

# ALDEN

## §316(b) Compliance

Alden is the leader in conducting engineering design and cost estimation studies of fish protection intake technology alternatives. Our team has completed cooling water intake structure (CWIS) alternative technology assessments under §316(b) for over 150 power plants located throughout the U.S. Alden prepared detailed reports using data supplied by the utility plant owners that define the following for each plant:

- How §316(b) affects plant design, operations, and economics

- The scope of studies that will need to be performed and how much they might cost (e.g. impingement mortality and entrainment reduction, characterization study, pilot-scale studies, verification monitoring, etc.)

- Fish protection alternatives that might be applied, and their projected efficacy

- Financial impacts in terms of capital costs, O&M, and replacement power costs

- Whether these technologies will meet the IM&E performance standard(s)

- The likely schedule for meeting compliance

Alden has compiled many comprehensive reviews on fish passage and protection technologies for the Electric Power Research Institute (EPRI), including the 2004 report "Procedural Guideline For Evaluating Alternative Fish Protection Technologies To Meet Section 316(b) Requirements Of The Clean Water Act." In addition, Alden also played an active role in providing technical comments to UWAG and EPRI during the 316(b) Phase I and Phase II rulemaking. Alden has a long-standing working relationship with the EPA, FERC, USFWS, NOAA, DOE, USACE, and many regional, state, and local agencies based on a history of successful interaction and mutual respect.

