

December 18, 2009

Hon. Peter Silva
Assistant Administrator for Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Mail Code: 4101M
Washington, DC 20460

RE: Information Collection Request for Proposed Stormwater Rulemaking: EPA ICR No. 2366.01,
OMB Control No. 2040-NEW. Docket Number EPA-HQ-OW-2009-0817; FRL-8975-8

Dear Mr. Silva:

On behalf of the memberships of the American Public Works Association (APWA), the National Association of Clean Water Agencies (NACWA), the National Association of Counties (NACO), the National Association of County Engineers (NACE) and the National Association of Flood and Stormwater Management Agencies (NAFSMA), we request a 60-day extension for submission of written comments in response to the Information Collection Request (ICR) on Stormwater Management Including Discharges from Newly Developed and Redeveloped Sites noticed in the October 30, 2009, Federal Register (74 Federal Register 56191-56193).

As stakeholders whose members will be impacted by this ICR, we strongly feel that additional time is needed to provide an appropriate level of review and develop comments on this request. Since many of our members will be mandated under this request to complete the questionnaires for MS4s and the information that will be collected from these surveys will help to shape new national stormwater management regulations, it is critical that our organizations and members be provided with ample time to review these important documents.

APWA, NACWA, NACO, NACE and NAFSMA have worked closely with EPA's Office of Water over the last two decades on issues related to the NPDES Stormwater Management program. As a result of our ongoing work on these critical issues, we recognize the impact the proposed surveys will have on developing future programmatic decisionmaking. We also understand that there will be a significant burden on our members to complete the proposed 32-page surveys and therefore request that additional time be provided to allow us to undertake the analysis required on such an important national rulemaking.

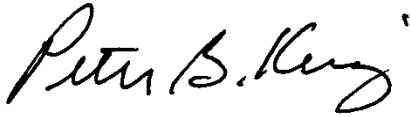
Since many of our members have been charged with the responsibility of managing local stormwater programs since Phase I of the program was first launched in the late 1980's, it is important that an adequate opportunity be provided for them to thoroughly review the completeness and accuracy of the proposed survey questions and the expected burden to complete the survey that our members will face.

With EPA officials in recent months indicating that the agency plans to move forward with new comprehensive stormwater regulations as early as 2012, the responses to these surveys will be a large factor for the agency in drafting these regulations. In light of this planned action, it is critical to ensure that the survey questions provide an accurate picture of the state of municipal stormwater management programs nationwide. With the current economic challenges facing our

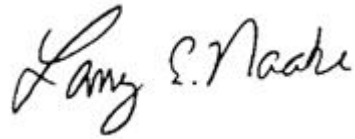
communities, it is important that their staff resources be respected in moving forward with this ICR. Although we are all reviewing the proposal, the fact that a week of the comment period falls over the Holidays makes this effort even more difficult.

We very much appreciate your consideration of this request and urge you to contact us if you have any questions.

Sincerely,



Peter B. King
Executive Director
American Public Works Association



Larry E. Naake
Executive Director
National Association of Counties



Anthony R. Giancola, P. E.
Executive Director
National Association of County Engineers



Susan Gilson
Executive Director
National Association of Flood and
Stormwater Management Agencies



Ken Kirk
Executive Director
National Association of Clean Water Agencies