

Second, the acquisition provisions would not be binding if the Administrator finds that advance notice would "have an adverse impact on the proposed purchase."

Third, this latter circumstance would completely void the mandate of section 804(b)(1) to consider all objections of local government to a proposed acquisition or change of use.

Thus, for reasons advantageous to Central Government purposes, GSA may not apply the provisions of section 804 rather than apply them. It would therefore seem that the executive branch would have control over GSA practices in its own hands, with or without enacting legislative requirements.

However, if the Congress determines that accommodation to local zoning, land-use, planning, and development objectives could be advanced by Federal departments and agencies only through basic legislation, we have no objection to title VII.

TITLE VIII, UNIFORM RELOCATION POLICY

This title deals with coordinating program content which is the result of different pieces of legislation enacted by different Congresses over the years. That is the practical source of the disparate policies, procedures, and payments which now exist. NAM itself has no specific policy with respect to Government relocation practices, so we have no formal theme on which to base support of or opposition to this title.

However, we've been aware of the problems. In fact, I had participated in the informal "critics" session on the draft report of the Advisory Commission on Intergovernmental Relations on Relocation. We do know that Government displacement of people and businesses is substantial and has existed for a long time, especially through highway, slum clearance, and code enforcement activities. We know that small businesses, particularly, have been seriously affected, and injured economically, that people have been dislocated without adequate rehousing and that there are inconsistencies of relocations practices and payment policies.

The imposition of similar uniformity of policies at the State level as a condition of receipt of grants from the Central Government is a natural outgrowth of the grant system as it has developed and the logical consequence of the detailed "oversight" that Congress and the executive branch have incorporated into the mechanics of the grant system.

We cannot condemn efforts to ameliorate injustices and the harmful effects of economic dislocations; nor can we criticize efforts to correct disparities in the policies of Central Government programs, grants-in-aid or otherwise, or in the practices of different Federal departments and agencies. We therefore do not oppose title VIII.

TITLE IX, UNIFORM ACQUISITION POLICY

This title seems almost a matter of internal management in the executive branch, except for the imposition on the States of similar uniform practices regarding land acquisition whenever Central Government funds are used. Consistency of policy and procedure "in order to encourage the acquisition of real property by amicable agreements with owners," whether in programs administered or aided by the