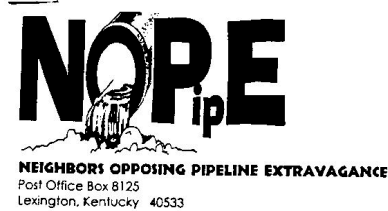


**Neighbors Opposing Pipeline Extravagance
Lexington, KY
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Dec 18, 2001

Mr. Roy Spears
US Department of Energy
3610 Collins Ferry Rd.
PO Box 880
Morgantown, WV 26507-0880

Dear Mr. Spears,

I am writing in regard to the draft EIS for the proposed Global Energy Power Plant located at Trapp, Kentucky to be operated by Kentucky Pioneer Energy.

Neighbors Opposing Pipeline Extravagance (NOPE) is a grassroots citizens group formed in 1999 to oppose the construction of a water supply pipeline from the Ohio River at Louisville to Lexington, which as you know is located approximately 20 miles downstream of Trapp on the Kentucky River. Lexington draws its water supply from this small river. The proposed pipeline, a \$100 million ratepayer-financed project which is sought by the privately-owned Kentucky American Water Company, is intended to be a backup water supply source during a drought. The Kentucky Attorney General's office, the Lexington-Fayette Urban County Government and many Bluegrass citizens have opposed this pipeline project as too costly and unnecessary.

During the severe drought of 1999, the Kentucky River water supply was extremely limited. In September of that year, water stopped flowing over the dams on the Kentucky River, and mandatory water conservation was imposed on Lexington residents. Experts have predicted that in the event of a more severe 100-year drought, with the projected population expansion of the region, the Kentucky River will be unable to meet the water supply needs of Kentucky-American's customers by the year 2020. NOPE takes the position that water conservation and improvements to the Kentucky River's system of locks and dams would be sufficient to get us through a drought, but we are alarmed at the projected 3.6 million gallons per day of water that would be drawn from the Kentucky River by the proposed Trapp power plant.

1/07

Comment No. 1

Issue Code: 07

The cumulative effects of withdrawals from the Kentucky River by power plants have been discussed by the Kentucky Natural Resources and Environmental Protection Cabinet in their cumulative assessment report (KNREPC 2001), addressed in Section 5.14, Cumulative Impacts. The Cabinet acknowledges that because many of Kentucky's power plants are exempt from water withdrawal requirements, the Cabinet does not have an accurate inventory of the volume of water being removed each day by the existing power plants. However, the KDEP has the authority to limit withdrawals from permitted sources during periods of abnormally low flow. Although the proposed plant would not be a permitted withdrawal source, KPE has stated that they would cease water withdrawals if requested by the state. Section 5.8, Water Resources and Water Quality, has been revised to address this issue.

Because of the lock and dam system on the Kentucky River in the project area, the withdrawals from the power plant located on the North Fork of the Kentucky River would be isolated from the area of the river in the proposed project area.

Comment No. 2

Issue Code: 22

Comment noted.

Comment No. 3

Issue Code: 20

The recently permitted Enviropower Power Plant is located on the North Fork of the Kentucky River upstream from the confluence with the South Fork that creates the Kentucky River. As discussed in Section 4.8, Water Resources and Water Quality, the Kentucky River is a series of pools created by 14 locks and dams composing the navigation system maintained and operated by the USACE. The proposed Kentucky Pioneer IGCC Demonstration Project would be

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In a severe drought, we simply do not have this water available. I would refer you to the Kentucky Division of Water for more information on this issue.

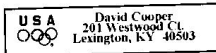
The end result of building a power plant at Trapp may be an additional \$100 million dollars burden on the people of Central Kentucky, a burden which is not recognized in your draft EIS.

I submit to you that the citizens of Central Kentucky are being asked to bear all of the costs of this proposal, yet receive few if any benefits.

I request that the Department of Energy consider the water withdrawal impacts of this proposal on the Kentucky River. I would also point out that the recently permitted Enviropower power plant located on the North Fork of the Kentucky River in Knott County, will also draw enormous quantities of water from the North Fork of the Kentucky River. It is possible that these two power plants will remove so much water from the Kentucky River that Lexington would be unable to survive even a 1999-type drought.

Sincerely,


David S. Cooper
President, NOPE



Comment No. 3 (cont.)

Issue Code: 20

located upstream of Lock 10. There are four additional locks upstream from the project site to the confluence of the North and South Forks of the Kentucky River.

2/22

1/07
(cont.)

3/20

The flow of the river is regulated by each lock and dam structure. Since there are four lock and dam structures between the two proposed plants, any withdrawals from the North Fork of the Kentucky River and resulting impacts to the flow rates would be mitigated by the time the river flow reached the area above Lock 10. As discussed in Section 5.14, Cumulative Impacts, the proposed Kentucky Pioneer IGCC Demonstration Project would withdraw 15.2 MLD (4 MGD) from the Kentucky River on a continual basis. The cumulative withdrawal from the Kentucky Pioneer facilities and all seven existing and reasonably foreseeable CTs at the J.K. Smith Site operating at full capacity would be 19.2 MLD (5 MGD) of operation. The cumulative withdrawal of all facilities operating full time at the J.K. Smith Site would be less than 0.15 percent of the average flow of the Kentucky River and would have little impact on water levels within the river itself.