

over 200,000 members of the New York State labor force "are directly employed in marine environment activities". Statistics such as these are not yet available for Nassau County alone, but there can be little doubt that a substantial portion of this 200,000 figure are here on Long Island.

The report also points out that local governments have historically been faced with the problems of operating pollution abatement facilities. However, the small units of government cannot deal effectively with the growing threat to pollution of the navigable waters which are under the ultimate jurisdiction of the federal government.

The survey mentioned above further reports that 300 of the 2,258 miles of New York shorelines are polluted to a significant extent.

This federal legislation before your Committee, S. 2907 would be an essential tool to safeguard against the loss of more of our irreplaceable waters. Experience has demonstrated that under the 1924 statute, voluntary compliance by vessel owners has not been satisfactory. Safeguards are written into this bill to protect the boat owner from arbitrary standards being set by the Secretary of the Interior, prior to the penalties being levied by the Secretary.

We thank the Committee Chairman, Mr. George Fallon, for the privilege of inserting this statement into the record, and look forward to swift affirmative action by the Committee in reporting favorably to the House.

Respectfully submitted.

FRANKLIN BEAR.

Chairman, Nassau County Planning Commission, Mineola, N.Y.

DELAWARE RIVER BASIN COMMISSION,
May 2, 1968.

HON. JOHN A. BLATNIK,
Rayburn House Office Building, Washington, D.C.

DEAR CONGRESSMAN BLATNIK: On April 24th, while waiting to testify before your Committee, I listened with interest to testimony presented by the American Petroleum Institute on proposed legislation known as the Oil and Hazardous Substance Pollution Control Act of 1968.

One of the major points made by the API was to the effect that the new authorities that would be given to the Secretary of Interior to control oil pollution should be exclusive and that the oil companies should not be faced with additional regulations imposed by other agencies. A related point, as you will recall, was that the authority of the Secretary should apply only to oil pollution from vessels and should not include shore installations.

I am sympathetic with the logic of the Secretary of Interior having exclusive authority over oil pollution problems emanating from ships. I am also in agreement that there is no need to extend his regulatory authorities directly to shore facilities. If the Secretary were to become involved in regulation of shore facilities it would cause problems in this river basin and elsewhere. As you know, the Delaware River Basin Commission has recently adopted water quality standards that apply to all kinds of pollutants, including oil. Less well-known is the fact that the Commission also carries out a project review function which covers major industrial facilities, the construction or modification of which might have a substantial effect on the water resources of the Delaware River Basin. This project review function covers a very wide range of industrial and public activity including shore facilities relating to the petroleum industry, and it is focused on the protection of other water resources values against possible incompatible effects. When the Commission reviews a proposed project it looks at it from the point of view of such values as protecting ground water recharge areas, preventing flood plain encroachments, protecting wildlife refuges, as well as possible effects on water quality. It is important to us that petroleum refineries and other shore facilities associated with the petroleum industry remain subject to this review authority by the Commission along with other industrial and municipal activities affecting water resources.

Accordingly, I would like to urge your Committee to consider these aspects in the final version of this proposed legislation. If it is imperative that the authority be extended to shore installations as well, then I would urge that the Secretary's prerogatives not be made exclusive. If this is not done, then we face the likelihood that the petroleum industry would use this new legislation as a basis for