

of analysis must be developed which will provide a relatively precise understanding of benefit cost and which will form the basis for the design of public policies and programs for effective water quality management.

The first recommendation means literally that pristine purity should be the objective, regardless of what costs or benefits may be associated with pursuit of this goal. The second proposes that the objective of pollution control efforts should be the management of river quality conditions so as to yield the greatest overall net benefits from water resources.

At least partial recognition of this latter concept had previously found expression in national legislation, if it can be presumed that the section of the act calling for development of comprehensive river basin programs embraced the notion of identification of costs and benefits. In fact, studies and reports related to comprehensive planning projects account for the expenditure already of many millions of dollars.

However, in the conduct of Federal enforcement conferences it is not at all apparent that findings from these comprehensive program studies are being weighed in the pronouncement of conclusions. Quite to the contrary, the central thrust of the decisions appears to be that all municipalities and industries should provide the maximum degree of treatment technically available regardless of physical, hydrologic, and economic characteristics of the basin.

The anomaly of dedicating substantial sums of money for preparation of comprehensive plans and then not giving them appropriate consideration in formulating action programs at enforcement hearings illustrates the inconsistency that exists with respect to Federal pollution control objectives.

The most recent attempt to develop a meaningful approach to determination of how clean should a stream be, is to be found in the 1965 amendments to the Water Pollution Control Act. A section has been added dealing with adoption of water quality criteria applicable to interstate waters followed by the promulgation of standards for their achievement. The original intent of the Senate version of the act called for establishment of national standards. The compromise measure that was passed offers the option to the States to undertake this assignment. However, should a State not comply and complete this work within 1½ years (June 30, 1967), then the Secretary is authorized to call a conference of the interested parties following which he will promulgate standards. If a Governor of a State is not satisfied with these standards then the Secretary shall convene a public hearing before a board of five or more persons appointed by the Secretary. Decision of the hearing board will be final.

With respect to guidelines to the States and to the Secretary for establishing standards, the act furnishes these clues: "Standards . . . shall be such as to protect the public health or welfare, *enhance the quality of water* and serve the purposes of this Act." [Emphasis added.] Note carefully the italicized phrase. Does this mean that regardless of the uses of a stream or the natural condition with which it may have been endowed that the standard must be established to "enhance" quality?

If this is the objective, then it would appear to be negated in a following section of that act setting forth these guidelines upon which