

(8) Prescribe the actions necessary to avert excessive accumulation of air contaminants during periods of temperature inversion or photochemical smog."

If Sections 9 and 10 are deleted certain of the definitions in Section 3 would no longer be needed in the Bill. In addition, some slight change would be needed in Section 12. Lines 21 and 22 should be changed to reflect the fact that emission standards would be set by the Commissioners under authority of this Bill.

Subsection (c) of Section 11 might well prove to be impracticable as well as unenforceable. There is a national program designed to provide guidance in this area and the present District of Columbia laws relating to motor vehicles provide ample authority to control air pollution from these sources. We would recommend that this subsection be deleted from the proposed Bill.

No matters concerning public health are involved in Sections 13 through 20 and we are, therefore, not expressing any opinions on these sections. We note, however, that the Bill does not contain a Separability Clause.

In conclusion, Mr. Chairman, the Department of Public Health strongly urges the adoption of air pollution control legislation. We support H.R. 6981 and hope that consideration will be given to the suggestions we have made, which, in our opinion, would add strength to the Bill as currently written.

Dr. GRANT. Generally, Mr. Chairman, some of its contents have already been described by Mr. Griswold in his testimony because our views were rather similar, I think. But I think in general what it says is we generally support the legislation under consideration today with certain modifications that we have outlined in this statement.

Basically, we feel it is very important for the District to have air pollution legislation because our present situation is such that while the Department of Public Health is the air pollution control agency in the District, it has only a coordinating role. In fact, it does not have the authority to really enforce adequate air-pollution methods.

We believe, therefore, that it is necessary for an agency to have the enforcement role and adequate legislative authority to back it up.

The other point we would make, Mr. Chairman, relates to the question of detailed standards being included or excluded from the legislation. I believe that Congressman Gude feels that such standards are desirable. We feel that it would be preferable for this to be embodied in authority given to the Commissioners because as I think Mr. Griswold himself testified technological changes are rapidly taking place and what may be good standards today may not be satisfactory tomorrow. Unless the Commissioners had the authority to change these it would be necessary every time we wanted to make a change to come to Congress for specific changes.

I think this summarizes what I have to say.

Mr. MULTER. Thank you, sir.

Do either of you gentlemen or any of you gentlemen want to make any comment on whether or not we need additional authority to enter into a compact with Maryland and Virginia on the subject?

Dr. GRANT. I believe, Mr. Chairman, that the District already has such authority, although I believe it would have to come to Congress for definite authorization, for definitive authorization.

Mr. MULTER. The Corporation Counsel's office is represented here.

Mr. GIMBLE. Yes, my name is Gilbert Gimble. I am Assistant Corporation Counsel. There is provision in the language submitted by the Commissioners, I presume included in your bill, which would give the Commissioner authority to advise and consult and cooperate with other governmental jurisdictions and inter-local agencies.