

ifying permissible waste which particular water users may discharge. Effluent standards are easier to enforce because they do not require the extensive surveys needed to establish a stream classification system; but stream classification gives greater attention to each of the key variables in quality control: water use, pollution loads, and streamflows.

Enforcement is the crucial aspect of State water quality regulation. Most States rely on a cooperative approach in dealing with water users who fail to meet the quality standards. New York State's enforcement procedure is fairly typical. After waters have been classified by the water resources commission, water users are required to prepare and adopt abatement programs. The water resources commission, before issuing administrative orders to secure compliance, holds informal conferences with each offender to discuss commission findings, the pollution abatement plan, and the action required of the municipality or industry. As a result of this procedure, it has seldom been necessary to issue administrative orders. Cooperation is undeniably the preferable method of securing compliance. In a few States, it has proved quite successful. However, in too many instances, the cooperative approach has been an excuse for inaction and inadequate enforcement of State water quality regulations.

Cooperation has been more successful in dealing with municipal pollution than with industrial pollution, in part because municipalities are more likely to benefit from improved water quality than a particular industry. Further, various State and Federal programs aid municipalities in meeting State standards, but rarely assist industry.

Serious economic and political repercussions can result from the enforcement of stringent pollution controls. As a result, they are seldom imposed. A number of States refuse to permit sewer extensions, in order to force compliance with orders to construct sewage treatment facilities. While this is an effective way of forcing local action, it has been utilized in only the most extreme cases. When the benefits of pollution abatement appear slight and the costs excessive, municipalities are likely to raise strong opposition to the efforts of a State pollution control agency. In Colorado, the State's aggressive water quality program has been challenged in the courts by the city of Denver which contends that the State does not have the authority to require the city to improve its treatment of waste.

Perhaps the most potent constraint on State pollution control is competition for new industry and the fear of driving existing industries from the State. Industries, concerned that their competitive position may be impaired by the cost of making up the tremendous backlog of industrial waste treatment, often threaten to move. Differentials among the States in standards and levels of enforcement make these threats credible. Industrial groups generally favor pollution standards based on public health requirements, liberal dilution of untreated waste, and strict controls only when the wastes have been proved harmful. In many States industrial operators have shown little concern for the recreational, wildlife, and esthetic values of water.

PROMOTING LOCAL ACTION

State governments have sought to facilitate more adequate provision of water and sewer services in urban areas through general en-