

use of funds for this program depends largely on its acceptance by individual States and cities. We have made no inquiries relative to such acceptance to date.

4. Since each State receives a specific amount of ABC funds, and since Interstate funds are apportioned on the basis of need, it is a certainty that the States would seek to use Interstate funds to the maximum possible degree for these parking facilities. Do you have any estimate as to how much this would increase the cost of the Interstate System?

*Answer:* In keeping with question 3 we have no estimate of total program cost and also no cost of the program as it relates to the Interstate System. The degree to which Interstate costs would be increased would again be primarily based on acceptance of the program by individual States and cities.

5. In approving projects for parking facilities adjacent to highways on a Federal-aid system, how would the source of Federal-aid funds be determined? Would it be on the basis of classification of the highway adjacent to which the facility is to be constructed?

*Answer:* Yes.

6. There seems to be no limitation in this section on dollars, percentage, or otherwise, upon the amount of Federal-aid funds which could be used for parking facilities. The Capital Beltway, which encircles Washington, D.C., has some 38 interchanges constructed or planned. Suppose the States of Maryland and Virginia decide it would be desirable to construct parking facilities at each of those interchanges, and since they would be adjacent to an Interstate highway, to use Interstate funds for that purpose. Would this be permitted under the Administration proposal?

*Answer:* Individual project submissions of the type suggested would be evaluated individually based on several criteria. One item bearing heavily on such a proposal and stated in the proposed legislation would be the probability of the usage of such facilities in conjunction with existing or planned mass transportation facilities. If all applicable criteria are clearly shown to be met a project of this type could be approved.

It would not seem reasonable to build facilities at all 38 beltway interchanges as suggested in the question without determining the effectiveness of the proposal at a smaller number of sites, and this would undoubtedly be suggested to the States involved.

7. Projects for parking facilities would be approved "as a project under this title"—meaning title 23, United States Code, "Highways." Title 23 defines the terms "highway," "Federal-aid system" and "project"—and by no stretch of the imagination are these definitions broad enough to include parking facilities.

(a) Would you recommend amending these definitions?

(b) Since section 209 of the Highway Revenue Act of 1956 limits the Highway Trust Fund to meeting expenditures "attributable to Federal-aid highways," would it be necessary to amend that Act to permit the use of Highway Trust Fund receipts to finance parking facilities?

*Answer:* The language of proposed section 139(b) authorizes the Secretary to approve, "as a project under this title," the acquisition of land adjacent to the Federal-aid system right-of-way and construction thereon of parking facilities. We believe this language in itself is sufficient to authorize the fringe parking facilities without further amendment.

8. Section 14 would permit the use of Federal funds for the acquisition of land "adjacent to the right-of-way on any Federal-aid highway system." What do you mean by the word "adjacent"? Does the land have to abut the right-of-way, or may it simply be in the general vicinity of a Federal-aid highway?

*Answer:* It is intended that the fringe facility have a definite orientation to a Federal-aid highway. If access is not controlled an abutting relationship would be required. If access is controlled we would use existing interchanges by location of the facility on a frontage road or by connection to a crossroad in close proximity to an interchange consistent with safety and good traffic operations.

9. As I understand it, Federal funds can participate in parking facilities only if they are located outside a "central business district." Don't we have an equal or greater need for parking facilities in downtown areas?

*Answer:* There is a definite need for additional downtown parking facilities serving the core areas of major cities. It is assumed that these facilities can be operated as a profitable venture, and can be adequately handled through local programs involving a mix of private and municipal facilities.