

Box 73A-5

JENNINGS RANDOLPH, W. VA., CHAIRMAN

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United States Senate
 COMMITTEE ON PUBLIC WORKS
 WASHINGTON, D.C. 20510
 NOTARIES
 15 MAR 28 1971

RICHARD B. ROYCE, CHIEF CLERK AND STAFF DIRECTOR
 J. B. HUYETT, JR., ASSISTANT CHIEF CLERK
 M. BARRY MEYER, COUNSEL

April 30th, 1971

Mr. F. Ritter Shumway, President
 Chamber of Commerce of the United States
 1615 H Street, N. W.
 Washington, D. C. 20006

Dear Mr. Shumway:

In response to your letter of April 19th I assure you that it has always been the policy and the practice of the Committee on Public Works and of its subcommittees to hear from the widest range of responsible views that time allows in our public hearings. I regret that the Chamber of Commerce was not afforded the opportunity to testify in the recent hearings of the Air and Water Pollution Subcommittee but, as Senator Muskie has indicated in his letter to you, a number of business and industrial associations did testify during the course of those hearings. I am further informed that you have been invited to testify at the scheduled hearing of the Subcommittee when it explores the economic impact of environmental controls.

You may be assured that the recent communication gap between the National Chamber of Commerce and the Subcommittee on Air and Water Pollution, and the interchange of correspondence which flowed from that, will not detract from my regard for the Chamber of Commerce of the United States nor from the warm relations which I have with many of your members.

With kind regards,

Truly,

Jennings Randolph
 Chairman

cc: Senator E. S. Muskie

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JENNINGS RANDOLPH, W. VA., CHAIRMAN
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With kind regards,

Truly,

Jennings Randolph
 Chairman

cc: Senator E. S. Muskie

015

CHAIRMAN, HOUSE PUBLIC WORKS COMMITTEE,
Rayburn Office Building,
Washington, D. C.

McLEAN, VA.

DEAR SEN: Since I am unable to appear before your committee I would appreciate being heard via the pen. The subject at issue is pollution of inland waters by recreational boaters.

Many before me have stated the boaters viewpoint very well, that is—boaters suffer from pollution more than others and therefore are interested more than most in doing something about it. Statistics will show that small boat pollutants represent a very minuscule percent of the problem. Having served in the Navy and now as a private boater I feel qualified to speak.

Compromises must be made but action must be taken now. This I support. The Federal Government must act before we are "illegally" on the waters with laws by which we cannot physically abide.

I would urgently recommend that Federal action be taken this year and that—

- (a.) laws be directed at the real major sources of pollution not small boaters alone;
- (b.) no holding tank laws be imposed on noncommercial boats until adequate procedures and facilities might be available; and
- (c.) chlorinator waterators be prescribed for all boats over twenty-five feet by January 1971.

In any case, this has been a problem where an unquantified amount of attention has been directed on the small boat owner. Such a course will not solve the pollution problem. You must put some attention on commercial and shore sewage plus chemical waste to really get at the problem.

Thank you for your consideration.

Sincerely yours,

STANLEY R. McCORP,
Captain, USN (Retired).

STATEMENT FOR THE CHAMBER OF COMMERCE OF THE UNITED STATES, BY EBEN S. TRYSBALS, STAFF ASSOCIATE, NATURAL RESOURCES, COMMUNITY AND REGIONAL RESOURCE DEVELOPMENT GROUP, CHAMBER OF COMMERCE OF THE UNITED STATES

The Chamber of Commerce appreciates the privilege of presenting this statement to the Committee on Public Works as it studies the proposed "Water Quality Improvement Act of 1969." The National Chamber is the largest association of business and professional organizations in the United States, and is the principal spokesman for the American business community. The Chamber represents 3,700 trade associations and local chambers of commerce. It has a direct membership of over 33,000 business firms and an underlying membership of approximately 5 million individuals and firms.

Our purpose in presenting this statement to you is to restate the National Chamber's position on water pollution and control, and to focus on several sections of particular importance in the various bills this Committee now has before it. Additionally, we would like to take this opportunity to commend this Committee for the leadership it has taken in dealing with the water pollution problem that is facing our nation. This Committee has been instrumental in developing the federal role in water pollution control. And your work goes back prior to the enactment of the 1965 law.

Recent statements of some members of the United States Senate, as were reported by the press relative to Secretary Hickey's selection of James C. Watt, formerly on the staff of the United States Chamber, as a consultant, unfortunately imply that the National Chamber and business interests are opposed to effective water pollution control legislation. Their remarks also imply that action taken by this Committee and the House of Representatives as a whole has been inadequate to protect the public against the dangers of water pollution. A brief summary of recent water pollution control legislation can place the issue into focus.

You will recall that in 1964 legislation was introduced in the United States Senate that would have given to one person in the Executive Branch of the Federal Government nearly absolute authority to determine water quality standards for all water. The proponents of this legislation, in arguing for their position, ignored progress being made at that time under laws that had been recommended by this Committee.

Fortunately, your Committee realized that water pollution control in essence means water quality control; that setting water quality standards requires pre-determination of water usage; and that in a country as big and varied as the United States some degree of decentralized judgment is necessary.

In 1965 this Committee proposed, and the House unanimously agreed, that there should be public hearings conducted by States at which the water uses would be defined and the standards for water protection established. We all recall the legislative controversy that developed and the ultimate House victory. The Chamber of Commerce of the United States strongly endorsed the House proposal, as you know. But the Chamber did more. Passing a law is the first step in achieving the objective. Implementing it can be more difficult. Congress set stringent time schedules for State action. A recognition of the difficulties faced by undermanned State staffs prompted a Chamber appeal that all potential help be organized to get the job done.

The Chamber joined in a team effort of national trade and agricultural associations and local and state chambers of commerce that—

- published a guide on how hearings should be held and on the kind of information that should be presented;
- encouraged industries to make available to State agencies both data and manpower;
- conducted regional meetings of industrial and state agency representatives at which the needs of the State were detailed, interstate aspects coordinated and enthusiasm generated for State action to fully implement the federal law.

The Chamber's guide was requested by this Committee for inclusion in its hearings record the following year.

While this endeavor to hold hearings and set standards was underway, the Senate Committee proposed a modification which would in effect transfer control on use of water from the State to an official of the U.S. Government. As law, such a rash plan as the Secretary of Interior would approve. Again, this Committee maintained the principle that water quality control and water use control are inextricably linked and decision belongs to the people affected.

Then last year there was another assault on this principle. Secretary of Interior Udall proclaimed his antidegradation policy. On the face of it the impression was good—high quality waters should be protected. A careful reading of the statement showed the quality could be degraded upon approval of the Secretary of Interior.

In essence this was exactly what the original Senate bill had proposed—the establishment of standards by the Federal Government. This was what the House rejected. Eventually the Senate also rejected this concept. Despite this, some proclaimed the statement by Secretary Udall to be the intent of Congress. Because of the implications and consequences that such a policy portended, as well as the confusion and delays that such a change in policy was causing the States in their programs, the National Chamber felt a qualified legal opinion should be obtained. Such an opinion, the Chamber believed, would determine whether the expressed intent of the Congress at the time of passage was consistent with the newly proposed policy.

A legal brief prepared by Covington and Burling was made available to members of the House and Senate Committees. A Chamber representative, John Courtney, included it in his testimony last year. The opinion documented the hold-up that the proposed Udall policy was not consistent with either the House or Senate intent.

In a concurrent review, a committee of State Attorneys General agreed that only by an act of State legislatures could States delegate to the Secretary of Interior the authority he sought for setting standards.

Missed in all the political and emotional arguments on the subject is the fact that Congress, by the 1965 Water Quality Act, really promulgated an effective antidegradation policy. The Congress insisted that (a) the States adopt standards to protect uses and (b) if such standards are not maintained the Federal Government will assume jurisdiction.

The National Chamber strongly endorsed and, as the record shows, actively assisted in making the 1965 Act work.

The recent criticism of the Chamber was probably prompted by our active support last year of the House-passed legislation. At that time some Senators attempted to force inclusion of a proposal that the Secretary of Interior should have authority to insert conditions in any lease, license, permit or contract issued

by a federal agency to a corporation or individual utilizing a water discharge. The House Committee considered the basic intent of the federal law as making the States primarily responsible and did not agree with the Senate proponents of this proposed amendment.

We believe that this Committee is fully aware of the efforts last fall of the National Chamber to encourage the Senate to adopt the House-passed measure. It is significant that the present Senate bill (S. 7) now supports the basic position held by the House last fall.

This Committee is to be commended for its fortitude in maintaining perspective. The Chamber of Commerce of the United States will continue to participate actively in effectuating reasonable water quality control legislation.

SECTIONS IN NEED OF FURTHER REVIEW IN S. 7, H.R. 4148 AND H.R. 7361

S. 7 and H.R. 4148 propose a section—Section 14—entitled "Cooperation by all Federal Agencies in the Control of Pollution." H.R. 7361 has no such section. In S. 7, Section 14(a) would require that each federal agency "within available appropriations and consistent with the interests of the United States, insure compliance with applicable water quality standards."

Section 14(a) of H.R. 4148 would require in addition that the federal agency "cooperate with the Secretary and the appropriate State water pollution control agency."

Neither bill places the responsibility for federal agencies' compliance under either the State or federal control agency except as the result of a federal enforcement action.

Both bills permit federal agency compliance to be controlled by the availability of appropriations. Section 14(b) of S. 7 would require that "any applicant for a Federal license or permit to conduct any activity which may result in discharges into the waters of the United States shall provide the licensing or permitting agency with certification from the appropriate State or interstate water pollution control agency that such activity will be conducted in a manner which shall insure compliance with applicable water quality standards."

H.R. 4148 covers "license, lease or permit which discharges or may discharge matter of any kind into any waters," and requires the concerned federal agency to "receive from the Secretary a report and recommendation . . . for the purpose of insuring compliance by such activity with applicable water quality standards."

H.R. 7361 contains no provisions similar to Section 14 of S. 7.

A much discussed reason for this section is to control possible thermal pollution. H.R. 4148 refers to discharge of "matter" and it is doubtful if heat can be classified as matter. Some clarification is needed.

"License" by definition has been considered as any form of permission and if this can be construed in this bill it would include contracts, leases, and licenses as well as the more commonly accepted form of permit. Clarification is needed to avert possible confusion.

It is impractical to require certifying in advance that a company or individual will conduct its business in a manner which will insure compliance with standards. It would be more reasonable to require (or request) the State agency to certify that control facilities will be or are being required which will, in the opinion of the agency, achieve the desired quality standards and that if such facilities are found to be inadequate either to meet present standards or future standards, additional controls will be required.

H.R. 7361 apparently recognizes that under present law Congress has expressed its intent that all federal installations shall provide such controls as are necessary to meet standards. S. 7 and H.R. 4148 do not require that all federal facilities have adequate controls because the compliance by the federal agency is left subject to appropriations.

H.R. 7361 apparently also recognizes that either under the present clause relating to federal installations or the portions dealing with State responsibilities and federal enforcement authority, 14(b) is not necessary.

However, since there is conflict between interagency agreements between Interior and the Corps of Engineers and the policy of the federal law as it relates to State responsibility, perhaps some modification of 14(b) in S. 7 would be desirable. A clarification is particularly needed to cover such problems as the requirements of the Corps of Engineers for dredging harbors. The Corps can dredge or can require local interests to dredge. No permit is required for the first activity, but since the disposal could be in waters of a State, is a certification re-

quired that such disposal will be controlled to prevent violation of standards? For local interests, a permit is required from the Corps specifying area of dredging and disposal site. Does the certification cover both? If, in the interests of the United States, dredging is considered mandatory by Corps of Engineers, and a State agency refuses to provide a certification what is the recourse of the Corps and the local interest?

There is also the question of requiring such controls over discharges into "any" waters.

Section 17 of H.R. 7361 and Section 12 of H.R. 4148 and S. 7 also need clarification.

These sections deal with oil pollution. Testimony presented to the Committee by several witnesses discussed the subject in detail. Here are some concerns which should be appraised so as to provide effective legislation:

Onshore facilities are considered apparently as a source of oil loss which could adversely affect beaches and water quality and as a reason for federal jurisdiction where needed in cleanup. However, it should be recalled that onshore facilities are now covered under the law, which requires control by State agencies for all discharges which would adversely affect water quality. Calling for direct reporting to the Secretary by a company bypasses the State agency sets up competing, not complimentary, jurisdiction.

States have the authority to require cleanup and can assess damages to an onshore discharge. Federal jurisdiction, if deemed necessary, should be limited to those incidents in which the State either does not act or does not have authority to act.

The inclusion of the word "matter" as a part of the "oil" extends the jurisdiction to every conceivable substance, including distilled water. The sensitivity of analytical techniques available can measure oil in municipal drinking water if from a surface supply.

The bills call for reporting of "significant" oil losses in one place "any" oil in another and "oil" in yet another. The proposed limits of liability (\$10,000,000 to \$15,000,000) suggest the intent is to limit liability to losses which would in fact cause damage to health or welfare. However, since no minimal amount is considered and since the word "significant" is not used consistently, an administrator could construe the bill to require federal action for every appearance of oil and "matter". Clarification of intent is required.

Section 12(c)(5) in S. 7 provides that any person who "willfully or negligently discharges or permits or contributes to the discharge of oil" is subject to specified liabilities. Section 12(d)(2) of the same bill would make any evidence of a discharge a prima facie case of liability. These subsections do not include the term "substantial" which is in the requirement to notify the Secretary (Section 12(c)(1)).

The enforcement jurisdiction of the federal agency in the Water Pollution Control Act is specifically limited to interstate waters and intrastate waters if invited by the Governor. This section on oil pollution would give jurisdiction to the federal agency over discharges of oil from onshore facilities into "navigable waters" in (c)(1) and "any waters" in (c)(2).

These points need clarification.

SUMMARY

In summary, the National Chamber has participated and will continue to participate actively in effectuating reasonable water quality control legislation. We are concerned at this time over some apparent ambiguities in the several pieces of legislation before you which, if not resolved, could lead to competing, not complimentary jurisdictions over water quality control and variations in compliance requirements between governmental agencies. We believe that these ambiguities should be clarified so that the responsibility for the administration of a water quality control program would clearly lie with the level of government most appropriate to the problem. This objective is consistent with recognition by this Committee that some degree of decentralized judgment is necessary in the implementation of a federal water pollution control program.

The timing of this hearing did not afford us an opportunity to present oral testimony on these matters which have such serious implications. We will be happy to elaborate further if the Committee desires additional information.

Box 73 A-5

DOLPH

United States Senate
COMMITTEE ON PUBLIC WORKS

10 May 1971

To; Berl Bernhard, John McEvoy, Dick Stewart
From: Leon Billings

Apparently the Chamber of Commerce wants to continue the pissing match. Do you have any preference as to the next step? My inclination is not to get into a pissing match with skunks.

Leon

Note to Leon:

I agree

Dick Stewart

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA
WASHINGTON, D. C. 20006

May 6, 1971

CHAIRMAN OF THE BOARD

Honorable Edmund S. Muskie
United States Senate
Washington, D. C. 20510

Dear Senator Muskie:

Your April 22nd reply to my recent letter concerning the National Chamber's request to testify on pending water pollution legislation demands a response.

As your letter points out more than 30 witnesses were heard during the eight days of this year's hearings. The National Chamber in no way feels that any of these witnesses should have been prevented from appearing. They have a right to be heard. But we claim the same right in the name of our 39,000 member firms and 1,100 trade associations.

The National Chamber's request to testify was dated March 5 and the response from Leon Billings was dated March 10. Since the final date of hearings was not until March 24, there appears to have been ample time to schedule the National Chamber for the testimony. In fact, several organizations listed on the initial witness list for the hearings did not testify, evidently indicating that openings were available even on a last minute basis. The National Chamber would have been available to fill any of the slots which were vacated by witnesses choosing not to appear.

The National Chamber must take strong exception to your reference to the National Chamber's lack of interest in your subcommittee's activities. Throughout the hearings that led up to the Water Quality Act of 1965, the National Chamber coordinated the efforts of industry representatives who ultimately appeared before your subcommittee. At that time, it was deemed more important to secure appearances by individual companies and specific associations to discuss how the proposed legislation would affect them directly. The National Chamber's direct participation was not

Honorable Edmund S. Muskie
Page 2
May 6, 1971

required in view of the benefits to be gained by the participation of specific industry representatives.

As you stated, this approach changed in following years as indicated by our statement filed with your subcommittee in 1966. Again in 1968, the National Chamber followed your subcommittee's oversight hearings and submitted to each member of your subcommittee a legal memorandum prepared by Covington and Burling on the administration of the Water Quality Act. In 1970 the National Chamber requested to appear, but unfortunately the date assigned conflicted with our Annual Meeting. Since there were indications that the 1970 legislation would be carried over into 1971 due to the subcommittee's efforts on the Clean Air Act, the National Chamber felt that filing a statement on the 1970 legislation would be sufficient. Our records indicate that this statement was received by subcommittee staff. However, it was not included in the hearing record.

This year's legislative proposals represent the first major serious proposals to revamp the entire federal-state water quality program established under the 1965 act. As such, this legislation is a key item on the legislative agenda of the National Chamber. Based upon our past record of interest in the subcommittee's consideration of water pollution legislation and the several appearances made before the subcommittee on other pollution matters, the National Chamber should have been permitted to testify. Your comments that a "full and adequate hearing was given to all segments of the business community which had demonstrated an interest in the subcommittee's work" is not substantiated in view of having denied the National Chamber such an opportunity. The National Chamber will stand on its record of participation and interest in the subcommittee's work and plans to continue such participation and interest.

Sincerely,

F. Rutter Shumway

F. RUTTER SHUMWAY
Chairman of the Board

JIMMIE RANDOLPH, W. VA., CHAIRMAN
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in small

United States Senate

COMMITTEE ON PUBLIC WORKS
WASHINGTON, D.C. 20510

April 22, 1971

Mr. F. Ritter Shumway, President
Chamber of Commerce of the United States
1615 H Street, N. W.
Washington, D. C. 20006

Dear Mr. Shumway:

This will acknowledge receipt of your letter of April 14 regarding the request of the Chamber of Commerce of the United States to testify on pending water pollution legislation.

The March hearings held by the Subcommittee on Air and Water Pollution consumed eight days; more than thirty witnesses were heard. Those witnesses included the following representatives of the business community:

- American Paper Institute
- National Association of Manufacturers
- American Petroleum Institute
- Manufacturing Chemists Association
- American Iron and Steel Institute

Because public interest groups such as Environmental Action, Friends of the Earth and Zero Population Growth also indicated an interest in the pending legislation, they were given an opportunity to testify.

I have asked that your statement be made a part of the record of the 1971 water pollution hearings. In regard to the statement submitted by the Chamber of Commerce on May 22, 1970 for inclusion in the record of last year's hearings, the Subcommittee has no record of having received such a statement.

Since the creation of the Subcommittee eight years ago, the Chamber has requested to testify only once and then decided not to appear. The only other record of the Chamber's interest in water pollution legislation is a statement submitted on the Federal Water Pollution Legislation in 1966. Thus, the Subcommittee had no basis to assume that the Chamber would be interested in appearing in this series of hearings.

Finally, the Subcommittee on Air and Water Pollution did not receive the Chamber's letter to Senator Randolph asking to

Mr. F. Ritter Shumway
April 22, 1971
Page Two

testify until three working days before the hearings, by which time there was no time available.

In the past eight years this Subcommittee has heard testimony from all segments of society. Business community testimony has occupied a great portion of the Subcommittee's time. Had the Chamber followed this issue and the work of the Subcommittee prior to this year, you would know that the Subcommittee has given a full and adequate hearing to the views of those segments of the business community which demonstrated an interest in our work.

Sincerely,

EDMUND S. MUSKIE, U.S.S.
Chairman, Subcommittee on
Air and Water Pollution

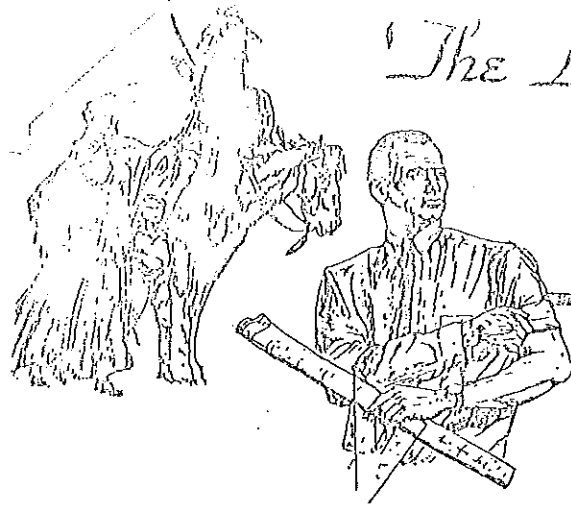
The Loveland Chamber of Commerce

714 E. FIFTH STREET

303 667-6311

P. O. BOX 245

LOVELAND, COLORADO 80537



May 5, 1971

Senator Edmund Muskie
Senate Public Works Committee
4202 New Senate Office Building
Washington, D. C. 20510

Dear Senator Muskie:

I read with interest the enclosed article. I would be interested to learn why you denied the National Chamber of Commerce the opportunity to testify at your water pollution hearings.

I will appreciate a reply from you soon.

Respectfully,

A handwritten signature in cursive script, appearing to read 'E. A. Witucki'.

E. A. Witucki
Executive Vice President

EAW:wjr
Enclosure

ccs: John Thomas
Gordon Weller

The City with Progress in Mind

Shumway protests: Muskie subcommittee excludes Chamber testimony on pollution

The National Chamber has challenged the rejection of its request to present the views of a large segment of business on water pollution legislation before a Senate subcommittee headed by Sen. Edmund Muskie (D-Maine).

Chamber President F. Ritter Shumway asserts in a letter to Sen. Muskie that the subcommittee displayed a "cavalier attitude" toward the Chamber in denying it the right to appear.

"It is not clear," Mr. Shumway said, "whether this refusal was at your order or was an action taken by the staff man on his own."

One of the reasons for turning down the request, the subcommittee staff had said, was that "extensive hearings" were held on the subject last year.

Mr. Shumway said this, and other excuses, were "flimsy, at best."

Mr. Shumway noted that a year ago 14 days of hearings were held on bills related to water pollution, but only four-and-a-half days were spent on general proposals. Also, he reminded Sen. Muskie that a Chamber statement filed with the subcommittee never appeared in the printed record of the 1970 hearings.

The subcommittee was able to find time this year to hear such organizations as "Friends of the Earth," "Zero Population Growth," "Environmental Action," and "Trout Unlimited."

While not disputing their right to be heard, Mr. Shumway pointed out that the Chamber speaks for 40,000 business and professional firms, representing all segments of business and professions; plus 2,700 state and local chambers, and 1,100 trade and professional associations. All of them—and the millions of individuals they represent—have a vital interest in pollution control legislation, he declared.

While the subcommittee did accept a Chamber statement on the pending bills, Mr. Shumway said there were several important issues which had received inadequate consideration by the subcommittee and which the Chamber feels could be better developed through in-person testimony.

He asked Sen. Muskie whether exclusion of the Chamber was "an indication of lack of concern on the part of yourself or your staff for the vital interest of many segments of this country's business community in the proposed legislation?"

Mr. Shumway also asked: "Should we interpret this exclusion as a lack of respect for some fundamental and established procedures necessary in a country such as ours to determine the will of the people?"



LEGISLATIVE STRATEGY is planned by Hilton Davis, left, Legislative Action general manager, with the Chamber's three legislative counsels, Argyll Campbell, Francis M. Judge and John S. McLees, who are in daily contact with Capitol Hill on behalf of business.

Chamber backs Treasury against foes of proposed faster tax write-offs

Business support for Treasury Department proposals which would ease tax depreciation rules to allow a 20% leeway in writing off machinery and equipment is being voiced by the National Chamber.

Despite political objections from certain members of Congress and others, the Chamber declares that the Treasury's move is in the right direction.

Unless permanent improvements are made in our inadequate tax depreciation tax structure, American business will continue to lag behind modern industrialized nations in world market competition.

The Chamber expressed that view in a statement to the Internal Revenue Service and is prepared to back it up with formal testimony at IRS hearings in May.

"Until the time that the United States can close the gap between the systems of capital recovery used by our competitors and that which is allowed by our own tax system, there will be little chance for increasing exports and reducing imports," Robert R. Statham, Chamber taxation and finance manager pointed out.

"A combination of high labor costs and the forced retention of obsolete equipment," he continued in the statement, "serve only to deter the expansion of our exports. What we need is a taxing system that encourages, rather than discourages, replacement of obsolete machinery and equipment."

He asserted that the proposed rule changes will encourage investments in more machinery and equipment and "thus create a huge number of new jobs in this country."

What's Congress doing?

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(202) 223-0580

The official transcript shows that Chairman Muskie was recorded as present only two days of the eight days of hearings held by the subcommittee last month. On those occasions, Administration officials testified and news media coverage was heavy.

Honorable Edmund S. Muskie
Page 2'
April 14, 1971

The National Chamber represents all segments of the American business community: manufacturers, retailers, wholesalers, the service trades, the extraction industries -- ALL segments of business are represented by the 40,000 business members of the Chamber. In addition, our membership includes 2700 state and local chambers of commerce and 1100 trade associations -- all of whom have vital interest in the water pollution control legislation before your subcommittee.

Several issues raised in the statement we would have presented to your committee had we been permitted, but that we submitted in writing instead on April 2, were unique. Specifically, the issues of state control over economic development, state water rights, and the protection of our total environment were not adequately covered in your hearings. The subcommittee members should have had the opportunity to review our concern and benefit from the question and answer session which follows in-person testimony presentation.

Are we to interpret our exclusion from the hearings as an indication of lack of concern on the part of yourself or your staff for the vital interest of many segments of this country's business community in the proposed legislation before your committee? And, should we also interpret this exclusion as a lack of respect for some fundamental and established procedures necessary in a country such as ours to determine the will of the people?

I'll greatly appreciate hearing from you.

Sincerely,

F. Retter Shumway

President