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03/31/2005 04:02 PM To
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cc

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Subject
ICR Number 2155.01 Docket ID No. OW-2004-0020

Attached please find AF&PA request for an additional sixty days to submit
comments on ICR Number 2155.01 Docket ID no. OW-2004-0020.

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April 1, 2005

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Office of Information and Regulatory Affairs
 Office of Management and Budget (OMB)
 Attention: Desk Officer for EPA
 725 17th Street, NW
 Washington, DC 20503

Erik Helm
 USEPA/OST/EAD
 Mail Code 4303T
 Environmental Protection Agency
 1200 Pennsylvania Avenue, NW
 Washington, DC 20460

**RE: Request for Sixty Days' Additional Time to Submit Comments on ICR Number 2155.01
 Docket ID No. OW-2004-0020**

Ladies and Gentlemen:

The American Forest & Paper Association (AF&PA) requests sixty additional days to submit comments on an Information Collection Request (ICR), No. 2155.01, that EPA has forwarded to the Office of Management and Budget for review and approval. The announcement of this action is at 70 Fed. Reg. 15,079 (March 24, 2005).

The Federal Register notice gives thirty days, until April 25, 2005, to submit comments on the ICR. The ICR addresses a proposed EPA study to estimate "nonuse benefits" from anticipated reductions in impingement and entrainment from cooling water intake structures under § 316(b) of the Clean Water Act. This ICR raises complex issues of economic theory, resource valuation, and psychology. It is fundamental to the process by which EPA, and other federal agencies, calculate "benefits" that cannot be directly measured. The thirty days that EPA has allotted for comment are insufficient for the purpose. AF&PA anticipates filing comments that draw on the research literature on how people respond to stated preference surveys involving natural resources, especially marginal changes in resources with which people may not be very familiar. Our comments will require the use of an economic consultant. We believe it will take an additional sixty days to respond adequately to EPA's Federal Register notice.

Accordingly, AF&PA requests that EPA and OMB allow an additional sixty days for comments and accept comments through June 25.

Respectfully submitted,

Jerry Schwartz
 Senior Director, Water Quality Programs