

RECOMMENDATION 7—STIPULATED LEADTIME

This recommendation requires that every reasonable effort is made to acquire real property by negotiated purchase and that no one is required to surrender possession without at least 90 days written advance notice.

You are certainly familiar with our procedure in negotiated purchases and condemnation suits. All properties purchased for highway projects are negotiated with the owner before any condemnation action takes place. I feel that I can confidently say that each displacee has been given at least 90 days advance notice to surrender possession.

Section IX of our regulations is entitled "Eviction" and is as follows:

"Families and individuals occupying property owned by the District shall not be evicted unless they have first been offered standard relocation housing, except for non-payment of rent, use of the premises for an illegal purpose or other violation of the Occupant's Agreement for the Use and Occupancy, refusal to accept standard accommodations, refusal to admit representatives of the Relocation Office, and situations requiring eviction under local law."

It is my judgment that our regulations provide sufficient protection for each displacee to find alternate accommodations. We would have no objection to a 90 day provision but it would necessitate a modification of present regulations.

RECOMMENDATION 8—EFFECTIVE DATE OF RELOCATION PAYMENTS

This recommendation requires the designation of an effective date of the relocation payments for Recommendations (1), (2), and (3).

Our regulations establish an effective date of December 6, 1964 for authorized payments. In the event Congress approves those portions of Recommendations (1), (2), and (3) which are not covered by our present regulations, the effective date would be contained in enabling legislation approved by the Congress.

RECOMMENDATION 9—COST OF ADMINISTRATION OF RELOCATION PROGRAM

It would appear that our present regulations and procedures will enable the District to obtain Federal-Aid reimbursement for a relocation program as set forth in these recommendations.

Recommendation 10—Assistance to Small Business

The District has on a number of occasions referred the operation of small businesses to the Small Business Administration. This practice will be continued and I shall make every effort to be assured that *all* small businesses will be referred to the Small Business Administration. It is agreed that ways and means should be devised as recommended to further aid small businesses suffering economic loss due to displacement.

Generally speaking we feel that the "study" really doesn't go much further than existing programs and doesn't approach the problem in a realistic manner. The accent on providing minimum and below minimum benefits is not what we consider a realistic approach to overcoming relocation difficulties. One example is in the recently discussed subject of paying above fair market value for relocation housing. It is our understanding that the Department of Transportation has made certain commitments to the State of Maryland in regard to relocation payments to the City of Baltimore, which will include the payment of amounts well above fair market value if the state makes such provisions in its own legislation. We would appreciate any new light you might be able to shed on this particular arrangement.

I hope the above provides you with the necessary information regarding our position and feelings with respect to the "Highway Relocation Assistance Study."

Very truly yours,

T. F. AIRIS, *Director,*
Department of Highways and Traffic, District of Columbia.