accommodation (if appropriate in the circumstances).
Section 33 (2)	Where the value of any alternative accommodation as determined by the appropriate officer of the Land Use and Allocation Committee is higher than the compensation payable under this Act the parties concerned may by agreement require that the excess in value in relation to the property concerned shall be treated as a loan which the person affected shall refund or repay to the Government in the prescribed manner.
Section 33 (3)	Where a person accepts a resettlement pursuant to subsection (1) of this section his right to compensation shall be deemed to have been duly satisfied and no further compensation shall be payable to such person.

4.4.3 Land Registration / Land Ownership Law and Property Rights

Each State government in Nigeria has laws requiring registration of interests in land. The Land

Use Act provides for the establishment of a Land Use and Allocation Committee in each State

that determines disputes as to the amount of compensation payable under this Act for improvements on land. This Committee also has the responsibility for advising the Governor on any matter connected with resettlement.

In Lagos State, the Lands Bureau Bureau is the main government agency in the State. Its responsibilities include:

- Land Policy and Land Matters.

- Revocation of Land for State purposes.

- Resolving Land disputes between individuals in conjunction with Ministry of Justice

- Compensation for acquired Lands.

- Dispute resolution on Land Matters

- Any other duty as may be assigned by the Governor.

4.4.4   Land Revocation, Removal, Resettlement, Re-location Procedures of Lagos State

While the legal framework for land revocation and resettlement is formulated in the Land Use Act CAP 202, LFN 2004, the responsibility for urban planning and spatial administration resides in agencies of the various state governments. Each State government in Nigeria has laws requiring registration of interests in land.

4.4.5   Land Use and Allocation Committee

This a statutory committee created by Land Use Act CAP 202, LFN 2004. The Land Use and Allocation Committee came into existence with the creation of the law. The Committee, which was established in each State, via the Decree, was charged with the sole responsibility of advising the Governor on Land Administration and Management Matters. It vested the power to Administer, Manage and Control State Land in the Governor of the State.

In Lagos State, the Land Use and Allocation Committee (LUAC) is housed within the Lagos State Lands Bureau and is responsible for the following.

1. Land allocation at various existing Land Schemes in the State to the public

2. Processing and issuance of Certificate of Occupancy (C of O)

3. Management of all existing Land Schemes in the State

4. Administering Ground Rent and computation of Demand Notice

5. Management of Government Land Leases

6. Creation and Management of Residential & Industrial Schemes

7. Dispute Resolution on Land Matters

8. Regularization of Federal Government Land Grants

9. Renewal of Land Leases

10. Processing Deemed Grant Consent (formerly Private C of O established as part of the transitional arrangements for the LUA under section 36 of the law)

4.4.6 Lagos State Ministry of Physical Planning and Urban Development

In Lagos State, the Ministry of Physical Planning and Urban Development, is the lead government agency in the planning spaces for new public projects in Lagos. It is also responsible for the enforcement of development plans for Lagos Metropolitan Area. In this regard, it plays a major role in planning and removal of encumbrances within planned urban areas of the city. The procedures for carrying out removal to give way for new infrastructure.

a. A drawing showing corridors and locations proposed for the infrastructure will be prepared by the public agency in charge of such infrastructure. In the case of LSMOWI, drawings of bus corridors and terminal/depots/shelters will be prepared.

b. The implementing public agency will submit the drawings/designs to the Ministry of Physical Planning and Urban Development through an official letter.

c. Having received that letter, the MPP&UD will go for a reconnaissance study with the implementing public agency to make inputs into the designs.

d. Officers of the MPP&UD will proceed to identify structures that are likely to be removed to pave way for the project. In most cases, when there are several structures within the affected area, MPP&UD may advise the implementing public agency to reflect impact avoidance considerations into the design.

e. MPP&UD will then proceed to evaluate the affected structures. The agency uses a costing approach which reckons with differences in types of buildings, number of floors, property locations.

f. Land Bureau will undertake a due diligence visit to ascertain the value and adequacy of the compensation to be paid

g. The total budget for compensation will be prepared and sent to the project implementing agency for implementation.

h. Publication for public awareness in two (2) national dailies.

i. Publication of list of affected properties identified for demolition and compensation in two (2) national dailies.

j. Stakeholder Engagement is also a requirement. Public interest and citizen groups such as Community Development Associations (CDA), Non-Governmental Organisations (NGOs) Traditional Leaders, relevant public agencies and other people within that area

will be invited to the public consultation events. Property owners that are going to be affected will be invited.

k. Issuance of 7-day notice for the removal of encumbrances on the right of way property owners.

l. Commencement of removal procedures Previously under Lagos State procedures for land and property revocation, only buildings with approved plans or title documents are entitled to compensation. However, in recent years, on compassionate grounds, possession of title documents is no longer a requirement.

The Lagos State Properties Protection Law 2016 which prohibits forceful takeover of land in Lagos State (known as land grabbing).

4.4.7   World Bank Environmental and Social Standards (ESS 5)

The Environmental and Social Standards (ESS 5) recognizes that project-related land revocation and restrictions on land use can have adverse impacts on communities and persons. Project-related land revocation1 or restrictions on land use may cause physical displacement (relocation, loss of residential land, or loss of shelter), economic displacement (loss of land, assets, or access to assets leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land revocation or restrictions on land use that result in displacement. The objective therefore is to:

❖ To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.

❖ To avoid forced eviction.

❖ To mitigate unavoidable adverse social and economic impacts from land revocation or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement economic impacts from land revocation or cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

❖ To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.

❖ To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.

❖ To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

4.4.8 Scope of Application of ESS5

ESS 5 applies to permanent or temporary physical and economic displacement resulting from the following types of land revocation or restrictions on land use undertaken or imposed in connection with project implementation:

1. Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national law;

2. Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures;

3. Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights. This may include situations where legally designated protected areas, forests, biodiversity areas or buffer zones are established in connection with the project

4. Relocation of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project-specific cut-off date;

5. Displacement of people as a result of project impacts that render their land unusable or inaccessible;

6. Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest

7. products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas;

8. Land rights or claims to land or resources relinquished by individuals or communities without full payment of compensation; and

9. Land revocation or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation for, the project.

4.5 Gap Analysis

Comparison between Land Use Act and World Bank Environmental and Social Standards (ESS 5)

The World Bank Environmental and Social Standards (ESS 5) explicitly makes adequate provision for project affected persons who are either displaced or suffer other losses, as a result of projects, to be adequately catered for. Livelihoods of persons to be affected must be preserved, but in cases when this is inevitable, minimal displacements should occur. In instances where displacement is unavoidable, compensation should be paid to PAPs to help them to restore their social, economic and environmental livelihoods.

The Land Use Act makes provision for compensation to be paid to only persons who have suffered any loss and can produce any form of title that is legal in the form of right of occupancy/ownership or legally binding tenancy agreement to the land in question. Whereas the law relating to land administration in Nigeria is wide and varied, entitlements for payment of compensation are essentially based on right of ownership. The Bank's ESS5 is fundamentally different from this and states that affected persons are entitled to some form of compensation whether they have legal title if they occupy the land by a cut-off date.

Therefore, the principles of World Bank ESS5 and Equator Principles Guidelines are not negotiable and must be adhered to. As a result, all land to be acquired by for this project would be so acquired subject to the Laws of Nigeria and the Bank ESS5. Where there are differences in the national law and World Bank ESS5, the higher standard will apply.

Table 4.2: Comparison of Nigerian Legislation and World Bank ESS5

Categories	Local Legal Framework/Policy	WB ESS5 requirements	Measures to address Conflict/gap
Minimization of Resettlement	No requirement to consider all options of project design in order to minimize the need for resettlement or displacement	Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs	Extensive stakeholder consultations will be held throughout the project, especially at the design phase to adopt possible strategies in minimizing resettlement/ displacement
Information and consultation	Silent	Insists upon consultation and informed participation of all affected persons throughout resettlement process.	Insists upon consultation and informed participation of all affected persons throughout resettlement process.
Eligibility	Entitled to compensation based upon the amount of rights they hold upon land.	All PAPs[1] irrespective of their status or whether they have formal titles, legal rights or not, squatters or otherwise encroaching illegally on land, are eligible for some kind of assistance if they occupied the project area before the cut-off date. Compensation for lost, or impacted, assets and replacement costs to both titled and non-titled landholders and resettlement assistance for lost income and livelihood.	Any person who will suffer loss or damage to an asset, business, trade or loss of access to productive resources, as a result of the project will be considered eligible for compensation and/ or resettlement assistance.

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[1] PAPs are defined as those who are affected by project activities which result in: Relocation or loss of shelter, Loss of assets or access to assets; and/or Loss of income source, business or means of livelihood, whether or not affected person must move to another location

Categories	Local Legal Framework/Policy	WB ESS5 requirements	Measures to address Conflict/gap
Cut-off Date		The Borrower will establish a cut-off date for eligibility and information should be disseminated. This will include posted warnings that persons settling in the project area after the cut-off date may be subject to removal[2]. It also sets a caveat for nullifying new claims as follows "provided that there has been an effective public dissemination of information on the area delineated, and systematic and continuous dissemination subsequent to the delineation to prevent further population influx'.	The cut-off date for being eligible for compensation and/ or resettlement assistance will be communicated to all stakeholders and identified project affected persons (PAPs) and which is the commencement day of census.
Timing of Compensation	All compensation to be completed before the commencement of civil works	All compensation to be completed before the commencement of civil works	All compensation to be completed before the commencement of civil works
Livelihood restoration.	Silent	Compensation for loss of assets at full replacement cost and other assistance to improve or at least restore standards of living and livelihoods.	Compensation for loss of assets at full replacement cost and other assistance to improve or at least restore standards of living and livelihoods.
Grievance Process.	Land Use Act provides for establishment of a Land Use and Allocation Committee in each state to arbitrate compensation related disputes. Either party may seek judicial redress in the courts.	Requires the elaborate design of multiple orders of grievance redress mechanism, which provides varied access to suit PAPs understanding and comfort for dispute resolution promptly in an impartial and transparent manner	Requires the elaborate design of multiple orders of grievance redress mechanism, which provides varied access to suit PAPs understanding and comfort for dispute resolution promptly in an impartial and transparent manner. Recognises judicial redress as the last option.
Statutory right of occupancy	Monetary compensation based upon market value.	Recommends land-for-land compensation. Other compensation is at replacement cost.	The eligible PAPs will be compensated on replacement cost.
Customary right of occupancy	Monetary compensation based upon market value.	Recommends land-for-land compensation. Other compensation is at replacement cost.	The eligible PAPs will be compensated on replacement cost.

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[2]   https://documents1.worldbank.org/curated/en/294331530217033360/ESF-Guidance-Note-5-Land-Revocation-Restrictions-on-Land-Use-and-Involuntary-Resettlement-English.pdf

Categories	Local Legal Framework/Policy	WB ESS5 requirements	Measures to address Conflict/gap
Individual holder of a right of occupancy	Entitled to compensation based upon the amount of rights they hold upon land.	Are entitled to some form of compensation whatever the legal recognition of their occupancy.	Those with legal right on the land are compensated and those without any form of rights on the land but affected by the project as of the cut of date are given a form of compensation based on impacts.
Community holder of a right of occupancy	Where land is owned by the community, compensation may be paid to the chief on behalf of the community or into a specially designated fund for the benefit of the community	Where land is collectively owned, the project is to offer land-base compensation where feasible Endeavour to offset the loss of communal resources through support for initiatives that enhance the productivity of the remaining resources, in-kind or Monetary compensation for loss of access, or provide access to alternative sources of the lost resource.	Where land is collectively owned, the project is to offer land-base compensation where feasible Endeavour to offset the loss of communal resources through support for initiatives that enhance the productivity of the remaining resources, in-kind or Monetary compensation for loss of access, or provide access to alternative sources of the lost resource.
Occupier of the right of occupancy	No compensations	Entitled to compensation for buildings, structures, installations and improvements and other assistance measures	Entitled to compensation for buildings, structures, installations and improvements and other assistance measures
Squatters, settlers, and migrants.	No compensations The harmonized Environmental Law coined as the Lagos State Environmental Protection and Management Law 2017 prohibits: People or person from constructing or putting any structure on roads, rail. People or persons from using any road, street or other setback as a mechanic workshop People or person from display, selling or buying goods on roads, rail tracks, bridges and road setbacks.	Entitled to compensation for buildings, structures, installations and improvements and other assistance measures	Entitled to compensation for buildings, structures, installations and improvements and other assistance measures
Owners of "Non-permanent" Buildings	Monetary compensation based on market value.	Entitled to in-kind compensation or Monetary compensation at full replacement cost including labor and relocation	Entitled to in-kind compensation or Monetary compensation at full replacement cost including labor and relocation expenses, prior to displacement.

Categories	Local Legal Framework/Policy	WB ESS5 requirements	Measures to address Conflict/gap
		expenses, prior to displacement.	
Owners of "Permanent" buildings, installations	Monetary compensation based on market value.	Entitled to in-kind compensation or Monetary compensation at full replacement cost including labor and relocation expenses, prior to displacement.	Entitled to in-kind compensation or Monetary compensation at full replacement cost including labor and relocation expenses, prior to displacement.
Restoration of livelihoods and living standards Support for displacement Development assistance.	Silent	Affected persons provided with assistance with movement, transition support and to re-establish access to lost resources.	Affected persons provided with assistance with movement, transition support and to re-establish access to lost resources.
Vulnerable people	Silent	Provide relocation assistance suited to the needs of each group of displaced persons, with particular attention paid to the needs of the poor and the vulnerable.	Provide relocation assistance suited to the needs of each group of displaced persons, with particular attention paid to the needs of the poor and the vulnerable.
Monitoring and evaluation (M&E)		The M&E of resettlement implementation should be planned as early as possible in preparation of the resettlement plan. Baseline conditions for monitoring and evaluation purposes should also be established. This is typically done through the early identification of key indicators to be tracked over time.	This plan has incorporated monitoring parameters and the resettlement census, including socioeconomic baseline studies and the inventory and evaluation of assets, will be conducted in a manner that enables subsequent tracking of resettlement outcomes.

Next step:
The National Legal Framework will be fully detailed, with information about the calculation of the values of loss (valuation report), the legal approval process, the different aspects of the goods and public/private services impacted (facilities impacted like energy distribution, transports, sanitation), environmental regulations (if relevant), etc.

An operational and detailed gap analysis will be performed at the beginning of RAP preparation, to ensure that the project will be compliant with the ESS 5 and to expose clearlythe measures /choices made to fill the gaps

4.6 Requirements of World Bank ESS5 adopted by LSMOWI for this RAP

Based on the outcome of the gap filling measures as presented in the Table 4.2, the following

requirements of the World Bank Environmental and Social Standards (ESS 5): Land Revocation, Restrictions on Land Use and Involuntary Resettlement have been adopted:

a. Necessary steps were taken to avoid/minimize the need for resettlement.

b. Resettlement/compensation measures were conceived and will be executed as development activities to provide sufficient resources to PAPs and opportunity to share in the project benefits. Affected persons, communities and local authorities are being meaningfully consulted and consultations will continue throughout the life cycle of the project.

c. Work may not commence on the PAP's properties until compensation has been made. Development assistance in addition to compensation measures, such as job opportunities will be made available to PAPs.

d. Particular attention will be paid to any vulnerable groups identified in the proposed project areas. Communities will be given opportunities to participate in the planning, implementation and monitoring of resettlement/compensation.

e. Resettlement/compensation is linked to Project Implementation Plan in which the resettlement costs are included in the overall project budget and displaced PAPs will be compensated before they are affected by project activities.

f. LSMOWI will adequately implement, monitor and evaluate this RAP. Provision is made for post compensation Grievance Redress.

5.0 Institutional Frameworks

5.1 Introduction

There are various institutions who are part of the stakeholders in ensuring that the 4th Mainland Bridge Project is implemented successfully. Such institutions include the Federal Ministry of Environment, Lagos State Ministry of Transportation (MOT), Lagos State Ministry of Works and Infrastructure (LSMOWI), Lagos State Traffic Management Authority (LASTMA), Local Government Councils and the Parks and Garages Management Committee. The aforementioned institutions including Lagos State Lands Bureau, Lagos State Ministry of Housing, Ministry of Physical Planning and Urban Development, Lagos State Ministry of Environment and Water Resources, Office of State Surveyor General and Lagos State Office of Public-Private Partnership (OPPP) have been identified as some of the institutions for resettlement. Most of the institutions are related in function and some other cases have overlapping functions but are duly recognized by law or customary norms of Lagos state. While most of them do not have direct links with resettlement, some of them, by operation or functions, have related responsibilities with resettlement. However, the ultimate responsibility rests with LSMOWI and its implementing agencies {(Ministry of Finance (Lands/Assets Valuation Committee), Ministry of Environment and Water Resources, Ministry of Women Affairs and Poverty Alleviation, Ministry of Transportation,). For the purpose of this RPF, the activities of the major institutions are highlighted below.

5.2 Institutional and Organization Responsibilities

The Lagos State Ministry of Works and Infrastructure (LSMOWI) will involve Federal and State Ministries, Department and Agencies (MDAs) as well as Local Government Authorities (LGA) and Local Council Development Areas (LCDAs) in which the project site is located. Institutions and/or organisations or stakeholders important to the RAP implementation include:

- Lagos State Office of Public-Private Partnership (OPPP)
- Ministry of Information and Strategy
- Ministry of Transportation (MOT)
- Lagos State Traffic Management Authority (LASTMA)
- Lagos State Parks and Gardens (LASPARK)
- Lagos State Lands Bureau
- Ministry of Housing
- Ministry of Physical Planning and Urban Development

- Lagos State Ministry of Environment & Water Resources
- Lagos State Environmental Protection Agency (LASEPA)
- Ministry of Local Government and Chieftaincy Affairs.
- Ministry of Economic Planning and Budget
- Debt Management Office (DMO)
- Ministry of Justice (MOJ)
- Ministry of Women Affairs and Poverty Alleviation
- Lagos State Parks and Garages Management Committee (LASPG)
- Community Interest Groups
- Grievance Redress Committee
- Contractors
- Project Affected Persons (PAPs)
- CSO/CBOs/Trade Union
- Non-Government Organisations (NGOs)
- Resettlement Steering/Implementation Committee
- Utilities

Implementation of the RAP requires cross-ministerial and cross-state coordination, collaboration, learning and teamwork in a highly-systematic manner, with clearly defined roles and responsibilities. There are good institutional arrangements to ensure implementation of this RAP and its management. The roles and responsibilities of the participating parties in collaborative efforts are well outlined. Capacity gaps have been identified in each agency that will be involved in implementing this RAP; and capacity gaps filling measures have been considered and will be implemented. Also presented is the budget and cost for the RAP implementation.

5.2.1 Organizational Arrangement – Roles and Responsibilities

The implementation of the RAP shall require close collaboration among all the stakeholders. A properly constituted structure for administration of its implementation is imperative and agreement must be reached from the onset with the relevant parties. The roles and responsibilities of all the various stakeholders relevant in the development, implementation and administration of the RAP and to an extent in the overall project management are outlined below:

Lagos State Ministry of Works and Infrastructure (LSMOWI)

The history of this Ministry dates back to 1967 when the State was created. It is considered as an engine room of growth and development of the State, due to its strategic importance.

VISION: To be Excellent in Sustainable Infrastructure Development and Service Delivery

MISSION: Providing world class infrastructure and services through the employment of motivated personnel and leading-edge technology for the benefit of the citizens and investors.

It consists of two offices:

- Office of Works
- Office of Infrastructure

The parastatals under the supervision of monitoring of the Ministry of Works and Infrastructure are:

PARASTATALS

- Public Works Corporation (PWC)
- Materials Testing Laboratory,
- Lagos State Infrastructure Asset Management Agency
- Lagos State Infrastructure Maintenance and Regulatory Agency (LASIMRA)

Responsibilities for the commitments made in this RPF are those of LSMOWI. The responsibilities are delegated internally to specific units within the agency as well as other government agencies. Specific units and staff are assigned clearly defined roles associated with the RAP implementation, including impact minimization, inventory preparation and confirmation, consultation and feedback, compensation, as well as monitoring and reporting.

All the identified agencies (Figure 5.1) that will be involved in any resettlement, under the overall direction of the Project Director (shaded green) who reports directly to the Resettlement Advisory Group (RAG). RAG which is headed by the Special Adviser of LSMOWI. A special unit referred to as the Resettlement Implementation Committee will work with the Project Director to ensure effective Resettlement implementation and monitoring. The core responsibilities for the resettlement implementation will rest with the social safeguard unit of LSMOWI (Project Director). Specific roles of the implementing units in LSMOWI will include:

Environmental and Safeguard Unit – This unit shall be responsible for facilitating liaison with communities as well as government agencies and local governments to facilitate stakeholder consultations. The unit reports directly to the Managing Director of LSMOWI

through the Director Corporate and investment planning on the process of resettlement of affected people. The unit shall also liaise with the trade and market women unions (Where markets are present along the corridors) in ensuring that members of the union are appropriately informed on the resettlement plan. It is the responsibility of the unit to adequately implement the RAP with a consultant and provide all informations to the AFD as and when required. The unit is also responsible for the tendering process and supervision for ESIAs and RAPs.

Transport Unit – is responsible for supervising the contractors engaged in construction of facilities and ensure strict adherence to project design specifications. They also identify alternative project sites (for temporary relocation for PAPs) ensure that the location has minimal impacts on the socio-economic status of people when relocated.

Legal Unit – oversee all legal functions including resolution of grievances. It also provides advice to the Resettlement implementation manager, including verification of compensation and drafting of legal agreements with affected parties, local government authorities etc.

Accounts – processes payments to the affected people and ensure proper accountability throughout the project life cycle.
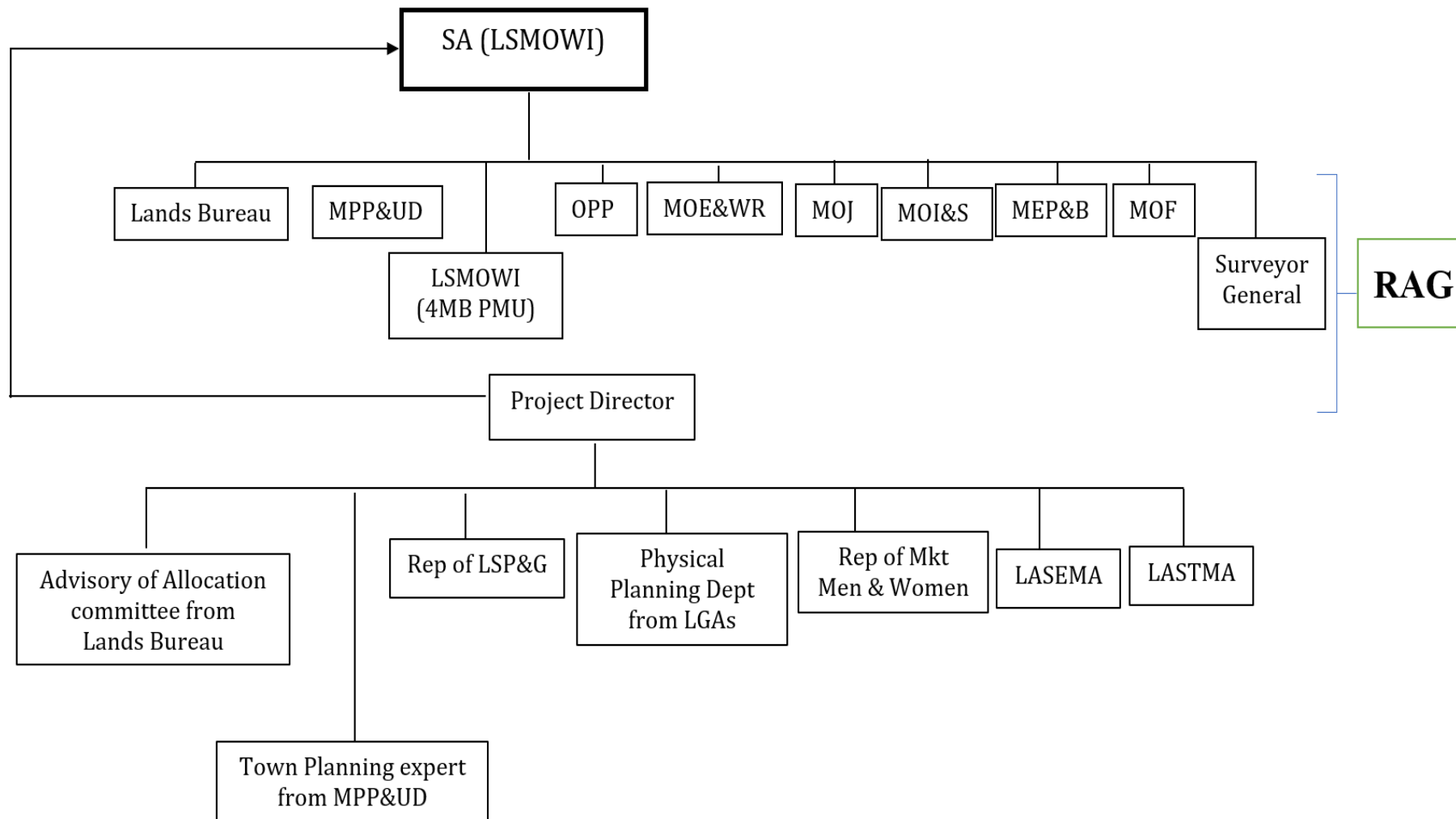
RAG = Resettlement Advisory Group

Figure 5.1: Organizational Arrangement, Roles and Responsibilities
Source: Adapted from Triple 'E' RAP for Iyana-Ipaja to Ikotun Bus Franchise Scheme, 2006

A. Lagos State Lands Bureau

The ministry has the responsibility for the formulation of policies and implementation pursuant to the provisions of the Land Use Act CAP 202, LFN 2004. It also has the primary responsibility for land management in the state. Part of its agencies includes the Land Use Advisory and Allocation Committee. Its functions and power include payment of compensation for the revocation of a right of occupancy.

Although LSMOWI is not acquiring new lands for the transport projects, since the ministry is statutorily mandated to implement compensation for acquired lands, the advisory and allocation committee shall work with the project director to ensure that affected people are compensated as stated in the RAP. They will also ensure LSMOWI's compensation and assistance programme are in conformity with the provisions of the Land Use Act.

This a statutory committee created by Land Use Act CAP 202, LFN 2004. The Land Use and Allocation Committee came into existence with the creation of the law. The Committee, which was established in each State, via the Decree, was charged with the sole responsibility of advising the Governor on Land Administration and Management Matters. Its responsibilities are to Administer, Manage and Control State Land being powers vested in the Governor of the State. In Lagos State, the Land Use and Allocation Committee (LUAC) is housed within the Lagos State Lands Bureau and is responsible for the following.

- ❖ Land allocation at various existing Land Schemes in the State to the public;
- ❖ Processing and issuance of Certificate of Occupancy (C of O)
- ❖ Management of all existing Land Schemes in the State
- ❖ Administering Ground Rent and computation of Demand Notice
- ❖ Management of Government Land Leases
- ❖ Creation and Management of Residential & Industrial Schemes
- ❖ Dispute Resolution on Land Matters;
- ❖ Regularization of Federal Government Land Grants
- ❖ Renewal of Land Leases
- ❖ Processing Deemed Grant Consent (formerly Private C of O established as part of the transitional arrangements for the LUA under section 36 of the law)

B. Lagos State Ministry of Physical Planning and Urban Development

The Lagos State Ministry of Physical Planning and Urban Development Law came into force in 2005. It provides for the administration of Physical Planning, Urban and Regional Development Agencies and for connected purposes. The Ministry of Physical Planning and Urban Development is given the ministerial responsibility for initiation, formulation and

implementation of policies and coordination of programmes on all aspects of physical planning and urban development in Lagos State.

In Section 51 (i) of the law, a development permit may be revoked, however with notice which shall state the reason for the revocation. Part of the reasons could be for overriding public interest pursuant to Sections 28 (2) (3) of the Land Use Act.

Section 54 States grounds for the payment of compensation for developments on the land with the assessment as stated in section 55, which should be paid within 90 days (section 56). There is also the Appeal Committee, which disputes the same where grievances could be addressed. Requirements for enforcement are stated in section 61-64.

The Ministry has the power to acquire any land in connection with planned urban or rural development, and any right of occupancy on such land can be revoked in accordance with the provisions of the Land Use Act. Payment of compensation generally under this law shall be in accordance with the provisions of the Land Use Act - (Sections 80-81).

Provision of alternative accommodation for a person likely to be displaced is available in section 90 of the Law. The assistance includes Planning, or building alternative accommodation or even financial assistance. There is also an appeal against any decision and the procedure as established in section 105 of the law.

The roles of this ministry in resettlement will among others include:

- Verification of selected sites for resettlement and ensuring that such sites are ideally suitable for affected people.
- Invoke the physical planning and urban development law at the project area
- Ensuring that LSMOWI meets with the requirements of resettlement.
- Make appropriate recommendation and input in the resettlement process
- Ensuring that affected people are adequately compensated and
- Carry out functions as may be directed by the Honourable Commissioner for Physical Planning and Urban Development.

C. Lagos State Traffic Management Authority Law 2004

The Lagos State Traffic Management Authority (LASTMA) is an agency under the ministry of transport in Lagos state. It has the power to regulate, control and manage traffic and other related matters. Parts of the functions of the authority include:

- Conducting high visible day and night traffic patrols to enforce traffic rules and regulations and clear the highways of obstruction.
- Reducing the incidence and severity of road traffic accidents.

- Enforcing the use of bus- stops and bus terminals.

- Safeguarding highways from encroachment from the activities of markets, roadside trading street hawking and alms begging.

- Safeguarding motor vehicles, motor cyclists, cyclists and pedestrians at railway level crossing.

The ministry shall mandate LASTMA to enforce traffic regulations on the roads and junctions during construction and implementation phases of the project. Specifically, they shall work with the project director to ensure that affected people are resettled in areas that will not impede traffic and also liaise with the Lagos Parks and Garages Management Committee to enforce traffic policies of Lagos state. They report directly to the Project Director.

D. Lagos State Ministry of Environment and Water Resources

The Lagos State Ministry of Environment and Water Resources is responsible for the overall environmental policy of Lagos State, enforcement of state environment laws, establishing regulations, sanitation and waste management. Pursuant to the fulfilment of its responsibilities, the government enacted the harmonized the Environmental Law coined as the Lagos State Environmental Protection and Management Law 2017. The law provides for environmental sanitation in Lagos State, and establishment of /Environmental Sanitation Corps and for connected purposes. It imposes responsibility on all facets of environmental media, and prohibition of certain acts and conducts.

Section 9(1) prohibits,

- People or person from constructing or putting any structure on roads, rail

- People or persons from using any road, street or other setback as a mechanic workshop

- People or person from display, selling or buying goods on roads, rail tracks, bridges and road setbacks.

The law further empowers the Ministry to create an environmental sanitation corps, which has, as part of its functions, the mandate to enforce state sanitation laws and street trading. It is also to assist the State Ministry of Physical Planning, Local Governments, Lagos State Waste Management Authority and Law Enforcement Agencies in monitoring matters affecting environmental sanitation.

E. The Lagos State Office of Public – Private Partnership

The Office of Public-Private Partnership (OPPP) was established under the Lagos State Public-Private Law 2011.

Objectives of the Office

In performing its functions and exercising its powers, the primary objective of the Office is to develop public infrastructure or public assets and provide social amenities and other facilities for the State through Public-Private Partnerships. In seeking to achieve its objectives, the Office shall:

a) initiate and develop public infrastructure and public assets development strategies for the State by means of Public-Private Partnerships;

b) advise on policies that will promote and sustain Public-Private Partnerships in the development of public infrastructure or public assets in the State;

c) co-ordinate policies and programmes of the State with respect to Public-Private Partnerships for the provision and development of public infrastructure or public assets in the State; and

d) ensure that Public-Private Partnerships for the provision and development of public infrastructure or public assets in the State are in accordance with prevailing Government Policy and public interest.

The Functions of the Office

The functions of the Office are to:

1. initiate procurement of Public-Private Partnerships for the development of public infrastructure and public assets by conducting pre-qualification assessment of private investors willing to enter into Public-Private Partnerships with the State, based on a request for expressions of interest;

2. evaluate technical and financial proposals, submissions or tenders by private investors interested in Public-Private Partnerships with the State and issue a preferred mandate in accordance with the provisions of the Lagos State Public Procurement Law;

3. act on behalf of the Government or any of its agencies in Public-Private Partnerships under this Law and develop optimal means of financing public investment projects in order to achieve value for money; ensure on behalf of the Government or any of its agencies that all aspects of financing, refinancing and insurance of public-private partnership projects are duly undertaken by means of Public-Private Partnerships, within the public sector;

4. prepare and develop on behalf of the State, strategic master plans for Public-Private Partnerships;

5. identify priority sectors for Public-Private Partnership initiatives;

6. determine the framework of engagement of consultants, specialists and advisers for Public-Private Partnerships in the State;

7. verify and maintain performance of the terms and conditions of concession agreements by concessionaires;

8. advise the Government on matters relating to financing, construction and maintenance of public infrastructure or public assets by means of Public-Private Partnerships in the State; and in particular, to identify and make recommendations to the Government with respect to the acquisition of land required for such purposes;

9. undertake or conduct research, investigations or inquiries and collect information relating to public infrastructure or public assets in general;

10. liaise with bodies of professional persons, and private agencies performing work regarding public infrastructure or public assets; and

11. in relation to Public-Private Partnerships initiated by the Office, it shall:

   a. ensure the provision by the Concessionaire of such facilities and amenities that are necessary for the users of public infrastructure or public assets;

   b. oversee the development, operation and maintenance of public infrastructure or public assets provided by means of Public-Private Partnerships and such other facilities necessary or adjacent to such public infrastructure or public assets; and

   c. satisfy, discharge, and perform the obligation of the Office and the State, to uphold and observe the terms of any concession agreement subject to the provisions of this Law.

The Office shall have power to:

1. grant concessions to private investors interested in Public-Private Partnerships for design, construction, operation, management, control, maintenance, rehabilitation and financing of public infrastructure or public assets, in accordance with the Lagos State Public Procurement Law;

2. negotiate with prospective private partners;

3. obtain from any government agency or private institutions, statistical or other information relevant to the functions of the Office;

4. inspect and monitor concessionaires to ensure compliance with the terms of any concession agreement;

5. recommend the designation of a public infrastructure or public asset as a service charge, user fee or toll paying public infrastructure or public asset and specify the condition for the use of such infrastructure or assets;

6. liaise and co-operate with all government agencies and parastatals with respect to private investors' participation in the provision and development of public infrastructure or public assets;

7. pursuant to and in accordance with the provisions of this Law, approve the fares that may be charged by any private or public operator with respect to any public infrastructure, public assets or amenities for the purpose of imposing toll or user fees in accordance with the payment mechanism stated in the relevant concession agreement;

8. establish and operate an information management system concerning public infrastructure or public assets and public-private partnership projects;

9. perform such other functions as may be assigned to it by the Governor under this Law;

and do all things that are necessary or expedient for the performance of its functions, including the engagement from time to time of consultants and advisers and other services providers.

F. Local Government Authority

The Constitution of the Federal Republic of Nigeria approves the creation of Local Government Councils in each of the 36 States of the Federation. Local Governments Councils were created by the Federal Government to carry out their functions as set out in the Constitution. The Local Governments are directly involved in the allocation of Bus Terminus and Markets which makes it is imperative that they are part of the Resettlement Plan. Therefore, the roles and responsibilities of the local authorities (Physical Planning or Works Department) in the Resettlement Plan shall not be limited to the following.

- Liaising with the Project Director to verify adequacy of resettlement location and provide approval for such sites.
- Providing additional resettlement area if the designated locations are not adequate.
- Ensure that traders on setbacks and who have approved shops are requested to move back to their respective shops previously allocated to them by the local government
- Ensure all facility areas are not encroached by the traders after relocation
- Provide necessary infrastructures in relocated areas.
- Implement policies developed by LSMOWI for project sustainability.
- Liaise with LSMOWI and participate in consultations with representatives of Transporters and traders.

G. Lagos State Parks and Garages and RTEAN

The Lagos Parks and Garages participates in public transportation and haulage activities. The union has branches and affiliations throughout Nigeria and is recognized by federal, state and local governments. LSMOWI had several consultations with the union on the objectives of this project. The executive of the Lagos Parks and Garages as well as the State Branch of RTEAN shall work with the Project Director to:

- Ensure that activities of their members do not contravene the traffic management policy of LSMOWI
- Provide resettlement assistance in areas where necessary
- Participate in consultations and enlightenment of members and other affected people
- Enforce policies of LSMOWI in bus terminal and bus stops controlled by the union
- Enforce traffic regulations along the corridors.

H. Community Interest Groups

- Coordinate community inputs to project planning, implementation and monitoring, with guidance from support professionals and technical service providers.
- Participating in site monitoring.
- Mobilize Youth and Women's groups.

I. Grievance Redress Committee (GRC)

LSMOWI will set-up a Grievance Redressal Committee (GRC) that will address any complaints related to land revocations and compensation. It must be ensured that composition of GRC is gender balanced such that needs of both men and women in project affect communities are considered, especially when complaints arise out of compensation payment. The Committee will comprise of the following:

- LSMOWI PMU
- Ward Level Officer
- Local Government Officer
- State Level Officer
- Local Community Members
- Women and youth representative(s) from affected communities,
- Members of an active local NGOs/CBOs/CSOs.

The key responsibilities of the GRC are given below:

- Receive, assess and process and decide on complaints related to compensation assistance
- Support PAPs in resolving issues related to R&R.
- Record grievance and resolve them within stipulated time.
- Inform LSMOWI about any serious cases.
- Report to the aggrieved parties about the decisions regarding them.

J. Contractors

- Comply with relevant contract clauses on resettlement issues
- Establish good community relations;

- Train the workforce, and avoid any form of discrimination in terms of gender, religion or tribe;
- As much as possible employ the workforce from the project area, and also make procurement therein;
- Try to provide local infrastructure and services in the course of executing the project;
- Ensure that workers and site staff are sensitive to the customs and way of life of the communities.
- Promptly repair any damage to utility services or infrastructure of the community in implementation of the project

K. Project Affected Persons (PAPs)

- Receive compensation and move away from impact areas within the agreed time period
- Liaise with the survey team/Resettlement Committee in carefully checking and signing off their affected lands and other assets as well as their entitlements;
- Make themselves available during census and participation in implementation;
- Provide feedback on improving the quality of the RAP and suggesting solutions for its effective implementation and
- Submit concerns through the right grievance redress channel

L. CSO/CBOs/Trade Unions

- Assist in resolving grievances of PAPs
- Support and assist in the mobilization of the various relevant grassroots interest groups.
- May have complaints that need to be resolved in the execution of the project with a view to avoiding conflicts and grievances.
- Serve as witness in compensation process and Monitoring and Evaluation

M. Non-Government Organisations (NGOs)

An independent NGO to monitor the RAP implementation including compensation and grievance management process as well as verify the compliance in line with LSMOWI and AFD commitments and national and the World Bank's requirements.

N. Utilities Agencies

The utility companies that may play some roles in the resettlement schemes under the 4th Mainland Bridge Project are: the Transmission Company of Nigeria (TCN), Eko Electricity Distribution Company (EKODISCO), the Ikeja Electricity Distribution Company (Ikeja Disco) and the Lagos State Water Corporation (LSWC).

These Agencies at the appropriate times disconnect and reconnect PAPs to their power and

water supply services before and after relocation as the case may be. Thus special consideration is given to PAPs so that they are not treated as normal applicants for services to their new places. A utilities committee would be put in place to ensure that PAPs have access to utility services without difficulty and added cost.

O. Resettlement Steering/Implementation Committee

A Resettlement Steering/Implementation Committee will be established by the LSMOWI to provide overall coordination and policy direction for the RAP implementation process.

The Resettlement Steering/Implementation Committee shall have responsibility for:

- Organizing meetings with all PAPs.
- Providing necessary information to the PAPs about their compensation entitlement and the basis for the calculation.
- Monitoring and ensuring implementation of the RAP efficiently.
- General compliance with the project implementation plan, schedule, and standards. Monitoring and ensuring that the Grievance Redress Mechanism is effectively and efficiently implemented.
- Providing any other necessary support for the successful implementation of the RAP

The generic composition of the Resettlement Steering/Implementation Committee are given below:

- LSMOWI PMU
- LSMOWI's Safeguards Officer
- LSMOWI's Monitoring and Evaluation Officer
- LSMOWI's Engineers
- Project Contractors
- Member of CSOs/CBOs (equal participation from women and men)
- Member of NGOs

An overview of the resettlement activities and responsible parties are given in Table 5.1.

Table 5.1: Resettlement Activities and Responsible Parties

S/No	Activity	Responsible Party
1	Liaising with Donors	LSMOWI
2	Coordination of Activities	LSMOWI
3	Vetting of request for compulsory revocation of land, Oversight of land expropriation and land issuance of titles to resettled PAPs.	Lagos State Lands Bureau, Ministry of Housing, Physical Planning and Urban Development
4	Alignment of ROW to approved planning scheme	LSMOWI/Ministry of Transport and other Relevant Agencies and Parastatals

S/No	Activity	Responsible Party
5	Vetting of request for Right of Way (Public Domain)	Lands Bureau, Ministry of Physical Planning and Urban Development/Ministry of Environment
6	Organization and implementation of, socio-economic studies, census of affected people and valuation of affected assets,	E&S Consultant, LSMOWI
7	Notifications, Request for proof of eligibility, - Consultations, Valuation of Affected Assets.	E&S Consultant, LSMOWI
8	Consultations, planning and Preparation of RAP	LSMOWI
9	Review of RAPs	FMEnv, LSMOWI, LSMOE&WR
10	Disclosure of RAP	LSMOWI / FMEnv
11	Internal Monitoring	LSMOWI
12	External Monitoring	FMEnv, LSMOE&WR, NGO, Donor
13	External Completion Audit	FMEnv, LSMOE&WR, NGO, Donor
14	Establishment of Resettlement & Rehabilitation Committees	LSMOWI
15	Establishment of Grievance and dispute resolutions Committee	Ministry of Physical Planning and Urban Development/Land Bureau/Non-Governmental Organization/ Ministry of Justice
16	Procedures for dispute resolutions and actual dispute resolutions	Grievance Committee
17	Organization of necessary training and capacity building measures for the different units and other partner organizations and committees;	Ministry of Physical Planning and Urban Development/Land Bureau/ Non-Governmental Organization/ Ministry of Justice
18	Release of funds for payment and Compensation Payments	Ministry of Finance, Economic Planning and Budgeting /LSMOWI
19	Disclosure of values Making of offers Processing for payments	LSMOWI/MPP&UD
20	Taking possession of site	LSMOWI, MPP&UD, Contractor
21	Disconnect and Reconnection of utilities	TCN, EKEDC, IKEDC, MTN, Airtel, Glo, 9Mobile, LSWC
22	Adherence to contractual clauses in procurement to contractors, promptly reporting of any conflict and disputes raised during construction and ensuring that all mitigation measures required from the contractor during construction are fully applied.	LSMOWI, Contractor
23	Representation of SPMU/government for any law court redress cases	LSMOWI, Lagos State Attorney General's Office/Ministry of Justice
24	Preparation of Monitoring and Evaluation	LSMOWI, Federal Ministry of Environment Abuja

S/No	Activity	Responsible Party
	Report of RAP and Disclosure	

5.3 Capacity Building and Training

Training and communication are essential for increasing the knowledge and understanding of the resettlement and land revocation issues related to the project areas as well as on measures and the safeguard requirement to address them.

All the parties, which will be engaged during the RAP implementation should be briefed about the

- Baseline socio-economic conditions of the project areas.
- Social and resettlement issues and impacts.
- Project affected persons (PAPs) and other affected assets.
- Vulnerable groups in the project areas.
- Suggestion measures and recommendations.
- Compensations and entitlements.
- Livelihood/income restoration measures.
- Parties/Stakeholders involved and their roles and responsibility.
- Implementation arrangements.
- M&E and GRM process.
- RAP budget

It is the responsibility of the LSMOWI PMU to conduct a training programme for the parties, which will give orientation about the project requirement as well as enhance their capacity for the implementation of RAP.

The capacity-building requirements for different stakeholder are explained below in the Table 5.2.

Table 5.2: Capacity-Building Requirements

S. No.	Institutions/Stakeholders	Responsibilities	Capacity-Building Requirements
1.	Lagos State Ministry of Environment & Water Resources	• Review of draft RAP report (in liaison with Federal Ministry of Environment) • Site assessment and monitoring of RAP implementation.	
2.	Federal Ministry of Environment/ EA Department and NESREA	Lead roles in the provision of advice on screening, scoping, review of draft RAP report (in liaison with State Ministry of Environment), receiving comments from stakeholders, public hearing of the project proposals and social liability investigations, monitoring and evaluation process and criteria.	
3.	PIU & Safeguard Unit, LSMOWI (Social and Communication Specialist)	• Ensure that project activities are implemented in accordance to best practices and guidelines set out in the site specific RAP; • Safeguards due diligence on behalf of the PIU	

S. No.	Institutions/Stakeholders	Responsibilities	Capacity-Building Requirements
		• Develop, coordinate and ensures the implementation of the social aspects of the RAP • Identify and liaise with all stakeholders involved in social related issues (labour influx, GBV, etc) in the project; • Conduct impact evaluation and beneficiary's assessment; and • Establish partnerships and liaise with organizations, Community Based Organizations (CBOs) and Civil Society Organizations (CSOs) • Supervise the Grievance Redress Committee (GRC) which is in charge of handling and addressing grievances/complaints.	
4.	Contractor	• Mitigate social impacts including Labor influx and GBV. • Implementation and enforcement of Occupational Health and Safety (OHS) measures on the ground • Regular inspection of sites and organize weekly work meetings to ensure adherence to management actions of the RAP • Ensure that there are sufficient resources (time, money and people) to manage the social issues of the works • Ensure any changes during construction process that may have significant social impacts are communicated to social safeguard specialist in time and managed accordingly. • Contractor should ensure that the safety officer conducts a Job Hazard Analysis (JHA) prior to the commencement of work to identify the hazards associated with the job activities • Contractor shall work with the responsible parties (Supervising Engineers) to identify alternative travel routes and install hazard and road safety signs where necessary to inform the communities and workers of impending hazard	
5.	Supervising Engineer	• Provides an independent oversight ensuring contractor adhere strictly to the engineering specifications provide frequent reports on contractor/ Clients compliance • Inspect and approve contractor's work • Update the RAP where necessary to reflect changes to the project, area of	

S. No.	Institutions/Stakeholders	Responsibilities	Capacity-Building Requirements
		influence or activities, with Borrower to re-disclose • Thorough supervision of the mitigation of the social impacts outlined in the RAP including labour influx and associated GBV.	
6.	State Government MDAs	• Other MDAs come in as and when relevant areas or resources under their jurisdiction or management are likely to be affected by or implicated projects. • They participate in the RAP processes and in project decision-making that helps prevent or minimize impacts and to mitigate them. These institutions may also be required to issue a consent or approval for an aspect of a project; allow an area to be included in a project; or allow impact to a certain extent or impose restrictions or conditions, monitoring responsibility or supervisory oversight.	
7.	Affected Community	• Promote environmental awareness. • Provide feedback/updates on current environmental and social performance issues with respect to project activities. This would be used to assess effective project implementation. • Provide comments, advice and/or complaints on issues of nonconformity. • Attend public meetings organized by the PIU to disseminate information and receive feedback.	
8.	CDA	• Ensure community participation by mobilizing, sensitizing community members; • Support with provision of necessary infrastructures and engage/ encourage carrying out comprehensive and practical awareness campaign for the proposed projects, amongst the various relevant grass roots interest groups	
9.	NGOs/CSOs/MDAs	• Assisting in their respective ways to ensure effective response actions in the RAP implementation, conducting scientific researches alongside government groups to evolve and devise sustainable stakeholder engagement strategies and techniques	
10.	Others/General Public	• Identify issues that could derail the project and support project impacts and mitigation measures, Awareness campaigns	

CHAPTER SIX

6.0 Assessment of Project Affected Persons

Project Affected Persons (PAPs) according to the World Bank policy refers to people who are directly affected socially, economically and spiritually by bank-assisted investment project. Put in another way, Project affected persons are those affected by the land use or revocation needs of government supported activities that lead to these persons(s) being required to (or not necessarily required to) be physically displaced or relocated due to loss of shelter and or lose, denied or restricted access and or to economic assets, or lose income sources or means of livelihood, whether or not the person(s) must move to another location. A good knowledge of the affected population, their categories and special needs early in the planning process of a project is critical, a tentative table (6.1) showing the number of affected persons per corridor and the cost of environmental and social studies to be conducted on each to a successful resettlement operation.

6.1 Baseline of Project Affected Persons for the 4th Mainland Bridge Project

The businesses are limited to a few small business enterprises run by households, often to supplement incomes from others. They include selling soft drinks, snacks and daily consumable items, cafes, bars selling locally made alcoholic drinks, stalls selling goods such as fruit and vegetables, maize milling machines and 'cinemas'/TV viewing rooms. The majority of these businesses are run from the household's house, but a small number are run from small dedicated business structures such as small kiosks or shelters with stick walls and straw or corrugated sheet metal roofs.

6.2 Assessment of Project affected Persons along the Corridor

It is estimated that the implementation of the projects under the 4th Mainland Bridge Project would affect traders, artisans etc. From previous experience on road construction projects in Lagos State and across Nigeria, it is estimated that a sizeable number of persons will be affected in 4th Mainland Bridge Project in the following categories:

❖ Traders (including Food Vendors, Street Traders, and Florists) –

❖ Street Hawkers -

❖ Newspaper Vendors –

❖ Vulcanisers –

❖ Beauticians (Hairdressers / Cosmetologists) –

❖ Shoe Shiners –

❖ Auto Technicians –

- ❖ Phone Repairers –
- ❖ Watch Repairers –
- ❖ Bus / Taxi Drivers –
- ❖ Barbers –

At this stage, it is not possible to get the baseline information of PAPs concerning their age, gender, health, education, incomes standard of living. This information can only be obtained during a detailed Socio-economic / RAP Studies which will include a detailed Census of persons and properties that will be affected by the Project. The cultural practices in Nigeria does not allow for such questions to be requested or given when there is no definitive or identified need for such. Moreover, it could encourage an influx of 'fake' PAPs to move into the Project areas in a bid to get 'easy money'.

The estimated PAPs are mainly in the low- and medium- income category, with the exception of those living in the Island axis who are in the Lower- and Upper- Income Class. For those at Island Axis, the most probable impact of the 4th Mainland Bridge Project will be demolition of the entire structures and replacement of the Perimeter Walls that are within the existing ROW on the corridor.

According to the World Bank estimates in its poverty assessment report titled ''A Better Future for all Nigerians: 2022 Nigeria Poverty Assessment, 95.1 million Nigerians (42.6% of Nigerians) were living below the National Poverty line in Nigeria. This is close to the estimations of the World Development Indicators of the World Bank in 2015 which reported that 53.47 of Nigerians lived below US$1.9 per day, with an additional 5% living between US$1.90 and 3.90 per day in 2015. It is expected that these estimates will be reviewed when all the specific sub projects are conducted.

During a Rapid Assessment exercise to identify the number of potential Structures to be affected along the Project Alignment, 2,111 Structures were identified with 1,153 shops within these Structures as tabulated hereunder in Table 6.1.

Table 6.1: Showing the Tentative initial census of PASs along the proposed 4th Mainland Bridge Project Alignment.

Island Area		Lekki Expressway / Agunfoye		Itamaga Interchange		Shagamu Road		Owutu / Isawo Road		Majidun / OPIC / Isheri	
PAS	Shops / Flats	PAS	Shops / Flats	PAS	Shops / Flats	PAS	Shops / Flats	PAS	Shops / Flats	PAS	Shops / Flats
381	250	798	99	216	27	366	295	196	129	154	102

This is an estimate and will be reviewed when the specific sub projects have been designed in full details. A census/socio-economic survey will be undertaken to obtain the total number, categories and needs and preferences of PAPs as part of the RAP preparations. This will inform

the choice of resettlement/compensation options and help estimate compensation cost.

The size of the population affected is determined by the project design which would be concluded early. In a situation where the design is reviewed, the data on PAPs will be updated to correspond to the current design. There will also be verification of the occupancy status of each displaced person in each project area. To this end, there will be determination of the number of displaced persons and their occupancy status. The date of the census determines the cut-off date for eligibility: those persons customarily occupying the site on the day of census qualify for resettlement assistance if the established occupancy rights formally or informally.

The census will be done as early as possible to avoid the inflow of other individuals into the affected right of ways (ROWs) and project areas. The census of people affected by the project is a key stage in the preparation of the RAP. The census serves five important functions:

➢ enumerating and collecting basic information on the affected population;

➢ registering the affected population by residence or locality;

➢ establishing a list of legitimate beneficiaries before the project's onset and counters spurious claims from those moving into the project area and anticipation of benefits;

➢ laying a framework for subsequent socio-economic research needed to establish fair compensation rates and to design, monitor; and evaluate sustainable restoration or development interventions; and

➢ Providing a baseline for monitoring and evaluation.

The likely displaced persons above will be further grouped according to each sub-project using identifiable groupings or demographics (such as occupational groups, gender. age groups) and their standards of living and specific needs identified, described and assessed which will be used to establish a livelihood restoration plan. See (Table 6.1) for an initial breakdown of categories of people for 4th Mainland Bridge Project. It is important to have a baseline socioeconomic survey at the feasibility stage of the project which will constitute the basis for evaluating the success of the resettlement and its impact on the people especially on improving their standard of living.   LSMOWI will give particular attention to vulnerable groups in the project area. These groups include: pregnant women, children, persons living with disabilities, food vendors, street hawkers, vulcanizers, shoe shiners, and public transport operators

CHAPTER SEVEN

7.0 Identification and Categorization of Losses and Impact

The type of impacts on people along the 4th Mainland Bridge Project Alignment are both permanent (demolition of structures) and temporary i.e potential physical relocation. The categories of PAPs are Property-owners, Filling Stations, street hawkers, market women, food vendors (see Plate 7.1 – 7.13) the major impacts on the 4th Mainland Bridge Project are those listed in the ESMF. The Social Impacts are the involuntary resettlement of the residents and business owners along the Project Alignment. Their relocation is only in terms of physical and economical relocations as some of the PAPs have temporary and movable equipment / assets which they will move and continue their economic activities while Property Owners will permanently lose the properties (houses, Offices etc.).

7.1 Pictures of Affected Structures Along the Project Corridor

Plate 7.1: Affected Structures along Ado Road and Okeira Nla

Plate 7.2: Affected Structure at Olawale Cadina Close and Milestone Close Ajah

Plate 7.3: Pictures of potential affected structures at Power line area, Ajah, Lagos

Plate 7.4: Pictures of Affected structures at Muninuola Street, Power line area, Ajah, Lagos

Plate 7.5: Affected Structures at Ajiwe-Ajah (Divine Homes) some were already marked by Lagos State

Plate 7.6: Pictures of Potential affected Structures at Lekki-Epe Express Road Ajah, Lagos
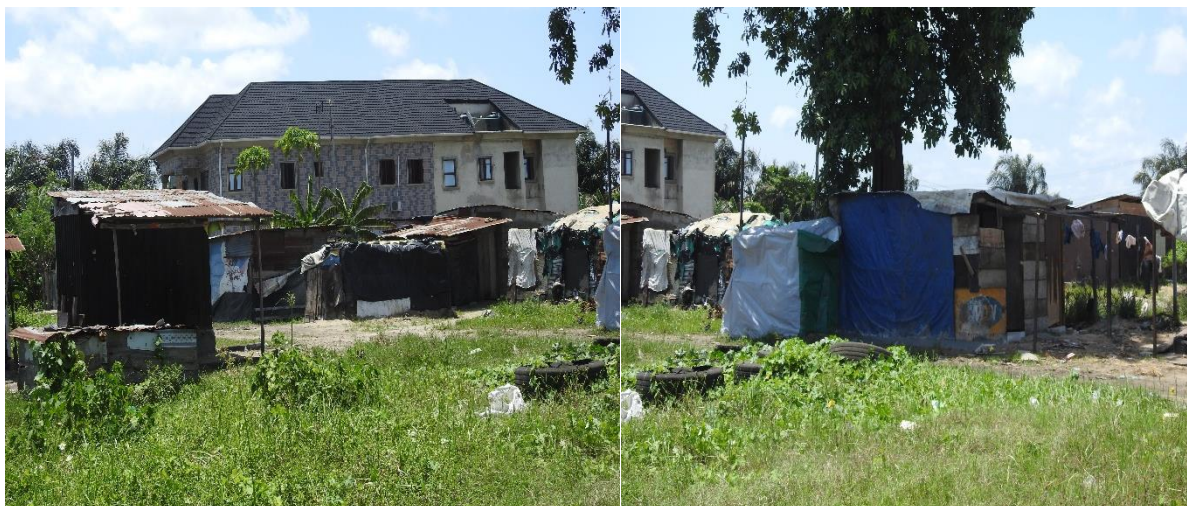
Plate 7.7: Potential Affected Structures at Ten Family

Plate 7.8: Potential Affected Structures at Itamaga, Odogunyan, and Itokin road, Ikorodu
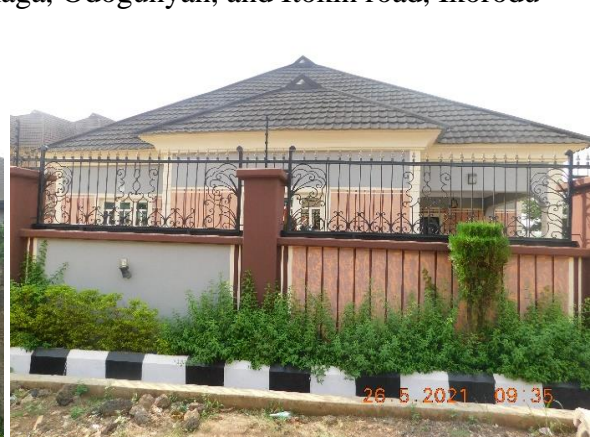
Plate 7.9: Potential affected structures at include Princess Glory close along Shagamu road, Olu Balogun Street,Titus Towoju Street, Ogunse Street, Taofeek Shokoya Street, Shamsel-deen Sanni Street, Alhaji Aregbesola street and New life Baptist Church Street, Ikorodu.

Plate 7.10: Potential affected structures at Owutu, Odungunyan, Agede, Isawo road,

Plate 7.11: Potential affected structures at Mart 'A' Street, Abolarinwa Street, Owutu, Odungunyan, Agede, Isawo road and Adeiye Street

Plate 7.12: Potential affected structures at Lonex Garden Estate, Green Villa Estate and Opic Estate Lagos

Plate 7.13: Potential affected structures at MTR Isheri Estate Olakunle Ismail Street, Osato Aideyan Street, Green Villa Estate and Opic Estate Lagos

7.2 Procedures for Delivery of Entitlement

The implementing agencies will follow appropriate procedures for assessing and delivering entitlements to affected persons. These procedures will be specified in the RAPs and will cover: Eligibility criteria and Entitlements.

The procedure for delivery of entitlements will be detailed in the RAP. LSMOWI will follow approved procedures ensuring that:

1. Full payment of compensation is carried out before contractors move to site.

2. Land/Asset valuation committee communicates the amount to be paid to the acquiring agency and the Lands Bureau will ensure that the amounts are fair and adequate.

3. LSMOWI formally makes an offer to affected persons and allow persons to accept or reject offer, offer a counter claim and seek redress under the grievance procedures established;

4. Payments are made to the affected person personally by LSMOWI in the presence of Land/Asset Valuation Committee and an independent witness of the affected person/opinion leader

5. Cheques shall be the preferred and first mode of payment; however, payment may be by

banker's draft where the amounts involved are "minimal". The acquiring agency shall make arrangements with nearest bank to effect payments by banker's draft;

6. Proper receipts are issued and copies given to the affected person, the Accounts Department of the LSMOWI and the Safeguards unit/social developmental specialists.

7. Comprehensive reports on payment made are submitted for review by Management of the LSMOWI.

7.3 Eligibility Criteria

Any person who suffers loss of or damage to an asset or loss of access to productive resources, as a result of the carrying out of any of the sub projects under the 4th Mainland Bridge Project will be considered eligible for compensation and/or resettlement assistance, provided the damage or loss is induced by the project and satisfies the conditions of the cut-off date (which will be set and enforced during the socio-economic survey). This is consistent with ESS 5 of the World Bank. For instance, provisions under 4th Mainland Bridge Project of the World Bank's ESS 5 suggest the following three criteria for eligibility which will be followed in the 4th Mainland Bridge Project:

❖ Those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country);

❖ Those who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets - provided that such claims are recognized under the laws of the country or become recognized through a process identified in the resettlement plan;

❖ Those who have no recognizable legal rights or claim to the land they are occupying. The eligibility will be based on the category of losses at the cut-off date identified through the various interest and rights derived from customary laws, common law and international conventions and in specific cases as agreed with affected community.

Eligible persons would include, but not be limited to those listed in Table 7.1.

Table 7.1:   Showing the Type of Losses, Eligibility Criteria and Entitlement for PAPs in the 4th Mainland Bridge Project.

Type of Loss	Eligibility Criteria	Entitlement
Loss of sources of income and livelihoods from loss of land.	Owners or users of land affected by the Project whose income or livelihood is impacted by Project land access	Depending on the severity of impact on the livelihoods of the affected households, livelihood restoration interventions will be designed to ensure that affected persons are not worse off in the long run, and if possible have improved livelihoods and standards of living. Measures will be designed in close consultation with the PMU and

		stakeholders such as the state and local Governments. The RAP document will provide further details on the planned livelihood restoration measures once the impacts on PAPs have been assessed and appropriate support measures identified. Potential livelihood restoration measures being considered include: ▪ Assistance in preparing land in a resettlement area for business use. ▪ Provision of education and skills programmes such as agricultural practices and other skills enhancement to improve productivity. ▪ Skills training ▪ programme for small businesses.
Loss of Structure (Across the entire 4th Mainland Bridge Project Alignment)	Various interest and rights – freeholder, leaseholder	Compensation – Capital Market Value of Asset
Business Losses (Across the entire 4th Mainland Bridge Project Alignment) – Loss of business structure – Loss of business income	▪ Business Owner / tenant ▪ Premise owner / operat or / tenant ▪ Business Owner / operat or / tenant ▪ Business Owner / operat or / tenant ▪ Landlord / Less or ▪ Business Employees / attendants ▪ Training / Person ▪ Offering apprenticeship training	Supplementary Assistance based: - –relocation allowance to new site –relocation allowance to new site –average net monthly profit; –monthly rent passing; –equivalent of rent advance to be refunded –monthly wages earned; –training fees to be refunded Calculated for a specific period taking into consideration reinstatement period.
Business Losses (Across the entire 4th Mainland Bridge Project Alignment) – Loss of business structure – Loss of business income	• Business Owner / tenant • Premise owner / operat or / tenant • Business Owner / operat or / tenant • Business Owner / operat or / tenant • Landlord / Less or • Business Employees / attendants • Training / Person	Supplementary Assistance based: - • relocation allowance to new site • relocation allowance to new site • average net monthly profit; • monthly rent passing; • equivalent of rent advance to be refunded • monthly wages earned; • training fees to be refunded Calculated for a specific period taking into consideration reinstatement period.
Loss of shelter	–Squatters living around the project site	Compensation at full replacement value for relocation of structure to

(Across the 4th Mainland Bridge Project Alignment)		resettlement site, with payment of site
Loss of training or apprenticeship (Across the entire 4th Mainland Bridge Project Alignment)	– Apprentice / Trainee	Comparable fees for alternative training
– Loss of Business, Residential or Industrial – Accommodation or Room	• Residential/Commercial/Industrial Tenant • Owner of building during the reinstatement period	Supplementary Assistance based: • comparable open market rent for alternative accommodation based on specific period (reinstatement period); and • transportation rates for the transfer of chattels or movable properties
Any other specific losses / impacts on vulnerable groups (women, aged persons, persons living with disabilities, children and pregnant women associated with any loss for the Project, will be identified during the development of the RAP	– Identified vulnerable groups in line with IFC definitions.	Special measures for effective participation, compensation, assistance and livelihood restoration will be defined in the RAP. Additional Re-establishment Resettlement Allowance - For relocated households and field only affected households from the RAP Area This is to ensure food security during this transitional period.
		– Additional assistance will also be offered to particularly vulnerable individuals and households during and after relocation in addition to the legally required Disturbance Allowance given as may be determined.

Next step: All the businesses can't be eligible to "individual compensation". For example, trade hawkers, etc. might be eligible to "collective compensation" (development project, livelihood restoration program) to be negotiated with the representatives or the syndicates.

7.4 Proof of Eligibility

LSMOWI will consider various forms of evidence as proof of eligibility to cover:
- Affected persons with formal legal rights, documented in the form of land title registration certificates, leasehold indentures, tenancy agreements, rent receipts, building and planning permits, business operating licenses, utility bills among others. Unprocessed/unregistered formal legal documents will not bar eligibility and procedures for confirming authenticity of such documents will be established in the RAP.
- Affected persons with no formal or recognized legal rights

- Criteria for establishing non-formal, undocumented or unrecognized claims to eligibility shall be established paying particular attention to each situation and its peculiarities. Alternative means of proof of eligibility will include:
  - ➢ Affidavit signed by landlords and tenants;
  - ➢ Witnessing or evidence by recognized trade union heads, traditional authority, customary heads, community elders, family heads and elders and the general community.

7.5 Defining Entitlements and Preparing an Entitlement Matrix

The basis of what is to be paid as compensation will be determined by identifying the most appropriate entitlement for each loss. Based on the entitlements, options for resettlement would be selected in accordance with the World Bank ESS 5.

LSMOWI will prepare an entitlement matrix with respect to both temporary and permanent displacement. This matrix will set the measure for the payment for all losses or impacts. It will also list the type of loss, criteria for eligibility and define entitlements as presented in Table 7.2 below.

Table 7.2: Example showing Entitlement Matrix to be adapted

Category of loss	Impact	Category of Project Affected Persons (PAP)	Basis of Approach	Packages
Loss of Structures				
Residential structures or houses				
Complete structures				
General / landowners	Loss of structure or access to structure	Immovable house owner	Square meter for square meter replacement in form of resettlement of existing immovable houses	Standard size houses, latrine and kitchen depending on the negotiated house design, Monetary compensation for annexes.
Incomplete structures		Owner	Monetary compensation	Monetary compensation at agreed square meter rate for % completed and provision of replacement plot.
Tenants				
Tenant accommodation	Loss of accommodation	Immovable accommodation/ tenant	Monetary compensation based on legal documentations	Livelihood restoration programs Re-establishment allowance Transport assistance Assistance in finding accommodation

Residential annexes (structures Separate from house, e.g. granaries, storage bins, animal pens etc.)	Loss of structure or access to structure	Immovable or building owner	Monetary compensation for all annexes, depending on resettlement house design	**Resettlement:** For people who currently have, Monetary compensation at applicable valuation rate for total existing square meters based on existing materials. All resettled households will be provided with a kitchen and latrine depending on negotiated house design.
Worship buildings (public / private)	Loss of structure or access to structure	Immovable building owner	Replace at resettlement sites	Private and public buildings of worship will be replaced or compensated for damage.
Small/Medium Enterprises (SMEs)	Cost of moving	Business owners	Transport assistance will be provided to move business materials as part of half a truckload allocated per trader.	Transport assistance to new resettlement site **Non-resident in Project Footprint:** Transport assistance to move business to resettlement site or nearby home town
	Re-establishment costs	Business owners	Salvaging will be facilitated	No resettlement nor relocation package because covered under other package
	Livelihood improvement	Current business owner	Access to credit and/or training depending on assessment of credit/training provides in areas	Access to micro-credit (Subject to rules) and other elements as set out in Livelihood Restoration Plan **Non-resident in Project Footprint:** Access to micro-credit if they move their business to a resettlement site or to where they live nearby (subject to review of specific cases)
Loss of rental income	Lost business location	Landlord (owner of Eligible Structure)	IFC standards – maintain livelihoods	New business structure and commercial plot provided

7.6 Method of Valuation

This involves the methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation under law and such supplementary measures as are necessary to achieve replacement cost for the assets. Valuation

of assets affected by the **4th Mainland Bridge** projects will be conducted by a qualified surveyor, in compliance with the national regulation. A general principle that will be adopted in the formulation of the compensation valuation is that lost income and assets will be valued at their full replacement cost such that the project affected populations will experience no net loss. This is in accordance with the LSMOWI Resettlement principles and World Bank operational standards on involuntary resettlement, ESS 5. In line with the above principle, LSMOWI will conduct an all-encompassing survey and valuation of the assets and loss of income by the Project affected persons (PAPs). From previous experience in Lagos State, below is an example of the Monetary compensation given to Project affected Persons this will be used as a guide on what could be proposed during the implementation of the project. For the 4th Mainland Bridge Project, the site-specific RAP will indicate the actual costs and entitlement for each of the corridors.

Table 7.3: Example of valuation matrix: Compensation structure

Items to replace			Rate/unit (N)
A	**Wooden structures**		
	A1	Wooden slabs/planks	
		A1.1 Stilts 2x6x12	3,500.00
		A1.2 Roofing wood 2x2x12; 2x3x12; 2x6x12	800; 1,200;
		A1.3 Plywood 4ft x 8ft (1/4, ½,3/4)	5,500; 7,500; 10,600
		A1.4 Flush doors (30x82, 33x82)	15,000; 16,500
		Security Doors	60,000
	A2	Zinc roofing sheets (Ordinary, Cameroon)	1,600; 2,500
		Asbestos	3,000
	A3	Nails (3"; 4") per bag	14,500.00;
Items to replace			**Rate/unit**
	A4	Labor	
		A 4.1 Labor per day	3,500; 5,500
		A4.2 Labor for dismantling small structure	250,000.00
		A4.3 Labor for dismantling medium structure	350,000.00
		A4.4 Labor for dismantling large structure	450,000.00
B	**Rent**		
	B1	Lockup shops (outside park)	
	B2	Lockup shops (inside park)	
C	**Relocation**		
	C1	Relocation allowance for shop owners (Small, Medium, Large)	25,000; 50,000; 75,000
	C2	Rehabilitation of temporary Bus Park	
	C3	Loss of use of Space (NURTW / Garages &/ Parks)	3,000,000.00
D	**Obstruction of Business Activities**		

	D1	loss of access and disturbance for non-moveable structures	3,000 daily
	D2	loss of access and disturbance for moveable	2,000 daily
	D3	Loss of access to tricycle operators	2,000 daily
	D4	Loss of access to Registered transporters in the course of construction works	3,000 daily
	D5	Loss of access to NURTW / Parks & Gardens Registered transporters in the course of construction works	3,000 daily

7.7 Basis of Valuation

In order to ensure that during the project implementation any person's assets or activities impacted displaced temporary will be provided full replacement cost of lost structures and are able to rebuild or replace their structures without difficulties. The valuation will estimate building/structure compensation rates based on full replacement cost without depreciation. Key points which the valuation will take care of are as follows:

a. Collection of all relevant primary and secondary data on the affected property during final detailed valuation inspection and referencing to serve as basis for assessment of loss;

b. A comprehensive primary database for monitoring, evaluation and audit

Some relevant data to be captured by the valuers will be:

1.Buildings (Immovable Structures)

– Photograph all affected immovable properties – Detailed internal measurement of buildings, shops and structures will be done.

– Collate property details which will include noting accommodation details, constructional details of affected parts and external works (fence walls, gates, pavements) affected owner's details, etc.

2.Temporary Structures (Movable Properties)

Collate data on temporary structures by categorizing temporary structures based on constructional details (wall materials, affixed to concrete slabs or not), size of structure and use of structure (business/residential) and type of business.

3.Intangible Assets (loss/impact arising from disturbance)

Obtain relevant data on households affected (tenants, owners, relatives), apprentices/trainees and determine intangible loss on households, business and livelihoods

The basis of valuation would comply with the stated legal provisions and this necessitates that the basis of valuation must assess the "Open Market Commercial Value". The methods for

valuation for the various losses are presented in Table 7.4.

Table 7.4: Method of Valuation

Type of Loss	Method of Valuation	Basis
Loss of Land	Comparative Sales Method	Based on the open market value of comparable recent land transactions
Loss of Buildings, structures and other civil works	Replacement Cost Method or Comparative sales Method (Whichever gives a commensurate value)	Full replacement cost value as if new – recent construction cost rates
Loss of Business Income and Loss of Business Goodwill	Comparative Method	Based on the average monthly net profit
Loss of Income from Rent and Expenditure Incurred for Alternative Accommodation during reinstatement period	Comparative Sales Method	Based on the comparable rent passing, rent advance paid
Expenditure incurred for Transfer of movable properties and temporary structures	Comparative Method	Based on truck/transport hiring charges
☐Loss of Wages ☐Loss of Fees from Apprentice ☐Loss of Job Training	*Comparative Method*	Based on Current Fees and Wages

Next step: Collective infrastructures and services affected by the project will be compensated following negotiations with the institutions / agencies / companies in charge.

7.8 Process for delivery of Right of Way (ROW) and Compensation

There will be some forms of demolition of structures in the 4th Mainland Bridge project. Fences of premises which are located on the existing ROW and the demolished structures including fence will be replaced or paid for. However, for the pure completeness and to ensure all other potential impacts are exhaustively covered and prepared with basic arrangements for demolition is presented. In situations where demolitions will occur, it shall occur only after replacement of the affected perimeter fence(s) and structures has been effected. Adequate notice will be served to affected persons concerning date of demolition, removal or destruction, to afford affected persons the opportunity to conveniently move out and/or salvage any building materials. Adequate notice includes serving individual notices, notification through local media (Newspapers, Radio Stations in English Hausa, Igbo and Yoruba Language at Prime Time), posters and public address systems. This should be done consistently over an adequate period

of time, usually two weeks. The presence of affected persons or representatives on the actual date of demolition, removal or destruction shall be ensured to avert any dispute in portions marked to be affected and those actually affected.

People being relocated due to the project will be proposed to benefit from a specific "relocation allowance", or will get operational support for their relocation.

Table 7.5: Preliminary resettlement Cost Estimation

Category	Activities	Cost Estimation
Resettlement and Compensation cost	• Cost of census and survey of PAPs and inventory of assets • Cost of information and consultation • Compensation for loss of assets (land, structures etc) • Cost of replacement land • Cost of preparation of replacement farmland	•
Relocation and transfer	• Cost of moving and transporting movable items • Cost of site and infrastructure development and services • Subsistence allowance during transition • Cost of replacement businesses and downtime	•
Income restoration plan	• Cost estimates for income restoration plans (e.g. training, small business, community enterprise, etc)	•
Administration costs	• Physical facilities (office space, staff housing, etc) • Transport/vehicles, materials • Operational staff (managerial, technical) and support staff • Training and monitoring • Technical assistance • Evaluation by independent agency	•

Source: Cernea, Michael, 1988. Involuntary Resettlement in DevelopmentProjects, the World Bank, Washington DC

8.0 Grievance Redress Mechanisms

LSMOWI will undertake a highly consultative process for transport development and rehabilitation that will provide ample opportunity to redress complaints informally, in addition to the existing, administrative and legal procedures.

The Land Use Act provides two formal mechanisms for grievance redress, one administrative and one legal. In the first instance, a displaced person with an occupancy certificate can lodge a complaint over valuation with the Department of Land Services. The interested party may even engage an independent Valuer to appraise his or her property, and provide the independent valuation as part of the dossier submitted for administrative departmental review. If the individual remains dissatisfied with the administrative review, he or she has legal recourse to the Courts as a last option for resolution of the matter.

LSMOWI recognizes that formal legal mechanisms for grievance redress tend to be lengthy and acrimonious procedures, and will establish an informal grievance redress mechanism through its Safeguard Unit. The social section of the Safeguard Unit will be charged with coordinating with NGOs, local government and community groups, as well as with informal committees of market vendors and transporters, to determine the design and the implementation time-table of sub-projects.

In the first instance, it helps inform the community of possible improvements in the transport network in their local area. These consultations also provide a forum to ascertain general opinions about the initiatives and to solicit both local concerns and their suggestions for alternative solutions, including how to avoid or reduce to a minimum all displacement. In the instance of vendors and transporters, such consultations help enlist their collaboration and cooperation, and contribute importantly to subproject planning and implementation.

Where displacement is unavoidable and displaced people are dissatisfied with the compensation and rehabilitation, LSMOWI will establish an informal forum for the presentation and consideration of individual complaints. The informal forum will include local government, the transport agency, and other concerned responsible parties, as deemed appropriate by LSMOWI. The existence, location purpose and composition of this forum will be publicized, so that displaced persons are knowledgeable about the availability of this forum for resolving any grievance. If a grievance cannot be resolved in these informal venues, the complainant may take recourse to the administrative and legal systems for satisfaction.

LSMOWI Safeguard Unit will be charged with coordinating with Local Government and

community groups, as well as with informal committees of market vendors and transporters, to determine the design and the implementation timetable of subprojects. Such local coordination and consultation serve various purposes. In the first instance, it helps inform the community of possible improvements in the transport network in their local area. These consultations also provide a forum to ascertain general opinions about the initiatives and to solicit both local concerns and their suggestions for alternative solutions, including how to avoid or reduce to a minimum all displacement. In the instance of vendors and transporters, such consultations help enlist their collaboration and cooperation, and contribute importantly to subproject planning and implementation.

In addition, where displacement is unavoidable and displaced people are dissatisfied with the compensation and rehabilitation, LSMOWI will establish an informal forum for the presentation and consideration of individual complaints. The informal forum will include local government, the transport agency, and other concerned responsible parties, as deemed appropriate by LSMOWI. The existence, location, purpose and composition of this forum will be publicized, so that displaced persons are aware about the availability of this forum for resolving any grievance. If a grievance cannot be resolved in these informal venues, the complainant may take recourse to the administrative and legal systems for satisfaction.

Table 8.1: Grievance Procedures Steps proposed for the 4th Mainland Bridge Project

Step	Category	Activities
1	*Reception and registration*	❖ PAP files complaints or grievances with regard to any aspect of the resettlement project verbally, in writing or through a representative in English or local language. ❖ The PAP first instance where to complaint is the "ward level". If the ward cannot resolve the complaint, then the ward will bring it up to the local government. If the grievance can be solved at 'local government level", then it stops at that level. If the grievance is not resolved at the "local government level", then it is escalated to the state level (LSMOWI PMU). If still unresolved, then a notification to the State Government (Ministry of Works and Infrastructure / Lands Bureau) will be made. ❖ Complaint recorded by LSMOWI with the name of the griever, address and location information, the nature of the grievance and the resolution desired. ❖ Grievance made acknowledged within 48 hours of receipt by an official authorized to receive grievances

2	*Resolution*	❖ All grievances referred to the appropriate party for resolution
		❖ Resolution made within 15 days after receipt of grievance.
		❖ If additional information is needed, project management can authorize additional 15 days for resolution.
		❖ Results of grievances disclosed to the griever in writing with an explanation of the basis of the decision.
		❖ The resolution of the grievances will be handled by the "Social and Environmental Specialist" with the support of the Local Authorities and the Social Safeguards LSMOWI PMU.
3	*Appeals*	❖ Grievers dissatisfied with the response to their grievance may file an appeal.
		❖ In such cases, the responsible authority assembles "The LSMOWI PMU (Project Coordinator" to hear cases including at least one disinterested party from outside the agency responsible for the resettlement project.
		❖ There will be no further redress available outside the resettlement project. In such cases, grievances would need to be pursued through the legal system.
4	**Monitoring**	During project implementation and for at least 3 months following the conclusion of the project, monthly reports will be prepared by the scheme safeguards officer regarding the number and nature of grievances filed and made available to project management.

8.0.1 Management of Reported Grievances

The procedure for managing grievances should be as follows:

a. Each person responsible at its own level (Community, Local Government and LSMOWI PMU) should disseminate their phone number for SMS complaints.

b. The LSMOWI PMU's safeguard officer/s will be the direct liaison with PAPs in collaboration with the local government representative to ensure objectivity in the grievance process.

c. Where the affected person is unable to write, the scheme level safeguards officer will write the note on the aggrieved person's behalf and duly thumb printed by the complainant.

d. Any informal grievances will also be documented.

8.0.2 Grievance Log and Response Time

The process of grievance redress will start with registration of the grievance/s to be addressed,

for reference purposes and to enable progress updates of the cases. Thus, a Grievance Form will be filed with the "Environmental and Social Officer" by the person affected by the project. The Form/Log (Table 8.2) should contain a record of the person responsible for an individual complaint, and records dates for the date the complaint was reported; date the Grievance Log was uploaded onto the project database; date information on proposed corrective action sent to complainant (if appropriate), the date the complaint was closed out and the date response was sent to complainant. The Project scheme level "Social Safeguard Officer" in recording all grievances will ensure that each complaint has an individual reference number, and is appropriately tracked and recorded actions are completed. In the case of a PAP not being satisfied by the "social and environmental officer" resolution, the PAP can appeal to the LSMOWI PMU (Project Coordinator) that would be the last instance to take decision.

Table 8.2: Format for Grievance Redress proposed for the 4th Mainland Bridge Project

Community project & Name of Complainant	Type of Grievance					Grievance Resolution			
	Affected, but not informed about impacts and options	Compensation awardedis inadequate	Compensation not paid before assets revocation	Resettlement benefits awarded are not	other	Date of complaint	Date received	Pending	Case referred to theCourt
Community Rep / Local Government Rep									
1.Complainant									
2.Complainant									
3.Complainant									
TOTAL									

CHAPTER NINE

9.0 Stakeholders Engagement

9.1 Consultation and Stakeholders' Participation

Public consultation and participation are essential because they afford potential displaced persons the opportunity to contribute to both the design and implementation of the activities and reduce possibility of conflict between LSMOWI contractors and the communities. World Bank's ESS 10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

Public consultation will take place at the inception of the planning stages of the resettlement action plan. The participation strategy would evolve around the provision the opportunity for involvement. This process would not be an isolated one because of the nature of the project, which through its implementation and design ensures consultation public participation and involvement at the local level. Therefore, as a matter of fact, public consultation would be an on-going activity taking place throughout the project. LSMOWI has a Stakeholder's Management Plan which will be used during the **4th Mainland Bridge Project**. The Stakeholders' Engagement Plan will be used during the implementation of the **4th Mainland Bridge Project**. The media and communication and safeguards units are in charge of ensuring this plan is implemented.

During the implementation of the 4th Mainland Bridge project, LSMOWI will commenced a radio programme titled 4MB Update every Wednesday 8.15 am to 9 am. There were community forums attended by local leaders (Baales/Chiefs) market leaders, community and transport leaders. Another tool be used by the 4MB is to keep in constant close touch with stakeholders and to disseminate information. LSMOWI will use social media platforms such as Instagram, WhatsApp, telephone texts, Facebook tool and its dedicated Toll-Free Line **0800**

4MB PROJECT to interface the public and engage with its customers.

In all Sub-projects under the **4th Mainland Bridge Project**, project affected persons will be consulted and involved in all resettlement activities: planning, implementation and monitoring. Their involvement provides them with greater understanding of the project, the resettlement issues and gives them opportunities to voice out their concern~ about the project, and they may offer alternatives and compromises that tend to promote implementation. The Deputy Governor of Lagos State while addressing Stakeholders of the **4th Mainland Bridge Project** on 29th September 2020 spoke extensively on the **4th Mainland Bridge Project** and engaged all Stakeholders, which included the Lagos State Leadership of the then NURTW (now Lagos Parks and Garages) and representatives of Iyaloja of Lagos State and the President General of the Market Men and Women of Nigeria. The Special Adviser, LSMOWI also elaborated on the on its plans for the 4th Mainland Bridge Project with a promise to continuously engage all Stakeholders at each stage of implementation for community entry, consultation and participation of PAPs will be addressed in the RAPs for the sub-projects and will be defined by cultural prescriptions which will be carefully studied and adhered to in each affected community. The mechanisms will include public meetings, participation in site preparation, resettlement committees for PAPs and communities and inter- agency committees for participating stakeholders. Mechanism for community entry, consultation and participation of PAPs will be addressed in the RAPs for the sub-projects and will be defined by cultural prescriptions which will be carefully studied and adhered to in each affected community. The mechanisms will include public meetings, participation in site preparation, resettlement committees for PAPs and communities and interagency committees for participating stakeholders. Public meetings: meetings with Community leaders, trade union leaders and PAPS as individuals (as during the survey) and in their groups. PAPs will also be briefed on the compensation/resettlement process and each affected person will be given the opportunity to air their views.

a.   Involvement in site preparation: Participation will also be fostered through use of local know-how and materials; the contractor will be encouraged to use local people to supply materials and goods needed for the sub-project implementation.

b.   Group formation: using existing groups or assisting PAPs to form groups provides institutional framework for participatory resettlement.

c.   Involvement in resettlement committees and monitoring teams: participation in committees would be one of the key mechanisms for involvement of PAPs in the planning, implementation and monitoring of the RAPs.

CHAPTER TEN

10.0 Monitoring and Evaluation

Monitoring and evaluation will be a continuous process and will include internal and external monitoring.

10.1 Internal Monitoring

The social safeguard unit of LSMOWI PMU will perform periodic monitoring of all resettlement activities in the Agency's portfolio. For those areas with minor resettlement, defined here as relocation of marketers, sidewalk sellers, as well as transport operators, to nearby locations without land revocation LSMOWI PMU will report at least quarterly on the:

- Implementation schedule
- Extent of community involvement
- Delivery and usage of any resettlement compensation
- Relocation of marketers and transporters, and their pre- and post-move
- Efficiency of resettlement agencies in fulfilling their obligations.

For those areas where a resettlement plan is required LSMOWI Safeguards Unit will provide a quarterly progress report on resettlement activities. The report will provide detailed explanation of resettlement progress, document the problems arising, as well as solutions devised, during implementation. In addition, the report will present in tabular format comparisons on: the estimated and actual extent compensation delivered, the number of structures demolished; the number of new built shops, market stalls and other required structures built; and all other matters that are pertinent for facilitating resettlement and project progress.

10.2 External Monitoring

For major resettlement, LSMOWI will engage an independent firm or organization to coordinate periodic external assessments of resettlement progress. LSMOWI will develop a detailed monitoring work plan for the terms of reference, based on the resettlement plan submitted to and approved by the Lagos State Government. LSMOWI will review and approve the questionnaires and inventory forms developed by the consultant, as well as the research methods, analytic techniques, and reporting formats. The aim of this independent monitoring is to provide verification of key concerns in resettlement, such as compliance with resettlement policies, implementation progress, the extent of effective consultation and participation of local populations, and the direction and extent of changes of income and livelihood among displaced persons. Careful attention to monitoring matters such as these will help ensure equitable benefits for every displaced person.

10.3 Completion Audit

An audit will be carried out to at project operation phase to determine whether the efforts to restore the living standards of the affected population have been properly designed and executed. This completion audit will verify that all physical inputs earmarked in the RAP have been delivered and all services provided. The audit will also evaluate if the mitigation actions prescribed in' the RAP have had the desired effect. The baseline conditions of the affected parties before the relocation will be used as a measure against their socio-economic status after the resettlement. To be effective, the completion audit will take place after all RAP activities have been completed including development initiatives, but before the completion of financial commitments to the programme. This will allow for flexibility to undertake any corrective action that the auditors may recommend before the project is completed.

CHAPTER ELEVEN

11.0 Disclosure of Social Safeguards Instruments

The final copy of the RPF will be disclosed by LSMOWI after the ratification of the FMEnv at the Public Panel Review, by making copies available at its Head office, relevant Local Government Council, the Federal Ministry of Environment, Lagos State Ministry of Environment and other stakeholders of the Lagos state transport sector.

Likewise, the RAP to be prepared under the 4th Mainland Bridge Project, will be disclosed by LSMOWI after Panel Review by the FMEnv, which will make copies available at its office, relevant Local Government Councils, the Lagos Ministry of Environment & Water Resources and other stakeholders. The Lagos State Government and LSMOWI will also notify the Federal Ministry of Environment of the Public Disclosure to enable it formally inform the general public through a 21 working days Public Display exercise at its Offices in Abuja, Surulere and Abeokuta, the Eti-Osa, Ikorodu and Obafemi Owode LGA Headquarters, the Ogun State Ministry of Environment and the Lagos Ministry of Environment & Water Resources with Advertisements in 3 National Newspapers and Radio Stations popular in the locality as required by extant regulations to be followed up in a Public Panel Review.

APPENDIX

Right of Way (ROW) ISLAND SECTION

Point #	Easting (mE)	Northing (mN)	Raw Description
1	565007.0643	715152.2261	ROW
2	565007.0643	715152.2261	ROW
3	564669.2083	715024.4914	ROW
4	564669.2083	715024.4914	ROW
5	564588.3209	715020.6370	ROW
6	564588.3209	715020.6370	ROW
7	564504.3393	715015.6129	ROW
8	564504.3393	715015.6129	ROW
9	564424.9143	715012.3114	ROW
10	564424.9143	715012.3114	ROW
11	564342.7375	715007.9696	ROW
12	564342.7375	715007.9696	ROW
13	564260.9641	715003.7802	ROW
14	564260.9641	715003.7802	ROW
15	564179.4530	714999.6901	ROW
16	564179.4530	714999.6901	ROW
17	564097.3085	714995.3604	ROW
18	564097.3085	714995.3604	ROW
19	564500.1719	715083.4214	ROW
20	564500.1719	715083.4214	ROW
21	564521.6422	715102.3359	ROW
22	564521.6422	715102.3359	ROW
23	564551.5787	715130.5434	ROW
24	564551.5787	715130.5434	ROW
25	564562.3861	715144.4673	ROW
26	564562.3861	715144.4673	ROW
27	564582.6911	715170.6273	ROW
28	564582.6911	715170.6273	ROW
29	564588.2851	715180.9861	ROW
30	564588.2851	715180.9861	ROW
31	564605.7915	715214.3319	ROW
32	564605.7915	715214.3319	ROW
33	564615.4155	715244.6976	ROW
34	564615.4155	715244.6976	ROW
35	564623.8694	715273.0351	ROW
36	564623.8694	715273.0351	ROW
37	564623.9424	715274.6485	ROW
38	564623.9424	715274.6485	ROW
39	564625.1727	715301.8408	ROW
40	564625.1727	715301.8408	ROW
41	564626.4030	715329.0330	ROW
42	564626.4030	715329.0330	ROW
43	564626.8390	715338.6696	ROW
44	564626.8390	715338.6696	ROW
45	564620.9748	715353.7078	ROW
46	564620.9748	715353.7078	ROW
47	564984.9830	715166.5378	ROW
48	564984.9830	715166.5378	ROW
49	564979.8812	715168.6760	ROW
50	564979.8812	715168.6760	ROW
51	564946.2895	715182.7029	ROW
52	564946.2895	715182.7029	ROW
53	564912.1420	715196.5197	ROW
54	564912.1420	715196.5197	ROW
55	564902.2380	715200.5271	ROW
56	564902.2380	715200.5271	ROW
57	564882.7038	715212.1170	ROW

58	564882.7038	715212.1170	ROW
59	564856.4693	715228.9255	ROW
60	564856.4693	715228.9255	ROW
61	564832.2235	715246.4859	ROW
62	564832.2235	715246.4859	ROW
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64	564810.0941	715264.8464	ROW
65	564801.9259	715271.8991	ROW
66	564801.9259	715271.8991	ROW
67	564792.5392	715284.9365	ROW
68	564792.5392	715284.9365	ROW
69	564777.4134	715305.9449	ROW
70	564777.4134	715305.9449	ROW
71	564768.4832	715318.3482	ROW
72	564768.4832	715318.3482	ROW
73	564759.2680	715352.5388	ROW
74	564759.2680	715352.5388	ROW
75	564751.7788	715376.4344	ROW
76	564751.7788	715376.4344	ROW
77	564750.4093	715380.7488	ROW
78	564750.4093	715380.7488	ROW
79	564742.5862	715394.6741	ROW
80	564742.5862	715394.6741	ROW
81	564741.4412	715399.2531	ROW
82	564741.4412	715399.2531	ROW
83	564736.4888	715419.0574	ROW
84	564736.4888	715419.0574	ROW
85	564734.7633	715423.4554	ROW
86	564734.7633	715423.4554	ROW
87	564725.6317	715446.7301	ROW
88	564725.6317	715446.7301	ROW
89	564611.8668	715376.9914	ROW
90	564611.8668	715376.9914	ROW
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92	564602.6612	715400.2381	ROW
93	564593.4555	715423.4848	ROW
94	564593.4555	715423.4848	ROW
95	564584.2499	715446.7315	ROW
96	564584.2499	715446.7315	ROW
97	564575.0442	715469.9781	ROW
98	564575.0442	715469.9781	ROW
99	564565.8386	715493.2248	ROW
100	564565.8386	715493.2248	ROW
101	564716.5001	715470.0048	ROW
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103	564707.6842	715493.3988	ROW
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105	564698.8683	715516.7928	ROW
106	564698.8683	715516.7928	ROW
107	564690.0524	715540.1869	ROW
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112	564671.8394	715586.7552	ROW
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114	564556.8954	715516.5707	ROW
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118	564539.5549	715563.4689	ROW

119	564530.8847	715586.9180	ROW
120	564530.8847	715586.9180	ROW
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122	564654.0417	715633.4805	ROW
123	564645.3404	715656.9179	ROW
124	564645.3404	715656.9179	ROW
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126	564636.6391	715680.3553	ROW
127	564627.9379	715703.7926	ROW
128	564627.9379	715703.7926	ROW
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130	564522.2145	715610.3671	ROW
131	564513.5443	715633.8162	ROW
132	564513.5443	715633.8162	ROW
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134	564504.8740	715657.2653	ROW
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136	564501.6640	715665.9472	ROW
137	564487.1161	715677.2786	ROW
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139	564479.3787	715682.9702	ROW
140	564479.3787	715682.9702	ROW
141	564619.0968	715727.1771	ROW
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144	564610.2557	715750.5616	ROW
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146	564601.4146	715773.9462	ROW
147	564592.5735	715797.3307	ROW
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152	564427.7356	715708.2826	ROW
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156	564384.2117	715721.7733	ROW
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158	564397.9474	715750.4746	ROW
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162	564399.6642	715777.8508	ROW
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165	564398.3192	715812.5733	ROW
166	564398.3192	715812.5733	ROW
167	564393.0619	715831.5218	ROW
168	564393.0619	715831.5218	ROW
169	564392.1225	715855.1807	ROW
170	564392.1225	715855.1807	ROW
171	564391.8664	715861.6292	ROW
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178	564583.7324	715820.7152	ROW
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186	564551.3232	715915.3704	ROW
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191	564377.7010	715956.6367	ROW
192	564377.7010	715956.6367	ROW
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198	564379.4355	715930.5654	ROW
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201	564526.0890	715986.0113	ROW
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212	564517.5123	716097.8920	ROW
213	564544.8928	716118.6577	ROW
214	564544.8928	716118.6577	ROW
215	564586.4525	716139.4234	ROW
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218	564568.9838	716167.3480	ROW
219	564532.5795	716144.9638	ROW
220	564532.5795	716144.9638	ROW
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222	564482.3088	716111.5729	ROW
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226	564465.1520	716150.0623	ROW
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228	564473.7339	716133.4148	ROW
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232	564359.0226	716029.7562	ROW
233	564350.7141	716053.3420	ROW
234	564350.7141	716053.3420	ROW
235	564342.2405	716076.4861	ROW
236	564342.2405	716076.4861	ROW
237	564333.5229	716100.2967	ROW
238	564333.5229	716100.2967	ROW
239	564325.0721	716123.8288	ROW
240	564325.0721	716123.8288	ROW

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242	564316.7524	716147.4104	ROW
243	564308.3424	716170.9579	ROW
244	564308.3424	716170.9579	ROW
245	564444.5408	716195.7239	ROW
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248	564453.6214	716172.4299	ROW
249	564434.9902	716218.8402	ROW
250	564434.9902	716218.8402	ROW
251	564438.2859	716212.0799	ROW
252	564438.2859	716212.0799	ROW
253	564423.9882	716241.4077	ROW
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257	564299.9270	716194.5033	ROW
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259	564291.5117	716218.0488	ROW
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261	564283.0964	716241.5943	ROW
262	564283.0964	716241.5943	ROW
263	564274.6810	716265.1398	ROW
264	564274.6810	716265.1398	ROW
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269	564407.4881	716288.6236	ROW
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271	564398.0302	716311.7749	ROW
272	564398.0302	716311.7749	ROW
273	564415.2629	716264.8360	ROW
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275	564389.1891	716335.1594	ROW
276	564389.1891	716335.1594	ROW
277	564380.3480	716358.5439	ROW
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284	564371.5070	716381.9284	ROW
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289	564363.2912	716405.5494	ROW
290	564363.2912	716405.5494	ROW
291	564355.0755	716429.1703	ROW
292	564355.0755	716429.1703	ROW
293	564346.2344	716452.5548	ROW
294	564346.2344	716452.5548	ROW
295	564337.3933	716475.9393	ROW
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297	564327.6858	716498.9963	ROW
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299	564223.8204	716406.2732	ROW
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303	564206.4411	716453.1567	ROW
304	564206.4411	716453.1567	ROW
305	564317.9783	716522.0532	ROW
306	564317.9783	716522.0532	ROW
307	564308.2708	716545.1101	ROW
308	564308.2708	716545.1101	ROW
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310	564197.6000	716476.5413	ROW
311	564188.2716	716499.7415	ROW
312	564188.2716	716499.7415	ROW
313	564178.9431	716522.9418	ROW
314	564178.9431	716522.9418	ROW
315	564168.4138	716545.6880	ROW
316	564168.4138	716545.6880	ROW
317	564157.8548	716568.4230	ROW
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325	564281.7923	716615.2806	ROW
326	564281.7923	716615.2806	ROW
327	564272.9512	716638.6651	ROW
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329	564264.1102	716662.0496	ROW
330	564264.1102	716662.0496	ROW
331	564255.2691	716685.4341	ROW
332	564255.2691	716685.4341	ROW
333	564246.4280	716708.8186	ROW
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337	564126.7278	716634.0795	ROW
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339	564125.8272	716636.4955	ROW
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342	564117.0946	716659.9210	ROW
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344	564108.3619	716683.3465	ROW
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346	564099.6293	716706.7720	ROW
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357	564228.7458	716755.5877	ROW
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360	564219.9047	716778.9722	ROW
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364	564223.9034	716797.8437	ROW
365	564229.2084	716809.2167	ROW
366	564229.2084	716809.2167	ROW
367	564236.3181	716825.9601	ROW
368	564236.3181	716825.9601	ROW
369	564240.1414	716838.9505	ROW
370	564240.1414	716838.9505	ROW
371	564232.4948	716840.8608	ROW
372	564232.4948	716840.8608	ROW
373	564228.2892	716831.0225	ROW
374	564228.2892	716831.0225	ROW
375	564223.7968	716831.7867	ROW
376	564223.7968	716831.7867	ROW
377	564202.0955	716840.9883	ROW
378	564202.0955	716840.9883	ROW
379	564193.8522	716847.9497	ROW
380	564193.8522	716847.9497	ROW
381	564184.8267	716872.6184	ROW
382	564184.8267	716872.6184	ROW
383	564176.2363	716896.0977	ROW
384	564176.2363	716896.0977	ROW
385	564167.6459	716919.5770	ROW
386	564167.6459	716919.5770	ROW
387	564159.0555	716943.0563	ROW
388	564159.0555	716943.0563	ROW
389	564150.4652	716966.5356	ROW
390	564150.4652	716966.5356	ROW
391	564061.5910	716758.1156	ROW
392	564061.5910	716758.1156	ROW
393	564072.5827	716776.7277	ROW
394	564072.5827	716776.7277	ROW
395	564076.0382	716794.6603	ROW
396	564076.0382	716794.6603	ROW
397	564072.9272	716803.5850	ROW
398	564072.9272	716803.5850	ROW
399	564063.8180	716826.8682	ROW
400	564063.8180	716826.8682	ROW
401	564054.8845	716850.2177	ROW
402	564054.8845	716850.2177	ROW
403	564046.3786	716873.7290	ROW
404	564046.3786	716873.7290	ROW
405	564042.1341	716871.5310	ROW
406	564042.1341	716871.5310	ROW
407	564035.9172	716878.9383	ROW
408	564035.9172	716878.9383	ROW
409	564040.8350	716890.2240	ROW
410	564040.8350	716890.2240	ROW
411	564038.2681	716897.3897	ROW
412	564038.2681	716897.3897	ROW
413	564029.8359	716920.9288	ROW
414	564029.8359	716920.9288	ROW
415	564141.8748	716990.0149	ROW
416	564141.8748	716990.0149	ROW
417	564133.2844	717013.4942	ROW
418	564133.2844	717013.4942	ROW
419	564124.6940	717036.9735	ROW
420	564124.6940	717036.9735	ROW
421	564124.2589	717038.1629	ROW
422	564124.2589	717038.1629	ROW
423	564021.4037	716944.4679	ROW

424	564021.4037	716944.4679	ROW
425	564018.8368	716951.6335	ROW
426	564018.8368	716951.6335	ROW
427	564012.7653	716965.4513	ROW
428	564012.7653	716965.4513	ROW
429	563970.6371	716938.0370	ROW
430	563970.6371	716938.0370	ROW
431	563962.5048	716948.9268	ROW
432	563962.5048	716948.9268	ROW
433	563958.6816	716954.0464	ROW
434	563958.6816	716954.0464	ROW
435	563977.3322	716966.7106	ROW
436	563977.3322	716966.7106	ROW
437	563979.9625	716964.0822	ROW
438	563979.9625	716964.0822	ROW
439	564004.9810	716983.2186	ROW
440	564004.9810	716983.2186	ROW
441	564002.2629	716990.6854	ROW
442	564002.2629	716990.6854	ROW
443	563993.7108	717014.1792	ROW
444	563993.7108	717014.1792	ROW
445	563985.1587	717037.6729	ROW
446	563985.1587	717037.6729	ROW
447	563976.6065	717061.1667	ROW
448	563976.6065	717061.1667	ROW
449	563967.8571	717084.5858	ROW
450	563967.8571	717084.5858	ROW
451	563962.0400	717099.8221	ROW
452	563962.0400	717099.8221	ROW
453	564130.7541	717047.0274	ROW
454	564130.7541	717047.0274	ROW
455	564119.2091	717060.2941	ROW
456	564119.2091	717060.2941	ROW
457	564109.2907	717071.4447	ROW
458	564109.2907	717071.4447	ROW
459	564145.7993	717098.4070	ROW
460	564145.7993	717098.4070	ROW
461	564178.1561	717101.3654	ROW
462	564178.1561	717101.3654	ROW
463	564188.5753	717085.5064	ROW
464	564188.5753	717085.5064	ROW
465	564187.3406	717087.3857	ROW
466	564187.3406	717087.3857	ROW
467	564128.2265	717118.4903	ROW
468	564128.2265	717118.4903	ROW
469	564110.6536	717138.5735	ROW
470	564110.6536	717138.5735	ROW
471	564109.9276	717139.4033	ROW
472	564109.9276	717139.4033	ROW
473	564121.0859	717154.8903	ROW
474	564121.0859	717154.8903	ROW
475	564112.9639	717166.1741	ROW
476	564112.9639	717166.1741	ROW
477	564097.8413	717187.1837	ROW
478	564097.8413	717187.1837	ROW
479	564082.2882	717208.0306	ROW
480	564082.2882	717208.0306	ROW
481	564069.6337	717224.8916	ROW
482	564069.6337	717224.8916	ROW
483	564135.3437	717249.6709	ROW
484	564135.3437	717249.6709	ROW

485	564160.1398	717267.0163	ROW
486	564160.1398	717267.0163	ROW
487	564172.5379	717272.5916	ROW
488	564172.5379	717272.5916	ROW
489	564184.3161	717287.4592	ROW
490	564184.3161	717287.4592	ROW
491	564197.5558	717318.8816	ROW
492	564197.5558	717318.8816	ROW
493	564213.4517	717379.1423	ROW
494	564213.4517	717379.1423	ROW
495	564241.8254	717395.4744	ROW
496	564241.8254	717395.4744	ROW
497	564290.9398	717423.7449	ROW
498	564290.9398	717423.7449	ROW
499	564319.4554	717434.2761	ROW
500	564319.4554	717434.2761	ROW
501	564341.1522	717426.8423	ROW
502	564341.1522	717426.8423	ROW
503	564347.9711	717385.9566	ROW
504	564347.9711	717385.9566	ROW
505	564334.9530	717341.3540	ROW
506	564334.9530	717341.3540	ROW
507	564321.3151	717302.9462	ROW
508	564321.3151	717302.9462	ROW
509	564344.2516	717288.6981	ROW
510	564344.2516	717288.6981	ROW
511	564375.0468	717345.0709	ROW
512	564375.0468	717345.0709	ROW
513	564386.2126	717378.2206	ROW
514	564386.2126	717378.2206	ROW
515	564387.6450	717436.7540	ROW
516	564387.6450	717436.7540	ROW
517	564399.4077	717468.7069	ROW
518	564399.4077	717468.7069	ROW
519	564429.7831	717501.5394	ROW
520	564429.7831	717501.5394	ROW
521	564456.4389	717546.1420	ROW
522	564456.4389	717546.1420	ROW
523	564535.1669	717725.1719	ROW
524	564535.1669	717725.1719	ROW
525	564497.3527	717749.9511	ROW
526	564497.3527	717749.9511	ROW
527	564442.1225	717630.2688	ROW
528	564442.1225	717630.2688	ROW
529	564393.1500	717546.0194	ROW
530	564393.1500	717546.0194	ROW
531	564352.8561	717544.7805	ROW
532	564352.8561	717544.7805	ROW
533	564323.7206	717587.5247	ROW
534	564323.7206	717587.5247	ROW
535	564305.3822	717572.6898	ROW
536	564305.3822	717572.6898	ROW
537	564248.8870	717508.3186	ROW
538	564248.8870	717508.3186	ROW
539	564221.4314	717451.3344	ROW
540	564221.4314	717451.3344	ROW
541	564190.8078	717404.9028	ROW
542	564190.8078	717404.9028	ROW
543	564151.7363	717367.9686	ROW
544	564151.7363	717367.9686	ROW
545	564105.8008	717389.0738	ROW

546	564105.8008	717389.0738	ROW
547	564083.6252	717347.9186	ROW
548	564083.6252	717347.9186	ROW
549	564184.3650	717305.6275	ROW
550	564184.3650	717305.6275	ROW
551	564184.3650	717305.6275	ROW
552	564184.3650	717305.6275	ROW
553	564172.9207	717280.6101	ROW
554	564172.9207	717280.6101	ROW
555	564157.2463	717273.6485	ROW
556	564157.2463	717273.6485	ROW
557	564134.6055	717257.1147	ROW
558	564134.6055	717257.1147	ROW
559	564063.5060	717230.7287	ROW
560	564063.5060	717230.7287	ROW
561	564034.2202	717216.5844	ROW
562	564034.2202	717216.5844	ROW
563	563997.5720	717155.1094	ROW
564	563997.5720	717155.1094	ROW
565	564020.6628	717196.5332	ROW
566	564020.6628	717196.5332	ROW
567	563961.7670	717111.6034	ROW
568	563961.7670	717111.6034	ROW
569	563932.3166	717073.9390	ROW
570	563932.3166	717073.9390	ROW
571	563906.9709	717053.6285	ROW
572	563906.9709	717053.6285	ROW
573	563866.0366	717028.4042	ROW
574	563866.0366	717028.4042	ROW
575	563831.1264	717023.6252	ROW
576	563831.1264	717023.6252	ROW
577	563810.0847	717021.4747	ROW
578	563810.0847	717021.4747	ROW
579	563799.0856	717023.8642	ROW
580	563799.0856	717023.8642	ROW
581	563766.0883	716992.0842	ROW
582	563766.0883	716992.0842	ROW
583	563751.6935	716982.0208	ROW
584	563751.6935	716982.0208	ROW
585	563700.0456	716952.1523	ROW
586	563700.0456	716952.1523	ROW
587	563668.7868	716931.5552	ROW
588	563668.7868	716931.5552	ROW
589	563542.6490	716848.4402	ROW
590	563542.6490	716848.4402	ROW
591	563419.4156	716767.2389	ROW
592	563419.4156	716767.2389	ROW
593	563263.1822	716716.6479	ROW
594	563263.1822	716716.6479	ROW
595	563266.9801	716704.5654	ROW
596	563266.9801	716704.5654	ROW
597	563314.9640	716629.2137	ROW
598	563314.9640	716629.2137	ROW
599	563366.8650	716543.0974	ROW
600	563366.8650	716543.0974	ROW
601	563387.2604	716480.8365	ROW
602	563387.2604	716480.8365	ROW
603	563388.4835	716422.1664	ROW
604	563388.4835	716422.1664	ROW
605	563350.7487	716362.5860	ROW
606	563350.7487	716362.5860	ROW

607	563327.3271	716325.6051	ROW
608	563327.3271	716325.6051	ROW
609	563296.1372	716279.7691	ROW
610	563296.1372	716279.7691	ROW
611	563318.1535	716260.2124	ROW
612	563318.1535	716260.2124	ROW
613	563372.5829	716313.9934	ROW
614	563372.5829	716313.9934	ROW
615	563428.9359	716384.5097	ROW
616	563428.9359	716384.5097	ROW
617	563449.7291	716427.9012	ROW
618	563449.7291	716427.9012	ROW
619	563469.9107	716522.6289	ROW
620	563469.9107	716522.6289	ROW
621	563519.4918	716588.8267	ROW
622	563519.4918	716588.8267	ROW
623	563565.3591	716612.0503	ROW
624	563565.3591	716612.0503	ROW
625	563600.2185	716637.7184	ROW
626	563600.2185	716637.7184	ROW
627	563647.9205	716693.9440	ROW
628	563647.9205	716693.9440	ROW
629	563630.8478	716714.2916	ROW
630	563630.8478	716714.2916	ROW
631	563603.9388	716696.5684	ROW
632	563603.9388	716696.5684	ROW
633	563576.4184	716672.1225	ROW
634	563576.4184	716672.1225	ROW
635	563540.3360	716647.0655	ROW
636	563540.3360	716647.0655	ROW
637	563518.9313	716666.6222	ROW
638	563518.9313	716666.6222	ROW
639	563529.9394	716695.3461	ROW
640	563529.9394	716695.3461	ROW
641	563549.5094	716732.6261	ROW
642	563549.5094	716732.6261	ROW
643	563689.9650	716937.7624	ROW
644	563689.9650	716937.7624	ROW
645	563752.4466	716975.4240	ROW
646	563752.4466	716975.4240	ROW
647	563775.3840	716993.3141	ROW
648	563775.3840	716993.3141	ROW
649	563796.6431	717013.4404	ROW
650	563796.6431	717013.4404	ROW
651	563808.1098	717015.4809	ROW
652	563808.1098	717015.4809	ROW
653	563866.0148	717021.2674	ROW
654	563866.0148	717021.2674	ROW
655	563913.6908	717050.2915	ROW
656	563913.6908	717050.2915	ROW
657	563936.5954	717070.6021	ROW
658	563936.5954	717070.6021	ROW
659	564021.4691	714991.5905	ROW
660	564021.4691	714991.5905	ROW
661	563988.9374	714992.0922	ROW
662	563988.9374	714992.0922	ROW
663	563968.7264	714991.4928	ROW
664	563968.7264	714991.4928	ROW
665	563958.5853	714975.4387	ROW
666	563958.5853	714975.4387	ROW
667	563942.0183	714974.5357	ROW

668	563942.0183	714974.5357	ROW
669	563940.3113	714980.5560	ROW
670	563940.3113	714980.5560	ROW
671	563936.4959	714982.1614	ROW
672	563936.4959	714982.1614	ROW
673	563932.0095	714994.3886	ROW
674	563932.0095	714994.3886	ROW
675	563898.9543	714995.3956	ROW
676	563898.9543	714995.3956	ROW
677	563854.3094	714992.8779	ROW
678	563854.3094	714992.8779	ROW
679	563807.8336	714992.3817	ROW
680	563807.8336	714992.3817	ROW
681	563562.9937	714979.1946	ROW
682	563562.9937	714979.1946	ROW
683	563524.4423	714977.7700	ROW
684	563524.4423	714977.7700	ROW
685	563466.5360	714977.7266	ROW
686	563466.5360	714977.7266	ROW
687	563416.3062	714976.4655	ROW
688	563416.3062	714976.4655	ROW
689	563413.8706	715019.8504	ROW
690	563413.8706	715019.8504	ROW
691	563461.3627	715022.4606	ROW
692	563461.3627	715022.4606	ROW
693	563558.8926	715027.2885	ROW
694	563558.8926	715027.2885	ROW
695	563667.4447	715032.6620	ROW
696	563667.4447	715032.6620	ROW
697	563763.7315	715037.4284	ROW
698	563763.7315	715037.4284	ROW
699	563841.1438	715041.6143	ROW
700	563841.1438	715041.6143	ROW
701	563872.5800	715043.6584	ROW
702	563872.5800	715043.6584	ROW
703	563935.2869	715048.3958	ROW
704	563935.2869	715048.3958	ROW
705	563992.4857	715053.2865	ROW
706	563992.4857	715053.2865	ROW
707	564042.0032	715056.9902	ROW
708	564042.0032	715056.9902	ROW
709	564111.0157	715062.5822	ROW
710	564111.0157	715062.5822	ROW
711	564256.9582	715070.2829	ROW
712	564256.9582	715070.2829	ROW
713	564310.7273	715072.1455	ROW
714	564310.7273	715072.1455	ROW
715	564379.6636	715077.1751	ROW
716	564379.6636	715077.1751	ROW
717	564463.5311	715083.9059	ROW
718	564463.5311	715083.9059	ROW

Right of Way (ROW) MAINLAND SECTION

Point Number	Easting (mE)	Northing (mE)	Raw Description
1	562601.2047	722884.771	ROW_M
2	562652.5456	722907.7787	ROW_M
3	562706.6068	722938.4296	ROW_M
4	562749.2574	722967.9175	ROW_M
5	562784.7308	722996.6721	ROW_M
6	562815.0784	723024.903	ROW_M
7	562841.4809	723052.7307	ROW_M
8	562864.6920	723080.2325	ROW_M
9	562885.2282	723107.4609	ROW_M
10	562903.4609	723134.4539	ROW_M
11	562919.6678	723161.24	ROW_M
12	562934.0622	723187.8408	ROW_M
13	562946.8823	723214.4293	ROW_M
14	562958.3618	723241.3302	ROW_M
15	562968.0645	723267.1956	ROW_M
16	562973.8706	723284.5431	ROW_M
17	562972.4965	723296.1758	ROW_M
18	562969.8911	723318.2326	ROW_M
19	562966.7551	723344.7813	ROW_M
20	562964.0660	723367.546	ROW_M
21	562961.4432	723389.7503	ROW_M
22	562957.9448	723419.3661	ROW_M
23	562955.3736	723441.1329	ROW_M
24	562952.1911	723468.0753	ROW_M
25	562949.3990	723491.7123	ROW_M
26	562946.7616	723514.0397	ROW_M
27	562944.6499	723531.9171	ROW_M
28	562940.4622	723567.3683	ROW_M
29	562937.1487	723595.4196	ROW_M
30	562933.7594	723618.9576	ROW_M
31	562929.5448	723645.2389	ROW_M
32	562925.9082	723667.9155	ROW_M
33	562922.2735	723690.5805	ROW_M
34	562918.5939	723713.5257	ROW_M
35	562914.4509	723739.3603	ROW_M
36	562910.0819	723766.6041	ROW_M
37	562906.5068	723788.8972	ROW_M
38	562902.4863	723813.5112	ROW_M
39	562898.5823	723838.3124	ROW_M
40	562894.5994	723863.1488	ROW_M
41	562890.6149	723887.9946	ROW_M
42	562886.7078	723912.0135	ROW_M
43	562882.6791	723937.4806	ROW_M
44	562878.7931	723961.7348	ROW_M
45	562875.2761	723986.4814	ROW_M
46	562871.6529	724011.1691	ROW_M
47	562868.0585	724035.8336	ROW_M
48	562864.5013	724060.3784	ROW_M
49	562860.8682	724085.1222	ROW_M
50	562857.1331	724110.0689	ROW_M
51	562853.5424	724135.2941	ROW_M
52	562849.9036	724160.4088	ROW_M
53	562846.2394	724185.5528	ROW_M
54	562842.5827	724210.6484	ROW_M
55	562839.0014	724235.6576	ROW_M
56	562835.2665	724260.8519	ROW_M
57	562831.6120	724285.9689	ROW_M
58	562827.9465	724311.0816	ROW_M

59	562824.3045	724336.1945	ROW_M
60	562820.6565	724361.3044	ROW_M
61	562816.9693	724386.407	ROW_M
62	562813.3680	724411.5193	ROW_M
63	562806.7586	724436.2187	ROW_M
64	562797.8844	724460.5863	ROW_M
65	562789.0196	724484.9277	ROW_M
66	562780.1643	724509.2435	ROW_M
67	562771.3181	724533.5339	ROW_M
68	562770.3579	724536.1706	ROW_M
69	562770.0526	724558.9322	ROW_M
70	562769.7099	724584.4837	ROW_M
71	562769.3669	724610.0528	ROW_M
72	562769.0237	724635.64	ROW_M
73	562768.6803	724661.2456	ROW_M
74	562769.2645	724687.0206	ROW_M
75	562771.2447	724713.0498	ROW_M
76	562773.1533	724739.0946	ROW_M
77	562775.0187	724764.0738	ROW_M
78	562776.9937	724790.5207	ROW_M
79	562778.9135	724816.229	ROW_M
80	562780.8071	724841.5858	ROW_M
81	562783.2772	724874.6624	ROW_M
82	562782.2103	724860.3759	ROW_M
83	562797.0467	724908.1805	ROW_M
84	562805.1815	724927.9824	ROW_M
85	562817.4177	724957.7683	ROW_M
86	562824.1310	724974.11	ROW_M
87	562832.9498	724995.577	ROW_M
88	562841.0010	725015.1755	ROW_M
89	562833.3272	725062.0392	ROW_M
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94	562814.2651	725210.5948	ROW_M
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110	562600.7403	723002.388	ROW_M
111	562600.7403	723026.6952	ROW_M
112	562600.7403	723047.5599	ROW_M
113	562600.7403	723063.615	ROW_M
114	562600.7403	723080.8945	ROW_M
115	562600.7403	723095.9588	ROW_M
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129	562587.7775	723382.2759	ROW_M
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132	562585.4356	723415.7168	ROW_M
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488	561373.6554	728210.2362	ROW_M
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491	561359.8368	728258.8294	ROW_M
492	561354.8343	728283.8244	ROW_M
493	561351.9100	728298.4363	ROW_M
494	561346.6100	728307.5976	ROW_M
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525	560805.6717	728659.5321	ROW_M
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527	560844.4486	728692.0061	ROW_M
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883	560388.8606	731602.1366	ROW_M
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889	560284.5822	731717.1159	ROW_M
890	560267.1976	731736.2846	ROW_M
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892	560232.3927	731774.6611	ROW_M
893	560257.6084	731811.9899	ROW_M
894	560282.8242	731849.3187	ROW_M
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896	560253.8709	731878.058	ROW_M
897	560223.4426	731843.5531	ROW_M
898	560185.8561	731800.931	ROW_M
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903	560088.5785	731885.2426	ROW_M
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1277	556891.0352	733724.8769	ROW_M
1278	556905.4798	733752.7799	ROW_M

1279	556919.7782	733780.4006	ROW_M
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1281	556944.1878	733827.6064	ROW_M
1282	556929.9140	733833.8534	ROW_M
1283	556907.1944	733843.7968	ROW_M
1284	556884.4731	733853.7409	ROW_M
1285	556861.6496	733863.4455	ROW_M
1286	556838.8292	733873.1895	ROW_M
1287	556815.8539	733883.0518	ROW_M
1288	556792.7349	733893.1096	ROW_M
1289	556769.9965	733903.0018	ROW_M
1290	556763.1384	733905.9854	ROW_M
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1292	556757.2916	733876.2841	ROW_M
1293	556749.6857	733877.8567	ROW_M
1294	556750.9970	733890.6991	ROW_M
1295	556747.8497	733904.3278	ROW_M
1296	556741.4009	733914.4821	ROW_M
1297	556723.4984	733921.3989	ROW_M
1298	556700.1725	733930.4112	ROW_M
1299	556677.0770	733939.9818	ROW_M
1300	556654.0055	733949.611	ROW_M
1301	556631.0067	733959.416	ROW_M
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1303	556584.9925	733978.9861	ROW_M
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1305	556538.9306	733998.4406	ROW_M
1306	556515.2674	734008.4043	ROW_M
1307	556491.3074	734017.2919	ROW_M
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1309	556443.4394	734035.3602	ROW_M
1310	556419.8908	734045.319	ROW_M
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1312	556369.5840	734058.7399	ROW_M
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1314	558914.5298	732784.7428	ROW_M
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1317	558863.9262	732829.3908	ROW_M
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1319	558869.8405	732825.7952	ROW_M
1320	558863.8577	732844.8708	ROW_M
1321	558854.7396	732869.7595	ROW_M
1322	558840.2724	732893.1287	ROW_M
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1324	558812.7050	732933.7088	ROW_M
1325	558812.1557	732938.5391	ROW_M
1326	558809.5681	732961.2948	ROW_M
1327	558847.2188	732972.2687	ROW_M
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1336	559065.9502	733025.5425	ROW_M
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1347	559168.3448	733035.7748	ROW_M
1348	559158.9340	733043.2982	ROW_M
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1385	558976.8635	733159.0796	ROW_M
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1387	558940.3916	733169.8219	ROW_M
1388	558922.9463	733174.9751	ROW_M
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1390	558885.9802	733182.9568	ROW_M
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1392	558849.8587	733188.6387	ROW_M
1393	558831.2129	733191.5717	ROW_M
1394	558817.4812	733193.7317	ROW_M
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1474	557767.8952	733887.3415	ROW_M
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1476	557762.3121	733923.0109	ROW_M
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1482	557797.5466	733982.0976	ROW_M
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1491	557681.6886	734134.5497	ROW_M
1492	557678.6201	734139.201	ROW_M
1493	557672.8843	734147.8954	ROW_M
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1495	557661.6227	734164.8887	ROW_M
1496	557656.2433	734173.12	ROW_M
1497	557649.8086	734181.2838	ROW_M
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1499	557636.0839	734198.7931	ROW_M
1500	557627.7815	734209.3662	ROW_M
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1505	557576.4596	734263.6395	ROW_M
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1507	557557.2832	734283.3184	ROW_M
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1509	557532.4405	734316.1828	ROW_M
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1529	557416.3263	734556.6422	ROW_M
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1532	557441.8553	734512.0341	ROW_M
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1534	557383.8171	734565.8988	ROW_M
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1543	557352.5640	734746.3234	ROW_M
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1546	557365.8568	734794.3894	ROW_M
1547	557371.8991	734807.8864	ROW_M
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1549	557396.7658	734821.8796	ROW_M
1550	557389.3103	734820.4121	ROW_M
1551	557410.0526	734816.7728	ROW_M
1552	557420.4296	734812.7844	ROW_M
1553	557426.1295	734827.7483	ROW_M
1554	557404.4931	734833.9259	ROW_M
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1556	557380.3840	734849.3699	ROW_M
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1558	557369.5659	734875.0068	ROW_M
1559	557352.5659	734879.9489	ROW_M
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1561	557341.8786	734846.0051	ROW_M
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1565	557324.1085	734797.2941	ROW_M
1566	557318.8672	734784.4278	ROW_M
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1568	557309.8195	734745.4713	ROW_M
1569	557306.3269	734731.1002	ROW_M
1570	557302.8002	734716.3807	ROW_M
1571	557299.9891	734704.4971	ROW_M
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1579	557246.4287	734515.7527	ROW_M
1580	557255.9930	734544.5962	ROW_M
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1583	557269.6851	734592.366	ROW_M

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1586	557197.3665	734350.1012	ROW_M
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1599	557175.3634	734303.5144	ROW_M
1600	557171.1389	734293.8246	ROW_M
1601	557167.2226	734285.1345	ROW_M
1602	557163.9674	734277.892	ROW_M
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1606	557150.5097	734243.4554	ROW_M
1607	557147.5471	734236.8521	ROW_M
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1609	557137.7970	734214.4155	ROW_M
1610	557134.9663	734207.9015	ROW_M
1611	557132.8679	734203.0861	ROW_M
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1613	557120.8347	734181.2356	ROW_M
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1615	557107.5411	734157.4022	ROW_M
1616	557099.7659	734137.7272	ROW_M
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1618	557089.1001	734115.7728	ROW_M
1619	557087.7667	734101.5528	ROW_M
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1622	557065.5365	734069.5895	ROW_M
1623	557060.3466	734056	ROW_M
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1625	557049.3201	734031.4583	ROW_M
1626	557047.3558	734018.1268	ROW_M
1627	557038.2187	734011.9385	ROW_M
1628	557037.2799	733997.1546	ROW_M
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1630	557026.7544	733988.0042	ROW_M
1631	557023.9522	733981.0799	ROW_M
1632	557016.0950	733971.2453	ROW_M
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1635	557006.3686	733948.6646	ROW_M
1636	557271.0584	734383.5923	ROW_M
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1638	557320.5821	734339.452	ROW_M
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1640	557376.3094	734289.0537	ROW_M
1641	557398.2892	734269.9835	ROW_M
1642	557411.7341	734257.9322	ROW_M
1643	557451.4615	734222.3223	ROW_M
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1647	557529.1639	734149.5012	ROW_M
1648	557550.7839	734130.9817	ROW_M
1649	557569.6848	734113.5718	ROW_M
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1651	557612.7944	734072.8785	ROW_M
1652	557629.5933	734056.0624	ROW_M
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1654	557663.7708	734023.2269	ROW_M
1655	557671.0055	734016.7372	ROW_M
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1657	557673.2543	733974.3843	ROW_M
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1661	557617.6077	733908.1843	ROW_M
1662	557602.9221	733890.2068	ROW_M
1663	557611.2976	733901.6452	ROW_M
1664	557593.8442	733879.094	ROW_M
1665	557584.5956	733867.7722	ROW_M
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1667	557563.0037	733841.7869	ROW_M
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1670	557521.4787	733793.5304	ROW_M
1671	557502.6884	733771.3138	ROW_M
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1674	557473.9877	733737.7795	ROW_M
1675	557466.4411	733741.2949	ROW_M
1676	557443.5465	733751.9597	ROW_M
1677	557420.6562	733762.6225	ROW_M
1678	557397.6871	733773.1166	ROW_M
1679	557374.5550	733783.2678	ROW_M
1680	557351.8898	733794.361	ROW_M
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1682	557306.8844	733817.3069	ROW_M
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1684	557259.9364	733836.0137	ROW_M
1685	557237.0484	733846.6238	ROW_M
1686	557214.1611	733857.2337	ROW_M
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1688	557168.3863	733878.4534	ROW_M
1689	557145.3944	733888.8353	ROW_M
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1691	557099.4108	733909.5992	ROW_M
1692	557076.4182	733919.9814	ROW_M
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1694	557062.1861	733956.4915	ROW_M
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1696	557084.2330	734001.7907	ROW_M
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1698	557096.7836	734027.2329	ROW_M
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1702	557128.3933	734089.0667	ROW_M
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1704	557142.6142	734119.6994	ROW_M
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1910	555170.2887	735444.1176	ROW_M
1911	555157.5098	735467.7304	ROW_M
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1913	555131.8002	735515.2365	ROW_M
1914	555129.1389	735520.154	ROW_M
1915	555115.1492	735536.2037	ROW_M
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1917	555079.9654	735576.5682	ROW_M
1918	555062.3900	735596.7316	ROW_M
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1928	554896.3136	735771.1681	ROW_M
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1931	554832.1829	735819.7392	ROW_M
1932	554810.8627	735835.8866	ROW_M
1933	554790.4706	735853.2098	ROW_M
1934	554770.2796	735870.8627	ROW_M
1935	554769.0999	735871.8941	ROW_M
1936	554761.5003	735904.3315	ROW_M
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1938	554749.3724	735994.9372	ROW_M
1939	554750.7940	735964.3482	ROW_M
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1941	554748.5340	735983.22	ROW_M
1942	554742.3173	736035.1295	ROW_M
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1948	554750.3845	736139.422	ROW_M
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1952	554784.2016	736221.1092	ROW_M
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1954	554821.9288	736286.532	ROW_M
1955	554856.4388	736326.6325	ROW_M
1956	554892.5911	736368.6413	ROW_M
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1963	554521.6540	736284.994	ROW_M
1964	554459.9263	736275.0859	ROW_M
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1970	554688.9905	735941.9335	ROW_M
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1985	554378.7556	736181.4838	ROW_M
1986	554376.6777	736184.9193	ROW_M
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1988	556369.5840	734058.7399	ROW_M
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1990	556322.7648	734079.7777	ROW_M
1991	556299.3295	734090.3081	ROW_M
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1993	556255.4021	734116.914	ROW_M
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1995	556212.8943	734146.0287	ROW_M
1996	556190.8534	734159.05	ROW_M
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1999	556124.6601	734197.9516	ROW_M
2000	556102.8687	734211.3734	ROW_M
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2002	556059.5238	734238.5958	ROW_M
2003	556037.9813	734252.4127	ROW_M
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2006	555991.7036	734275.3395	ROW_M
2007	555970.7334	734290.1029	ROW_M
2008	555949.7633	734304.8664	ROW_M
2009	555930.1091	734321.4715	ROW_M
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2011	555890.5303	734354.1419	ROW_M
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2013	555850.6670	734386.286	ROW_M
2014	555830.7499	734402.3463	ROW_M
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2017	555771.0236	734450.5071	ROW_M
2018	555751.1139	734466.5614	ROW_M
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2022	555675.4755	734527.6094	ROW_M
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2026	555591.3528	734530.972	ROW_M
2027	555579.3315	734544.8538	ROW_M
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2037	555463.8628	734721.8147	ROW_M
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2039	555426.3710	734757.1299	ROW_M
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2041	555388.2352	734792.0639	ROW_M
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2043	555349.9579	734827.1274	ROW_M
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2045	555311.5170	734862.3407	ROW_M
2046	555295.3477	734877.1525	ROW_M
2047	555292.8649	734880.5217	ROW_M
2048	555277.5025	734901.3686	ROW_M
2049	555262.1488	734922.2038	ROW_M
2050	555246.8015	734943.0303	ROW_M
2051	555231.4585	734963.8509	ROW_M
2052	555216.3794	734984.8615	ROW_M
2053	555201.5054	735006.0139	ROW_M
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2056	555156.8962	735069.4528	ROW_M
2057	555142.0238	735090.6029	ROW_M
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2059	555127.6533	735112.0956	ROW_M
2060	555114.4266	735134.3348	ROW_M
2061	555101.2089	735156.5591	ROW_M
2062	555087.9982	735178.7714	ROW_M
2063	555074.7927	735200.9749	ROW_M
2064	555061.5906	735223.1728	ROW_M
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2066	555032.1769	735260.4373	ROW_M
2067	555016.8820	735278.505	ROW_M
2068	555001.6384	735296.5122	ROW_M
2069	554986.4395	735314.4666	ROW_M
2070	554971.2789	735332.3756	ROW_M
2071	554956.1505	735350.2467	ROW_M

2072	554941.0479	735368.0874	ROW_M
2073	554925.9648	735385.9048	ROW_M
2074	554910.8952	735403.7065	ROW_M
2075	554895.8328	735421.4995	ROW_M
2076	554880.7716	735439.2913	ROW_M
2077	554865.7052	735457.089	ROW_M
2078	554852.3121	735472.9102	ROW_M
2079	554850.4168	735474.7063	ROW_M
2080	554833.4611	735490.774	ROW_M
2081	554816.5321	735506.8163	ROW_M
2082	554799.6230	735522.8398	ROW_M
2083	554782.7267	735538.8512	ROW_M
2084	554765.8364	735554.8569	ROW_M
2085	554748.9452	735570.8635	ROW_M
2086	554732.0461	735586.8775	ROW_M
2087	554715.1323	735602.9054	ROW_M
2088	554696.9698	735617.4955	ROW_M
2089	554678.7244	735631.9603	ROW_M
2090	554660.4868	735646.4189	ROW_M
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2092	554624.0049	735675.3414	ROW_M
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2094	554587.4644	735704.3104	ROW_M
2095	554569.1536	735718.8271	ROW_M
2096	554550.8055	735733.3732	ROW_M
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2098	554532.2473	735747.6976	ROW_M
2099	554512.6150	735760.4051	ROW_M
2100	554492.9727	735773.1191	ROW_M
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2104	554414.1418	735824.1442	ROW_M
2105	554394.3281	735836.9692	ROW_M
2106	554383.8168	735843.7728	ROW_M
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2116	554180.3965	735935.5695	ROW_M
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2118	554135.8709	735951.4551	ROW_M
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2123	554022.2700	735984.319	ROW_M
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2125	553975.9878	735994.2377	ROW_M
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2128	553929.4474	736002.8461	ROW_M
2129	553906.1700	736007.1516	ROW_M
2130	553882.8036	736010.9618	ROW_M
2131	553859.2903	736013.7325	ROW_M
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2139	553694.1318	736025.0273	ROW_M
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2141	553646.8606	735997.7066	ROW_M
2142	553623.7223	735990.2794	ROW_M
2143	553623.7223	735990.2794	ROW_M
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2146	553570.4389	735973.1758	ROW_M
2147	553554.8601	735978.818	ROW_M
2148	553531.1671	735987.3988	ROW_M
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2151	553457.7106	736018.0765	ROW_M
2152	553450.0852	736021.5542	ROW_M
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2159	553284.1148	736002.2219	ROW_M
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2163	553184.7530	735990.8995	ROW_M
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2174	552935.9309	735965.9637	ROW_M
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2176	552886.2314	735959.567	ROW_M
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2187	552799.7267	735850.933	ROW_M
2188	552801.2459	735832.5622	ROW_M
2189	552789.1461	735834.4224	ROW_M
2190	552777.0463	735836.2827	ROW_M
2191	552780.3039	735853.955	ROW_M
2192	552776.5808	735878.6032	ROW_M
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2196	552764.7914	735919.7237	ROW_M
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2198	552737.6565	735939.6929	ROW_M
2199	552712.8860	735936.2978	ROW_M
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2204	552589.5849	735914.8726	ROW_M
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2207	552570.0093	735869.5538	ROW_M
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2214	552535.7261	735838.6623	ROW_M
2215	552522.3997	735847.1766	ROW_M
2216	552502.7655	735858.8426	ROW_M
2217	552495.2084	735863.3178	ROW_M
2218	552467.9898	735879.6798	ROW_M
2219	552440.7481	735896.2271	ROW_M
2220	552413.3378	735914.1359	ROW_M
2221	552403.6515	735920.5435	ROW_M
2222	552387.6354	735918.4559	ROW_M
2223	552362.9241	735914.3885	ROW_M
2224	552338.4241	735908.81	ROW_M
2225	552313.9242	735903.2316	ROW_M
2226	552289.4812	735897.6217	ROW_M
2227	552265.6687	735892.0793	ROW_M
2228	552241.9006	735886.5473	ROW_M
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2231	552171.5260	735865.9403	ROW_M
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2237	552059.4996	735812.8519	ROW_M
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2244	551905.3949	735744.5054	ROW_M
2245	551884.3290	735732.6098	ROW_M
2246	551862.7636	735720.1449	ROW_M
2247	551853.2454	735714.4742	ROW_M
2248	551825.8623	735671.7385	ROW_M
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2250	551827.6367	735631.5448	ROW_M
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2252	551827.8158	735568.6328	ROW_M
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2259	551815.4065	735427.8449	ROW_M
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2263	551800.5107	735333.5699	ROW_M
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2265	551795.1047	735299.3553	ROW_M
2266	551688.6368	735340.7312	ROW_M
2267	551707.0827	735333.5627	ROW_M
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2290	551376.3304	735532.2426	ROW_M
2291	551378.5752	735532.1471	ROW_M
2292	551406.5999	735530.9554	ROW_M
2293	551431.9304	735529.8782	ROW_M
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2295	551331.5494	735517.9473	ROW_M
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2309	554271.2628	736242.2222	ROW_M
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2326	553940.7254	736226.0237	ROW_M
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2329	553886.1918	736222.7255	ROW_M
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2338	553699.5007	736216.6167	ROW_M
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2340	553646.7388	736216.9284	ROW_M
2341	553620.3690	736216.2017	ROW_M
2342	553594.0088	736215.4753	ROW_M
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2373	552965.3678	736134.9971	ROW_M
2374	552940.9476	736128.7747	ROW_M
2375	552916.5275	736122.5523	ROW_M
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2386	552717.6476	736101.1687	ROW_M
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2388	552690.7646	736114.8218	ROW_M
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2390	552682.5996	736126.2736	ROW_M
2391	552662.5382	736155.9937	ROW_M
2392	552651.3493	736170.2429	ROW_M
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2396	552673.0833	736120.7364	ROW_M
2397	552680.9282	736109.0372	ROW_M
2398	552688.7211	736097.8202	ROW_M
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2403	552572.9724	736086.7598	ROW_M
2404	552568.2693	736086.893	ROW_M
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2406	552542.4871	736091.6626	ROW_M
2407	552515.8913	736105.9373	ROW_M
2408	552487.0854	736132.169	ROW_M
2409	552459.2575	736159.2504	ROW_M
2410	552424.0882	736194.0334	ROW_M
2411	552366.7137	736250.7775	ROW_M
2412	552401.8202	736216.0567	ROW_M
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2415	552279.4560	736300.7	ROW_M
2416	552257.2399	736313.4104	ROW_M
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2418	552211.7436	736339.4401	ROW_M
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2420	552154.1363	736359.3051	ROW_M
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2422	552122.9692	736368.7402	ROW_M
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2426	552065.6020	736389.8347	ROW_M
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2443	551797.6592	736397.2188	ROW_M
2444	551786.6818	736385.2816	ROW_M
2445	551774.8656	736372.4322	ROW_M
2446	551756.2131	736352.1488	ROW_M
2447	551763.5558	736360.1336	ROW_M
2448	551762.4719	736348.1604	ROW_M
2449	551780.6564	736336.5724	ROW_M
2450	551772.7635	736341.6022	ROW_M
2451	551791.8970	736329.4094	ROW_M
2452	551806.9843	736319.7951	ROW_M
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2454	551832.4804	736303.5479	ROW_M
2455	551837.3384	736299.5595	ROW_M
2456	551773.9579	736226.839	ROW_M
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2458	551799.6482	736256.3152	ROW_M
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2467	551737.9798	736159.0412	ROW_M
2468	551732.5535	736148.8158	ROW_M
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2472	551701.1718	736095.6215	ROW_M
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2475	551681.1303	736061.6496	ROW_M
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2586	549818.7836	734334.6084	ROW_M
2587	549791.0176	734330.9088	ROW_M
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2607	549451.8744	734171.9232	ROW_M
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2635	551025.9708	735326.8042	ROW_M
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2643	550892.7664	735222.0992	ROW_M
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2646	550842.8158	735169.3435	ROW_M
2647	550826.3176	735151.6485	ROW_M
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2757	549967.0756	733343.2291	ROW_M
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2762	549981.3696	733308.4052	ROW_M
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2768	549999.8463	733263.122	ROW_M
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2777	550044.4104	733154.8213	ROW_M
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2779	550052.7807	733121.8381	ROW_M
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2794	550095.0496	732947.7975	ROW_M
2795	550096.3498	732939.2524	ROW_M
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2797	550099.4607	732918.8067	ROW_M
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3191	550023.0883	732868.4663	ROW_M
3192	550027.0141	732840.8818	ROW_M
3193	550022.0541	732875.7328	ROW_M
3194	550020.8004	732884.5422	ROW_M
3195	550019.4698	732893.8914	ROW_M
3196	550018.2074	732902.7615	ROW_M
3197	550017.2952	732909.1714	ROW_M
3198	550016.2020	732916.8523	ROW_M
3199	550013.6950	732933.3214	ROW_M
3200	550014.8950	732926.0357	ROW_M
3201	550010.8221	732943.8585	ROW_M
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3204	550001.4504	732978.2304	ROW_M
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3207	549999.6300	732984.9072	ROW_M
3208	549994.4008	733003.8914	ROW_M
3209	549990.0446	733020.063	ROW_M
3210	549987.6431	733028.871	ROW_M
3211	549985.9106	733035.225	ROW_M
3212	549983.4322	733044.315	ROW_M
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3214	549977.3659	733066.5641	ROW_M
3215	549974.3211	733077.7312	ROW_M
3216	549970.4982	733087.2697	ROW_M
3217	549965.1092	733100.7158	ROW_M
3218	549961.4692	733109.7981	ROW_M
3219	549956.6808	733121.7456	ROW_M
3220	549950.4243	733137.356	ROW_M
3221	549942.9737	733155.9461	ROW_M
3222	549946.6935	733146.6646	ROW_M
3223	549954.0834	733128.2262	ROW_M
3224	549940.1807	733162.9149	ROW_M
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3226	549930.0336	733187.4102	ROW_M
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3228	549917.2062	733216.6482	ROW_M
3229	549923.2230	733202.9339	ROW_M
3230	549911.5334	733229.5785	ROW_M

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3234	549881.8813	733297.1655	ROW_M
3235	549888.5642	733281.933	ROW_M
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3239	549868.4166	733327.8563	ROW_M
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3242	549847.1337	733367.5047	ROW_M
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3245	549843.6863	733373.9268	ROW_M
3246	549831.1045	733397.3658	ROW_M
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3249	549814.5795	733428.1507	ROW_M
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3287	549618.4285	733703.7753	ROW_M
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3294	549588.6045	733742.5445	ROW_M
3295	549584.5526	733747.6782	ROW_M
3296	549580.6799	733752.5849	ROW_M
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3303	549554.7382	733785.4527	ROW_M
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3306	549517.6618	733812.4083	ROW_M
3307	549492.5670	733825.3704	ROW_M
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3346	548627.7180	733663.7988	ROW_M
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3389	547599.6042	733593.02	ROW_M
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3392	547550.2912	733579.9433	ROW_M
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3461	546522.9555	733547.0694	ROW_M
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3486	546365.5764	733274.6071	ROW_M
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3508	546201.3264	733522.5149	ROW_M
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3520	545893.8036	733520.0101	ROW_M
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3543	545563.6489	733389.758	ROW_M
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3545	545565.0838	733427.9954	ROW_M
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3547	545565.2759	733457.6583	ROW_M
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3558	545486.6471	733574.2141	ROW_M
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3567	545263.0351	733632.8073	ROW_M
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3570	545189.9446	733657.2406	ROW_M
3571	545165.5802	733665.3853	ROW_M
3572	545141.2073	733673.5328	ROW_M
3573	545117.3420	733683.0684	ROW_M
3574	545093.4862	733692.6002	ROW_M
3575	545069.6351	733702.1301	ROW_M
3576	545045.8504	733711.8212	ROW_M
3577	545022.0641	733721.5129	ROW_M
3578	544998.2716	733731.2071	ROW_M
3579	544974.4680	733740.9059	ROW_M
3580	544950.6485	733750.6111	ROW_M
3581	544927.5075	733761.8091	ROW_M
3582	544904.3714	733773.0047	ROW_M
3583	544881.2355	733784.2001	ROW_M
3584	544858.0953	733795.3977	ROW_M
3585	544835.3405	733807.3571	ROW_M
3586	544812.6734	733819.4768	ROW_M
3587	544790.0068	733831.5962	ROW_M
3588	544767.3360	733843.7179	ROW_M
3589	544745.0925	733856.6055	ROW_M
3590	544722.8513	733869.4918	ROW_M
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3593	544659.7753	733907.3825	ROW_M
3594	544649.8212	733884.3896	ROW_M
3595	544634.8988	733865.0089	ROW_M
3596	544634.0489	733833.2191	ROW_M

3597	544633.0305	733800.9838	ROW_M
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3599	544615.0261	733832.0299	ROW_M
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3603	544542.9042	733883.4811	ROW_M
3604	544521.2961	733880.7181	ROW_M
3605	544498.4955	733880.3319	ROW_M
3606	544474.8964	733879.9322	ROW_M
3607	544457.1184	733867.8514	ROW_M
3608	544425.1179	733860.0344	ROW_M
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3610	544368.2281	733877.0897	ROW_M
3611	544338.7557	733877.326	ROW_M
3612	544311.0193	733877.5483	ROW_M
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3614	544294.8681	733898.0498	ROW_M
3615	544294.8681	733918.4219	ROW_M
3616	544318.6176	733919.0623	ROW_M
3617	544342.0532	733919.6943	ROW_M
3618	544371.5993	733920.5231	ROW_M
3619	544388.5748	733921.2607	ROW_M
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3621	544408.7621	733933.2299	ROW_M
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3624	544408.4501	733979.664	ROW_M
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3626	544409.5348	734009.2924	ROW_M
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3632	544367.4531	734122.605	ROW_M
3633	544348.0927	734139.4894	ROW_M
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3635	544310.0106	734173.9628	ROW_M
3636	544291.2930	734191.5435	ROW_M
3637	544272.5807	734209.1194	ROW_M
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3639	544235.7897	734244.923	ROW_M
3640	544217.7165	734263.1451	ROW_M
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3642	544181.9759	734299.9702	ROW_M
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3645	544128.9727	734355.7798	ROW_M
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3651	544101.2611	734257.8565	ROW_M
3652	544101.9736	734237.4433	ROW_M
3653	544102.9518	734209.4203	ROW_M
3654	544103.9887	734179.7156	ROW_M
3655	544085.3494	734177.4441	ROW_M
3656	544084.1219	734205.3316	ROW_M
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3660	544079.9047	734290.6016	ROW_M
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3662	544042.8235	734289.2805	ROW_M
3663	544043.1312	734306.7503	ROW_M
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3667	544094.9070	734325.129	ROW_M
3668	544094.2072	734359.0781	ROW_M
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3673	544052.1546	734407.0687	ROW_M
3674	544033.9700	734407.9773	ROW_M
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3677	544015.2558	734461.6708	ROW_M
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3679	543981.2696	734498.9565	ROW_M
3680	543978.0519	734502.0189	ROW_M
3681	543954.8663	734503.3819	ROW_M
3682	543946.2685	734502.9174	ROW_M
3683	543938.0455	734502.4732	ROW_M
3684	543924.8918	734500.7705	ROW_M
3685	543911.7380	734499.0677	ROW_M
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3687	543911.2572	734522.785	ROW_M
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3689	543951.2534	734523.7729	ROW_M
3690	543973.0456	734524.4134	ROW_M
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3692	543981.7247	734531.3808	ROW_M
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3704	543775.9454	734782.9534	ROW_M
3705	543760.5639	734802.6645	ROW_M
3706	543756.2774	734808.1574	ROW_M
3707	543726.4416	734807.331	ROW_M
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3757	542932.6032	734768.7703	ROW_M
3758	542923.3788	734763.9417	ROW_M
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3762	542838.3742	734721.0729	ROW_M
3763	542807.5757	734705.5915	ROW_M
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3786	542678.0714	734733.4442	ROW_M
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3789	542725.7518	734759.641	ROW_M
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3793	542771.0963	734784.5544	ROW_M
3794	542778.5391	734788.6436	ROW_M
3795	542789.7127	734794.7827	ROW_M
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3805	542907.6841	734857.9393	ROW_M
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3807	542930.4430	734869.8531	ROW_M
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3846	543491.7184	735178.1525	ROW_M
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3848	543512.2813	735189.1829	ROW_M
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3877	543805.9022	735425.7652	ROW_M
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3892	543745.7590	735163.4619	ROW_M
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3906	543986.1504	734855.5238	ROW_M
3907	544092.1957	734852.2288	ROW_M
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3918	549141.5030	733969.246	ROW_M
3919	549120.5297	733956.4304	ROW_M
3920	549099.4718	733943.563	ROW_M
3921	549078.3245	733930.641	ROW_M
3922	549070.9943	733926.1619	ROW_M
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3924	549032.9848	733913.337	ROW_M
3925	549009.9919	733905.608	ROW_M
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3928	548940.9501	733882.2831	ROW_M
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3930	548894.4054	733868.2412	ROW_M
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3934	548822.9629	733853.704	ROW_M
3935	548799.1712	733848.8629	ROW_M
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3937	548751.5941	733839.1819	ROW_M
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3943	548632.0122	733818.2267	ROW_M
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3945	548583.6223	733813.794	ROW_M
3946	548559.4637	733811.4581	ROW_M
3947	548535.2872	733809.3663	ROW_M
3948	548511.1287	733807.1533	ROW_M
3949	548486.9698	733804.9402	ROW_M
3950	548462.8114	733802.6529	ROW_M
3951	548438.6329	733800.5124	ROW_M
3952	548413.8921	733798.246	ROW_M
3953	548388.9677	733796.2302	ROW_M
3954	548364.0072	733794.8241	ROW_M
3955	548289.1256	733790.6058	ROW_M
3956	548339.0467	733793.418	ROW_M
3957	548264.1651	733789.1996	ROW_M
3958	548239.2045	733787.7935	ROW_M
3959	548214.2440	733786.3874	ROW_M
3960	548189.2835	733784.9813	ROW_M
3961	548164.3229	733783.5752	ROW_M
3962	548139.3624	733782.1691	ROW_M

3963	548114.4019	733780.763	ROW_M
3964	548089.3826	733780.3485	ROW_M
3965	548064.4808	733777.9507	ROW_M
3966	548039.5203	733776.5446	ROW_M
3967	548014.5598	733775.1385	ROW_M
3968	547989.5992	733773.7324	ROW_M
3969	547964.6387	733772.3263	ROW_M
3970	547939.6782	733770.9202	ROW_M
3971	547914.7176	733769.5141	ROW_M
3972	547889.7789	733767.7401	ROW_M
3973	547864.8549	733765.7164	ROW_M
3974	547839.9310	733763.6927	ROW_M
3975	547815.0071	733761.669	ROW_M
3976	547790.0831	733759.6454	ROW_M
3977	547765.1592	733757.6217	ROW_M
3978	547740.2352	733755.598	ROW_M
3979	547727.5235	733754.5659	ROW_M
3980	547715.2188	733755.1352	ROW_M
3981	547690.1062	733756.297	ROW_M
3982	547664.0192	733756.7326	ROW_M
3983	547639.8808	733758.6206	ROW_M
3984	547614.7681	733759.7825	ROW_M
3985	547607.9801	733760.0965	ROW_M
3986	547589.5498	733762.7276	ROW_M
3987	547564.2924	733766.3333	ROW_M
3988	547539.0349	733769.9391	ROW_M
3989	547513.7774	733773.5448	ROW_M
3990	547488.5200	733777.1505	ROW_M
3991	547463.2625	733780.7563	ROW_M
3992	547438.0949	733782.8459	ROW_M
3993	547411.8360	733784.8534	ROW_M
3994	547387.7793	733786.6925	ROW_M
3995	547362.9074	733788.5939	ROW_M
3996	547337.6233	733787.8454	ROW_M
3997	547312.6234	733787.1054	ROW_M
3998	547303.0890	733786.8232	ROW_M
3999	547297.6184	733905.2728	ROW_M
4000	547401.5203	733908.3584	ROW_M
4001	547399.9042	733951.3773	ROW_M
4002	546964.5465	733948.4413	ROW_M
4003	546912.3503	733985.1741	ROW_M
4004	546892.5009	733966.073	ROW_M
4005	546855.7430	733960.1958	ROW_M
4006	546752.0855	733957.2572	ROW_M
4007	546750.6152	733941.0947	ROW_M
4008	546699.8892	733933.0135	ROW_M
4009	546519.3948	733930.5429	ROW_M
4010	546395.8781	733928.7233	ROW_M
4011	545602.4025	733919.7406	ROW_M
4012	545602.8251	733928.5794	ROW_M
4013	545603.4056	733966.3077	ROW_M
4014	545589.0767	733971.6781	ROW_M
4015	545558.5401	733924.8002	ROW_M
4016	545545.9967	733920.0613	ROW_M
4017	545332.9292	733922.0937	ROW_M
4018	544997.9751	733925.3304	ROW_M
4019	544984.6002	733939.0377	ROW_M
4020	544974.1652	734238.9933	ROW_M
4021	544973.3876	734295.43	ROW_M
4022	544979.7876	734336.6468	ROW_M
4023	544979.2808	734030.3525	ROW_M

4024	545003.2547	734355.1234	ROW_M
4025	545003.2547	734397.0508	ROW_M
4026	544976.6359	734411.4095	ROW_M
4027	544970.7600	734430.9904	ROW_M
4028	544970.2696	734499.0205	ROW_M
4029	544942.3523	734499.0205	ROW_M
4030	544942.3523	734429.0298	ROW_M
4031	544922.1868	734384.2594	ROW_M
4032	544454.9797	734372.1786	ROW_M
4033	544435.0683	734385.6806	ROW_M
4034	544430.8016	734409.8423	ROW_M
4035	544428.6681	734502.9355	ROW_M
4036	544407.3345	734501.5142	ROW_M
4037	544407.3265	734395.4033	ROW_M
4038	544388.1263	734375.5055	ROW_M
4039	544384.5706	734353.4758	ROW_M
4040	544405.1932	734303.0207	ROW_M
4041	544396.5530	734282.7304	ROW_M
4042	544384.7993	734293.9241	ROW_M
4043	544367.2119	734310.6735	ROW_M
4044	544349.6284	734327.4191	ROW_M
4045	544332.0452	734344.1645	ROW_M
4046	544314.4588	734360.9129	ROW_M
4047	544296.8657	734377.6677	ROW_M
4048	544279.2623	734394.4324	ROW_M
4049	544261.6652	734411.2292	ROW_M
4050	544244.8704	734428.8064	ROW_M
4051	544228.0342	734446.4269	ROW_M
4052	544211.2653	734463.9769	ROW_M
4053	544194.4484	734481.5773	ROW_M
4054	544178.7318	734500.1518	ROW_M
4055	544163.0488	734518.7492	ROW_M
4056	544147.3659	734537.3466	ROW_M
4057	544131.6798	734555.9476	ROW_M
4058	544115.7771	734574.8767	ROW_M
4059	544100.1757	734594.4114	ROW_M
4060	544084.5744	734613.9461	ROW_M
4061	544068.9731	734633.4807	ROW_M
4062	544053.3718	734653.0154	ROW_M
4063	544037.7705	734672.55	ROW_M
4064	544022.1692	734692.0847	ROW_M
4065	544006.5679	734711.6194	ROW_M
4066	543990.9666	734731.154	ROW_M
4067	543975.3653	734750.6887	ROW_M
4068	543959.1469	734769.728	ROW_M
4069	544462.1940	734311.4866	ROW_M
4070	544483.5276	734253.2145	ROW_M
4071	544486.2204	734196.0319	ROW_M
4072	544490.8418	734192.0435	ROW_M
4073	544508.6295	734176.6919	ROW_M
4074	544522.6842	734164.5621	ROW_M
4075	544547.1781	734146.8483	ROW_M
4076	544567.0937	734132.781	ROW_M
4077	544586.6791	734118.2817	ROW_M
4078	544606.4252	734104.0016	ROW_M
4079	544626.6999	734090.4725	ROW_M
4080	544646.9761	734076.9643	ROW_M
4081	544667.2473	734063.4594	ROW_M
4082	544687.5175	734049.9552	ROW_M
4083	544707.7907	734036.449	ROW_M
4084	544728.2793	734023.27	ROW_M

4085	544749.3920	734011.098	ROW_M
4086	544770.4932	733998.9325	ROW_M
4087	544794.9773	733984.8167	ROW_M
4088	544812.6781	733974.6117	ROW_M
4089	544833.7703	733962.4515	ROW_M
4090	544854.8679	733950.2882	ROW_M
4091	544866.9247	733943.3371	ROW_M
4092	544876.2682	733938.6685	ROW_M
4093	544898.0547	733927.7827	ROW_M
4094	544919.8338	733916.9006	ROW_M
4095	544926.0813	733913.779	ROW_M
4096	544943.6236	733913.5309	ROW_M
4097	544944.0640	733964.5861	ROW_M
4098	544942.2013	734101.1386	ROW_M
4099	544895.9784	734101.8492	ROW_M
4100	544894.5562	734125.3002	ROW_M
4101	544940.0679	734132.4066	ROW_M
4102	544938.6457	734342.044	ROW_M
4103	544926.5567	734354.1247	ROW_M
4104	544467.8830	734342.7546	ROW_M
4105	545003.2014	733881.3101	ROW_M
4106	545031.6549	733868.9202	ROW_M
4107	545054.1617	733859.7551	ROW_M
4108	545076.6580	733850.5943	ROW_M
4109	545099.1483	733841.436	ROW_M
4110	545121.6370	733832.2783	ROW_M
4111	545144.1286	733823.1194	ROW_M
4112	545168.0411	733817.7108	ROW_M
4113	545189.1388	733804.7906	ROW_M
4114	545212.1758	733797.0566	ROW_M
4115	545235.3627	733789.7844	ROW_M
4116	545258.5375	733782.516	ROW_M
4117	545290.4701	733769.9593	ROW_M
4118	545304.7484	733768.0226	ROW_M
4119	545328.0352	733760.7191	ROW_M
4120	545351.2077	733753.4513	ROW_M
4121	545374.3912	733746.1802	ROW_M
4122	545397.5904	733738.9041	ROW_M
4123	545421.3144	733733.5958	ROW_M
4124	545445.0240	733728.2907	ROW_M
4125	545468.7242	733722.9878	ROW_M
4126	545492.4197	733717.6859	ROW_M
4127	545516.1152	733712.384	ROW_M
4128	545539.8154	733707.081	ROW_M
4129	545563.5251	733701.776	ROW_M
4130	545587.2490	733696.4677	ROW_M
4131	545592.2369	733815.3014	ROW_M
4132	545532.1121	733881.9226	ROW_M
4133	545044.7151	733884.7755	ROW_M
4134	545167.4568	733883.2423	ROW_M
4135	545627.8905	733877.672	ROW_M
4136	545649.5872	733819.1082	ROW_M
4137	545659.5430	733747.334	ROW_M
4138	545660.1452	733684.3355	ROW_M
4139	545707.4465	733678.9885	ROW_M
4140	545731.5800	733676.2604	ROW_M
4141	545755.7100	733673.5328	ROW_M
4142	545779.8411	733670.805	ROW_M
4143	545803.9782	733668.0765	ROW_M
4144	545828.1261	733665.3468	ROW_M
4145	545876.7164	733663.9103	ROW_M

4146	545852.4311	733664.6283	ROW_M
4147	545900.9868	733663.1929	ROW_M
4148	545925.2472	733662.4757	ROW_M
4149	545949.5025	733661.7586	ROW_M
4150	545973.7576	733661.0416	ROW_M
4151	545998.0172	733660.3244	ROW_M
4152	546022.2862	733659.6069	ROW_M
4153	546046.5695	733658.8891	ROW_M
4154	546070.8467	733659.4446	ROW_M
4155	546055.0860	733658.6373	ROW_M
4156	546095.1019	733660.6871	ROW_M
4157	546119.3468	733661.929	ROW_M
4158	546143.5861	733663.1706	ROW_M
4159	546192.8438	733665.6938	ROW_M
4160	546217.8118	733666.9727	ROW_M
4161	546242.7799	733668.2517	ROW_M
4162	546267.7480	733669.5307	ROW_M
4163	546292.7160	733670.8096	ROW_M
4164	546317.6723	733672.2882	ROW_M
4165	546342.6285	733673.7667	ROW_M
4166	546366.0462	733675.1541	ROW_M
4167	546366.1405	733699.6225	ROW_M
4168	546366.7976	733870.1661	ROW_M
4169	546307.8647	733885.8222	ROW_M
4170	546024.9222	733881.654	ROW_M
4171	545736.3597	733877.6048	ROW_M
4172	546398.8796	733887.2716	ROW_M
4173	546404.3937	733678.1037	ROW_M
4174	546442.6206	733676.8597	ROW_M
4175	546448.3661	733676.6727	ROW_M
4176	546467.5538	733678.7278	ROW_M
4177	546492.4397	733681.3933	ROW_M
4178	546517.3256	733684.0588	ROW_M
4179	546542.2115	733686.7243	ROW_M
4180	546567.0974	733689.3897	ROW_M
4181	546567.0974	733689.3897	ROW_M
4182	546591.8485	733694.3315	ROW_M
4183	546616.5996	733699.2732	ROW_M
4184	546641.3506	733704.2149	ROW_M
4185	546656.8246	733707.3044	ROW_M
4186	546666.0609	733709.8459	ROW_M
4187	546690.7030	733716.6267	ROW_M
4188	546715.3451	733723.4075	ROW_M
4189	546739.9872	733730.1883	ROW_M
4190	546760.1160	733735.5456	ROW_M
4191	546762.5214	733795.6302	ROW_M
4192	546758.1104	733836.7709	ROW_M
4193	546761.0511	733874.2384	ROW_M
4194	546753.6593	733892.3895	ROW_M
4195	546521.3453	733888.9671	ROW_M
4196	551993.2241	736316.4971	ROW_M
4197	551985.6614	736287.0226	ROW_M
4198	552140.6977	736193.3086	ROW_M
4199	552193.6369	736175.9262	ROW_M
4200	552226.1569	736147.2074	ROW_M
4201	552257.1641	736129.825	ROW_M
4202	552294.9779	736104.1292	ROW_M
4203	552332.0354	736074.6547	ROW_M
4204	552356.9924	736046.6917	ROW_M
4205	552371.3142	736049.9764	ROW_M
4206	552395.8092	736055.5944	ROW_M

4207	552403.1252	736057.2723	ROW_M
4208	552421.2759	736079.945	ROW_M
4209	552389.0600	736110.0618	ROW_M
4210	552350.9423	736145.6959	ROW_M
4211	552289.6840	736184.2396	ROW_M
4212	552240.5260	736206.9123	ROW_M
4213	552158.8483	736260.571	ROW_M
4214	552066.5828	736301.382	ROW_M
4215	552249.1257	736014.9149	ROW_M
4216	552273.9693	736022.0082	ROW_M
4217	552298.3439	736028.9675	ROW_M
4218	552296.6698	736042.4772	ROW_M
4219	552309.2263	736032.2437	ROW_M
4220	552268.0682	736069.3282	ROW_M
4221	552261.0476	736074.9995	ROW_M
4222	552019.7155	736215.0088	ROW_M
4223	551965.2637	736241.4603	ROW_M
4224	551901.7365	736234.6584	ROW_M
4225	551852.7553	736172.0626	ROW_M
4226	551821.5714	736109.9584	ROW_M
4227	551805.6896	736065.3687	ROW_M
4228	551819.3025	736023.0463	ROW_M
4229	551848.5830	736026.6634	ROW_M
4230	551875.1287	736029.9427	ROW_M
4231	551901.5967	736033.2124	ROW_M
4232	551928.1376	736035.9092	ROW_M
4233	551954.8184	736037.7108	ROW_M
4234	551981.4073	736039.5063	ROW_M
4235	552008.1060	736040.4271	ROW_M
4236	552034.7097	736041.3248	ROW_M
4237	552061.2194	736042.2194	ROW_M
4238	552087.6407	736043.111	ROW_M
4239	552098.5874	736043.4804	ROW_M
4240	552142.0066	736034.7811	ROW_M
4241	552169.6207	736026.4185	ROW_M
4242	552196.0622	736023.9508	ROW_M
4243	552222.7972	736018.5943	ROW_M

Construction Right of Way (ROW) Boundary ISLAND

Point Number	Easting (mE)	Northing (mN)	Raw Description
1	565035.3460	715129.3189	Construction_Zone_Island
2	565136.0072	715152.9151	Construction_Zone_Island
3	565308.2084	715202.8295	Construction_Zone_Island
4	565438.8884	715240.7086	Construction_Zone_Island
5	565495.6065	715256.8789	Construction_Zone_Island
6	565568.8149	715278.3692	Construction_Zone_Island
7	565367.6712	715220.4455	Construction_Zone_Island
8	565208.4512	715173.2762	Construction_Zone_Island
9	565635.0369	715297.4910	Construction_Zone_Island
10	565613.2328	715290.7998	Construction_Zone_Island
11	565663.4630	715303.7976	Construction_Zone_Island
12	565688.5470	715309.8729	Construction_Zone_Island
13	565731.1131	715319.7224	Construction_Zone_Island
14	565759.0377	715325.4847	Construction_Zone_Island
15	565797.4454	715333.6767	Construction_Zone_Island
16	565872.2967	715352.6276	Construction_Zone_Island
17	565902.6017	715361.3384	Construction_Zone_Island
18	565814.2950	715337.9427	Construction_Zone_Island
19	565963.3512	715378.8001	Construction_Zone_Island
20	566017.2005	715394.4547	Construction_Zone_Island
21	566068.1128	715400.1906	Construction_Zone_Island
22	566116.1361	715414.1107	Construction_Zone_Island
23	566124.1131	715384.5050	Construction_Zone_Island
24	566076.6477	715370.7467	Construction_Zone_Island
25	566029.9780	715352.1564	Construction_Zone_Island
26	565973.0479	715335.6551	Construction_Zone_Island
27	565916.1178	715319.1537	Construction_Zone_Island
28	565683.5996	715237.8578	Construction_Zone_Island
29	565761.8251	715265.9452	Construction_Zone_Island
30	565805.5180	715282.4104	Construction_Zone_Island
31	565861.3866	715301.8681	Construction_Zone_Island
32	565531.6855	715192.0184	Construction_Zone_Island
33	565613.8401	715215.8578	Construction_Zone_Island
34	565459.1004	715170.9788	Construction_Zone_Island
35	565336.2149	715135.3591	Construction_Zone_Island
36	565213.3295	715099.7394	Construction_Zone_Island
37	565143.8337	715083.1251	Construction_Zone_Island
38	565040.8177	715070.1878	Construction_Zone_Island
39	565096.6489	715075.7290	Construction_Zone_Island
40	564828.8661	715042.9290	Construction_Zone_Island
41	564931.6756	715059.7917	Construction_Zone_Island
42	564987.6480	715065.2677	Construction_Zone_Island
43	564882.7341	715052.1313	Construction_Zone_Island
44	564804.5184	715012.7101	Construction_Zone_Island
45	564802.3899	714966.8501	Construction_Zone_Island
46	564805.7216	714989.6723	Construction_Zone_Island
47	564810.7006	715032.6471	Construction_Zone_Island
48	564801.2603	714951.8181	Construction_Zone_Island
49	564780.0080	714977.4153	Construction_Zone_Island
50	564774.2293	715003.9376	Construction_Zone_Island
51	564773.2482	715016.0131	Construction_Zone_Island
52	564753.6906	715032.4827	Construction_Zone_Island
53	564767.6830	715026.5344	Construction_Zone_Island
54	564716.8075	715029.1564	Construction_Zone_Island
55	564689.4039	715026.7480	Construction_Zone_Island
56	564646.9550	715024.4285	Construction_Zone_Island
57	564640.1074	715024.1214	Construction_Zone_Island
58	564665.4058	715025.2559	Construction_Zone_Island

59	564612.6983	715022.8923	Construction_Zone_Island
60	564588.3209	715021.7571	Construction_Zone_Island
61	564551.8422	715019.3880	Construction_Zone_Island
62	564499.3073	715016.3274	Construction_Zone_Island
63	564449.2880	715013.7782	Construction_Zone_Island
64	564393.3827	715010.9768	Construction_Zone_Island
65	564354.7218	715009.0395	Construction_Zone_Island
66	564317.8939	715007.1940	Construction_Zone_Island
67	564274.9182	715005.0405	Construction_Zone_Island
68	564221.9781	715002.3877	Construction_Zone_Island
69	564190.7384	715000.8222	Construction_Zone_Island
70	564131.4534	714997.8515	Construction_Zone_Island
71	564084.9414	714995.5207	Construction_Zone_Island
72	564022.5686	714993.1254	Construction_Zone_Island
73	564041.1405	714993.4670	Construction_Zone_Island
74	563984.2998	714993.8590	Construction_Zone_Island
75	563948.1890	714995.3137	Construction_Zone_Island
76	563915.3415	714996.4528	Construction_Zone_Island
77	563898.9543	714996.5690	Construction_Zone_Island
78	563867.7960	714995.7981	Construction_Zone_Island
79	563840.3853	714994.4320	Construction_Zone_Island
80	563804.9730	714992.6575	Construction_Zone_Island
81	563770.4904	714990.9296	Construction_Zone_Island
82	563716.7380	714988.2360	Construction_Zone_Island
83	563659.9156	714985.1700	Construction_Zone_Island
84	563602.5720	714982.5152	Construction_Zone_Island
85	563577.0177	714981.2346	Construction_Zone_Island
86	563548.5753	714979.8686	Construction_Zone_Island
87	563511.7325	714979.3577	Construction_Zone_Island
88	563488.9777	714978.7062	Construction_Zone_Island
89	563466.5360	714978.9267	Construction_Zone_Island
90	563444.9997	714978.2756	Construction_Zone_Island
91	563416.3062	714976.8928	Construction_Zone_Island
92	563414.1230	715014.9638	Construction_Zone_Island
93	563913.5562	715040.0515	Construction_Zone_Island
94	563970.0323	715045.9043	Construction_Zone_Island
95	564023.3804	715053.4917	Construction_Zone_Island
96	564068.3508	715058.0974	Construction_Zone_Island
97	564506.9054	715080.9357	Construction_Zone_Island
98	564642.8954	715089.1135	Construction_Zone_Island
99	564627.8222	715088.6676	Construction_Zone_Island
100	564543.0296	715083.0592	Construction_Zone_Island
101	564714.5047	715095.0710	Construction_Zone_Island
102	564731.1126	715096.9530	Construction_Zone_Island
103	564765.6463	715136.8183	Construction_Zone_Island
104	564757.6032	715111.3655	Construction_Zone_Island
105	564793.0845	715172.3401	Construction_Zone_Island
106	564797.6209	715153.2222	Construction_Zone_Island
107	564800.5583	715127.6057	Construction_Zone_Island
108	564819.0465	715107.8685	Construction_Zone_Island
109	564905.0453	715113.6554	Construction_Zone_Island
110	564547.7524	715122.2443	Construction_Zone_Island
111	564571.3988	715147.8717	Construction_Zone_Island
112	564598.2021	715184.7230	Construction_Zone_Island
113	564612.9732	715217.0444	Construction_Zone_Island
114	564623.4095	715247.7114	Construction_Zone_Island
115	564632.0366	715277.6382	Construction_Zone_Island
116	564632.7553	715304.7076	Construction_Zone_Island
117	564634.0929	715331.9403	Construction_Zone_Island
118	564630.3311	715357.2452	Construction_Zone_Island
119	564628.4192	715369.6429	Construction_Zone_Island

120	564614.1638	715377.8598	Construction_Zone_Island
121	564992.5120	715146.7156	Construction_Zone_Island
122	564973.3216	715166.2446	Construction_Zone_Island
123	564940.3762	715180.4673	Construction_Zone_Island
124	564905.2080	715193.8951	Construction_Zone_Island
125	564876.3116	715209.7003	Construction_Zone_Island
126	564848.7938	715226.0236	Construction_Zone_Island
127	564824.6879	715243.6434	Construction_Zone_Island
128	564802.8095	715262.0923	Construction_Zone_Island
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131	564755.1755	715324.2832	Construction_Zone_Island
132	564740.1409	715345.2423	Construction_Zone_Island
133	564730.3834	715368.1864	Construction_Zone_Island
134	564721.8052	715391.7903	Construction_Zone_Island
135	564718.3316	715403.3450	Construction_Zone_Island
136	564726.7085	715406.5120	Construction_Zone_Island
137	564732.8837	715420.1953	Construction_Zone_Island
138	564732.0404	715422.4260	Construction_Zone_Island
139	564723.1993	715445.8105	Construction_Zone_Island
140	564714.3582	715469.1950	Construction_Zone_Island
141	564705.5171	715492.5795	Construction_Zone_Island
142	564696.6760	715515.9640	Construction_Zone_Island
143	564687.8350	715539.3485	Construction_Zone_Island
144	564678.9939	715562.7330	Construction_Zone_Island
145	564670.1528	715586.1175	Construction_Zone_Island
146	564661.3117	715609.5020	Construction_Zone_Island
147	564652.4706	715632.8866	Construction_Zone_Island
148	564643.6295	715656.2711	Construction_Zone_Island
149	564634.7885	715679.6556	Construction_Zone_Island
150	564625.9474	715703.0401	Construction_Zone_Island
151	564617.1063	715726.4246	Construction_Zone_Island
152	564608.2652	715749.8091	Construction_Zone_Island
153	564599.4241	715773.1936	Construction_Zone_Island
154	564590.5830	715796.5781	Construction_Zone_Island
155	564581.7420	715819.9626	Construction_Zone_Island
156	564572.9009	715843.3471	Construction_Zone_Island
157	564564.0598	715866.7316	Construction_Zone_Island
158	564546.3776	715913.5007	Construction_Zone_Island
159	564555.2187	715890.1161	Construction_Zone_Island
160	564537.5365	715936.8852	Construction_Zone_Island
161	564528.6954	715960.2697	Construction_Zone_Island
162	564519.8544	715983.6542	Construction_Zone_Island
163	564511.0133	716007.0387	Construction_Zone_Island
164	564502.1722	716030.4232	Construction_Zone_Island
165	564493.3311	716053.8077	Construction_Zone_Island
166	564491.5905	716058.4116	Construction_Zone_Island
167	564514.3493	716101.2652	Construction_Zone_Island
168	564550.2126	716128.0690	Construction_Zone_Island
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170	564596.4816	715424.6289	Construction_Zone_Island
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172	564578.7994	715471.3979	Construction_Zone_Island
173	564569.9583	715494.7824	Construction_Zone_Island
174	564561.1173	715518.1669	Construction_Zone_Island
175	564552.2762	715541.5514	Construction_Zone_Island
176	564543.4351	715564.9359	Construction_Zone_Island
177	564534.5940	715588.3204	Construction_Zone_Island
178	564525.7529	715611.7049	Construction_Zone_Island
179	564516.9118	715635.0894	Construction_Zone_Island
180	564508.0707	715658.4739	Construction_Zone_Island

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183	564481.5475	715728.6275	Construction_Zone_Island
184	564472.7064	715752.0120	Construction_Zone_Island
185	564463.8653	715775.3965	Construction_Zone_Island
186	564455.0242	715798.7810	Construction_Zone_Island
187	564446.1832	715822.1655	Construction_Zone_Island
188	564437.3421	715845.5500	Construction_Zone_Island
189	564428.5010	715868.9345	Construction_Zone_Island
190	564419.6599	715892.3190	Construction_Zone_Island
191	564410.8188	715915.7035	Construction_Zone_Island
192	564403.3557	715935.4432	Construction_Zone_Island
193	564406.1239	715940.6556	Construction_Zone_Island
194	564419.3555	715965.5700	Construction_Zone_Island
195	564417.1011	715971.5329	Construction_Zone_Island
196	564408.2600	715994.9174	Construction_Zone_Island
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199	564381.7368	716065.0709	Construction_Zone_Island
200	564372.8957	716088.4554	Construction_Zone_Island
201	564364.0546	716111.8399	Construction_Zone_Island
202	564355.2135	716135.2244	Construction_Zone_Island
203	564346.3724	716158.6090	Construction_Zone_Island
204	564337.5313	716181.9935	Construction_Zone_Island
205	564328.6903	716205.3780	Construction_Zone_Island
206	564319.8492	716228.7625	Construction_Zone_Island
207	564296.6521	716219.9923	Construction_Zone_Island
208	564498.3179	716114.2523	Construction_Zone_Island
209	564465.4438	716052.3520	Construction_Zone_Island
210	564459.6089	716067.7853	Construction_Zone_Island
211	564450.7678	716091.1698	Construction_Zone_Island
212	564441.9267	716114.5543	Construction_Zone_Island
213	564433.0857	716137.9388	Construction_Zone_Island
214	564424.2446	716161.3233	Construction_Zone_Island
215	564415.4035	716184.7078	Construction_Zone_Island
216	564406.5624	716208.0923	Construction_Zone_Island
217	564397.7213	716231.4769	Construction_Zone_Island
218	564388.8802	716254.8614	Construction_Zone_Island
219	564412.6527	716264.5020	Construction_Zone_Island
220	564403.9947	716287.3029	Construction_Zone_Island
221	564395.1200	716310.6746	Construction_Zone_Island
222	564386.2452	716334.0464	Construction_Zone_Island
223	564377.3704	716357.4182	Construction_Zone_Island
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225	564359.6209	716404.1617	Construction_Zone_Island
226	564350.7461	716427.5335	Construction_Zone_Island
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228	564332.9965	716474.2770	Construction_Zone_Island
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233	564288.6227	716591.1359	Construction_Zone_Island
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239	564235.3741	716731.3665	Construction_Zone_Island
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243	564199.8750	716824.8536	Construction_Zone_Island
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246	564173.2507	716894.9689	Construction_Zone_Island
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248	564155.5011	716941.7125	Construction_Zone_Island
249	564146.6263	716965.0842	Construction_Zone_Island
250	564137.7516	716988.4560	Construction_Zone_Island
251	564128.8768	717011.8278	Construction_Zone_Island
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253	564111.1273	717058.5713	Construction_Zone_Island
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256	564084.5029	717128.6866	Construction_Zone_Island
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259	564057.8786	717198.8020	Construction_Zone_Island
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261	564287.8264	716243.3826	Construction_Zone_Island
262	564279.0007	716266.7729	Construction_Zone_Island
263	564270.2657	716289.9229	Construction_Zone_Island
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273	564173.0922	716547.4568	Construction_Zone_Island
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278	564128.9636	716664.4084	Construction_Zone_Island
279	564111.3117	716711.1903	Construction_Zone_Island
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285	564067.1836	716828.1406	Construction_Zone_Island
286	564058.3579	716851.5309	Construction_Zone_Island
287	564049.5322	716874.9212	Construction_Zone_Island
288	564040.7065	716898.3116	Construction_Zone_Island
289	564031.8807	716921.7019	Construction_Zone_Island
290	564023.0550	716945.0922	Construction_Zone_Island
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296	563970.1008	717085.4341	Construction_Zone_Island
297	563961.2750	717108.8244	Construction_Zone_Island
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306	563374.6975	716327.4031	Construction_Zone_Island
307	563359.7850	716311.6186	Construction_Zone_Island
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317	563496.4840	716571.7891	Construction_Zone_Island
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321	563602.9176	716651.1030	Construction_Zone_Island
322	563621.4638	716672.3922	Construction_Zone_Island
323	563633.6314	716687.0601	Construction_Zone_Island
324	563640.5367	716694.2011	Construction_Zone_Island
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330	563586.1364	716671.9451	Construction_Zone_Island
331	563551.5721	716642.6369	Construction_Zone_Island
332	563518.1143	716625.0567	Construction_Zone_Island
333	563491.7388	716630.6795	Construction_Zone_Island
334	563487.0204	716657.2317	Construction_Zone_Island
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338	563342.4567	716326.4341	Construction_Zone_Island
339	563355.3682	716344.3729	Construction_Zone_Island
340	563369.2936	716362.1118	Construction_Zone_Island
341	563381.9156	716378.1900	Construction_Zone_Island
342	563407.9878	716417.6871	Construction_Zone_Island
343	563421.4031	716453.3491	Construction_Zone_Island
344	563430.9382	716503.7815	Construction_Zone_Island
345	563427.1951	716478.7146	Construction_Zone_Island
346	563454.2087	716478.6129	Construction_Zone_Island
347	563427.2891	716532.6057	Construction_Zone_Island
348	563410.9092	716556.6026	Construction_Zone_Island
349	563395.6752	716579.8574	Construction_Zone_Island
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353	563346.7592	716647.8112	Construction_Zone_Island
354	563362.1702	716670.7080	Construction_Zone_Island
355	563387.2796	716653.8077	Construction_Zone_Island
356	563407.3417	716646.3691	Construction_Zone_Island
357	563431.5473	716649.9324	Construction_Zone_Island
358	563454.1755	716662.6147	Construction_Zone_Island
359	563469.6345	716683.4448	Construction_Zone_Island
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361	563493.2935	716732.9598	Construction_Zone_Island
362	563505.8358	716757.4792	Construction_Zone_Island
363	563523.2702	716789.8561	Construction_Zone_Island

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365	563567.7769	716864.9975	Construction_Zone_Island
366	563599.8049	716913.6092	Construction_Zone_Island
367	563639.5807	716968.8477	Construction_Zone_Island
368	563685.2571	717026.4310	Construction_Zone_Island
369	563497.8106	716681.0525	Construction_Zone_Island
370	563512.2613	716711.3310	Construction_Zone_Island
371	563521.1266	716729.0838	Construction_Zone_Island
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373	563554.7557	716791.5997	Construction_Zone_Island
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376	563624.2535	716902.2113	Construction_Zone_Island
377	564227.6336	717410.3907	Construction_Zone_Island
378	564243.0673	717446.2434	Construction_Zone_Island
379	564278.9492	717462.9628	Construction_Zone_Island
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385	564337.6247	717437.2101	Construction_Zone_Island
386	564345.6133	717431.4863	Construction_Zone_Island
387	564351.8015	717420.1226	Construction_Zone_Island
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389	564348.2183	717367.3561	Construction_Zone_Island
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394	564326.4845	717302.2812	Construction_Zone_Island
395	564344.1450	717295.2735	Construction_Zone_Island
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398	564360.2595	717330.7409	Construction_Zone_Island
399	564371.3465	717353.5221	Construction_Zone_Island
400	564376.8450	717369.1813	Construction_Zone_Island
401	564380.5803	717390.4275	Construction_Zone_Island
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403	564378.1907	717424.1003	Construction_Zone_Island
404	564377.9215	717440.5050	Construction_Zone_Island
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406	564387.7714	717462.0541	Construction_Zone_Island
407	564390.2518	717468.9447	Construction_Zone_Island
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409	564409.3054	717496.6821	Construction_Zone_Island
410	564432.1414	717518.8288	Construction_Zone_Island
411	564447.9207	717546.4507	Construction_Zone_Island
412	564467.3057	717595.2433	Construction_Zone_Island
413	564485.5692	717641.4019	Construction_Zone_Island
414	564495.8348	717668.9218	Construction_Zone_Island
415	564507.2646	717694.7959	Construction_Zone_Island
416	564516.0981	717714.5841	Construction_Zone_Island
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418	564481.0813	717682.7527	Construction_Zone_Island
419	564475.2887	717670.8568	Construction_Zone_Island
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421	564452.1256	717626.9319	Construction_Zone_Island
422	564432.8927	717580.6683	Construction_Zone_Island
423	564442.5852	717605.0646	Construction_Zone_Island
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425	564414.1633	717539.3002	Construction_Zone_Island
426	564401.2960	717524.4522	Construction_Zone_Island
427	564385.2317	717516.9074	Construction_Zone_Island
428	564367.3067	717519.7685	Construction_Zone_Island
429	564361.5152	717522.1440	Construction_Zone_Island
430	564340.8318	717529.8715	Construction_Zone_Island
431	564330.3805	717541.8185	Construction_Zone_Island
432	564311.2385	717577.4272	Construction_Zone_Island
433	564302.4772	717594.8503	Construction_Zone_Island
434	564276.6532	717584.9130	Construction_Zone_Island
435	564291.1608	717556.4857	Construction_Zone_Island
436	564302.8112	717534.8132	Construction_Zone_Island
437	564305.7880	717493.5678	Construction_Zone_Island
438	564282.9492	717463.7128	Construction_Zone_Island
439	564308.6610	717515.0393	Construction_Zone_Island
440	563665.2361	716958.6560	Construction_Zone_Island
441	563718.4523	717024.8369	Construction_Zone_Island
442	563690.4336	716990.7901	Construction_Zone_Island
443	563666.0773	717002.9438	Construction_Zone_Island
444	563622.0051	716945.0798	Construction_Zone_Island
445	563646.6398	716933.7279	Construction_Zone_Island

Construction Right of Way (ROW) Boundary MAINLAND

Point Number	Easting (mE)	Northing (mN)	Raw Description
1	562615.6689	724010.2813	Construction_Zone_Mainland
2	562614.3620	724034.712	Construction_Zone_Mainland
3	562612.7428	724059.7702	Construction_Zone_Mainland
4	562611.2822	724084.5423	Construction_Zone_Mainland
5	562609.7195	724109.261	Construction_Zone_Mainland
6	562607.6819	724133.9087	Construction_Zone_Mainland
7	562605.6459	724158.6571	Construction_Zone_Mainland
8	562603.5255	724183.3685	Construction_Zone_Mainland
9	562601.2348	724208.0282	Construction_Zone_Mainland
10	562598.8306	724232.6986	Construction_Zone_Mainland
11	562596.2767	724257.3661	Construction_Zone_Mainland
12	562593.5897	724281.9913	Construction_Zone_Mainland
13	562590.7665	724306.604	Construction_Zone_Mainland
14	562587.8079	724331.2103	Construction_Zone_Mainland
15	562584.6775	724355.7943	Construction_Zone_Mainland
16	562581.4258	724380.3626	Construction_Zone_Mainland
17	562578.0809	724405.1458	Construction_Zone_Mainland
18	562574.5103	724430.1384	Construction_Zone_Mainland
19	562571.3350	724453.8524	Construction_Zone_Mainland
20	562568.5106	724478.6544	Construction_Zone_Mainland
21	562566.4058	724503.3959	Construction_Zone_Mainland
22	562564.1020	724528.1153	Construction_Zone_Mainland
23	562562.1561	724552.8905	Construction_Zone_Mainland
24	562559.9764	724577.65	Construction_Zone_Mainland
25	562557.8650	724602.7669	Construction_Zone_Mainland
26	562555.7823	724626.9741	Construction_Zone_Mainland
27	562553.4776	724651.9688	Construction_Zone_Mainland
28	562551.2536	724676.7504	Construction_Zone_Mainland
29	562548.9119	724701.4262	Construction_Zone_Mainland
30	562546.0452	724726.2125	Construction_Zone_Mainland
31	562543.1729	724750.9835	Construction_Zone_Mainland
32	562539.9209	724775.7713	Construction_Zone_Mainland
33	562536.4110	724800.5725	Construction_Zone_Mainland
34	562532.6958	724825.0444	Construction_Zone_Mainland
35	562528.6107	724849.2061	Construction_Zone_Mainland
36	562524.3422	724873.6737	Construction_Zone_Mainland
37	562520.0931	724898.1463	Construction_Zone_Mainland
38	562515.4862	724922.4683	Construction_Zone_Mainland
39	562510.4434	724946.8746	Construction_Zone_Mainland
40	562505.8069	724971.2746	Construction_Zone_Mainland
41	562501.2136	724995.7789	Construction_Zone_Mainland
42	562496.2229	725020.0146	Construction_Zone_Mainland
43	562491.3896	725044.6068	Construction_Zone_Mainland
44	562486.2195	725068.6703	Construction_Zone_Mainland
45	562481.3826	725093.0895	Construction_Zone_Mainland
46	562476.4078	725117.3669	Construction_Zone_Mainland
47	562471.0800	725141.7745	Construction_Zone_Mainland
48	562465.8220	725165.9005	Construction_Zone_Mainland
49	562460.5707	725190.2386	Construction_Zone_Mainland
50	562455.1783	725214.4208	Construction_Zone_Mainland
51	562449.8225	725238.6371	Construction_Zone_Mainland
52	562444.3211	725262.8937	Construction_Zone_Mainland
53	562438.8091	725287.0846	Construction_Zone_Mainland
54	562433.1544	725311.2964	Construction_Zone_Mainland
55	562427.3214	725335.4391	Construction_Zone_Mainland
56	562421.8050	725359.6564	Construction_Zone_Mainland
57	562415.9082	725383.7835	Construction_Zone_Mainland
58	562409.7538	725407.8779	Construction_Zone_Mainland

59	562403.1231	725431.7928	Construction_Zone_Mainland
60	562396.0448	725455.6232	Construction_Zone_Mainland
61	562388.6652	725479.3721	Construction_Zone_Mainland
62	562381.2947	725503.1163	Construction_Zone_Mainland
63	562373.9027	725526.8482	Construction_Zone_Mainland
64	562366.5008	725550.5711	Construction_Zone_Mainland
65	562359.0815	725574.2831	Construction_Zone_Mainland
66	562351.8456	725598.1742	Construction_Zone_Mainland
67	562345.0315	725621.8998	Construction_Zone_Mainland
68	562338.5616	725645.809	Construction_Zone_Mainland
69	562332.0069	725669.7827	Construction_Zone_Mainland
70	562325.5149	725693.5721	Construction_Zone_Mainland
71	562318.4692	725717.5232	Construction_Zone_Mainland
72	562312.1239	725741.5111	Construction_Zone_Mainland
73	562305.4054	725765.3952	Construction_Zone_Mainland
74	562298.6042	725789.2559	Construction_Zone_Mainland
75	562291.7391	725813.0983	Construction_Zone_Mainland
76	562284.8053	725836.9197	Construction_Zone_Mainland
77	562277.8047	725860.7235	Construction_Zone_Mainland
78	562270.6855	725884.4912	Construction_Zone_Mainland
79	562263.4475	725908.2229	Construction_Zone_Mainland
80	562256.0909	725931.9181	Construction_Zone_Mainland
81	562249.2748	725955.7496	Construction_Zone_Mainland
82	562241.9511	725979.5862	Construction_Zone_Mainland
83	562234.5197	726003.154	Construction_Zone_Mainland
84	562227.2374	726026.84	Construction_Zone_Mainland
85	562219.7269	726050.5185	Construction_Zone_Mainland
86	562212.2095	726074.1626	Construction_Zone_Mainland
87	562204.6248	726097.8848	Construction_Zone_Mainland
88	562196.9807	726121.4896	Construction_Zone_Mainland
89	562189.3023	726144.9985	Construction_Zone_Mainland
90	562181.5209	726168.6217	Construction_Zone_Mainland
91	562173.7020	726192.159	Construction_Zone_Mainland
92	562165.8381	726215.6346	Construction_Zone_Mainland
93	562157.8771	726239.1286	Construction_Zone_Mainland
94	562149.4257	726262.2428	Construction_Zone_Mainland
95	562140.5674	726285.6336	Construction_Zone_Mainland
96	562131.7091	726309.0245	Construction_Zone_Mainland
97	562122.0409	726331.2962	Construction_Zone_Mainland
98	562111.2648	726354.275	Construction_Zone_Mainland
99	562099.9686	726376.629	Construction_Zone_Mainland
100	562087.9459	726398.5364	Construction_Zone_Mainland
101	562075.4481	726420.3674	Construction_Zone_Mainland
102	562062.0770	726441.8256	Construction_Zone_Mainland
103	562047.9685	726463.1113	Construction_Zone_Mainland
104	562033.1879	726484.0288	Construction_Zone_Mainland
105	562018.0044	726504.6909	Construction_Zone_Mainland
106	562021.2266	726500.0362	Construction_Zone_Mainland
107	562004.1418	726525.8633	Construction_Zone_Mainland
108	561990.3662	726547.2496	Construction_Zone_Mainland
109	561977.2417	726568.4718	Construction_Zone_Mainland
110	561965.1220	726589.7089	Construction_Zone_Mainland
111	561952.8794	726611.9403	Construction_Zone_Mainland
112	561941.5563	726633.9798	Construction_Zone_Mainland
113	561930.7509	726656.2084	Construction_Zone_Mainland
114	561920.4851	726678.6396	Construction_Zone_Mainland
115	561910.7660	726701.2811	Construction_Zone_Mainland
116	561901.5751	726724.1307	Construction_Zone_Mainland
117	561892.8284	726747.1594	Construction_Zone_Mainland
118	561884.1067	726770.2009	Construction_Zone_Mainland
119	561875.3822	726793.2445	Construction_Zone_Mainland

120	561866.6548	726816.2904	Construction_Zone_Mainland
121	561857.9126	726839.3341	Construction_Zone_Mainland
122	561849.1805	726862.4392	Construction_Zone_Mainland
123	561840.3203	726885.815	Construction_Zone_Mainland
124	561831.4666	726909.2167	Construction_Zone_Mainland
125	561822.5808	726932.592	Construction_Zone_Mainland
126	561813.7373	726956.0347	Construction_Zone_Mainland
127	561804.8935	726979.3886	Construction_Zone_Mainland
128	561796.0327	727002.7831	Construction_Zone_Mainland
129	561787.2405	727026.204	Construction_Zone_Mainland
130	561779.2218	727049.9481	Construction_Zone_Mainland
131	561772.1574	727074.091	Construction_Zone_Mainland
132	561766.0530	727098.6349	Construction_Zone_Mainland
133	561760.8792	727123.5712	Construction_Zone_Mainland
134	561756.6808	727148.8389	Construction_Zone_Mainland
135	561753.4191	727174.64	Construction_Zone_Mainland
136	561749.9390	727200.2806	Construction_Zone_Mainland
137	561745.9475	727225.6778	Construction_Zone_Mainland
138	561741.2574	727250.8424	Construction_Zone_Mainland
139	561736.1273	727275.7935	Construction_Zone_Mainland
140	561730.3974	727300.494	Construction_Zone_Mainland
141	561724.0948	727324.9495	Construction_Zone_Mainland
142	561717.2352	727349.1748	Construction_Zone_Mainland
143	561709.8176	727373.1789	Construction_Zone_Mainland
144	561701.8574	727396.9475	Construction_Zone_Mainland
145	561693.5766	727419.9582	Construction_Zone_Mainland
146	561684.3163	727443.8747	Construction_Zone_Mainland
147	561674.7586	727466.926	Construction_Zone_Mainland
148	561665.2570	727488.4508	Construction_Zone_Mainland
149	561664.6787	727489.835	Construction_Zone_Mainland
150	561655.0488	727512.8812	Construction_Zone_Mainland
151	561645.3884	727535.9203	Construction_Zone_Mainland
152	561635.7590	727558.9913	Construction_Zone_Mainland
153	561626.1233	727582.106	Construction_Zone_Mainland
154	562796.7368	724028.9653	Construction_Zone_Mainland
155	562793.1127	724052.995	Construction_Zone_Mainland
156	562789.4082	724077.6798	Construction_Zone_Mainland
157	562785.6815	724102.6387	Construction_Zone_Mainland
158	562781.9744	724127.594	Construction_Zone_Mainland
159	562778.2867	724152.5462	Construction_Zone_Mainland
160	562774.6184	724177.4957	Construction_Zone_Mainland
161	562770.9694	724202.4429	Construction_Zone_Mainland
162	562767.3397	724227.3884	Construction_Zone_Mainland
163	562763.7291	724252.3326	Construction_Zone_Mainland
164	562760.1376	724277.2759	Construction_Zone_Mainland
165	562756.5652	724302.2187	Construction_Zone_Mainland
166	562753.0116	724327.1616	Construction_Zone_Mainland
167	562749.4770	724352.1049	Construction_Zone_Mainland
168	562745.9612	724377.0492	Construction_Zone_Mainland
169	562742.4641	724401.9948	Construction_Zone_Mainland
170	562738.9856	724426.9423	Construction_Zone_Mainland
171	562735.5258	724451.892	Construction_Zone_Mainland
172	562732.0846	724476.8445	Construction_Zone_Mainland
173	562728.6618	724501.8001	Construction_Zone_Mainland
174	562725.2574	724526.7594	Construction_Zone_Mainland
175	562721.8715	724551.7228	Construction_Zone_Mainland
176	562721.6131	724553.6336	Construction_Zone_Mainland
177	562715.8517	724576.287	Construction_Zone_Mainland
178	562709.6159	724600.8064	Construction_Zone_Mainland
179	562703.3830	724625.3141	Construction_Zone_Mainland
180	562697.1530	724649.8104	Construction_Zone_Mainland

181	562690.9258	724674.2955	Construction_Zone_Mainland
182	562684.7014	724698.7698	Construction_Zone_Mainland
183	562678.4797	724723.2337	Construction_Zone_Mainland
184	562672.2605	724747.6873	Construction_Zone_Mainland
185	562670.1945	724755.8108	Construction_Zone_Mainland
186	562667.3524	724772.3572	Construction_Zone_Mainland
187	562663.0443	724797.1289	Construction_Zone_Mainland
188	562658.6742	724821.8898	Construction_Zone_Mainland
189	562654.2422	724846.6397	Construction_Zone_Mainland
190	562649.7483	724871.3784	Construction_Zone_Mainland
191	562645.1925	724896.1058	Construction_Zone_Mainland
192	562640.5749	724920.8218	Construction_Zone_Mainland
193	562635.8955	724945.5261	Construction_Zone_Mainland
194	562631.1543	724970.2187	Construction_Zone_Mainland
195	562626.3513	724994.8993	Construction_Zone_Mainland
196	562621.4866	725019.5679	Construction_Zone_Mainland
197	562616.5603	725044.2241	Construction_Zone_Mainland
198	562611.5723	725068.8681	Construction_Zone_Mainland
199	562606.5226	725093.4994	Construction_Zone_Mainland
200	562601.4114	725118.1181	Construction_Zone_Mainland
201	562596.2386	725142.7238	Construction_Zone_Mainland
202	562591.0042	725167.3166	Construction_Zone_Mainland
203	562600.1542	725195.0286	Construction_Zone_Mainland
204	562628.4989	725227.0288	Construction_Zone_Mainland
205	562665.2627	725261.0757	Construction_Zone_Mainland
206	562669.0526	725263.42	Construction_Zone_Mainland
207	562662.9575	725271.3494	Construction_Zone_Mainland
208	562645.3619	725256.6561	Construction_Zone_Mainland
209	562610.9819	725223.1846	Construction_Zone_Mainland
210	562596.1086	725206.3292	Construction_Zone_Mainland
211	562587.2772	725192.2364	Construction_Zone_Mainland
212	562585.7084	725191.8962	Construction_Zone_Mainland
213	562580.3511	725216.4625	Construction_Zone_Mainland
214	562574.9323	725241.0154	Construction_Zone_Mainland
215	562569.4522	725265.5546	Construction_Zone_Mainland
216	562564.4517	725290.203	Construction_Zone_Mainland
217	562559.6230	725314.8939	Construction_Zone_Mainland
218	562554.7935	725339.5889	Construction_Zone_Mainland
219	562549.9631	725364.2882	Construction_Zone_Mainland
220	562545.1318	725388.9923	Construction_Zone_Mainland
221	562540.2996	725413.7013	Construction_Zone_Mainland
222	562539.6362	725417.0934	Construction_Zone_Mainland
223	562534.3902	725438.154	Construction_Zone_Mainland
224	562528.3096	725462.5648	Construction_Zone_Mainland
225	562522.2292	725486.9752	Construction_Zone_Mainland
226	562516.1488	725511.3855	Construction_Zone_Mainland
227	562510.0683	725535.7961	Construction_Zone_Mainland
228	562503.9877	725560.2072	Construction_Zone_Mainland
229	562497.9069	725584.6191	Construction_Zone_Mainland
230	562491.8257	725609.0322	Construction_Zone_Mainland
231	562485.7443	725633.4468	Construction_Zone_Mainland
232	562479.6624	725657.8631	Construction_Zone_Mainland
233	562473.5799	725682.2815	Construction_Zone_Mainland
234	562467.1731	725706.614	Construction_Zone_Mainland
235	562460.6016	725730.9023	Construction_Zone_Mainland
236	562453.9558	725755.1706	Construction_Zone_Mainland
237	562447.2358	725779.4185	Construction_Zone_Mainland
238	562440.4417	725803.6458	Construction_Zone_Mainland
239	562433.5734	725827.8522	Construction_Zone_Mainland
240	562426.6312	725852.0376	Construction_Zone_Mainland
241	562419.6150	725876.2016	Construction_Zone_Mainland

242	562412.5249	725900.3441	Construction_Zone_Mainland
243	562405.3611	725924.4647	Construction_Zone_Mainland
244	562398.1236	725948.5631	Construction_Zone_Mainland
245	562390.8124	725972.6393	Construction_Zone_Mainland
246	562383.4276	725996.6928	Construction_Zone_Mainland
247	562375.9694	726020.7234	Construction_Zone_Mainland
248	562368.4378	726044.731	Construction_Zone_Mainland
249	562360.8328	726068.7152	Construction_Zone_Mainland
250	562353.1546	726092.6758	Construction_Zone_Mainland
251	562345.4033	726116.6125	Construction_Zone_Mainland
252	562337.5789	726140.5252	Construction_Zone_Mainland
253	562329.6814	726164.4134	Construction_Zone_Mainland
254	562321.7111	726188.2771	Construction_Zone_Mainland
255	562313.6680	726212.116	Construction_Zone_Mainland
256	562305.5521	726235.9297	Construction_Zone_Mainland
257	562297.3636	726259.7181	Construction_Zone_Mainland
258	562289.1026	726283.4809	Construction_Zone_Mainland
259	562280.7690	726307.2179	Construction_Zone_Mainland
260	562271.1561	726330.5139	Construction_Zone_Mainland
261	562261.5950	726353.6632	Construction_Zone_Mainland
262	562253.6843	726377.6949	Construction_Zone_Mainland
263	562246.4140	726401.7975	Construction_Zone_Mainland
264	562239.7372	726426.1168	Construction_Zone_Mainland
265	562228.1754	726475.4311	Construction_Zone_Mainland
266	562223.3006	726500.4407	Construction_Zone_Mainland
267	562219.0394	726525.6961	Construction_Zone_Mainland
268	562215.4015	726551.2064	Construction_Zone_Mainland
269	562212.4263	726576.9921	Construction_Zone_Mainland
270	562208.5034	726602.4558	Construction_Zone_Mainland
271	562203.4044	726627.5035	Construction_Zone_Mainland
272	562197.1549	726652.1353	Construction_Zone_Mainland
273	562189.7737	726676.349	Construction_Zone_Mainland
274	562181.2790	726700.1422	Construction_Zone_Mainland
275	562172.3339	726723.7636	Construction_Zone_Mainland
276	562163.3884	726747.3861	Construction_Zone_Mainland
277	562154.4424	726771.01	Construction_Zone_Mainland
278	562145.4958	726794.6355	Construction_Zone_Mainland
279	562136.5484	726818.2629	Construction_Zone_Mainland
280	562127.6001	726841.8926	Construction_Zone_Mainland
281	562118.6509	726865.5249	Construction_Zone_Mainland
282	562109.7007	726889.16	Construction_Zone_Mainland
283	562100.7492	726912.7982	Construction_Zone_Mainland
284	562091.7964	726936.4399	Construction_Zone_Mainland
285	562082.8512	726960.0617	Construction_Zone_Mainland
286	562073.9925	726983.4548	Construction_Zone_Mainland
287	562064.9331	727006.7641	Construction_Zone_Mainland
288	562055.3226	727029.8431	Construction_Zone_Mainland
289	562045.1548	727052.6892	Construction_Zone_Mainland
290	562034.4287	727075.302	Construction_Zone_Mainland
291	562023.1424	727097.6808	Construction_Zone_Mainland
292	562011.2930	727119.8242	Construction_Zone_Mainland
293	561998.8766	727141.7307	Construction_Zone_Mainland
294	561986.0380	727163.4608	Construction_Zone_Mainland
295	561973.1978	727185.1903	Construction_Zone_Mainland
296	561960.3577	727206.9198	Construction_Zone_Mainland
297	561947.5175	727228.6492	Construction_Zone_Mainland
298	561934.6773	727250.3787	Construction_Zone_Mainland
299	561921.8372	727272.1082	Construction_Zone_Mainland
300	561908.9970	727293.8376	Construction_Zone_Mainland
301	561896.1568	727315.5671	Construction_Zone_Mainland
302	561883.3167	727337.2965	Construction_Zone_Mainland

303	561870.6644	727359.1045	Construction_Zone_Mainland
304	561847.5440	727403.6331	Construction_Zone_Mainland
305	561837.0970	727426.3626	Construction_Zone_Mainland
306	561827.3880	727449.4004	Construction_Zone_Mainland
307	561818.3741	727472.7287	Construction_Zone_Mainland
308	561809.5208	727496.124	Construction_Zone_Mainland
309	561800.6676	727519.5194	Construction_Zone_Mainland
310	561791.6785	727542.8581	Construction_Zone_Mainland
311	561782.3139	727566.0398	Construction_Zone_Mainland
312	561772.6846	727589.1109	Construction_Zone_Mainland
313	561763.0459	727612.1781	Construction_Zone_Mainland
314	561753.4073	727635.2454	Construction_Zone_Mainland
315	561743.7687	727658.3126	Construction_Zone_Mainland
316	561734.1300	727681.3798	Construction_Zone_Mainland
317	561724.4914	727704.447	Construction_Zone_Mainland
318	561714.8528	727727.5143	Construction_Zone_Mainland
319	561705.2142	727750.5815	Construction_Zone_Mainland
320	561695.5755	727773.6487	Construction_Zone_Mainland
321	561685.9369	727796.7159	Construction_Zone_Mainland
322	561676.2983	727819.7831	Construction_Zone_Mainland
323	561666.6596	727842.8504	Construction_Zone_Mainland
324	561657.0210	727865.9176	Construction_Zone_Mainland
325	561647.3824	727888.9848	Construction_Zone_Mainland
326	561637.7437	727912.052	Construction_Zone_Mainland
327	561628.1051	727935.1193	Construction_Zone_Mainland
328	561619.3702	727958.5641	Construction_Zone_Mainland
329	561612.7168	727982.8787	Construction_Zone_Mainland
330	561608.2240	728008.0961	Construction_Zone_Mainland
331	561606.0296	728034.2739	Construction_Zone_Mainland
332	561606.3132	728060.8018	Construction_Zone_Mainland
333	561609.3568	728088.7802	Construction_Zone_Mainland
334	561615.6465	728117.9982	Construction_Zone_Mainland
335	561625.9464	728148.7347	Construction_Zone_Mainland
336	561649.1545	728194.1461	Construction_Zone_Mainland
337	561670.7142	728228.2569	Construction_Zone_Mainland
338	561697.1824	728270.1337	Construction_Zone_Mainland
339	561725.1121	728314.3227	Construction_Zone_Mainland
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341	561761.6283	728363.0976	Construction_Zone_Mainland
342	561783.4531	728372.1215	Construction_Zone_Mainland
343	561799.6479	728376.9406	Construction_Zone_Mainland
344	561814.5275	728384.9464	Construction_Zone_Mainland
345	561830.1443	728392.5891	Construction_Zone_Mainland
346	561849.3203	728395.6291	Construction_Zone_Mainland
347	561867.8191	728392.8051	Construction_Zone_Mainland
348	561892.8776	728384.9716	Construction_Zone_Mainland
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362	561647.5396	728452.6239	Construction_Zone_Mainland
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368	561654.6399	728300.4743	Construction_Zone_Mainland
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373	561439.1665	728342.0683	Construction_Zone_Mainland
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690	560842.1482	730740.6062	Construction_Zone_Mainland
691	560834.0055	730764.9316	Construction_Zone_Mainland
692	560825.6187	730789.1739	Construction_Zone_Mainland
693	560819.1016	730814.0953	Construction_Zone_Mainland
694	560819.8678	730841.7866	Construction_Zone_Mainland
695	560832.3672	730874.2161	Construction_Zone_Mainland
696	560840.3199	730885.1105	Construction_Zone_Mainland
697	560866.1977	730915.6017	Construction_Zone_Mainland
698	560877.1811	730928.5433	Construction_Zone_Mainland
699	560865.3635	730938.5729	Construction_Zone_Mainland
700	560835.5630	730903.4596	Construction_Zone_Mainland
701	560810.8052	730865.9184	Construction_Zone_Mainland
702	560804.8850	730845.9843	Construction_Zone_Mainland
703	560799.0029	730861.3766	Construction_Zone_Mainland
704	560789.6488	730885.2614	Construction_Zone_Mainland
705	560780.0552	730909.0507	Construction_Zone_Mainland
706	560770.2231	730932.7422	Construction_Zone_Mainland
707	560760.1534	730956.3334	Construction_Zone_Mainland
708	560749.8473	730979.8219	Construction_Zone_Mainland
709	560739.3057	731003.2054	Construction_Zone_Mainland
710	560728.5298	731026.4815	Construction_Zone_Mainland
711	560717.5207	731049.6479	Construction_Zone_Mainland
712	560706.2794	731072.7021	Construction_Zone_Mainland
713	560694.8071	731095.6419	Construction_Zone_Mainland
714	560683.1050	731118.4649	Construction_Zone_Mainland
715	560671.1743	731141.1688	Construction_Zone_Mainland
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717	560646.6320	731186.2102	Construction_Zone_Mainland
718	560634.0230	731208.5431	Construction_Zone_Mainland
719	560621.1903	731230.7478	Construction_Zone_Mainland
720	560608.4818	731253.0286	Construction_Zone_Mainland
721	560602.9740	731278.6291	Construction_Zone_Mainland
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724	560676.1695	731404.8245	Construction_Zone_Mainland
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727	560581.3641	731296.5704	Construction_Zone_Mainland
728	560567.6504	731318.24	Construction_Zone_Mainland
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742	560423.0466	731572.7249	Construction_Zone_Mainland
743	560438.6340	731585.4751	Construction_Zone_Mainland
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753	560302.5792	731663.5815	Construction_Zone_Mainland
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1705	553931.2991	736013.5771	Construction_Zone_Mainland

1706	553907.8034	736017.4977	Construction_Zone_Mainland
1707	553884.2531	736021.0793	Construction_Zone_Mainland
1708	553860.6532	736024.3212	Construction_Zone_Mainland
1709	553837.0086	736027.2226	Construction_Zone_Mainland
1710	553813.3242	736029.7829	Construction_Zone_Mainland
1711	553789.6050	736032.0016	Construction_Zone_Mainland
1712	553765.8561	736033.8782	Construction_Zone_Mainland
1713	553742.0822	736035.4123	Construction_Zone_Mainland
1714	553718.2885	736036.6035	Construction_Zone_Mainland
1715	553694.4799	736037.4517	Construction_Zone_Mainland
1716	557692.7221	733662.7754	Construction_Zone_Mainland
1717	557712.8711	733690.9872	Construction_Zone_Mainland
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1719	557720.4209	733739.5028	Construction_Zone_Mainland
1720	557720.1903	733749.5509	Construction_Zone_Mainland
1721	557721.4117	733763.7825	Construction_Zone_Mainland
1722	557723.4728	733773.5606	Construction_Zone_Mainland
1723	557724.4872	733797.7412	Construction_Zone_Mainland
1724	557723.5173	733841.2552	Construction_Zone_Mainland
1725	557721.6432	733870.1974	Construction_Zone_Mainland
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1729	557707.5356	733952.442	Construction_Zone_Mainland
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1731	557692.3071	734001.9071	Construction_Zone_Mainland
1732	557688.0799	734005.5427	Construction_Zone_Mainland
1733	557687.2817	734015.1407	Construction_Zone_Mainland
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1766	557336.7827	734419.9293	Construction_Zone_Mainland

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1914	551808.0817	735461.5536	Construction_Zone_Mainland
1915	551786.0566	735403.6061	Construction_Zone_Mainland
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1917	551705.9161	735338.2747	Construction_Zone_Mainland
1918	551728.5107	735403.3339	Construction_Zone_Mainland
1919	551739.4452	735463.2342	Construction_Zone_Mainland
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1928	551557.5773	735654.0179	Construction_Zone_Mainland
1929	551533.6514	735647.8246	Construction_Zone_Mainland
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1931	551488.9868	735629.9468	Construction_Zone_Mainland
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1933	551444.5635	735610.7962	Construction_Zone_Mainland
1934	551422.4580	735600.9109	Construction_Zone_Mainland
1935	551400.4257	735590.8192	Construction_Zone_Mainland
1936	551378.4683	735580.5214	Construction_Zone_Mainland
1937	551356.5878	735570.0178	Construction_Zone_Mainland
1938	551333.0774	735562.1861	Construction_Zone_Mainland
1939	551313.0644	735548.3946	Construction_Zone_Mainland
1940	551291.4252	735537.2755	Construction_Zone_Mainland
1941	551269.8702	735525.952	Construction_Zone_Mainland
1942	551248.4011	735514.4243	Construction_Zone_Mainland
1943	551227.0198	735502.6929	Construction_Zone_Mainland
1944	551205.7281	735490.7582	Construction_Zone_Mainland
1945	551174.0586	735487.0184	Construction_Zone_Mainland
1946	551155.6168	735474.9973	Construction_Zone_Mainland
1947	551136.9939	735462.1973	Construction_Zone_Mainland
1948	551117.4674	735448.4453	Construction_Zone_Mainland
1949	551094.5549	735431.8622	Construction_Zone_Mainland

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1952	551078.0659	735419.3991	Construction_Zone_Mainland
1953	551019.9994	735374.2995	Construction_Zone_Mainland
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1956	550961.1779	735324.3013	Construction_Zone_Mainland
1957	550944.6536	735309.6943	Construction_Zone_Mainland
1958	550925.4091	735292.6159	Construction_Zone_Mainland
1959	550906.4647	735275.2057	Construction_Zone_Mainland
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1961	550872.3065	735243.5689	Construction_Zone_Mainland
1962	550855.3558	735227.6075	Construction_Zone_Mainland
1963	550836.7849	735209.7898	Construction_Zone_Mainland
1964	550821.4680	735193.9122	Construction_Zone_Mainland
1965	550803.2480	735175.7373	Construction_Zone_Mainland
1966	550785.0909	735157.4912	Construction_Zone_Mainland
1967	550767.7398	735138.4775	Construction_Zone_Mainland
1968	550750.2437	735119.6038	Construction_Zone_Mainland
1969	550735.1291	735103.2639	Construction_Zone_Mainland
1970	550717.9458	735083.4115	Construction_Zone_Mainland
1971	550700.5470	735063.7539	Construction_Zone_Mainland
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1973	550667.5932	735027.8271	Construction_Zone_Mainland
1974	550652.9741	735011.7481	Construction_Zone_Mainland
1975	550634.0738	734992.4116	Construction_Zone_Mainland
1976	550617.1130	734972.3581	Construction_Zone_Mainland
1977	550602.2515	734955.462	Construction_Zone_Mainland
1978	550584.2981	734936.3058	Construction_Zone_Mainland
1979	550568.8093	734919.9766	Construction_Zone_Mainland
1980	550549.5213	734896.9718	Construction_Zone_Mainland
1981	550534.2311	734880.4632	Construction_Zone_Mainland
1982	550516.5484	734861.0622	Construction_Zone_Mainland
1983	550501.5497	734844.2901	Construction_Zone_Mainland
1984	550483.9921	734824.7762	Construction_Zone_Mainland
1985	550468.8429	734808.1401	Construction_Zone_Mainland
1986	550449.0570	734785.5853	Construction_Zone_Mainland
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1990	550384.2712	734712.7176	Construction_Zone_Mainland
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1992	550351.1189	734676.9703	Construction_Zone_Mainland
1993	550333.6949	734657.3355	Construction_Zone_Mainland
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1995	550300.6013	734621.5351	Construction_Zone_Mainland
1996	550283.5242	734601.5867	Construction_Zone_Mainland
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1999	550233.3486	734545.8423	Construction_Zone_Mainland
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2001	550200.6190	734506.2286	Construction_Zone_Mainland
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2004	550149.3089	734452.2393	Construction_Zone_Mainland
2005	550133.4670	734430.1883	Construction_Zone_Mainland
2006	550117.2759	734410.1902	Construction_Zone_Mainland
2007	550101.0731	734390.1778	Construction_Zone_Mainland
2008	550082.2660	734372.7167	Construction_Zone_Mainland
2009	550063.3812	734355.4029	Construction_Zone_Mainland
2010	550044.3904	734338.21	Construction_Zone_Mainland

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2015	549947.0532	734255.0102	Construction_Zone_Mainland
2016	549927.2055	734238.8287	Construction_Zone_Mainland
2017	549907.2000	734222.8427	Construction_Zone_Mainland
2018	549887.0388	734207.0535	Construction_Zone_Mainland
2019	549866.7238	734191.4627	Construction_Zone_Mainland
2020	549846.2569	734176.0718	Construction_Zone_Mainland
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2022	549805.2545	734145.3649	Construction_Zone_Mainland
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2041	553489.4490	736200.9965	Construction_Zone_Mainland
2042	553463.3151	736198.5481	Construction_Zone_Mainland
2043	553437.2188	736195.7267	Construction_Zone_Mainland
2044	553411.6683	736192.6266	Construction_Zone_Mainland
2045	553386.8581	736189.5523	Construction_Zone_Mainland
2046	553362.0478	736186.478	Construction_Zone_Mainland
2047	553337.2376	736183.4037	Construction_Zone_Mainland
2048	553312.4273	736180.3294	Construction_Zone_Mainland
2049	553287.6171	736177.2551	Construction_Zone_Mainland
2050	553262.8068	736174.1808	Construction_Zone_Mainland
2051	553237.5591	736171.0522	Construction_Zone_Mainland
2052	553213.2205	736167.7564	Construction_Zone_Mainland
2053	553188.5153	736163.8345	Construction_Zone_Mainland
2054	553163.8811	736159.3393	Construction_Zone_Mainland
2055	553139.3182	736154.2686	Construction_Zone_Mainland
2056	553114.8270	736148.6191	Construction_Zone_Mainland
2057	553090.3852	736142.5718	Construction_Zone_Mainland
2058	553065.9425	736136.531	Construction_Zone_Mainland
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2060	553016.7436	736126.9804	Construction_Zone_Mainland
2061	552991.9445	736123.8161	Construction_Zone_Mainland
2062	552967.0551	736121.38	Construction_Zone_Mainland
2063	552942.1631	736118.9653	Construction_Zone_Mainland
2064	552917.2712	736116.5506	Construction_Zone_Mainland
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2066	552867.4872	736111.7212	Construction_Zone_Mainland
2067	552842.5952	736109.3065	Construction_Zone_Mainland
2068	552817.7032	736106.8918	Construction_Zone_Mainland
2069	552792.8112	736104.4771	Construction_Zone_Mainland
2070	552767.9192	736102.0624	Construction_Zone_Mainland
2071	552743.0273	736099.6477	Construction_Zone_Mainland

2072	552718.1353	736097.233	Construction_Zone_Mainland
2073	552698.3051	736104.2458	Construction_Zone_Mainland
2074	552662.5382	736155.9937	Construction_Zone_Mainland
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2076	552643.1992	736165.2922	Construction_Zone_Mainland
2077	552656.3033	736147.406	Construction_Zone_Mainland
2078	552688.7211	736097.8202	Construction_Zone_Mainland
2079	552668.3513	736092.4036	Construction_Zone_Mainland
2080	552643.4593	736089.9889	Construction_Zone_Mainland
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2084	552543.8914	736080.3301	Construction_Zone_Mainland
2085	552518.9994	736077.9154	Construction_Zone_Mainland
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2087	552497.2255	736097.0368	Construction_Zone_Mainland
2088	552401.4246	736155.6745	Construction_Zone_Mainland
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2092	552444.3774	736070.2359	Construction_Zone_Mainland
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2094	552395.8092	736055.5944	Construction_Zone_Mainland
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2099	552273.9693	736022.0082	Construction_Zone_Mainland
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2103	552169.6207	736026.4181	Construction_Zone_Mainland
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2105	552118.3428	736020.4276	Construction_Zone_Mainland
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2127	551966.1965	736252.7579	Construction_Zone_Mainland
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2138	551781.0506	736203.1273	Construction_Zone_Mainland
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2141	551772.8515	736191.6779	Construction_Zone_Mainland
2142	551752.1750	736160.9718	Construction_Zone_Mainland
2143	551739.9534	736141.9914	Construction_Zone_Mainland
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2145	551732.0883	736130.7506	Construction_Zone_Mainland
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2169	551336.1441	735718.8543	Construction_Zone_Mainland
2170	551330.7958	735716.3536	Construction_Zone_Mainland
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2172	551286.8422	735690.1461	Construction_Zone_Mainland
2173	551265.3810	735676.7248	Construction_Zone_Mainland
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2175	551221.6406	735649.72	Construction_Zone_Mainland
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2177	551178.8234	735621.7788	Construction_Zone_Mainland
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2217	550442.1424	734928.3227	Construction_Zone_Mainland
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2219	550409.7687	734891.8715	Construction_Zone_Mainland
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2225	550308.6758	734781.0533	Construction_Zone_Mainland
2226	550290.7234	734761.8961	Construction_Zone_Mainland
2227	550275.9384	734744.8903	Construction_Zone_Mainland
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2230	550223.1358	734686.5061	Construction_Zone_Mainland
2231	550207.4600	734670.3461	Construction_Zone_Mainland
2232	550190.0467	734650.7016	Construction_Zone_Mainland
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2253	549809.2059	734307.8084	Construction_Zone_Mainland
2254	549787.5708	734296.0792	Construction_Zone_Mainland

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2256	549743.5896	734274.0681	Construction_Zone_Mainland
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2271	549394.1614	734178.2579	Construction_Zone_Mainland
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2273	549297.3216	734187.5445	Construction_Zone_Mainland
2274	549321.8737	734146.7437	Construction_Zone_Mainland
2275	549330.9911	734115.4682	Construction_Zone_Mainland
2276	549326.9983	734081.9925	Construction_Zone_Mainland
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2278	549309.6130	734064.0946	Construction_Zone_Mainland
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2285	549168.4865	733966.0915	Construction_Zone_Mainland
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2309	548609.4144	733803.7291	Construction_Zone_Mainland
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2314	548488.1121	733790.8771	Construction_Zone_Mainland
2315	548463.7842	733789.0211	Construction_Zone_Mainland

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2329	548115.1471	733768.1845	Construction_Zone_Mainland
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2339	547865.5847	733753.3991	Construction_Zone_Mainland
2340	547844.5764	733752.1544	Construction_Zone_Mainland
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2342	547815.7967	733748.3414	Construction_Zone_Mainland
2343	547790.9479	733745.0492	Construction_Zone_Mainland
2344	547766.0991	733741.757	Construction_Zone_Mainland
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2350	547641.0333	733739.1673	Construction_Zone_Mainland
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2360	547388.4568	733775.2581	Construction_Zone_Mainland
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2362	547338.2815	733776.736	Construction_Zone_Mainland
2363	547313.2983	733775.7131	Construction_Zone_Mainland
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2367	547213.4442	733770.2913	Construction_Zone_Mainland
2368	547188.4806	733768.9358	Construction_Zone_Mainland
2369	547163.5171	733767.5803	Construction_Zone_Mainland
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2371	547113.5900	733764.8694	Construction_Zone_Mainland
2372	547088.9143	733763.5296	Construction_Zone_Mainland
2373	547063.5689	733763.7462	Construction_Zone_Mainland
2374	547038.5462	733763.3893	Construction_Zone_Mainland
2375	547013.5571	733762.4661	Construction_Zone_Mainland
2376	546988.6014	733760.9776	Construction_Zone_Mainland

2377	546963.6793	733758.9238	Construction_Zone_Mainland
2378	546938.7907	733756.3037	Construction_Zone_Mainland
2379	546913.9357	733753.1156	Construction_Zone_Mainland
2380	546889.1145	733749.3569	Construction_Zone_Mainland
2381	546864.3274	733745.024	Construction_Zone_Mainland
2382	546839.5746	733740.1123	Construction_Zone_Mainland
2383	546814.8563	733734.6165	Construction_Zone_Mainland
2384	546811.9943	733733.9415	Construction_Zone_Mainland
2385	546814.5895	733739.1206	Construction_Zone_Mainland
2386	546818.6899	733758.6278	Construction_Zone_Mainland
2387	546819.1409	733818.6261	Construction_Zone_Mainland
2388	546798.6415	733818.7802	Construction_Zone_Mainland
2389	546798.1905	733758.7819	Construction_Zone_Mainland
2390	546789.6062	733738.0983	Construction_Zone_Mainland
2391	546776.3837	733730.3353	Construction_Zone_Mainland
2392	546765.2098	733727.1713	Construction_Zone_Mainland
2393	546740.6046	733719.7666	Construction_Zone_Mainland
2394	546715.9889	733712.5396	Construction_Zone_Mainland
2395	546691.3468	733705.7602	Construction_Zone_Mainland
2396	546666.6783	733699.4236	Construction_Zone_Mainland
2397	546641.9839	733693.5253	Construction_Zone_Mainland
2398	546617.2638	733688.0614	Construction_Zone_Mainland
2399	546592.5101	733683.164	Construction_Zone_Mainland
2400	546568.1001	733679.4341	Construction_Zone_Mainland
2401	546543.0196	733673.0854	Construction_Zone_Mainland
2402	546518.6932	733666.9275	Construction_Zone_Mainland
2403	546493.3699	733665.6924	Construction_Zone_Mainland
2404	546468.3480	733665.322	Construction_Zone_Mainland
2405	546443.3066	733665.2809	Construction_Zone_Mainland
2406	546418.2652	733665.2398	Construction_Zone_Mainland
2407	546404.3937	733678.1037	Construction_Zone_Mainland
2408	546398.8796	733887.2716	Construction_Zone_Mainland
2409	546399.8781	733929.4733	Construction_Zone_Mainland
2410	546354.2513	733928.1101	Construction_Zone_Mainland
2411	546366.7976	733870.1661	Construction_Zone_Mainland
2412	546365.6587	733769.2268	Construction_Zone_Mainland
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2414	546366.0462	733675.1541	Construction_Zone_Mainland
2415	546343.2146	733663.8736	Construction_Zone_Mainland
2416	546318.2584	733662.3951	Construction_Zone_Mainland
2417	546293.3021	733660.9165	Construction_Zone_Mainland
2418	546268.3459	733659.438	Construction_Zone_Mainland
2419	546243.3897	733657.9594	Construction_Zone_Mainland
2420	546218.4334	733656.4809	Construction_Zone_Mainland
2421	546193.4772	733655.0024	Construction_Zone_Mainland
2422	546168.5209	733653.5238	Construction_Zone_Mainland
2423	546144.1286	733652.303	Construction_Zone_Mainland
2424	546119.7708	733651.3004	Construction_Zone_Mainland
2425	546095.4062	733650.5043	Construction_Zone_Mainland
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2427	546046.6619	733649.5313	Construction_Zone_Mainland
2428	546022.2849	733649.3546	Construction_Zone_Mainland
2429	545997.9064	733649.3844	Construction_Zone_Mainland
2430	545973.5277	733649.6207	Construction_Zone_Mainland
2431	545949.1501	733650.0636	Construction_Zone_Mainland
2432	545924.7750	733650.7131	Construction_Zone_Mainland
2433	545900.4037	733651.5693	Construction_Zone_Mainland
2434	545876.0374	733652.6321	Construction_Zone_Mainland
2435	545851.6776	733653.9015	Construction_Zone_Mainland
2436	545827.3256	733655.3777	Construction_Zone_Mainland
2437	545802.9875	733657.1143	Construction_Zone_Mainland

2438	545778.6926	733659.3736	Construction_Zone_Mainland
2439	545754.4274	733661.934	Construction_Zone_Mainland
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2445	545659.5430	733747.334	Construction_Zone_Mainland
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2447	545627.8905	733877.672	Construction_Zone_Mainland
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2449	545603.3550	733967.6897	Construction_Zone_Mainland
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2467	545324.5740	733749.1259	Construction_Zone_Mainland
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2529	544271.8801	734387.2645	Construction_Zone_Mainland
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2713	550777.6105	731631.8448	Construction_Zone_Mainland
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3042	545715.6203	733544.0417	Construction_Zone_Mainland
3043	545690.1965	733547.174	Construction_Zone_Mainland
3044	545664.8161	733550.6409	Construction_Zone_Mainland
3045	545639.4838	733554.4416	Construction_Zone_Mainland
3046	545614.2047	733558.5753	Construction_Zone_Mainland
3047	545611.1712	733548.7214	Construction_Zone_Mainland

3048	545563.8257	733567.8385	Construction_Zone_Mainland
3049	545538.7355	733572.966	Construction_Zone_Mainland
3050	545513.7182	733578.4226	Construction_Zone_Mainland
3051	545488.7411	733584.0325	Construction_Zone_Mainland
3052	545463.7531	733589.5679	Construction_Zone_Mainland
3053	545438.8202	733595.3434	Construction_Zone_Mainland
3054	545413.9439	733601.3553	Construction_Zone_Mainland
3055	545389.1262	733607.603	Construction_Zone_Mainland
3056	545364.3694	733614.0861	Construction_Zone_Mainland
3057	545339.6753	733620.8039	Construction_Zone_Mainland
3058	545315.0463	733627.756	Construction_Zone_Mainland
3059	545290.4844	733634.9416	Construction_Zone_Mainland
3060	545265.9915	733642.3603	Construction_Zone_Mainland
3061	545241.5700	733650.0113	Construction_Zone_Mainland
3062	545217.2217	733657.8941	Construction_Zone_Mainland
3063	545192.9488	733666.0079	Construction_Zone_Mainland
3064	545168.7534	733674.3522	Construction_Zone_Mainland
3065	545144.6375	733682.9262	Construction_Zone_Mainland
3066	545120.6031	733691.7292	Construction_Zone_Mainland
3067	545096.6524	733700.7605	Construction_Zone_Mainland
3068	545072.7874	733710.0194	Construction_Zone_Mainland
3069	545049.0100	733719.5051	Construction_Zone_Mainland
3070	545025.3225	733729.2169	Construction_Zone_Mainland
3071	545001.7267	733739.1539	Construction_Zone_Mainland
3072	544978.2247	733749.3154	Construction_Zone_Mainland
3073	544954.8185	733759.7005	Construction_Zone_Mainland
3074	544931.5102	733770.3085	Construction_Zone_Mainland
3075	544908.0360	733781.0905	Construction_Zone_Mainland
3076	544885.4047	733792.6125	Construction_Zone_Mainland
3077	544862.5661	733804.2401	Construction_Zone_Mainland
3078	544839.8127	733815.9447	Construction_Zone_Mainland
3079	544817.1601	733827.8859	Construction_Zone_Mainland
3080	544794.6281	733840.0529	Construction_Zone_Mainland
3081	544772.2189	733852.4447	Construction_Zone_Mainland
3082	544749.9347	733865.06	Construction_Zone_Mainland
3083	544727.7777	733877.8974	Construction_Zone_Mainland
3084	544705.7503	733890.9558	Construction_Zone_Mainland
3085	544683.8545	733904.2338	Construction_Zone_Mainland
3086	544662.0926	733917.7301	Construction_Zone_Mainland
3087	544640.4668	733931.4434	Construction_Zone_Mainland
3088	544618.9792	733945.3722	Construction_Zone_Mainland
3089	544597.6319	733959.5151	Construction_Zone_Mainland
3090	546816.0886	733412.5522	Construction_Zone_Mainland
3091	546795.5891	733412.7061	Construction_Zone_Mainland
3092	546795.9318	733476.3813	Construction_Zone_Mainland
3093	546756.2528	733521.821	Construction_Zone_Mainland
3094	546786.4735	733502.4122	Construction_Zone_Mainland
3095	546396.4474	733439.662	Construction_Zone_Mainland
3096	546396.5342	733365.1053	Construction_Zone_Mainland
3097	546396.6963	733225.8935	Construction_Zone_Mainland
3098	546365.6841	733225.8935	Construction_Zone_Mainland
3099	546365.5331	733294.2081	Construction_Zone_Mainland
3100	546365.3586	733373.1456	Construction_Zone_Mainland
3101	546365.1968	733446.3244	Construction_Zone_Mainland
3102	546365.0085	733531.5309	Construction_Zone_Mainland
3103	545604.0218	733506.9105	Construction_Zone_Mainland
3104	545599.6664	733450.951	Construction_Zone_Mainland
3105	545595.1328	733406.7109	Construction_Zone_Mainland
3106	545591.2216	733370.4685	Construction_Zone_Mainland
3107	545562.7768	733371.8898	Construction_Zone_Mainland
3108	545565.0838	733427.9954	Construction_Zone_Mainland

3109	545565.2759	733457.6583	Construction_Zone_Mainland
3110	545564.1989	733499.0935	Construction_Zone_Mainland
3111	545570.8429	733557.3154	Construction_Zone_Mainland
3112	544576.4271	733973.8709	Construction_Zone_Mainland
3113	544555.3669	733988.4379	Construction_Zone_Mainland
3114	544534.4535	734003.2149	Construction_Zone_Mainland
3115	544513.6889	734018.2002	Construction_Zone_Mainland
3116	544493.1091	734033.4381	Construction_Zone_Mainland
3117	544472.7856	734049.0152	Construction_Zone_Mainland
3118	544458.9564	734047.1049	Construction_Zone_Mainland
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3120	544451.4293	733969.4723	Construction_Zone_Mainland
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3122	544474.8964	733879.9322	Construction_Zone_Mainland
3123	544457.1184	733867.8514	Construction_Zone_Mainland
3124	544425.1179	733860.0344	Construction_Zone_Mainland
3125	544402.3619	733871.4046	Construction_Zone_Mainland
3126	544368.2281	733877.0897	Construction_Zone_Mainland
3127	544338.7557	733877.326	Construction_Zone_Mainland
3128	544342.0532	733919.6943	Construction_Zone_Mainland
3129	544371.5993	733920.5231	Construction_Zone_Mainland
3130	544402.3619	733921.8597	Construction_Zone_Mainland
3131	544408.7621	733933.2299	Construction_Zone_Mainland
3132	544408.2427	733954.8993	Construction_Zone_Mainland
3133	544408.0509	733968.7616	Construction_Zone_Mainland
3134	544451.4293	733969.4723	Construction_Zone_Mainland
3135	544452.8517	734015.6636	Construction_Zone_Mainland
3136	544410.1843	734027.0337	Construction_Zone_Mainland
3137	544458.9564	734047.1049	Construction_Zone_Mainland
3138	544419.0318	734078.9777	Construction_Zone_Mainland
3139	544412.8276	734097.0125	Construction_Zone_Mainland
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3141	544373.7223	734130.0463	Construction_Zone_Mainland
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3143	544335.3313	734163.8901	Construction_Zone_Mainland
3144	544316.4090	734181.1107	Construction_Zone_Mainland
3145	544297.6717	734198.5277	Construction_Zone_Mainland
3146	544279.1216	734216.1389	Construction_Zone_Mainland
3147	544260.7607	734233.9422	Construction_Zone_Mainland
3148	544242.5911	734251.9354	Construction_Zone_Mainland
3149	544224.6148	734270.1165	Construction_Zone_Mainland
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3152	544136.2932	734362.473	Construction_Zone_Mainland
3153	544119.1435	734381.4241	Construction_Zone_Mainland
3154	544102.1856	734400.5471	Construction_Zone_Mainland
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3156	544068.8454	734439.2985	Construction_Zone_Mainland
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3163	543958.4506	734576.8149	Construction_Zone_Mainland
3164	543942.4546	734596.0328	Construction_Zone_Mainland
3165	543926.6444	734615.3998	Construction_Zone_Mainland
3166	543910.8342	734634.7667	Construction_Zone_Mainland
3167	543895.0240	734654.1337	Construction_Zone_Mainland
3168	543879.2138	734673.5007	Construction_Zone_Mainland
3169	543863.4036	734692.8677	Construction_Zone_Mainland

3170	543847.5935	734712.2346	Construction_Zone_Mainland
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3172	543815.9731	734750.9686	Construction_Zone_Mainland
3173	543800.1629	734770.3356	Construction_Zone_Mainland
3174	543784.3527	734789.7025	Construction_Zone_Mainland
3175	543768.5425	734809.0695	Construction_Zone_Mainland
3176	543766.6574	734811.3786	Construction_Zone_Mainland
3177	543774.3691	734820.3485	Construction_Zone_Mainland
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3183	543686.7278	734935.7448	Construction_Zone_Mainland
3184	543669.2754	734953.3404	Construction_Zone_Mainland
3185	543649.7752	734970.3373	Construction_Zone_Mainland
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3188	543580.3593	735010.7854	Construction_Zone_Mainland
3189	543552.3699	735020.7655	Construction_Zone_Mainland
3190	543521.0174	735028.0344	Construction_Zone_Mainland
3191	543486.5253	735031.2643	Construction_Zone_Mainland
3192	543463.1876	735032.2937	Construction_Zone_Mainland
3193	543435.4279	735029.3114	Construction_Zone_Mainland
3194	543412.6347	735023.1056	Construction_Zone_Mainland
3195	543396.8881	735018.4521	Construction_Zone_Mainland
3196	543379.5145	735011.3417	Construction_Zone_Mainland
3197	543360.5301	735002.0778	Construction_Zone_Mainland
3198	543348.4923	734994.8061	Construction_Zone_Mainland
3199	543322.1354	734979.27	Construction_Zone_Mainland
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3204	543211.7225	734921.5557	Construction_Zone_Mainland
3205	543201.7128	734916.7539	Construction_Zone_Mainland
3206	543188.6653	734909.335	Construction_Zone_Mainland
3207	543162.4783	734894.673	Construction_Zone_Mainland
3208	543145.7229	734885.8415	Construction_Zone_Mainland
3209	543139.7342	734883.6201	Construction_Zone_Mainland
3210	543127.7996	734876.8025	Construction_Zone_Mainland
3211	543121.7299	734874.1065	Construction_Zone_Mainland
3212	543100.4958	734864.1096	Construction_Zone_Mainland
3213	543043.8041	734838.7886	Construction_Zone_Mainland
3214	543038.8272	734837.7225	Construction_Zone_Mainland
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3216	543008.2265	734823.2399	Construction_Zone_Mainland
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3219	542938.1115	734790.2724	Construction_Zone_Mainland
3220	542861.7866	734749.9966	Construction_Zone_Mainland
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3222	542908.5055	734775.2183	Construction_Zone_Mainland
3223	542838.4550	734737.8765	Construction_Zone_Mainland
3224	542820.8079	734728.4633	Construction_Zone_Mainland
3225	542804.4808	734719.3137	Construction_Zone_Mainland
3226	542791.1781	734712.3828	Construction_Zone_Mainland
3227	542773.3672	734702.8903	Construction_Zone_Mainland
3228	542750.1670	734690.9115	Construction_Zone_Mainland
3229	542727.8958	734679.5511	Construction_Zone_Mainland
3230	542739.5968	734685.6685	Construction_Zone_Mainland

3231	542764.3122	734698.5356	Construction_Zone_Mainland
3232	542713.7276	734673.1431	Construction_Zone_Mainland
3233	542708.6629	734670.5672	Construction_Zone_Mainland
3234	542703.4405	734668.2036	Construction_Zone_Mainland
3235	542693.1084	734663.7891	Construction_Zone_Mainland
3236	542683.0565	734658.8255	Construction_Zone_Mainland
3237	542677.9848	734656.3061	Construction_Zone_Mainland
3238	542673.2113	734654.6443	Construction_Zone_Mainland
3239	542610.3794	734696.2526	Construction_Zone_Mainland
3240	542739.0784	734766.963	Construction_Zone_Mainland
3241	542798.7490	734799.7475	Construction_Zone_Mainland
3242	542873.8888	734840.2481	Construction_Zone_Mainland
3243	542999.2209	734905.8571	Construction_Zone_Mainland
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3248	543377.9459	735116.3298	Construction_Zone_Mainland
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3253	543623.6288	735276.0913	Construction_Zone_Mainland
3254	543671.1346	735315.6644	Construction_Zone_Mainland
3255	543697.4463	735337.5862	Construction_Zone_Mainland
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3258	543828.6996	735444.0012	Construction_Zone_Mainland
3259	543913.2444	735513.1565	Construction_Zone_Mainland
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3263	544150.3674	735742.8064	Construction_Zone_Mainland
3264	544197.1571	735792.0416	Construction_Zone_Mainland
3265	544268.7315	735871.5167	Construction_Zone_Mainland
3266	544239.8326	735836.9474	Construction_Zone_Mainland
3267	544331.8052	735953.2305	Construction_Zone_Mainland
3268	544394.8789	736034.9442	Construction_Zone_Mainland