

**Utah Attorney General's Office**  
**Memorandum**

To: Utah Air Quality Board

From: Fred Nelson



Re: In the Matter of Sevier Power Company DAQE-AN2529001-04

Date: June 1, 2006

Attached are the post-hearing briefs of Sevier Citizens, the Executive Secretary, Sevier Power Company, and PacifiCorp. This matter is on the agenda for decision at the June 15, 2006 meeting. The Executive Secretary and Sevier Power Company also included proposed findings and conclusions for consideration by the Board.

**Sevier County Citizens For Clean Air  
& Water, Inc.**

**Summation of Sevier Power Company  
Appeal**

**May 10, 2006**

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**BEFORE THE UTAH AIR QUALITY BOARD**

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Sevier County Citizens For Clean	*
Air And Water, Inc.	*

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Petitioner,	*	Summation of Air Quality
	*	Hearing on May 10, 2006
In the matter of Sevier Power	*	Held at Snow College in
Company:	*	Richfield, Utah
Case No. DAQE-AN2529001-04	*	

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The Sevier County Citizens (SCC) hereby submits the following statements summarizing the hearing in the matter of Sevier Power Company, held in Richfield, Utah on May 10, 2006,

I, James Kennon, submit the following statement to support the testimony given at the above hearing.

The evidence presented stands on its own as it was direct evidence from a number of organizations and federal agencies that specialize in the claims we put forth. The comments made by Richard Long, on April 6, 2004, must be adhered to before the Permit for the Sevier Power Company can be considered as valid. The overlapping of ambient impacts is of serious concern as the evidence presented by SCC shows. The degradation of national parks as found in the National Park Service report, dated March, 2006 demonstrates and reaffirms the other evidence submitted to the Air Quality Board. The response by the National Park Service,

dated April, 2004 lends credence to our testimony that the modeling for the Class 1 areas was inadequate. That same document also states like the other evidence submitted, that SCR systems needs to be employed in the Sevier Power Company permit, as well as IGCC. The growth analysis was totally off the mark. Sevier County has experienced rapid growth in recent years and the discovery of oil in the last 3 years has spurred a real estate growth like nothing ever seen in our county. To use the census does not reflect future growth but indicates past growth. The oil discovery has been termed as the biggest in recent times in the United States. Investors have moved into the real estate market in our county. The P.M. 2.5 & P.M. 10 problem must be addressed. We have many miles of dirt roads that must be figured into any growth analysis. The number of small sources that are operating without a permit would have been easy to determine by checking the number of permits on file and then just checking a local phone book. This maybe a elementary way of doing it but it would be better then ignoring such things as gravel pits that cause problems. The CALMET error described by the Park Service must be reevaluated using the CALPUFF modeling. The modeling shows many areas that are inconsistent with EPA guidance. Without some indication that the recommendations from the various agencies have been incorporated into the modeling, the Air Quality Board must declare the Sevier Power Company permit, illegal. The fact that only one gypsum plant was included in the modeling of the PSD Class II NO2 increment phase puts doubt on other aspects as well.

The National Park Service has stated that the focus on air quality is "PREVENTION", as it is in the U.S. Clean Air Act. Monitoring is the only way to determine if the air quality has improved or degraded in an area. The EPA also encourages states to prevent pollution and has programs to assist the states in this endeavor. EPA encourages states to adopt regulations more strict than federal regulations when it is found that is necessary to protect individual areas within their state. Utah law also allows that when necessary. I quote the Utah here as it is written.

**19-2-106 Rulemaking authority and procedure.**

(1) Except as provided in Subsection (2), no rule which the board makes for the purpose of administering a program under the federal Clean Air Act may be more stringent than the corresponding federal regulations which address the same circumstances. In making rules, the board may incorporate by reference corresponding federal regulations.

(2) *The board may make rules more stringent than corresponding federal regulations for the purpose described in Subsection (1), only if it makes a written*

*finding after public comment and hearing and based on evidence in the record, that corresponding federal regulations are not adequate to protect public health and the environment of the state. Those findings shall be accompanied by an opinion referring to the evaluating the public health and environment information and studies contained in the record which will form the basis for the board's conclusions.*

The question of IGCC is an area where there is little agreement on the subject. Those that oppose the concept like to use the argument that they do not want to be told they have to **consider** it. The truth of the matter is we are told every day how we are to behave. When we come upon a stop sign, we must stop or pay the penalty. There are signs along the road that tells the speed that we can travel. If we make a nuisance of ourself we are told we need stop it. To use the excuse that they do not want to be told they have to consider IGCC does not wash. They are already being told that they have to follow certain regulations. IGCC is no different than the other rules found in the Clean Air Act and the Utah Air Conservation Act. The EPA stated that NEVCO had to justify the reason for not considering IGCC. That should have been enough not to issue them a permit. The fact that Collin Campbell a witness for the Executive Secretary, stated in cross examination, that he had no formal education in the area, should lend credence to the fact the people such as ourselves can and do obtain enough information to testify in these areas.

The mere fact that the 100 foot tower was 2 miles from the site of the power plant should be enough to indicate that the information gained from that tower would not provide accurate information for modeling. When you check the WINDROSE modeling it shows the difference between the 10 meter and 100 meter level on the quarterly figures. With the tower close to the hills and mountains the wind flows will be totally different that those in the middle of the valley. In meetings with the Sevier County Planning Commission, Mr. Craig Cox (part owner in NEVCO) stated that the DAQ sited the tower and told them to move the site of the plant because of the wind currents against the hills. If that is so, why wasn't the tower also moved? I live in a high valley due south of the proposed plant and within less than 30 miles of the plant. The wind currents are nothing like shown in the modeling. With the narrow long valley and close proximity to high mountains, more that one tower is required to obtain accurate information. As a matter of fact, several towers would be called for in this case. When I first read the WINDROSE modeling, my first thought was where did they get their information. I held discussions with a very experienced meteorologist that retired from a federal agency. He lives in Richfield but was not willing to testify due to local politics. He stated that the only way to get accurate information

was to release radiosonde within Sevier Valley. Salt Lake and Grand Junction do not reflect the true information.

**Claim numbers 9 and 10 were combined. UDAQ did not require sufficient analysis of the impacts of the Sevier Power Company coal-fired power plant on soil, vegetation, wildlife, and animals.**

Noticeably missing from NEVCO's witness list was the company that conducted the soils, vegetation, wildlife, and animal portion of the NOI. It would have been interesting. One thing that needs to be looked at, is one year of data that was collected for some areas of the NOI, and little time was spent on these issues. UDAQ is mandated to collect data on all areas of the Clean Air Act and the Utah Conservation Act sufficient to reflect the true impact on the area. The mere fact that Section 112-7 of the Clean Air Act was not adhered to is sufficient to determine that the permit is illegal. That section requires the DAQ to protect endangered and threatened species. SSC provided photo's of bald eagle on the very property of the proposed plant site. Whooping Cranes, ducks, geese, and many others can be found in the area. Testing for mercury has not been conducted in Sevier Valley. Due to this the UDAQ can not determine the impact on the citizens or on the many animals and fish in the area.

The issue of selenium, and nitrogen saturation must be investigated before this permit moves forward. Researchers from the US Geological Survey and the National Park Service have studied the affects of pollution on the Rocky Mountain National Park for twenty years. They have determined that the pollution in the Park comes not only from the area around the Park but from states nearby as well. The facts they have found are; nitrogen concentration in the Park's rain and snow has been increasing. There is more nitrogen deposited in high elevation ecosystems at the Park than plants can use, and excess nitrogen is leaking into park lakes and streams at certain times of the year. The chemical changes are occurring in surface waters, soils, and trees on the east side of the Park. The NOI submitted by NEVCO, states that there are no long term studies on the impact of these elements. They should look further. Selenium damage occurs over long periods of time and to model it over a short period of time does not produce scientific data. As testified to during the hearing, Utah reported one incident of selenium damage in 1988. The Utah Health Department issued a health advisory to protect the public. Steps had to then be taken to mitigate the problem which can be very costly. In May of 2001. Jill S. Baron of the US Geological Survey, gave testimony before the House Committee On Science. She and her colleagues had spent over 20 years studying the influences of atmospheric deposition on natural environments. They discovered several things, but a very important observation was noted. That being that long term monitoring is badly needed, but due to the

complex topography modeling is difficult. In a June, 2003 publication, titled, "Air Pollution Related Lichen Monitoring in National Parks, Forests and Refuges," it describes the process land managers are to use in considering PSD applications. It also states, "predictive requirement presents a challenge because no models are available that quantitatively predict changes in air chemistry." It states that lichens are valuable sources of forage, shelter, and nesting material for mammals, birds, and invertebrates. Air pollution is one of many potential stressors that can affect lichen health. Pollution concentration estimated from passive monitors (including lichens) are not usually thought to be of high value by **Air Regulators.**"

Claim 11 deals with **health**. This subject is very important to the citizens of Sevier County. As a reminder, Utah Code 19-2-106 does allow for stricter regulations when justified. With 183 homes within 1 3/4 miles of the proposed site, this would certainly call for stricter requirements. With such a small valley the rest of the citizens of the county will also feel the effects. To quote from a May 12, 2006, press release from the EPA. In an effort to understand why some people are more susceptible to the affects of environmental contaminants than others; Dr. George Gray, EPA's assistant administrator for the Office of Research and Development, said, "We know that environmental contaminants have different effects on people, due to inherited traits, lifestyles and genetic makeup, the environment and disease." We are all aware of the thresholds that EPA has set for the different problems caused by pollution. How many are aware of how they came up with these thresholds? Let us look at one that I researched. "The current U.S. EPA reference dose (RfD) for methylmercury is based on neurological effects witnessed in 81 Iraqi children whose mothers had methylmercury-contaminated bread during pregnancy and breast feed their babies." Does this sound like the kind of study you would rely on to protect **YOUR FAMILY?** On March 15, 2005, Acting Administrator Steve Johnson, stated, "Airborne mercury knows no boundaries: it is a global problem." Sevier Power Company has informed the citizens of Sevier County that the mercury will concentrate at a level of 900 feet above the base of the stack. If this is so, it will then leach into the ground water in the form of rain or snow. The State of Utah in a report on water in the Sigurd-Sevier area, found that the ground water in the aquifer is replenished by the flood irrigation that takes place on the valley floor and from the rain and snow draining from the foot hills and seeping into the aquifer. This would also bring mercury into the ponds and ditches that migratory birds use to feed and raise their young. A Harvard University study, paid for by EPA, co-authored by an EPA scientist estimated health benefits 100 times greater than the EPA did, but top officials ordered the findings stripped from public documents. An EPA staff member acknowledged the Harvard study would have forced the agency to consider more

stringent controls. The Harvard study concluded that \$ 5 billion a year would be saved due to reduced neurological and cardiac harm. If you are not aware of it, a number of states are taking legal action against the EPA for this striking of the study. Utah Section 26-1-30, that describes the relationship between the Health Department and the Department of Environmental Quality needs to be reaffirmed. In July, 2004 press release, Administrator, Mike Leavitt announced, "An important component of the strategy is to improve our understanding of the health risks from long-term exposure to particulate pollution, particularly as it relates to heart disease, the leading cause of death in our country" In a press release dated May 2005, The National Institute of Environmental Health Services reported that, "People with Diabetes may be at higher risk for cardiovascular problems when air pollution levels are higher, according to a new study of Boston area residents." This information indicates that there is much reason to believe that the thresholds are always changing and are open to doubt.

In a Utah State Summary of Emissions, dated 1999, that I found on the UDAQ web site, a couple of things stood out for me. The reason I quote 1999, is because that was the last year posted on your web site. But if you look at that data, you will find the following.

For CO emissions -----	Sevier County	23,358.16 tons/year
	Emery County	16,282.70 tons/year
For PM 10 emissions-	Sevier County	2,230 tons/year
	Emery County	3,519.31 tons/year
For VOC emissions—	Sevier County	42,801.83tons/year
	Emery County	20,289----tons/year
	Millard County	29,708-----tons/year

In 2001, about 5% of Utahans were under care for asthma (Utah Health Status Survey, 2001). It is estimated that about 118,400 Utahans have asthma, which includes 36,000 children under age 18. Some 1,400 persons were hospitalized because of asthma during 2001, with the a cost of \$ 7.8 million . Efforts toward prevention and control of environmental risk factors must focus on reducing indoor and outdoor pollution. Natural and man-made environmental factors such as nitrogen dioxide, sulfur dioxide, particulate matter and ozone also play an important role in asthma. The Utah Task Force states that they will, identify geographical areas within the state that are elevated risks for asthma and associated allergic respiratory diseases due to air emissions, air inversions and other conditions. Their outcome is to, "Decrease air emissions and outdoor pollutants." I wonder if this goal has been accomplished? Many people that are exceptionally sensitive to the effects of pollution have moved to Sevier County to find a quality of life that they no longer could find in northern Utah and other areas of the west.

This means we have a higher population of people that feel the effects of low levels of pollution. This fact would call for another look at the health thresholds that are now under study by the EPA.

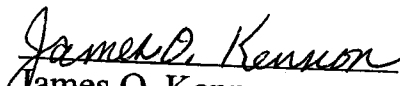
Claim # 12 is asking you to consider the impact on property values and additional medical expenses. The Utah Air Conservation Act and the U.S. Clean Air Act both require that these be considered. From the Washington State Air Quality plan, it states. "As traffic volumes increase, the safety of our streets declines along with property values, air quality, and the quiet we enjoy in our homes. Traffic noise can have a significant effect on property value. A home located adjacent to a major highway may sell for 8% to 10% less when compared to one located along a quiet neighborhood street." If that is the case, what would be the drop in value to a home next to a power plant running 24 hours a day?

Claim # 13 can be summed up by looking at the 2006, Performance Partnership Agreement that states the PM 10 problem in Sevier County will be corrected. How can you correct it when you add to the problem by permitting a coal-fired power plant. It also makes clear that Sevier County and surrounding areas have a problem with visibility. Just as we have contended all along, the National Park Service has also expressed concern about these issues. The growth that Sevier County has experienced will only add to the already problems of air quality intrusion into our valley.

Claim # 14 is questioning the "downwash" modeling. The witness for NEVCO stated that the building for the coal pile was remodeled and there was no change. He used a 30 foot tall building to remodel. You do not have to run a model to know that a building 50 feet high and covering 5 acres will have an impact on air currents. This building will be larger than half of all the buildings modeled.

For the above reasons the Sevier Power Company Permit should be ruled illegal.

Respectfully,

  
James O. Kennon

The following statement was submitted by Scott Chamberland, witness at the hearing.

Selenium

The soils in the Sevier Valley favor mobile types of selenium that can be taken up by plants and/or leach into water. Of the soils surveyed in Sevier County, 84.1% of the soil families have optimum pH levels (pH 7.5-8.5) for mobile forms of selenium. Most of the soils are well oxidized and have low organic content, which also favor mobile or aids in the mobility of selenium (ASTRD, page 244 & 245). Sevier Valley may already have selenium problems. Dr. Duane Utley, DMV, of the Sevier Valley Animal Clinic has reported selenium toxicity cases from Sevier County. Species of plants which will only grow in selenium rich soils, such as *Stanleya pinnata*, are found soils around some sedimentary rock outcroppings along the foothills of the valley. These rock outcroppings will make up a portion of the parent material from which the valleys soils were made. My own garden soil tested at 0.79 mg se/kg soil. This is more than double the 0.30 mg se/kg average for soils, but still in the normal range of 0.10 to 0.90 mg se/kg soil. In aquatic systems, selenium is bio-accumulated in aquatic organisms, from algae to fish. There is even evidence that selenium may bio-magnified in aquatic organisms under natural conditions (ASTRD, page 244 & 245).

Adding extra selenium to the soils could possibly present a threat to the health of the area. Dr, Packhams toxicology report presented May 10, 2006, addresses only inhalation of selenium from air borne se compounds. It does not address the deposition of these compounds, nor does it address how these compounds accumulate. Using the amount of selenium in the air of  $1.49E-05$  mg se/m<sup>3</sup> air (DR. Packham reported 24-hour modeled max for selenium in the air) and having the selenium precipitate from only the 100 meters closest to the ground there would be  $1.49E-03$  mg se/m<sup>2</sup> deposited daily and 0.544mg se/m<sup>2</sup> (2,200 mg se/acre) annually. This half a milligram of selenium per square meter could possibly be available for plant take up and ingestion by animals or humans. The deposition of selenium needs to be investigated further.

The Sevier County Citizens For Clean Air And Water, Inc., hereby request the Utah Air Quality Board to declare the Sevier Power Company permit illegal.

The following statements were submitted by Dick Cumisky, member of the Board of Directors for the Sevier County Citizens For Clean Air And Water, Inc.

Let us begin with the Constitution of the United States of America. The Preamble of this great document was written by the men who painstakingly drafted one of the most memorable outlines for civilization and government – one that has withstood over two centuries of unparalleled change.

“We the people of the United States, in Order to form a more perfect Union, establish Justice, insure domestic Tranquility, provide for the common defense, promote general Welfare, and secure the Blessings of Liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America.”

. The Congress of the United States saw fit draft “The Clean Air Act.” As with our own U.S. Constitution – there was written a “preamble.”

(b) The purposes of this title are -

- (1) to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population;
- (2) to initiate and accelerate a national research and development program to achieve the prevention and control of air pollution;

The state of Utah drafted its own “Air Conservation Act” to follow through with the mandate of Congress.

**19-2-101. Short title -- Policy of state and purpose of chapter -- Support of local and regional programs -- Provision of coordinated statewide program.**

- (1) This chapter is known as the “Air Conservation Act.”
- (2) It is the policy of this state and the purpose of this chapter to achieve and maintain levels of air quality which will protect human health and safety, and to the greatest degree practicable, prevent injury to plant and animal life and property, foster the comfort and convenience of the people, promote the economic and social development of this state, and facilitate the enjoyment of the natural attractions of this state.

3. **UDAQ failed to adequately consider the use of IGCC both as a viable method of achieving BACT and as a cost effective way to minimize emissions.**

The Utah State Implementation Plan, Section VIII, page 2 states “Utah regulation require all new and modified sources in PSD areas to use the **Best Available Control Technology** (BACT) which would yield the highest air cleaning efficiencies and the lowest pollution discharges in an effort to save the air resource for future use and protect the national treasures such as our National Parks through planning designed to best benefit the state.”

We are here to prove that CFB, as approved, does not meet the requirements of BACT.

On June 10, 2005 the Executive Secretary's Response to our appeal was: “Consistent with applicable laws and regulations, UDAQ did not require consideration of ... (IGCC) for the proposed SPC plant processes. Still, SPC provided and analysis, which UDAQ reviewed. IGCC is not yet as cost effective or available for the SPC plant processes and the BACT approved for the SPC is lawful and appropriate.”

On March 20, 2006 The Executive Secretary submitted the following comments to Sevier Citizens initial pleading:

"While SCC correctly observes that the process for permit consideration is one of electrical generation, let us not forget that the purpose of (BACT) analysis is not to pre-determine the installation's process but to determine an *emission limitation* based on the applicant's selected process This determination can only take place *after* the source selects the process . . .

The Executive Secretary completely misses the point.

Please refer to EPA 40 CFR, subpart 1, part C, section 169 "Definitions:"

- (3) The term "Best Available Control Technology" means an emission limitation based on the **maximum** degree of reduction of each pollutant subject to regulation under this Act emitted from or which results from any major emitting **facility**, which the permitting authority, on a case -by -case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such **facility** through application of **production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each such pollutant . . .**

Since the SPC proposed project would be a major emitter of regulated pollutants, it is subject to **New Source Review**

The Utah DEQ R 307-101 definition of "**source**" reads:

"**Source**" means any structure, **building, facility, or installation** which emits or may emit any air pollutant subject to regulation under the Clean Air Act and which is located on one or more continuous or adjacent properties and which is under the control of the same person or persons under common control. A building, structure, facility, or installation means all of the pollutant-emitting activities which belong to the same industrial grouping.

The EPA definition clearly states it is the **facility** that is evaluated including any "**methods, systems and techniques**" **used within that facility.**" This is a major oversight on the part of the Executive Secretary and the Approval Order should be returned to the Division for a proper study. In addition to EPA's requirements, the Utah Code Section 19-2-102 "Definitions", states:

- (10)(a) "facility" means machinery, equipment, structures, or any part or accessories of them, installed or acquired for the primary purpose of controlling or disposing of air pollution.

The **process** is one of electrical generation. The regulated pollutants must be reduced to the lowest level achievable per both state and federal regulations.

From the **Gasification Technologies Conference**, Washington, DC, October 2004  
(documents submitted during the Discovery Process, November 2005)

### **Gasification Offers Significant Environmental and Economic Benefits.**

"When linked with modern combined cycle turbines, gasification is one of the most efficient, environmentally effective means of producing electricity from solid or liquid feedstocks.

Air Emissions from an Integrated Gasification combined Cycle (IGCC) are far below U.S. Clean Air Act standards. Sulfur removal efficiencies of more than 99% are achievable. Reductions of emissions of SO<sub>2</sub>, NO<sub>x</sub>, CO and particulates from an IGCC plant are significantly better than those achieved by scrubber-equipped, as well as Circulating Fluidized Bed Combustion (CFBC) plants on a fuel-by-fuel basis.

As air emissions standards become more strict, the superior environmental performance of IGCC will take on added economic benefits because the technology can achieve greater emissions reductions at lower cost than less advanced technologies."

There is enough evidence provided by the U.S. Department of Energy, Office of Fossil Energy (evidence submitted during discovery) to determine the costs of this equipment is only slightly higher than for CFB systems and could even be lower once marketable byproducts are deducted.. Several reputable companies are offering "turn-key" project development. Those include General Electric, Bechtel, Westinghouse, Shell Oil and Conoco-Phillips.

There is more evidence that IGCC offers significant advantages in achieving BACT. I refer to a paper entitled "An Environmental Assessment of IGCC Power Systems" by Gary Stiegel of the U.S. DOE/National Energy Technology Laboratory, presented at the Nineteenth Annual Pittsburg Coal Conference, September 23-27, 2002.

### **"Comparison to IGCC with PC-fired and FBC Power Plants**

"Most of the trace metals either remain with the slag/bottom ash or are removed from the syngas prior in downstream process equipment. The trace metals of greatest environmental concern are reported to be arsenic, boron, cadmium, **mercury and selenium....** "

"Compared with combustion systems, IGCC has a major advantage when it comes to mercury control. Commercial methods have been employed for many years that remove trace amounts of mercury from natural gas and gasifier syngas. Thus, mercury emissions control from IGCC technology is more of an economic issue than a technical one."

.However, as discussed previously, the high pressure and high CO<sub>2</sub> concentration of IGCC's synfuel provides optimum conditions for CO<sub>2</sub> removal prior to combustion, if required. This capability has the potential to further set IGCC apart from other coal-fueled power generation technologies, and would go a long way toward eliminating its contribution to possible global climate change. (Since the SPC plant may have a useful life exceeding 40 years, this is something to consider).

In a letter from the EPA, Region 8, dated April 6, 2004, Richard R. Long, Director questions the Executive Secretary:

1. **Statement that IGCC is too costly should be quantified.** Page 35 of the State's engineering analysis says that one of the ways to achieve a (BACT) level of emission control is by good process design. . .

Please keep in mind that we are discussing a proposed coal-fired power plant which could be constructed within 1.75 miles of a community with 183 residences.

The evidence cited above clearly indicates that the Executive Secretary erred in determining that a circulating, fluidized bed combustor system met the requirements of BACT. It is clear from the rules issued by both the EPA and the State of Utah, DEQ that the definitions of **facility** and **source** were misconstrued and mis-applied to the SPC project.

The **Approval Order** dated October 12, 2004. should be **rescinded and remanded** to the Division for further study and evaluation.

4. **UDAQ failed to determine that the ambient air within the Sevier Valley airshed is in compliance with the Clean Air Act and, in fact, has no base line data with which to evaluate the additions requested by SPC.**

In a one line statement from SPC's Notice of Intent (NOI), section 6.1.2, it says "Sigurd (Town) where the proposed facility will be located, is in attainment for all pollutants." There is no evidence to support this conclusion. Was it decided, perhaps, that the area is "in attainment" solely because there is no data available?

5. **UDAQ failed to model the airflows and currents as they actually exist within the enclosed Sevier Valley, but rather assumed uniform distribution of emissions from the proposed SPC plant.**
6. **Maximum predicted concentrations of PM<sub>10</sub> in areas where the applicant has significant impact would occur along the eastern edge of the site's proposed boundary, and is the result of coal handling processes at the plant.**

The Executive Secretary states in his response dated June 10, 2005 that "Data from the collection tower was used in the model together with the local terrain through the use of topographic maps, distance calculations, and elevation numbers. . . ."

Has anyone ever proofed out one of these models on the ground to verify their accuracy? Verifying these models on the ground is the only way to develop confidence