

Another matter of concern to the league, though not directly germane to the legislation before you is thermal pollution and particularly the no man's land of thermal pollution from nuclear power generators licensed by the Atomic Energy Commission. AEC states it has no authority to even consider thermal pollution. The Interior Department has no authorities in the licensing procedures. Yet, thermal pollution from such plants is a live threat. The prospects for the proliferation of nuclear plants are large.

Authorities and responsibilities should be clearly spelled out and assigned promptly, and before the problem gets way ahead of us.

In conjunction with thermal and other water quality standards and with expanded research on criteria indicated, we have been happy to hear the Secretary expound on the principle that approved standards be set within safe limits, rather than at the extreme limit of what we believe aquatic life can tolerate. Let the error in setting standards, if any, be on the safe side. "This is a reasonable requirement," he said, "to protect our resources and aquatic life in the face of incomplete knowledge."

This is standard engineering practice in designing any structure—a very generous safety factor is built into it. We don't think we can afford any less care in manipulating very sensitive aquatic environments.

In summary, Mr. Chairman, we strongly support the objectives and purposes of legislation before you as represented in H.R. 15907, S. 2760, H.R. 15906, H.R. 14000 and H.R. 13923.

We appreciate the privilege of presenting our views.

Thank you.

(Prepared statement of Joseph W. Penfold follows:)

STATEMENT BY J. W. PENFOLD, CONSERVATION DIRECTOR, THE IZAAK WALTON  
LEAGUE OF AMERICA

Mr. Chairman, I am J. W. Penfold, conservation director of the Izaak Walton League. The League is a national membership society dedicated to the conservation and wise use of America's natural resources. The national scandal of water pollution and the accelerating deterioration of our waters for fishing and all other public values was a prime reason for the organization of the League nearly a half century ago. We have over the years consistently and staunchly supported water pollution abatement and control programs at Federal, State and local levels. We are just as concerned today.

The scope and variety of proposals now before your Committee are such as to confuse the average citizen. He might have had reason to suppose, with the Water Quality Act of 1965 and the Clean Water Restoration Act of 1966 on the books, coupled with the transfer of the Federal program to the Interior Department, that the basic legislative job had been accomplished, that the remaining task was to implement these programs fully and to follow through with whatever enforcement might be required to assure clean water. But things are seldom so simple.

ADDITIONAL METHOD OF FINANCING WASTE TREATMENT WORKS

The 1966 Act established a schedule of action to expedite the construction of municipal waste treatment works. Due to the Vietnam conflict and the national budget, however, we defaulted on that pledge—the appropriations have not been made. Now the financing provisions of H.R. 15907 are proposed. We support this as a workable alternative to direct appropriations under the 1966 formula. If it succeeds in maintaining the accelerating pace of treatment plant construction that is required, it will be worth the additional cost over direct appropriations. We cannot afford to have this program lag. Water quality standards do not clean up water. Surveillance programs do not clean up water. Research doesn't clean