

**Assessment of the Completeness of Alternative Routes
Considered by East Kentucky Power Cooperative
In its Application to Construct the Cranston-Rowan County
138 kV Transmission Line -- Case No 2005-00458**

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Introduction

The Commission has asked MSB Energy Associates, Inc. (MSB) to assess whether EKPC did a comprehensive survey of all possible routes for the Cranston-Rowan County 138 kV transmission line. MSB had prepared an assessment of the need for EKPC's proposed Cranston-Rowan County 138 kV transmission line and issued a report in June 2005. MSB testified regarding the report and its findings in public hearings in Frankfort on July 18, 2005.

The Commission denied the application for the proposed line in its August 19, 2005 order in Case No. 2005-00089. The Commission concluded that while the need for such a project was established, the proposed route did not adequately consider the use of existing rights-of-way and transmission line and corridors, thus resulting in the wasteful duplication of facilities.

EKPC conducted further analysis and provided further documentation of routing alternatives to the proposed Cranston-Rowan County route. EKPC re-applied for authority to construct the proposed Cranston-Rowan County line on December 8, 2005 in Case No. 2005-00458. The Commission established a two-step analysis for the case: (1) Did the utility do a comprehensive survey of all possible routes for the line? (2) If yes, was its choice of its proposed location reasonable? The Commission asked MSB to focus solely on the first step, whether EKPC did a comprehensive survey of potential routes.

What constitutes a comprehensive survey of alternative routes?

The project must electrically connect the Cranston and at Rowan County substations, which are separated by approximately seven miles. This means that potential routes could be located in approximately a 50 square mile project area. In that project area, there would be virtually an infinite number of combinations of transmission centerline placements. It is not necessary that every one of the possible centerline placements be explicitly evaluated in order to have completed a comprehensive survey. That is because many of those centerline alternatives are indistinguishable from one another. A pole located at point x and a pole located at point y are likely to have indistinguishable impacts as long as both x and y are in the same type of land use and resource. From a transmission corridor siting perspective, it is not necessary to identify a specific corridor for each pole placement at x and y.

The purpose of evaluating a number of alternatives is to identify the one(s) that best satisfy the public interest. The public interest is not a monolith – it is determined by weighing a number of often-conflicting factors to establish what is the best balance of tradeoffs. The least expensive to build alternative is not necessarily the least expensive to operate, and it may have the most impact on aesthetics or natural areas or agricultural land use, etc. In addition, what is the “best” alternative is in the eye of the beholder. For example, one person may be more concerned about aesthetic impacts while another may be more concerned about potential impacts to sensitive ecological communities. Route selection, to be in the public interest, should address and balance these various perspectives.

The point of this is to reach a pragmatic definition of what constitutes a comprehensive survey of alternatives. For transmission line corridors, the scope of alternatives should reflect substantially different potential impacts. That way, the alternative corridors will provide real choices in terms of balancing the public interest. The identification of alternative transmission corridors will depend on the current and potential land uses in the project area and the public values that may be attached to those land uses. This report will refer to these as primary alternative corridors.

While the alternative corridors will represent substantially different land uses and public values, it is also true that there are decisions to be made within the corridors to establish the rights-of-way and centerlines for the line. The corridors are not completely homogenous in terms of the potential impacts that may occur. For example, a corridor passing residential areas will include some places where a centerline could not be located and others where it may be preferable to locate. In some cases, deviations outside the corridor might be necessary when more detailed analysis of the centerline is conducted. This report will refer to specific restrictions within the corridor or deviations outside the corridor to address specific problems – both types are adjustments made to the primary alternatives as more information becomes available – as secondary alternatives.

Scope of Primary Alternatives

The building blocks for primary alternative corridors connecting the Cranston and Rowan County substations are determined by the following land uses in the area:

- Forest land – publicly-owned in the Daniel Boone National Forest
- Forest land – privately-owned
- Developed or developing areas – residential, rural residential and commercial mix generally in valleys of North Fork Triplett, Triplett and Christy Creeks
- Corridors – highway, transmission, and gas pipeline. Existing corridors, regardless of the land use through which they pass, are sites of disturbance for certain types of impacts. Thus use of existing corridors can result in less incremental impact than opening new corridors.

Referring to Application Exhibit VIII₁ the dominant land use in the area connecting the Cranston and Rowan County substations is the Daniel Boone National Forest.

On the east side of the project area is a band of privately owned property, heading generally northeast, through which Triplett Creek flows and through which Highway 60 is routed. Morehead and the Rowan County substation are situated along this easterly band of privately owned property. Similarly, on the west side of the project area is another band of privately owned property, heading generally northeast, through which North Fork Triplett Creek flows and through which Interstate Highway 64 is routed. Cranston and the Cranston substation are located along the western band. The land uses along these bands are much different than in the Daniel Boone National Forest, being a mix of residential, rural residential and commercial development.

There is no short private land crossing between the North Fork Triplett Creek valley where the Cranston substation is located and the Triplett Creek – Christy Creek valleys that access the Rowan County substation. Crossing the mountains between the North Fork Triplett Creek and Triplett Creek valleys predominantly on privately owned forestland is possible on the southwest and northeast ends of the project area (off the map in Exhibit VIII₁).

There are three existing corridors crossing the mountainous forestland between the two valleys. On the south end of the project area are an existing 138 kV transmission line (KU Goddard-Rodburn) owned by KU and an existing 69 kV transmission line (Hilda-Rowan County) owned by EKPC. The third existing corridor is Highway 799 on the north end of the project area.

The privately owned land in the North Fork Triplett Creek valley also contains several existing corridors that could reduce certain types of impacts. These are Interstate Highway 64, Highway 377, and eight natural gas pipelines. Highways 60 and 32 and an existing 69 kV transmission line (Leon-Rodburn) owned by AEP are potential corridors in the Triplett Creek valley.

Highways are existing corridors that are already disturbed, frequently reducing the amount of impact to natural areas. However, attempting to route fairly large transmission lines along small highways can sometimes exacerbate impacts as they relate to guying towers to follow highway curves and to aesthetics. In developed areas, dwellings and commercial buildings often line the highways, which increases routing difficulty due to clearance issues and nearness to human activity.

Thus primary routing alternatives for the Cranston-Rowan County project should include routes to achieve the following objectives: minimize construction cost (generally shortest most direct route), minimize impact on the National Forest, minimize impact on human activities, and maximize the use of existing corridors (to reduce incremental impact).

Primary Route Alternatives Considered by EKPC

EKPC, in the testimony of Mark Brewer in Case No. 2005-00458, provided a description of the alternatives reviewed as well as a chronology of when they were considered. The

scope of alternatives considered by EKPC as characterized in Mr. Brewer's testimony is larger than was characterized in the application filed on April 21, 2005 in Case No. 2005-00089. It would also appear that the alternatives were considered sooner than previously disclosed by EKPC. However, the issue at this time is not when alternatives were considered, but whether they have been considered in the filing of the application in Case No. 2005-00458.

Alternatives EKPC Identified in the April 21, 2005 Application

EKPC's application in Case No. 2005-00089 described a process that resulted in two alternatives – the proposed Cranston-Rowan County line and the Cranston-Cranston Tap line with Cranston Tap-Rodburn 138 kV (and Goddard Hilda 69 kV) reconductoring. The reconductoring option terminated at Rodburn, and did not reach as far as the Rowan County substation. EKPC did not identify any alternative that paralleled the KU Goddard-Rodburn 138 kV line or the Hilda-Rowan County 69 kV line.

EKPC's testimony (Ms. Warner) indicated that in April 2002, it contacted the US Forest Service and jointly developed corridors because the proposed line crossed the Daniel Boone National Forest. The testimony indicates that the Forest Service evaluated seven different alternatives as part of the Environmental Assessment.

EKPC's application contained the proposed route from Cranston to Rowan County, including centerline and proposed pole locations, in Exhibit VII in Case No. 2005-00089. EKPC indicated that this was the route considered to be the best alternative by the Forest Service.

EKPC's application also contained "alternative routes" as depicted in Exhibit VIII in Case No. 2005-00089. These alternative routes involved two alternative centerlines in the last quarter mile approaching the Cranston substation and a 300-foot deviation in the centerline involving two towers just south of the Highway 60 crossing. The "alternative routes" depicted in Exhibit VIII in Case No. 2005-00089 are not primary route alternatives, but secondary route alternatives involving the proposal.

EKPC described a process for routing, but provided no primary route alternatives to connecting Cranston to Rowan County other than its proposed line as part of its application in Case No. 2005-00089.

MSB's June 9, 2005 Report on the Need for the Cranston-Rowan 138 kV Transmission Line identified the Cranston-Parallel Line Alternative connecting Cranston to Rodburn. It was identified not as a routing alternative, but as an electrical alternative to EKPC's Cranston-Cranston Tap-Rodburn reconductoring alternative. MSB's report goes on to state that it may be possible to extend the parallel line to Rowan County substation by overbuilding the 138 kV line on a portion of the existing Rowan-Hilda 69 kV line.

Alternatives Identified in 2002

Mr. Brewer in testimony filed in Case No. 2005-00458 indicated that EKPC had identified three alternative routes that it took to the US Forest Service in early 2002. These are depicted on Application Exhibit VIII₁ and are discussed in Brewer Exhibit A to his testimony. The three 2002 alternative routes are reasonable primary alternative routes as described below.

Option 1 is a “straight line” route crossing the Daniel Boone National Forest along virtually the shortest distance between the Cranston and Rowan County substations. It crosses the National Forest without any apparent regard for sharing corridors or routing along other land uses. Option 1 appears designed to minimize length and construction cost.

Option 2 runs down the band of privately owned land in the North Fork Triplett Creek valley along the west side of the project area from Cranston until it intersects the KU Goddard-Rodburn 138 kV line. From there it crosses the National Forest by paralleling the KU Goddard-Rodburn 138 kV line until it intersects the Hilda-Rowan 69 kV line. It then parallels that line through the National Forest until making its final approach to the Rowan County substation. Option 2 is routed across other residential, rural residential and commercial land uses (rather than public forestland). Option 2 potentially shares corridors in the North Fork Triplett Creek valley with gas pipelines, Interstate 64 and Highway 377. Option 2 shares corridors across the National Forest. Option 2 is a reasonable primary route alternative that emphasizes sharing existing corridors, resulting in no new crossings of the Daniel Boone National Forest. Option 2 appears designed to maximize use of corridors and minimize new disruptions to publicly owned lands of the National Forest.

Option 3 crosses the Daniel Boone National Forest at a narrow point by routing along “fingers” of privately owned land extending into the National Forest. It enters the Perry Branch “finger” from the north roughly paralleling Highway 799 to Highway 60. From there it is routed through the privately owned band along the Triplett Creek valley, potentially sharing corridors with the AEP 69 kV transmission line and US Highway 60. Option 3 is a reasonable primary route alternative, blending some new crossing of the National Forest, some corridor sharing and some crossing of developed/potentially developing land uses. Option 3 is a medium length route that reflects the potential for significantly different impacts than Options 1 or 2.

All three options identified by EKPC at this stage of the review are reasonable and necessary primary routing alternatives for a comprehensive survey of possible routes. Application Exhibit VIII₁ also shows the proposed route, which was developed in conjunction with the US Forest Service. The proposed route is a refinement of Option 1, deviating by less than a quarter mile from the “straight line” route of Option 1 as it approaches the Cranston substation. The proposal is in effect a secondary route alternative to Option 1.

Alternatives Identified in 2002-04 by the US Forest Service

In his testimony filed in Case No. 2005-00458, Mr. Brewer indicated that the US Forest Service in conjunction with EKPC had identified eight alternatives, consisting of six alternative routes. The other two alternatives were the “no action” alternative and a no herbicide policy on the preferred routing alternative. These are depicted on Application Exhibit VIII₂ and are discussed in Brewer Exhibit A to his testimony. The eight US Forest Service alternatives route are described below.

Alternative A is essentially the proposed route using herbicides to control right of way vegetation. Alternative A is a refinement to EKPC’s Option 1 and EKPC’s proposed route is a refinement to Alternative A. Both are the same primary route alternative as Option 1.

Alternative B is the same as Alternative A, but uses mechanical right of way vegetation management. It is another refinement to EKPC’s Option 1- and is the same primary route alternative as Option 1.

Alternative C is the no action alternative – there is no associated route.

Alternative D follows a western route, and is similar to Option 2 in that it parallels the existing KU Goddard Rodburn 138 kV line part way across the National Forest. Unlike Option 2 which contemplated a route in the North Fork Triplett Creek valley sharing corridors on the west side of Interstate 64, Alternative D stays to the east of Interstate 64. Alternative D parallels Interstate 64 across private and National Forest land about a quarter mile to the east until it intersects the KU Goddard-Rodburn transmission line. From there on to the Rowan County substation, it is the same as Option 2. Although Alternative D is similar to Option 2 in its use of corridor sharing to minimize disruption to the land uses it crosses, it is different in that the segment between Cranston and the KU Goddard-Rodburn stays exclusively on private lands in Option 2 and substantially on National Forest public lands in Alternative D. Thus Alternative D has the potential for substantially different types of impacts to land uses and on public values, and MSB considers this to be another primary route alternative.

Alternative E follows a western and southern route, completely skirting the Daniel Boone National Forest. Alternative E starts at the Cranston Substation similar to EKPC’s Option 2, staying on private lands with the potential for sharing highway and pipeline corridors in the North Fork Triplett Creek valley. Unlike Option 2, Alternative E crosses the KU Goddard-Rodburn line and continues southwesterly until the end of the National Forest. At that point it turns southeast until it intersects KU’s Rodburn-Spencer Road 138 kV line, which it parallels skirting the National Forest just north of Morehead before it cuts east to the Rowan County substation. Alternative E is the longest of the routes considered, but completely avoids the National Forest. As such, it has the potential for substantially different types of impacts to land uses and on public values, and MSB considers this to be another primary route alternative.

Alternative F is the Cranston-Cranston Tap-Rodburn reconductoring alternative EKPC presented in its April 21, 2005 application. It is identical to Option 2 and Alternative E until it reaches the KU Goddard-Rodburn 138 kV line (Cranston Tap). Alternative F then calls for reconductoring the existing KU Goddard-Rodburn line from Cranston Tap to Rodburn. It is not electrically equivalent to the proposed Cranston-Rowan County line, and hence is not a routing alternative.

Alternative G appears to be essentially the same as EKPC's Option 3, perhaps with some refinements along Perry Branch as it approaches Highway 60. Alternative G follows Perry Branch more closely than EKPC's Option 3, but both stay on privately owned land. It is a secondary route alternative to Option 3.

Alternative H runs to the southeast from the Cranston substation crossing a narrow place in the Daniel Boone National Forest to privately owned mountain forestland. It continues cross country on private mountain forest land until it reaches the Triplett Creek valley, and then swings southwest generally paralleling the creek and Highway 60 to Perry Branch where it becomes identical to Alternative G to the Rowan substation. Alternative H is second to Alternative E in avoiding the National Forest, is in the National Forest about one-fourth of the distance of the proposed line. Alternative H utilizes some privately owned developed or developing land with a potential for corridor sharing, and also some privately owned mountain forestland. As such, it has the potential for substantially different types of impacts to land uses and on public values, and MSB considers this to be another primary route alternative.

MSB considers US Forest Service Alternatives D, E and H to be additional primary route alternatives. The consideration of these alternatives is reasonable and necessary for a comprehensive survey of possible routes. Although not initially proposed by EKPC, EKPC considered these alternatives in conjunction with the US Forest Service.

Alternatives Identified Post-Hearing July 18, 2005

Mr. Brewer filed testimony in Case No. 2005-00458 indicated that EKPC had identified three more alternative routes that were suggested during or after the July 18 hearing in Case No. 2005-00089. These are depicted on Application Exhibit VIII₃ and are discussed in Brewer Exhibit A to his testimony. The three post hearing routes are described below.

Post hearing parallel alternative is a more westerly route than Option 2 until it intersects with the KU Goddard-Rodburn line. It then is similar to Option 2 in that it parallels the KU Goddard-Rodburn and Hilda-Rowan County lines across the National Forest to the Rowan County substation. Concerns regarding potential transmission impacts on the North Fork Triplett Creek and corridor sharing with gas pipelines prompted moving the route out of the valley to the west. Although the post hearing parallel alternative is primarily on privately owned land, it differs from Option 2 in that it doesn't provide the opportunity for corridor sharing with the roads or pipelines in the valley. As such, it has the potential for substantially different types of impacts to land uses and on public values, and MSB considers this to be another primary route alternative.

Post hearing parallel alternative adjusted is very similar to the post hearing parallel alternative, except that it avoids more developed residential areas between Cranston substation and the intersection with the KU Goddard-Rodburn line. The adjusted alternative crosses Highway 799 to the east of the post hearing parallel alternative and is located to the west of the post hearing parallel alternative as it approaches the intersection with the KU Goddard-Rodburn line in order to avoid existing and potential residential development. MSB considers the post hearing parallel alternative adjusted to be a secondary route alternative to the post hearing parallel alternative.

Post hearing I-64 is the final alternative Mr. Brewer identified. This alternative was intended to closely parallel or share the right of way Interstate 64. Placing poles just outside the edge of the highway right of way would allow part of the transmission line right of way to overlap with the highway right of way. Placing poles inside the highway right of way would allow even more overlap of the transmission and highway rights of way. Depending on whether the post hearing I-64 route was located on privately owned or on National Forest land, the post hearing I-64 alternative is a variation of Option 2 or Alternative D, respectively. In either case, this is a secondary route alternative.

MSB considers the post hearing parallel alternatives to only add only one additional primary route alternative. The consideration of this alternative is reasonable and necessary for a comprehensive survey of possible routes.

Other Primary Route Alternatives

MSB believes that there are no other primary alternatives in the area that should be considered. The primary route alternatives considered by EKPC are a good representation of range of impacts that may be caused or avoided by transmission line routes through the Cranston-Rowan County area. Together, the primary alternatives avoid the National Forest by skirting it to the south, largely avoid it by skirting it to the north, utilize all the different land use types in the area to varying degrees, and utilize corridor sharing to reduce incremental impacts.

The only other possible opportunities that might be considered as primary alternatives are routes that utilize the two remaining corridors across the Daniel Boone National Forest in the vicinity of the Cranston and Rowan County substations.

The first begins at Cranston as Alternative H until it crosses Interstate 64. Rather than going cross country through privately owned mountain forest land, it would follow Highway 799, first across privately owned land and then through the National Forest until it became Alternative G (where Highway 799 leaves the National Forest and enters the “finger” of private land at Perry Branch). Highway 799 follows the Perry Branch valley from near the crossing at Interstate 64 to its intersection with Highway 60. It is probable that the US Forest Service and EKPC considered this road-sharing corridor when identifying alternatives for the Environmental Assessment but did not explicitly identify it. The fact that Highway 799 is a small and curving road makes it difficult to follow

with a transmission line. Many angles would be required in the transmission line, and with them, higher cost and more environmental disruption due to the stronger and guyed structures that would be needed. In addition, it would pass through the National Forest in a fairly narrow and undeveloped valley associated with Perry Branch. It would be reasonable to expect the potential for significant impacts to the stream and its ecosystem.

The other corridor is the existing Hilda-Rowan County 69 kV line that extends generally east-west across the south end of the National Forest. Other alternatives, such as Option 2 and Alternative D already utilize this corridor east from the intersection with the KU Goddard-Rodburn line. Continuing along this corridor to the west of the intersection would eventually come out at Interstate 64, but considerably south of Option 2 and Alternative D. Sharing this corridor would add length to the line while passing through land uses of similar character, and thus would not appear to offer any benefits relative to Alternative D and Option 2.

Thus neither of the other possible opportunities for corridor sharing that were not explicitly considered by EKPC rises to the merit of being required for a comprehensive survey of possible routes.

Secondary Route Alternatives Considered by EKPC

The secondary route alternatives are developed when refinements to a primary alternative can take advantage of some opportunities (enhance corridor sharing) or mitigate impacts (relocate to avoid very localized impacts). The reasons that EKPC and the US Forest Service identified secondary route alternatives are not always clear and it may no longer be possible to document them. MSB requested EKPC to provide a comprehensive list of all the alternative routes it considered. EKPC indicated that most of the documentation of alternative routes no longer exists because it was discarded or destroyed once the US Forest Service issued its finding of no significant impact. Some of the routes evolved through numerous iterations and variations that were developed in work papers that have since been discarded.

Specific Routes Documented to Have Been Considered

Those secondary alternatives involving corridor sharing with and access from Interstate 64 were considered, but rejected by the Department of Transportation as shown in the letter in Brewer Exhibit E. This affects Option 2 and the post hearing I-64 alternatives.

The US Forest Service considered a number of primary alternatives as well as secondary alternatives (as evidenced by the refinements the Forest Service made to primary route alternatives). The Forest Service considered and rejected a number of alternatives, specifically Alternatives D, E, F, G, and H, which also effectively rejected Options 2 and 3. The grounds for rejection included:

- High visibility from Interstate 64, county roads and the Forest Roads
- Crossing over or too near to homes barns and other buildings
- Crossing densely populated areas

- Negative impact on the community due to taking of private lands
- High cost, meaning that the low cost objective of the project would not be met
- Adverse effects on the Kentucky Lady Slipper, a Forest Service Sensitive Species, that grows in the wooded areas on private lands along the North Fork of Triplett Creek
- Conflict with gas pipeline corridors regarding induced currents and safety
- Clearing of forested riparian area on private lands along Triplett Creek, adversely affecting water quality and rare plant species
- Crossing an existing AEP line, which would create a potentially unsafe and costly situation

EKPC also considered and rejected Options 2 and 3, and the post hearing parallel and parallel adjusted alternatives on bases which included:

- Adverse impacts on North Fork Triplett Creek
- Adverse impacts on Triplett Creek
- Conflict with gas pipelines
- Conflict with residential development
- High impact to community
- Construction cost

The purpose of this list is not to second-guess the decisions of the Kentucky Department of Transportation, the US Forest Service or EKPC. Rather, the list provides some evidence that information on secondary route alternatives was being developed and considered. Thus although MSB was not able to obtain a complete list of all route alternatives and permutations of route alternatives that EKPC considered because the documentation has been discarded, MSB is confident that the right kinds of questions were being asked while EKPC was considering alternatives.

Process Evidence Points to Completeness

Brewer Exhibits B₁ to B₁₁ are a collection of workpapers that EKPC says had inadvertently been retained, a small collection from a much large body that had been discarded. Though not dated, these workpapers suggest that a broad range of primary and secondary route alternatives were considered. For example, Brewer Exhibit B₂ displays five alternate routes between the Cranston substation and the KU Goddard-Rodburn line. The five alternative routes show openness to considering alternatives that serve different objectives. The first alternative parallels the interstate but stays largely in the National Forest (may be related to the Forest Service's Alternative D). The second alternative weaves around the North Fork Triplett Creek valley, at times appearing to parallel pipelines, at other times roads, and at other times trying to avoid problem areas (perhaps residences, perhaps the stream and sensitive species growing there). The third and fourth alternatives move the route further west (and may be related to the post hearing parallel and parallel modified alternatives that were recently evaluated). The fifth alternative moves even further west. Similarly, Brewer Exhibits B₇ to B₁₁ show a series of secondary route alternatives for Option 1 (ultimately, with modifications, the proposed route). Again this suggests a process that identifies routing problems and routing

opportunities, suggesting that consideration had been given to a much wider array of alternatives than were ultimately actually documented as alternatives.

The process suggests that ultimately a complete survey of alternatives was considered even when specific documentation for specific alternatives does not exist. Primary route alternatives were reasonably identified and an iterative process that identified problem areas and siting opportunities took place to refine routes. Sometimes this ended in secondary routes (e.g., post hearing parallel adjusted), while in other cases it probably led to fatal flaws and rejection of the alternative (e.g., access from Interstate 64).

Other Secondary Route Alternatives

Identifying specific secondary route alternatives requires detailed information on specific opportunities and problems that might occur along the primary route alternatives. That review is beyond the scope of MSB's task in this assessment. MSB's charge was not to review the detailed data and assess the results (which is inherent in identifying the need for secondary route alternatives), but to assess whether a comprehensive set of alternatives had been considered.

Conclusions

MSB concludes that:

- EKPC, by this point in the process, has considered a full spectrum of primary route alternatives. MSB did not identify any primary route alternative that EKPC had not considered.
- EKPC has only limited documentation of the secondary route alternatives it considered. It is not possible to compile a comprehensive list of all secondary route alternatives EKPC considered. It is also not possible to identify the reasons secondary route alternatives were considered to be appropriate.
- The process EKPC used to develop secondary route alternatives can identify and develop the full spectrum of route alternatives. There are examples to suggest that such information was developed and considered in this case.
- Just because information identifying and evaluating a full spectrum of alternatives is available to EKPC does not mean that all reasonable people would reach the same conclusion regarding the preferred alternative that EKPC arrived at. The judgement as to whether EKPC's choice of location for the route is reasonable is beyond the scope of MSB's work.