

Section 13 (c)

Local Agency Formation Commissions (LAFC)¹

¹ Referred to in my book. page 125, paragraph 3 as "LAFC, General Folder (GF) p. 3" and "GF Section 13, part 5".

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no 287*

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Statewide Survey 1966



**LOCAL
AGENCY
FORMATION
COMMISSIONS**

INTERGOVERNMENTAL COUNCIL ON URBAN GROWTH

STATE OF CALIFORNIA

EDMUND G. BROWN, Governor

✓
"In the best tradition of home rule, local agency formation commissions have been established in 57 of California's 58 counties. . . . You are the trustees of a sizeable public trust. The people of California are the beneficiaries. The manner in which you function is the best test of the capacity of local government to deal effectively with urban growth."

GOVERNOR EDMUND G. BROWN
First Statewide Conference of Local Agency Formation Commissions
May 15, 1964, Fresno

"You have demonstrated impressively that LAFCOs fill a very real need even outside metropolitan areas. Besides, the decisions you are making today will do much, as you grow, to prevent the tangle of problems that our urban areas are presently struggling to unsnarl."

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ALAN CRANSTON, State Controller
Second Statewide Conference of Local Agency Formation Commissions
May 21, 1965, Sacramento

REPORT ON A
STATEWIDE SURVEY OF

LOCAL AGENCY FORMATION COMMISSIONS

1966



by the

INTERGOVERNMENTAL COUNCIL ON URBAN GROWTH
STATE OF CALIFORNIA

EDMUND G. BROWN, Governor

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ABOUT THE STUDY

The Intergovernmental Council on Urban Growth and local agency formation commissions came into being at the same time in 1963; both were part of a related package of urban affairs legislation. The statewide functions assigned the Council and those assigned the local agency formation commissions established in each county are also related. The Council's primary objective to promote the effective treatment of urban growth problems through intergovernmental cooperation is advanced where LAFCs can assure the growth of strong and healthy local units of government capable of fulfilling their responsibilities to their residents. In short, the Council's job is easier if the LAFCs are doing their jobs. For these reasons, the Council has had a deep interest in LAFCs from the very beginning.

In February, 1966, the Council decided that it would be important to conduct a field survey with a particular view to three objectives: 1) to gain a current picture of overall LAFC performance; 2) to evaluate the effect of LAFC actions on the pattern and structure of local government and the degree of LAFC relationship with local planning agencies; and, 3) to assess LAFC potential in anticipating and guiding growth. The ultimate purpose of the study was to have its findings and conclusions and its very process serve as a vehicle of communication and education to advance the recognition of LAFCs as unique agencies with a developing role in the future of local government.

The Council undertook this study with the full cooperation of the League of California Cities and the County Supervisors Association of California. It also hired a local government consultant to help in the fact-finding and analysis stages of the project. In addition, the Council created an informal technical study advisory committee with the composition as listed on the opposite page. This committee participated in the basic study design and was called upon to advise and comment at various stages throughout the progress of the study.

In the first, or fact-finding, stage of this project, the consultant visited 41 counties, interviewing the LAFC executive, county planner, and other LAFC, county and city officials. LAFC files, reports, other materials, and county general plans were studied. The remaining 16 counties, none of which are large, were contacted by a mailed questionnaire. The consultant's summary reports on LAFC activity, organization, and growth problems and subsequent analyses provide the basis for the Council's deliberations and this statewide report.

This report is intended as a general document setting forth, in a positive way, what LAFCs are doing and can do to play their part in meeting the immense challenge of urban growth in California.

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I. REPORT IN BRIEF: SUMMARY AND CONCLUSIONS

New Strength for Local Government

In 1963 state legislation was adopted requiring the establishment of a local agency formation commission (LAFC) in each county. This attempt to rationalize the proliferation of local government was not only an entirely new approach for California, but was without precedent in the nation.

It charged the representatives of local governments themselves—cities and counties—with the responsibility of controlling this proliferation, and furthermore provided that each local agency formation commission would be setting its own countywide development pattern in the new undertaking. In 1965 the Legislature gave additional powers to the commissions.

Nearly three years of LAFC practice are now available for study and analysis. While this survey by no means assumes LAFCs have already evolved into their full effectiveness, it does assume that enough experience has accumulated for a preliminary assessment of present performance and future potential.

The major findings and conclusions of the survey are as follows:

1. *Local agency formation commissions are increasingly able to carry out their legislative charge to discourage urban sprawl and to encourage orderly urban growth, although there are some weak spots.*

Within three years an entirely new intergovernmental institution—the local agency formation commission—has demonstrated its ability to facilitate orderly patterns of local government and development. With further time and experience, this capability should progressively expand, particularly in those counties where LAFC has been slow to take hold.

Collectively, LAFCs have already acted upon over 5,000 separate proposals for city and district formations and annexations across the State. In this process they have accelerated city growth, cut the rate of special district proliferation in half, improved the content of many proposals, established city expansion areas, simplified governmental structure in complex urban areas, established rational procedures for public consideration of governmental alternatives, extended urban government to areas that would otherwise be unserved, prevented scattered and speculative development, protected farms and open space from urbanization, secured intergovernmental cooperation in working out overlapping problems, and studied a wide variety of long-term governmental needs.

The field survey also encountered some situations where LAFC performance appeared spotty. In some counties it was a simple matter of little activity and no real opportunity for the commission to develop a "sense of role" or purpose. There are counties in which there has been frequent unqualified approval of proposals which could have been analyzed and improved by LAFC. These weak spots are not chronic enough to question the LAFC concept although they do call for continuing attention.

- 2. A "sense of role" appears to be a key factor in any local agency formation commission taking full advantage of its potential effectiveness.**

This was found to be the most decisive single quality or measure affecting LAFC performance. It could also be called sense of identity, values, mission, or purpose. This means that each LAFC must view itself as an individual intergovernmental entity in relation to the desires of the county, the cities, and the public. The extent of this sense of role can be felt as each LAFC is studied on its home ground, and is also reflected in the treatment of proposals, the use of conditions, the influence of long-range considerations, the work of the staff, and local attitudes toward LAFC.

The law says each LAFC is to carry out its responsibilities "based on local conditions and circumstances." With a LAFC in each county, it came as no surprise to find that the difference between LAFCs is about as wide as the difference between counties in this varied State. Most LAFCs are doing the things noted above, particularly in the large urbanizing counties where the need is urgent and the opportunities are many. The recognition of the extent of LAFC powers, which did not occur immediately in some counties, is a major step in the development of a sense of role, a sense of working out the use of those powers.

- 3. There is a basic need for local agency formation commission countywide governmental structure and services studies.**

A major purpose of the Council survey was to explore the relations between local agency formation commissions and local planning agencies. Their respective activities have a direct impact on one another. General plans vary widely in scope, quality, and in adherence by their respective governing bodies, but it is found that LAFCs use them where they exist and to the extent that their nature permits. Also, many LAFCs routinely refer proposals to the county planning agency for advice and recommendations. But city general plans do not consider much beyond their present boundaries and it is a rare county general plan that outlines the governmental machinery required for its implementation. LAFCs need countywide analyses and projections of urban growth patterns and the related requirements for governmental services which could provide a long-range reference to place each specific proposal in a broader context and to guide and support LAFC decisions.

The Council suggests that these governmental structure studies be performed by LAFCs in cooperation with city, county, and district planning staffs. These LAFC studies should be a regular feature or element of the countywide general planning process.

Because of the close relationship between LAFCs and the local planning activities and the need for countywide government structure studies, the Council suggests that local officials consider pulling together a countywide working arrangement of LAFC, local planning agency, and other city, county and district officials to look at the entire spectrum of the research and studies that have been done and those that still need to be done, and then to coordinate, on a continuing basis, both the use of what exists and the acquisition of what is needed.

- 4. Local agency formation commission composition is most workable and provides a unique basis for countywide cooperation and city-county communication.**

The commission make-up of two county members, two city members, and a public member appears to be successful. It has opened a new channel of communication between city and county officials and reinforces the idea that the LAFC has countywide jurisdiction, without distinction between city and county territory.

The composition is emphasized here because the Council was asked to review a minor problem concerning the lack of statutory definition of the conflict-of-interest circumstances that might disqualify a county member. The law automatically disqualifies a city member when an annexation to his city is before LAFC; for a county member it merely provides that he may disqualify himself. Rather than attempt to handle this problem through additional legislation, the Council suggests that the conditions for which a county member should disqualify himself to act on a proposal can be set forth under the respective LAFC operating rules.

5. *Adequate executive and technical staff assistance is essential to effective local agency formation commission operations.*

Although the law permits appointment of an entirely separate executive, it implies that the executive and other staff tasks will be performed by county officials who also have other responsibilities. LAFCs can make various arrangements for assistance, and can call on all local agency officials for information. Counties are generally cooperating by making additional funds or staff time available, often to the extent of reducing other assignments of the LAFC executive. County legal counsel is also provided and their advice, together with court interpretations of LAFC authority, are now building up a statewide body of doctrine that is another factor contributing to the increasing strength of LAFC.

6. *Some local agency formation commissions are developing a multi-county regional viewpoint through the nature of their concern for regional problems.*

LAFCs are created on a county-wide basis with responsibilities within their respective county. Some LAFCs, however, particularly in the San Francisco Bay and Southern California Regions are developing a regional "awareness" by keeping in touch with regional problems, activities, and organizations. This is done through commission members active in regional affairs, through monitoring and reporting by the LAFC executive officers and other informal means.

Also, virtually all LAFCs cooperate with adjacent LAFCs. This is frequently triggered by a district proposal crossing county lines. The "principal" LAFC may refer the proposal to the other LAFCs included, or a joint meeting may be called. LAFCs with persistent cross-boundary problems can hold general joint meetings from time to time.

7. *There is still much potential benefit to be realized from the exercise of the presently authorized local agency formation commission powers in planning for the orderly extension of government for urban services and in special district reorganization.*

The great capabilities of LAFCs are just barely beginning to be shown. One noteworthy potential that is beginning to emerge is the concept of the "urban expansion zone" or "sphere of influence" which can be applied by LAFCs. This starts with the adoption of growth areas for each city or future community. Within these areas, intensive development planning can take place; governmental planning can also proceed aimed at staged development. Temporary urban service devices, the avoidance of conflicting district expansion, and a timed annexation program could all play a part. With such a plan for all the cities in an area, it then becomes easier to plan areawide services and district organization.

II. HOW THE COMMISSIONS PERFORM

LOCAL AGENCY FORMATION COMMISSIONS ARE INCREASINGLY ABLE TO CARRY OUT THEIR LEGISLATIVE CHARGE TO DISCOURAGE URBAN SPRAWL AND TO ENCOURAGE ORDERLY URBAN GROWTH, ALTHOUGH THERE ARE SOME WEAK SPOTS.

The major legislative mandate to the commissions is set forth in Section 54774 of the Government Code:

“Among the purposes of a local agency formation commission are the discouragement of urban sprawl and the encouragement of the orderly formation and development of local governmental agencies based upon local conditions and circumstances.”

This study finds that LAFCs are increasingly determined and able to carry out this charge, and in the main are accomplishing what was expected and hoped of them. In this connection, their primary statutory power is to review and approve or disapprove with or without amendment, wholly, partially or conditionally all proposals for the formation of cities and districts, or for the annexation of territory to them. Specifically, they have done and can do the following (the qualifying phrases “some, many, most” are used to indicate the relative number of LAFCs doing these things):

They Discourage Urban Sprawl . . .

- Prevent scattered or premature development and urban expansion into agricultural or greenbelt areas by denying formation or extension of the local agency which would provide the essential services. (Most; see Case Study #4)
- Deny the formation of districts and other proposals where the need is not clearly demonstrated, including “development promotion” districts and other proposals involving dubious development schemes. (Most)
- Deny “strip” and “cherry-stem” city annexations. (Most; see Case Study #6)
- Use plans, planners, and planning criteria in the review of proposals and the improvement of their boundaries; adopt planning guidelines. (Most)
- Support planning commissions in making difficult but desirable zoning decisions, and encourage closer city-county coordination in the control of development. (Many; see Case Study #6)
- Require the pre-zoning of city annexations, and of “developer district” formations in outlying areas. (Some; see Case Study #5)

They Encourage Orderly Development of Local Governmental Agencies . . .

- Accelerate the annexation of urban areas to cities and reduce the number of city annexations and district formations, statewide. (Most; see Appendix B)
- Improve the shape of annexations and the content of other proposals by influence, informal staff work, and formal action. (Most)

- Limit the formation of new agencies, and the expansion of districts, in complex urban areas where the growth of existing cities is preferable. (Most)
- Require cities to annex entire area, rather than just the financially desirable portions. (Many; see Case Study #2)
- Adopt policies favoring annexation over incorporation, cities over districts, larger agencies over smaller ones, multi-purpose agencies over single-purpose, and flexible county-controlled agencies over inflexible independent agencies. (Many)
- Require cities and districts to mutually work out the service and financial problems caused by city growth into district territory. (Many; see Case Study #5)
- Adopt proposal guidelines calling for logical and efficient service areas, socio-economic cohesiveness, financial feasibility and equity, avoidance of intergovernmental conflict, and the best choice among alternatives. (Many; see Case Study #6)
- Promote, under 1965 legislation, the elimination of city-district overlaps and of dormant districts; the consolidation and reorganization of districts; and their merger with cities. (Many; see Appendix C)
- Study, and request local agencies to study, a wide variety of service and governmental structure problems, aimed at, among other things, the sorting out of regional (district) and city services. (Some)
- Suspend action on proposals for city incorporation and annexation, so that all concerned could study, and reach agreement on, areawide solutions. (Some; see Case study #2)
- Adopt boundary agreements between cities, as well as city expansion areas within which coordinated extension of urban services and city boundaries can take place. (Some; see Case Study #3)
- Require simultaneous annexation of a development to several local agencies, to assure the full range of urban services. (Some)
- Apply conditions limiting the duration, services, service areas and government of new districts. (Some)

They Respond to Local Conditions and Circumstances . . .

The local context varies tremendously among counties of this State, in terms of either sprawl or orderly local government. In some of the larger counties the situation, by 1963, was serious; it is here that the strongest LAFCs are found. While LAFCs cannot initiate the correction of pre-LAFC weaknesses in the local governmental pattern, they are finding ways to cooperate with local agencies in bringing this about. Other counties are just embarking on rapid growth; for them LAFC was created in the nick of time. Still others are small and slow-growing; their LAFCs have had little to do.

One of the most heartening findings of this study is that one LAFC can be entirely different than another, yet each is just as effective in its county. This principle of the legislation—to give each county a chance to find the best way to solve its problem, before resorting to one statewide way—is being confirmed.

Some Weak Spots . . .

The field survey encountered some situations where LAFC performance appeared spotty. Generally these were in smaller counties with few LAFC-type problems, where limited activity provided no real opportunity for the commission to develop a "sense of role". Generally, also, these were in counties where up to date forms of local governmental organization, practices, and outlook have been slow to develop. LAFC, while hampered by this static atmosphere, may also provide an additional pressure for the modernization of local government.

Indications of weak spots included the following:

- Frequent unconditional approval of proposals which could have been analyzed and improved by LAFC.
- Frequent modification or disapproval of sound proposals, due to protests at the public hearing.
- Frequent LAFC voting splits along city-county lines.

While these weak spots are not chronic enough to question the LAFC concept, they do call for continuing attention. It may be expected that most of these situations will correct themselves as the LAFC sense of role becomes more fully developed.

A "SENSE OF ROLE" APPEARS TO BE A KEY FACTOR IN ANY LOCAL AGENCY FORMATION COMMISSION TAKING FULL ADVANTAGE OF ITS POTENTIAL EFFECTIVENESS.

This was found to be the most decisive single quality or measure affecting LAFC performance. It could also be called sense of identity, values, mission or purpose, and might be further clarified as a question each LAFC should ask itself: How does the LAFC mandate apply in our county—what effect are we trying to have, and what do we need to do to bring it about?

This means that LAFC must view itself as an individual intergovernmental entity in relation to the desires of the county government, the cities, or the districts. It is an institution with its own responsibilities under the law, with positive goals of its own, and with no vested interest in the status quo other than assisting cities, counties, and districts solve common problems in serving the people. The extent of this sense of role can be felt as each LAFC is studied on its home ground, and is also reflected in the treatment of proposals, the use of conditions, the influence of long-range considerations (studies, plans, criteria, future growth), the existence of LAFC objectives and guidelines, the quality of staff work, and local attitudes toward LAFC.

This sense is already strong in some LAFCs, and is growing in others as they gain experience and education, stabilize their membership and staff, face controversial issues, develop studies and plans, and so forth. In one smaller county, for example, LAFC initially thought it should not "rock the boat." Now it feels it should use, rather than avoid use of, the power it finds it has. This recognition of the extent of LAFC powers, by the local agencies as well as by LAFC, which did not occur immediately in some counties, is a major step in the development of a sense of role, a sense of working out the use of those powers.

Those LAFCs where this sense of role is strong are finding ways to influence events beyond the expectations of the LAFC legislation, as is noted at various points in this study. They provide signposts for the growing potential of LAFCs generally, and more than counter-balance the weak spots.

Contributing to a collective sense of role, as well as to the general effectiveness of LAFCs, have been several statewide efforts. These include the "Manual for Executive Officers" and the "Manual for Commissioners" developed by a group of LAFC executive officers and distributed by the County Supervisors Association of California. These documents contain general information, outlines of LAFC legislation, suggested forms and procedures, and other materials that are proving extremely useful to LAFCs, and to those having dealings with LAFCs, all over the State. The Assembly Interim Committee on Municipal and County Government, which initiated the various

L AFC legislative bills, has provided continuing information and assistance, as have the County Supervisors Association and the League of California Cities. Jointly the latter two organizations sponsor an annual statewide L AFC conference.

LOCAL AGENCY FORMATION COMMISSION COMPOSITION IS MOST WORKABLE AND PROVIDES A UNIQUE BASIS FOR COUNTYWIDE COOPERATION AND CITY-COUNTY COMMUNICATION.

The Commission

The basic principle of commission make-up—two county members, two city members, and a public member—appears to be successful. In addition to equitably solving the commission make-up problem, it has opened a new channel of communication between city and county officials, which has in turn sparked the formation of city-county coordination groups in several counties. In addition, city members on L AFC are gaining, through the proposals coming before them, a broader understanding of county and district problems. County members derive a similar gain respecting city and district problems.

Perhaps most important, in terms of L AFC potential, is that L AFCs provide a means for a joint city-county approach, and some of the tools to implement this approach, to the total governmental and growth problems of a county. The traditionally and legally separate jurisdictions of cities and counties had always been an obstacle to such an approach, even by planning commissions. L AFCs provide a mutually acceptable forum for hammering out agreements, largely as a result of the commission's composition. In addition, L AFC jurisdiction is that of the entire county, without distinction between city and county territory.

Several factors made for confusion during the initial period, and are now correcting themselves. Until the qualities desirable in commission members were demonstrated by experience, it was difficult to attract and make the best appointments. The short terms of many initial members, and a 1965 change in county member qualifications, made for rapid turnover. Today, most commissions are becoming stabilized, and appointments are increasingly well-suited to the job.

This goes hand-in-hand with growth of a L AFC sense of role, which in turn gives commission members a sense of direct responsibility to L AFC, aside from that to their county or city. In this connection, a minor problem the study was asked to review is the lack of a statutory definition of the conflict-of-interest circumstances which might disqualify a county member. The law automatically disqualifies a city member when an annexation to his city is before L AFC; for a county member it merely provides that he may disqualify himself. A discussion of the intent of this legislation with its author has clarified that it does not preclude a L AFC from including, in its own rules, the circumstances under which a county member is disqualified. This appears to be more workable than the alternative of attempting to handle this problem through additional legislation.

Commission Executive Officer

Most commissions meet monthly. The day-to-day work of L AFCs—which, in addition to the staff review and report on each proposal and other procedural routine, may include a great deal of liaison with local agencies and the public, as well as the general study of L AFC problems—falls almost entirely on the executive officer. His competence is critical to L AFC success.

Though the law permits appointment of an entirely separate executive, it implies that normally the executive and other staff tasks will be performed by county officials who also have other responsibilities. To date, as indicated in the summary material (see Appendix D) all LAFC executives have simultaneously held other county jobs. There is wide diversity, however, in the background, experience, personality, and so forth of these 57 people.

Initially the job sometimes went to whomever the county felt was most available, though he may not have sought it nor been the best choice. Fortunately, in many other counties there were people eager to take the job, because they appreciated its potential. As LAFCs grow in importance, their commissions are increasingly asking: "What kind of guy do we want in this job?", and are increasingly making their own appointments, at the same time realizing that their relationship to their executive should be a direct one, not indirect through the county, even though he is also a county official.

Counties are generally cooperating by making additional funds or staff time available, often to the extent of reducing the other assignments of the LAFC executive. However, many LAFCs would benefit from more executive staff time.

Other Staff Assistance

LAFCs can make various arrangements for assistance, and can call on all local agency officials for information. In practice there is general reliance on the various county departments, in particular the surveyor or other official routinely used for the legally-required boundary review of each proposal. County legal counsel is also provided, and initially offered overly cautious or inconsistent advice in a few instances. The work of LAFC counsels, together with court interpretations of LAFC authority, are now building up a statewide body of doctrine that is another factor contributing to the increasing strength of LAFC.

LAFC use of other staff assistance in reviewing proposals varies widely with local conditions. The smaller counties usually "keep it simple", the LAFC executive informally checking with certain county officials. In larger counties, detailed forms may go to many departments, requesting data, analysis and recommendations. So far only Los Angeles has a full-time separate LAFC staff to assist the executive. Forms, procedures, and other technical aspects of LAFCs are similarly varied.

In general, the more inter-play that can be created by LAFC staff assistance, the better. That is, inter-play with city, county and district planners and engineers not only familiar with, but currently working on, other aspects of development; inter-play with the people reviewing subdivisions; inter-play with staff committees who also advise the county and cities on other matters; and so forth.

III. ENCOURAGING THE ORDERLY GROWTH OF LOCAL AGENCIES

Most LAFCs favor the expansion of cities, rather than the use of districts or other devices, to serve urban areas. However, by 1963 many counties had disorderly patterns of cities, districts, unincorporated urban communities, developments, and boundaries. LAFCs are not empowered to correct many of these past mistakes, nor to compel the annexation of urban areas to cities. However, they are finding ways to ameliorate various factors in this picture.

City Growth and The Urban Fringe

Urbanization outside existing city boundaries is made possible where sanitation and water supply are private or are available from districts, and where other service needs are not pressing, or are adequately provided by the county and districts. Once inhabited, these urban fringes seem to develop a resistance to annexation.

Generally where cities have been used to the exclusion of districts, city boundaries are orderly and include all urban development. Where districts have been widely used, often preceding cities and in any case competing with them in the provision of essential urban services such as sewers and perhaps water, development is scattered and so are city boundaries. These cities had to take any annexations they could get, often motivated by development "deals", and leave unincorporated pockets behind.

Counties are now finding devices for virtually requiring annexation of these areas in order to develop. General policies, the subdivision review process, mandatory sewer connection ordinances, non-urban zoning such as a 2½ acre minimum lot size in the unincorporated area, minimum county service levels, and high unincorporated urban area taxation, are among them. However, the fringes persist in some parts of the state, particularly where there are large urban service districts which permit development without a district annexation proposal coming before LAFC, or where a rigid structure of districts has resisted change, including political opposition to city annexation or incorporation.

Another negative factor is the limits and peculiarities of the city annexation procedure set forth in State law. Generally these laws include a variety of restrictions to protect against abuses and to protect the rights of local residents and land-owners. But they also lead to small, piecemeal annexations with boundaries designed to include proponents (often developers) and avoid opponents (often residents).

LAFC Impact

It was generally hoped that the LAFC approach would facilitate city growth, and progressively make feasible the transfer to LAFC discretion of many of the annexation matters previously subject to statutory restriction. Both are happening. The statewide data show that since LAFC the rate of city growth, measured in terms of annexed population, has increased noticeably. A greater proportion of the state's population now lives in, and is served by, cities (See Appendix B). A factor contributing to this trend has been the growing desirability of public sanitation in many areas, abetted by FHA policies. At the same time, the number of separate annexations has decreased, demon-

strating that they are becoming fewer, larger, and less piecemeal. Meanwhile, the state-wide figures show a decline in the number of new districts.

Furthermore, the first statutory transfer of discretion to LAFCs has already taken place, in the form of permitting them to waive the restriction against annexations which created unincorporated pockets. This study finds that LAFCs have generally been extremely careful, conscientious, and effective in the use of this discretion.

How have LAFCs increased and improved City annexations?

Some examples from around the State:

- By expanding annexation boundaries, where the city was reluctant to do this, or doubtful of its success. In one county, if too much opposition is later apparent, LAFC reconsiders the boundaries.
- By requesting cities to develop broad annexation areas and programs, lessening inter-city disputes and district frictions, and making more reasonable the approval of necessarily piecemeal annexations, and expediting the processing of all proposals.
- By holding up annexation and incorporation proposals until areawide questions could be resolved and mutual agreements worked out between the city and local residents, neighborhoods and districts. For example, a city commitment to maintain the suburban character of a partially developed area resulted in the annexation of the entire area, rather than piecemeal controversial annexations by developers.
- By the LAFC “seal of approval” in itself. This can help reassure residents in the annexation area that the proposal is a sound one, having been reviewed and perhaps modified by a neutral body with professional staff.
- By requiring that an area which wants to annex to a district for some essential service, usually sewers, must also annex to the adjoining city to gain the full range of urban services. This assumes a cooperative agreement between the city and district, often aimed at eventual merger. LAFCs can stimulate such agreements.
- By coordinating annexation with the withdrawal of the territory from overlapping districts. This is being done under the District Reorganization Act of 1965. Previously, many annexations into special district territory (where the city and district both levied taxes for the same service, such as parks or sanitation) were discouraged because there was no assured method for withdrawing the territory from the district and avoiding double taxation.
- By providing a means of smoothing out the many service and financial problems that arise as cities annex into the territory of districts engaged in the same services as the city, including fire protection, water, sanitation, and parks. LAFC can request both agencies to do this, can place relevant conditions on the annexation, or can ask for proceedings under the District Reorganization Act. The result may be joint service agreements under which the district serves city territory, the city serves district territory, double taxation is avoided, or the progressive absorption of district service areas by the city is planned.
- By simply denying the formation or expansion of districts in areas LAFC feels should preferably be annexed to, and served by, cities. A question here is when does a fringe, through distance or size, become a separate community. LAFC can better decide this issue if it has already adopted community criteria or set up long-range city and district service areas.

Next Steps

LAFCs are demonstrating that they are not only a safeguard against undesirable annexations, but also a positive tool for solving a wide variety of annexation problems, as the examples above indicate. To carry out their legislative mandate, many of them are becoming conscious of the need for further improvements in the annexation statutes,

transferring to LAFC and local agency discretion more of the matters still under state-wide legal constraint. There are too many situations where LAFC is still, unavoidably, "just one more negative step" in the annexation process.

Among the possibilities, many of them a subject of legislative effort prior to LAFC and merely repeated here, are:

- Permit LAFCs to approve city initiation of large inhabited annexations (these are too difficult to initiate at present);
- Permit LAFCs to expand the applicability of the uninhabited annexation proceeding (this is the easiest of the present alternative proceedings);
- Permit LAFCs to approve use of a "100% petition" (this would speed up some annexations, one of the deficiencies of current law);
- Permit LAFCs to waive all statutory definitions of contiguity (these sometimes prevent desirable annexations);
- Permit LAFCs, under appropriate conditions, to approve the annexation or transfer of small problem areas without local area approval;
- Permit LAFCs to waive the one-year time limit on a second annexation effort of the same territory (this would encourage cities to enlarge annexations);
- Generally simplify and speed up the annexation process by its further integration with the LAFC process.

Special Districts and Their Proper Use

Districts have been widely used and abused, praised and condemned, in California. Their role varies "based on local conditions and circumstances," and is a particularly appropriate subject for the LAFC approach. In addition, the number of districts and district formations exceeds that of cities so that basic decisions concerning districts are more frequently before LAFC.

It should be noted that the issue is not always cities *or* districts, or incorporated *versus* unincorporated status, since many districts serve both cities and other areas for such urban services as water, sanitation, fire protection and parks. In these cases the cities simply stay out of these fields, either because the district was there first or because local conditions favor a service area larger than cities. Increasingly, also, either traditional services or new needs are tending toward a semi-regional base—water importation, sewage disposal, smog control, transit, parks, and so forth. Regional devices, either districts or other arrangements, often governed by cities and counties, are hence likely to increase.

Each LAFC is working out its own policies and solutions to these problems—which services should be provided by cities and which by districts—and the consequences this has for the size, number, boundaries, financial resources, future growth, and intergovernmental relations of each local agency or type of agency. On a less complex level, LAFCs are faced with decisions on proposals to form new districts or annex to existing ones, as well as opportunities under the District Reorganization Act to influence changes in the present pattern of districts.

LAFC studies of some of these questions will be noted in a later section. Some of their actions have been the following:

New Districts and Annexations

- Conditioning formation approval on dissolution, as soon as the district's purpose (usually bond financing) had been accomplished.
- Conditioning formation approval by specifying form of governing body, limiting service area, services, and taxes.

- Looking into alternate district types, either generally or in connection with a particular proposal. A district type is often proposed for expedient reasons such as ease of formation, governing body, powers, financing, and a specific function, yet once in existence must abide by all the other, and usually inflexible, statutes for that particular district type. LAFCs can evaluate this long-term impact and push the best alternatives.
- Requiring multi-purpose districts over single-purpose, in order to provide for long-term needs.
- Requiring simultaneous annexation to several districts, to assure a fuller range of services.
- Requiring demonstration of the public need and support for the proposal.

As an alternative to district formation or district annexation, the possibility of a city extending individual services (e.g., water supply or sanitation) outside its boundaries should not be overlooked by LAFC. This can be more flexible than the permanence of a district, can provide functional unity within the area for the service in question, and in many cases can serve as a prelude to city annexation.

District Reorganization Act

- Generally prompted cities and districts to look at, and correct, functional and geographic overlaps.
- Dissolved dormant districts.
- Initiated reorganization studies, sometimes by exerting influence on annexation approvals.
- Assisted cities to merge with districts, or take over their government.
- Encouraged cities to meet district service standards, as a prerequisite to transfer of service responsibility from a district to a city.
- Prompted and supported county take-over of a district or group of districts covering virtually the entire county and closely related to other county activities.
- Approved a variety of reorganizations, involving both geographic and functional consolidation.
- Begun to study the problems of local governmental structure in vacation-resort-retirement areas, which are characterized by low density, small service areas, absentee ownership, reliance on property taxation, and a close relationship to planning and development decisions.
- Although some LAFCs would like legislative authorization for LAFC to initiate reorganization proposals, many are usually able to find ways to get the presently authorized agencies, particularly the county, to initiate the proposals desired by LAFC.

General Guidelines

In reviewing city and district formation proposals, LAFCs have used such criteria as: community identity; socio-economic viability; fiscal balance; boundary cohesiveness; existence of a strong core; and the ability to offer and finance needed new services, now and in the future.

Some LAFCs adjust their review of proposals to the type of proposal in question. For example, city annexations may be expedited and the "protest" element of public hearing minimized, while certain district proposals may be treated in an opposite manner. Proponents may be encouraged to informally check their proposals with the executive officer in advance, so that they can be improved prior to formal submission, and possible conflicts ironed out. While adding to initial staff work, this can often save later review and hearing time.

IV. LAFCs AND PLANNING AGENCIES— HOW THEY RELATE

A major purpose of the survey is to explore the relations between LAFCs and local planning agencies—actual, potential, and inherent.

It is to be recognized, for example, that where a LAFC approves an incorporation or annexation proposal it is, in effect, making a decision which affects the land uses and developing character of the environment. Does the LAFC actively involve or consult with the planning agencies of the affected jurisdictions?

On the other hand, local planning agencies make judgments and recommendations concerning the location of new subdivisions which will require the provision or extension of governmental services—by a city, the county, one or more special districts, or a combination of all three. To what extent is the LAFC consulted or advised of these actions?

GENERAL PLANS AS LAFC GUIDES

Most county general plans do not outline the governmental machinery required for their implementation. One reason is that implementation will require local agencies other than, and largely beyond the control of, the county. Another is that many county plans seek a regional or coordinative character, deliberately avoiding "local details" aside from a general delineation of community or city planning areas.

City general plans, while often limited by non-city provision of some urban services (e.g., schools, water, sanitation), usually go farther into implementation, frequently including capital improvement programs, and occasionally efforts to guide, in time and place, various stages in the city's anticipated future growth.

A common feature of city plans, except where cities can no longer expand, is the concept of the city planning area. This covers the outside fringes which the city expects to annex, and in any case whose development the city wants to control, or at least influence. By obtaining county recognition of this planning area, and county adoption of the city plan for it, a lot can be accomplished in this direction. Cities in open country, incidentally, often establish planning areas several times larger than the existing city.

There are also the plans of special districts (or of the county) for water, sanitation, flood control, public transit, and other district functions. They are frequently of a regional character larger than the cities.

All of these plans have been, and can be, useful to the LAFC decision-making process. Some examples:

1. A county plan clearly setting aside non-urban areas (agriculture, forest, green belt) is a basis for LAFC disapproval, out of hand, of any proposals to include such territory in urban service agencies and taxation. Protection from the latter, in turn, encourages continued non-urban use. This is especially helpful in protecting prime agricultural areas from urban sprawl. Unfortunately, most county plans and zoning policies do not adequately define and protect such areas. Even so, LAFCs have sometimes on their own acted to do so.

2. County and city plans clearly setting aside urban areas focus attention on how these areas are to be governed, and outline the scope of long-term problems. Where a city already exists, it can be recognized as an urban area's primary governmental agency, and special districts can be disapproved by LAFC, or required to coordinate with city expansion. And, conversely, the city can be required to coordinate with those districts into whose service area it is expanding. In other areas, LAFC can deny the piecemeal formation of independent single-purpose districts and encourage only flexible multipurpose districts or county-controlled service devices, as an interim form of local government.
3. Tight and coordinated county and city plans and development standards can minimize the land use question, and developer "deals," in city annexation proposals to LAFC. This also cuts back the proposal of cherry-stem annexations often required by such deals. Similarly, when a city proposes an annexation running outside its own planning area, LAFC is in an excellent position to either disapprove it or ask revision of the city general plan.
4. Plans for district facilities and organization can guide LAFC in district formation, annexation, and reorganization proposals, and can diminish city-district inefficiencies as cities expand and assume district services. Some of these plans, which are in some cases prompted by LAFC, include provisions for joint contracts to cover service gaps.
5. Plan implementation elements—public facilities, governmental structure, financing, timing, development controls, and so forth—are often of direct use to LAFC.

General plans vary widely in scope and quality, and in adherence by their respective governing bodies. Without trying to evaluate existing plans in these terms, this survey finds LAFCs generally use them where they exist, and to the extent that their nature permits. Executive officers, particularly, welcome guides of this sort, which can substantiate LAFC decisions and also afford a means of placing many otherwise routine, almost meaningless, small city and district annexation proposals in a broader context.

In return, LAFCs can have an impact on a general plan. In some cases, approval of a service district making possible the development of an area has already led to county general plan revision. Though not yet encountered, it is also conceivable that LAFC analysis of the governmental service problems implicit in a proposed plan could lead to appropriate plan changes. Similarly, a firm LAFC policy of not permitting establishment of needed urban service agencies in an area general-planned for urban development could force a plan change.

Many counties and cities do not have adopted general plans, though a large number of general plan studies are currently underway, particularly at the county level as a prerequisite to federal-state aid programs. In some cases plans exist, but have not yet been adopted, or won't be in their present form. In others the adopted plans are clearly obsolete, inadequate, or too "general." LAFCs still attempt to use such plans, at least informally, where possible. A few of the large LAFCs in this predicament talk of developing their own general plans. Most LAFCs can encourage and request local agencies to develop better plans.

INTERCHANGE THROUGH THE PLANNING PROCESS

Both planning and LAFC are concerned with "concepts of the community," planners to assist in development decisions and LAFC because the successful operation of local government frequently depends on the appropriate physical base for both political feasibility (workable local representation) and service efficiency.

Some of the connections, actual in some counties and potential in most, are:

Review of LAFC Proposals by Planners

LAFC executive officers ask the assistance of other county departments in reviewing proposals. At a minimum this will include the legally-required boundary review by the

appropriate department. In most counties the proposals are reviewed by several other departments, including the planning department where there is one. (A number of smaller counties still have no planning department.) It may be discretionary with the executive officer which proposals are reviewed by other departments.

This review varies in method and scope. Usually a form accompanies a copy of the proposal, asking for certain factual data, or the verification of the factual data in the proposal (e.g., land area, population, topography, land use, anticipated growth), and asking for analysis (as to boundaries, impact, etc.) as well as comments or recommendations. With some LAFCs, the form does not go beyond the factual. Whether recommendations should be made is sometimes left to the planning department's judgment or initiative.

As a consequence, planning's review may result in a routine sentence or two in one county, and an incisive several-page report in another, perhaps recommending modification or disapproval due to small size, illogical boundaries, splitting of natural areas, inclusion of only certain land uses, noncompliance with planning and zoning, or current subdivision activity. Planning also often prepares the graphics for LAFC meetings. In one county planning handles the field inspection of all proposals.

In some counties the review is verbal rather than written. It may take the form of a discussion of all, or some, proposals between the executive and the planner. It may be a committee meeting (executive, planner, public works, assessor, etc.) where all proposals on the next LAFC agenda are discussed.

However the review is made, it is then up to the executive to make whatever use of it he chooses in writing his staff report and recommendations to the commission. In a few counties, with or without the above review, the county planning director is asked to attend LAFC meetings, participating to the extent desired by LAFC. In some counties which have not involved planning in the review of proposals, the planning director has nevertheless become aware of the planning significance of some LAFC proposals and has shown up at LAFC meetings on his own.

Generally, assuming an adequate planning department, the referral of all proposals is desirable both to departments of the county and affected cities, leaving it to the planning agency's discretion which ones are reviewed and to what extent. This does not necessarily require written forms and can, for example, be accommodated by the committee meeting approach. Planning personnel are particularly useful on proposals concerning large areas, land use changes or development problems, poor or inter-city boundaries, and the like. Together with public works people, they can often provide a useful history and current evaluation of the development and developers in various areas. As LAFCs develop a stronger and more definite sense of role, they are likely to find more situations in which to use planners and other professionals.

Some LAFCs also use city planning departments in reviewing proposals, while others have overlooked this possibility. City planners frequently prepare a city's annexation proposal in the first place. But the proposal format may not provide a place for full planning data and analysis. Of course, a city planner might be regarded as biased in reviewing his own city's proposals, but can still provide valuable background information, as well as clarify any planning issues involved. He can also be of assistance on special district proposals involving territory within the city or its planning area, as well as those of other adjacent cities.

City planning commissions are still required, under the law, to report on each proposed annexation which includes 12 or more registered voters (inhabited proceedings). However, this report is not required by law to be made before the LAFC hearing, so LAFCs should coordinate the timing to make use of this report's recommendations.

Subdivision Review

Subdivision review does not necessarily involve the LAFc. Tentative subdivision maps and other development proposals usually go to city and county planners for initial review and approval. Conditions for approval may include the specification of various public facilities and services, and how they are to be provided. This is a more complex problem in a county (unincorporated area) subdivision than in a city, though even the latter may require special districts for some needs. If annexation or special district formation is required for development, then a proposal must be made to the LAFc as a separate but directly related step.

Catching development at this early, detailed, and vulnerable stage permits the correction of conflicting district boundaries, the annexation to or formulation of cities or districts, and attention to the entire element of governmental structure for the subdivision or development. This is a point where planners and their governments can require appropriate structural, including boundary, changes in a subdivision as a condition of approval apart from LAFc action. Also of direct interest to LAFc, cities and counties can also require changes in the content of the subdivision or development, if this content would cause difficult governmental problems.

In effect this is a positive power, rather than the negative one to which LAFc itself is usually restricted, particularly since developers seldom balk at structural requirements. It also permits anticipation of future problems, such as the need not only for a governmental device to landscape a proposed subdivision park, for example, but also to require the subdivider to put in the park water system and grading as he develops, rather than leave this as an expensive governmental problem later on. It might be emphasized that this has been a frequent weakness in the approval process for subdivisions, and one which LAFc participation should improve.

The question of how far a county or city planning agency can go in requiring annexation to a specific city or district as a condition of subdivision approval is sometimes raised. This, still, is apart from LAFc. However, without specifying agencies, conditions can usually be worded so as to leave little alternative to the one desired. In many counties this sort of thing has been going on for a long time apart from LAFc and now the stipulation of governmental structure as a condition of subdivision approval may also have to be submitted to LAFc, depending upon the kinds of governmental changes the subdivision involves.

Thus some routine close coordination between LAFc and subdivision review has been and can be highly useful to both in fast-growing areas. This can take the form of using the same personnel on both staffs, a representative of one unit serving on the other, or a procedure for either referral of tentative subdivisions to LAFc staff or review of subdivisions by planning staff using a LAFc check-list and referral where indicated. Some LAFcs are starting to do these things. In several counties coordination occurs automatically because the LAFc executive or his assistant also wears another hat which places him on the subdivision review committee.

Capital Improvement and Development Coordination

Capital improvement programming is an optional activity of local government, occasionally given to the planning department or administrator. The State Planning Law also charges the planning commission, where there is a general plan, with public works coordination and the mandatory referral of certain site acquisitions. Both are related to capital improvement programming.

The over-all subject has LAFc implications at two points. One is the coordination, or orderly extension, of public facilities. Typically these involve several jurisdictions within a given area. Even within or adjacent to a city, roads, sewers, water, drainage, schools,

parks, fire stations and gas lines might each be under a separate agency, usually a district. The coordinative difficulties are well-known but have been partially solved in some areas.

The second is the coordination of public development (that is, the above) with private development. The latter is influenced by availability of the facilities noted, which may require annexation or the formation of new agencies, and by planning, zoning and subdivision approval—responsibilities of planners and their cities and counties.

The objective is to facilitate the orderly growth of a particular section of the community at a particular time, meanwhile presumably discouraging growth in other sections—to foster logical, rather than indiscriminate, growth. For example, one part of a city may have excess capacity in the local school, or in other public facilities, while other areas are at capacity. So development should be concentrated in this area for the time being. Among the governmental tools available are: a) Simple denial of service to development elsewhere, if something essential like a sewer line is overloaded and cannot immediately be expanded; b) Zoning and subdivision controls, such as a phased rezoning of land from non-urban to urban use to accommodate several years' advance demand without permitting sprawl; and c) LAFC, if annexation or a district is needed for development. LAFC could condition proposals on the provision or coordination of certain facilities, or on advance planning, zoning and subdivision actions by the county as well as city; it could request or require comprehensive plans from the agencies involved; it could deny proposals where development is not currently desired; and it could approve proposals in the desired area, even though they fell below normal LAFC standards as to boundaries and the like.

This approach is not applicable to all situations, and few LAFCs have so far used all of it in any situation—or perceived their role in this process—but many are using pieces of it. It could strengthen an area of planning that has been weak due to lack of tools.

Pre-zoning

LAFCs may consider the planning and land use implications of proposals. If city and county planning is detailed and coordinated, this is seldom a major issue in an annexation, though there may be legitimate minor differences. Even where city and county general plans are incomplete, city-county planning and zoning coordination is frequently good. On the other hand, lack of planning and zoning coordination among jurisdictions is a problem constantly before some LAFCs.

Under a recent law cities may pre-zone areas considered for annexation, and LAFCs are increasingly requesting this of annexation proposals prior to LAFC decision. The LAFC purpose may vary:

- To assure no, or only certain, zoning changes.
- To find what the zoning will be, so that LAFC can evaluate the proposal generally, and its public service impact particularly (for example, districts may be affected).
- To clarify the issue for proponents and opponents.
- To put the city on the spot before annexation, when it contemplates a controversial rezoning after annexation.
- Generally, to induce cities to plan their expansion areas, and to encourage better city-county coordination.

Zoning

This itself can be affected by LAFC actions—that is, by the extension of governmental boundaries and services aside from city annexation. Many counties zone broad areas for non-urban uses, largely because lack of sewers, water or drainage makes their development impractical. Parenthetically, prior to LAFC, this practice and its concomitant,

the permitting of development in such areas merely upon provision of the needed services, led to a great deal of unanticipated and scattered development, made possible by numerous small districts.

These counties are continuing this practice under LAFC, leaving urban rezoning in certain areas dependent primarily upon the provision of urban services, normally through the formation of district devices. LAFC can rationally shape and structure these devices. Territory can be added to, or taken from, proposals to provide a better development base. Numerous small or single-purpose districts, and the accompanying scatteration, can be disapproved. This could take LAFC far into the planning field, though it could also give planners a firmer base for their job.

INTERCHANGE OF PEOPLE WITH PLANNING BACKGROUND

Large numbers of people have been engaged in planning, as both professionals and laymen, and then moved on. A number of professional planners are concurrently serving as LAFC executive officers, carrying back to their planning roles and commissions the activities and problems of LAFC. Former planners are in county administration, and in the latter role staff LAFC. Former or present city and county planning commission members are now councilmen and supervisors, or public members, sitting on LAFC. Former LAFC members are probably migrating back to planning commissions.

Planners attend LAFC meetings, and LAFC executives have attended planning commission meetings. One planner does all the field work on LAFC proposals, accompanied by a committee of his planning commission.

The potential for joint LAFC-planning activities in the field of research, studies and plans will be set forth in the next section.

V. LAFC STUDIES, PLANS AND GUIDES

THERE IS A BASIC NEED FOR LOCAL AGENCY FORMATION COMMISSION COUNTYWIDE GOVERNMENTAL STRUCTURE AND SERVICES STUDIES.

The Council suggests that these governmental structure studies be performed by LAFCs in cooperation with city, county, and district planning staffs. These LAFC studies should be a regular feature or element of the countywide general planning process.

Section 54774 of the Government Code states:

“One of the objects of the local agency formation commission is to make studies and to obtain and furnish information which will contribute to the logical and reasonable development of local governments. . . . Such studies may include but shall not be limited to inventorying such agencies and determining their maximum service area and service capacities the commission may ask for land use information, studies and plans of cities and counties and may cooperate with the county planning commissions.”

The survey found considerable activity being initiated under this mandate. It is noted that LAFC studies can have a number of collateral benefits. They develop the commission's activity and interest, and contribute to a positive sense of role. They provide a context and significance to the many small, routine annexation proposals which take up most of the time of most commissions. They assist the executive officer in spotting and straightening out potential problems in advance.

What Has Been Done

Studies and staff activity useful to LAFC preceded its creation in most of the large, and some of the other, counties. Unusually broad county general plans, analyses of service needs, metropolitan problems, special districts and their reorganization, and city-county relations are among them.

Many LAFCs have made their own staff studies, ranging from analysis of a major proposal before LAFC to a generalized treatment of a common service or structural problem. Included have been transit service areas, water agency overlaps, lighting district consolidation, fire service areas and consolidation, city versus regional provision of services, the boundaries or service areas of all local agencies, and city expansion areas. Some LAFCs have requested plans, service area projections, and other information of all local agencies as the first step in developing a LAFC plan. A few LAFCs have had outside consultants prepare a total analysis of an unincorporated area, or countywide graphic materials for LAFC hearings, showing agency boundaries, facilities, service areas, topography, and the like.

Formally or informally, some LAFCs are studying the need or opportunity for eliminating city-district overlaps, the dissolution of dormant districts, district consolidation and reorganization, or the merger of districts with cities, including the new subsidiary district concept, or with counties where the district or districts are virtually countywide and the service in question lends itself to county administration. As occasion arises, these LAFCs are then able to push the implementation of various aspects of such a program.

What Is Contemplated

In terms of likely future studies, most LAFCs feel a need to study districts and their reorganization, or ultimate local agency service areas. Many are also interested in a land use inventory, governmental inventory and analysis, analysis of existing city boundaries, and LAFC policy development studies to implement the foregoing. Some of the above studies have already been authorized, usually as part of a broader federally-aided county planning or transportation study.

Several LAFCs want to make their own studies with federal financing. In some cases the other phases of a possible broader study have already been done, or are not desired by the county departments concerned.

In others, LAFC prefers its own study in order to directly control it, identify it with LAFC rather than the county, and avoid delays. LAFC eligibility for federal assistance is now in the process of being clarified.

In other cases, study needs have not yet been put in specific shape by LAFC, or have not yet gained support from the local agencies involved, including district participation and county financing.

Most contemplated LAFC studies do not overlap planning or other established study fields. The implementation of the resulting plans, policies and programs, however, might well overlap many other fields and agencies outside LAFC. They include county, city, and district governing boards and policies (for example, a strategy to eliminate unincorporated pockets), as well as such functional fields as planning and public works. This problem of implementation is not yet clear enough to permit analysis, though some of LAFC's tools and constraints have already been suggested in this survey report.

In terms of related studies, it should be noted that in a number of counties local communities are now getting into new federal programs—in economic development, housing and urban affairs, and agricultural development—which makes grants available for public facilities if there is a comprehensive local plan. Since governmental devices will be needed to install and operate these facilities, LAFC is likely to become involved.

The Potential

Two specific possibilities noted during the study are (1) the concept of the urban expansion zone and (2) the activity of countywide local agency research and study coordination. There are others as well.

1. *The Urban Expansion Zone*

Among the planning tools LAFCs are beginning to develop is the "expansion zone", "sphere of influence", or "boundary agreement" concept for cities. Most of the large, and some smaller, LAFCs are engaged in this effort in some form. Initially it may be intended merely to avoid competing annexation proposals, or to ascertain city planning areas, but its potential goes much further, coming close to a joint LAFC and planning agency general plan. A complete approach might include the following (a synthesis of what is contemplated in San Bernardino and San Mateo Counties):

Agreement as to city areas, a joint product of LAFC and planners, encompassing the approaches and objectives of both (virtually identical, in any case). The areas could actually be worked out by the cities, the county, LAFC, and the respective planning commissions to serve as a guide for their respective activities.

In some cases the city areas will include a great deal of surrounding territory, or will tend to divide up the entire area, assuming everything will eventually be urban. If greenbelts or buffers between cities are desired, they should be protected from this tendency.

In addition to the long-term areas of present cities, the areas of future cities and unincorporated centers could also be included, if needed. A frequent advantage of the areas (as well as of L AFC itself) is to discourage development deals and inter-jurisdictional competition.

Within such areas, intensive planning of development and government can then take place. On the development side, planning, zoning, subdivision standards, etc., for the unincorporated portion can be coordinated with, and perhaps even turned over to, the city. In the absence of a city they would be tailored to the local situation.

On the governmental side, extension of services by, and annexation to, the city would be staged into the balance of the area. This would include services via service areas or joint district agreements, if not by the city, then by coordinated temporary devices; programming of capital improvements (roads, utilities, parks, etc.); and, an annexation program including timing devices, and so forth. Piecemeal annexations might then appear more reasonable, as they always do when they are part of a plan. Such a plan is more feasible where no competing districts exist, or where they can be coordinated with the plan. In any case, conflicting district annexation and formation proposals would be denied by L AFC. Again, in the absence of a city, the plan would aim at an appropriate long-term community governmental structure.

An optional related element could deal with regional services and district reorganization.

2. Local Agency Research and Study Coordination

In large counties with aggressive L AFCs and complex governmental and growth problems, L AFCs and planning are beginning to be regarded as part of the same process. L AFCs can already control most of the development in a county, making unavoidable the question of what kind of future communities are desired. Even when making purely governmental structure decisions, L AFCs need a broad range of information in the fields of land use, socio-economic characteristics, housing and public service needs, and so forth.

Some of the relations between L AFCs and planning have already been noted, particularly with respect to the review of current proposals. There is an additional potential for a general continuing relationship as L AFCs move farther into the field of studies and plans.

Planners do research and have access to information of continuing value to L AFC. In addition, planners have developed studies and plans—or hope to—which overlap potential L AFC fields. Looking at the entire spectrum of research and studies done and still needed in most counties, there may well be some areas best suited to planning, others to L AFC, and still others to a joint approach. Among the latter, an example is research into the most efficient size for various jurisdictions, services, time stages, and other conditions.

In addition, while most L AFCs work closely with county planners, they have yet to make full use of city and district planners, and hence to develop the unique L AFC potential for integrating countywide expertise, views and jurisdictions into a total local governmental approach and program.

What is suggested here is that local officials consider pulling together a countywide working arrangement of L AFC, local planning agency, and other city, county and district officials to look at the entire spectrum of the research and studies that have been done and those that still need to be done, and then to coordinate, on a continuing basis, both the use of what exists and the acquisition of what is needed.

Examples of what has already been done by some LAFCs in this direction include:

- a. Advisory committees to LAFC exist in a number of counties, with a composition similar to that of the old boundary commission—planning director, public works director, assessor, and, in one county, many more department heads. In addition to advising LAFC, either periodically or on each proposal, the committee may also advise the county on other matters such as subdivision review.
In one county a LAFC advisory committee has just been formed, comprising the county planning and public works directors, representatives of water, sanitation, and other utility districts and the utility companies. It is to work out agency service areas, as well as to consider other problems, the need for studies, and so forth. Another LAFC has established two committees, one representing cities and the other districts, to assist in developing LAFC guidelines and on other matters.
- b. A large LAFC has just established a study committee, made up of city and county planning and administrative people, to meet periodically and discuss common matters. So far, this is directed more at planning concepts and approaches than at studies.
- c. The executive officer of another large LAFC meets regularly with the county's regional planning staff to develop a joint approach toward policies, studies, etc.
- d. Several LAFCs take advantage of city planning departments and data in reviewing specific proposals or general problems. Somewhat similarly, where city-county planning activity is closely coordinated—often including a working committee—there may be byproducts, such as studies, useful to LAFC.

VI. LAFCS AND THE REGIONAL PICTURE

SOME LOCAL AGENCY FORMATION COMMISSIONS ARE DEVELOPING A MULTI-COUNTY REGIONAL VIEWPOINT THROUGH THE NATURE OF THEIR CONCERN FOR REGIONAL PROBLEMS.

Do LAFCS relate regionally? The survey explored this question, and finds that "regional" has two different, though occasionally inter-connected, meanings in the field.

"Regional" As County or Area Planning

This definition is relevant to planners and to the discouragement of urban sprawl in some counties. It is similar to the city-county planning and zoning coordination discussed earlier, but emphasizes the total county area, as against the interests and territory of the jurisdictions which divide it up. It assumes that if there are various agencies (i.e., cities and counties) in control of the development of various portions of an area, each will have different standards, each will compete for the most lucrative development (e.g., shopping centers), each will be guided by its own, rather than the area's interest, and developers will take advantage of any weaknesses in this divided front. What land use one jurisdiction permits may then have a detrimental impact on what the others can permit.

As a solution, some planners urge a "regional" approach to development—a single county-wide planning program, uniform standards for zoning, subdivision and building activity. This may be advocated by cities, where county standards are low, or the county is not providing regional, as opposed to unincorporated area, facilities. Some county planners feel the county takes a regional land use view while the cities do not, and urge greater county control of general planning throughout the county. They point out that LAFCS can serve as a back-up for county general planning.

"Regional" as Multi-County

Regional areas are normally thought of as multi-county aggregations related to physical problems (smog), socio-economic needs (rapid transit), or used as the geographic base for certain districts, state boards and studies, as well as for describing such metropolitan areas as those around Los Angeles and San Francisco. In the latter two cases, voluntary associations of counties and cities have formed to deal with a multitude of common problems, some of which might otherwise force the creation of new regional agencies independent of, and not initiated by, the cities and counties.

These areas are extremely broad geographically, varying with the particular need at hand, though once established a regional political-governmental mechanism might deal with a variety of needs only loosely related geographically. In any case these are, by definition, needs exceeding a county's boundaries and therefore exceeding the ability of traditional local government, in which the county is the largest possible unit, to meet them. That is why they are called regional.

The use of regional special districts to meet such needs is limited by conflicts with the existing governmental structure, by the danger of proliferation as each new need arises, and by their unsuitability to some needs. Among the latter are ad hoc problems that may overlap county boundaries and require no more than temporary technical and policy coordination, or the extension of an existing agency across county lines. Examples found

during the study included water supply, sanitation, soil conservation, irrigation, mosquito abatement, and the like.

LAFCs are created in each county with responsibilities centered in their county. They can cooperate with each other in the county-by-county implementation of a regional plan, though no region has yet adopted such a plan. If regional planning by Southern California Association of Governments or the Association of Bay Area Governments, for example, produced features which fell within LAFCs sphere, each LAFC—and all of them jointly and voluntarily—could and very probably would assist in its implementation. As such plans evolve, therefore, it will be desirable for LAFCs to become involved.

Whether LAFCs themselves should jointly undertake regional studies and plans is an interesting question for the future. For the present they have not yet done the studies they would like to do, and need to do, within their own counties.

Meanwhile, the study did find the following LAFC practices with respect to regional areas:

- They can have a regional “awareness” by keeping in touch with regional problems, activities, and organizations. This is done through commission members active in regional affairs, through monitoring and reporting by the executive officer and county planning department, and similar informal means.
- Virtually all LAFCs cooperate with adjacent LAFCs. This is frequently triggered by a district proposal crossing county lines. The “principal” LAFC may refer the proposal to the second LAFC, or a joint meeting may be called. LAFCs with persistent cross-boundary problems can hold general joint meetings from time to time.

APPENDIX A

CASE STUDIES

Establishing City Expansion Areas

1. In a large county, a six-square mile area had failed to incorporate separately and was now the target of aggressive annexation preparations by the three surrounding cities. When one of them proposed a small annexation in a part of the area sought by all three, LAFC realized a general solution was needed before things became further complicated.

It delayed the annexation, asking the three cities to mutually work out the ultimate boundaries of each in this area. The city planning directors, who were given the job, were unable to reach agreement, due to the heavy political content of the issue. LAFC staff then studied and recommended expansion boundaries which the commission adopted. So far, annexation proponents have gone along with this plan, rather than to seek changes in it. In addition, special district reorganization in the area is being coordinated with the plan for city growth. Later, LAFC adopted expansion areas for two other cities and is considering several more, including one which would protect an established unincorporated community from annexations until projected growth makes incorporation feasible.

2. In another large county with a sprawling unincorporated urban area, the problem was the kind of governmental evolution LAFC should favor, and was triggered by conflicting incorporation and annexation proposals. Of the alternatives, two (city-county consolidation and mass annexation to the central city) were rejected as impractical, and one (continued unincorporated status) as unstable.

There remained evolution of either a large number of smaller cities, or a small number of larger cities. Both the conflicting proposals would have contributed to the former. The incorporation comprised a small part of the area and a population of 20,000. The annexation, to a small adjacent city, comprised the commercial portion of the incorporation area and if approved would virtually preclude later incorporation.

LAFC favored evolution of a small number of larger cities and delayed both proposals asking the incorporation proponents to try to get together with adjacent areas and come back with a proposal comprising 50,000–70,000 population. They will apparently succeed in doing this. The annexation proponents were asked to expand their proposal five-fold to take in adjacent residential and open areas and instead dropped the proposal altogether.

A LAFC argument for larger cities, incidentally, was to make feasible city, rather than continued district, provision of many urban services.

3. In a medium-sized residential county where two cities had chaotically inter-mixed boundaries, LAFC staff developed a rational new line and proposed it to the cities. Both rejected it, saying they could work out their own line, which they proceeded to do. Though perhaps not as rational as the original LAFC line, it is being used by the cities and LAFC as a workable basis for exchanging territory.

Discouraging Urban Sprawl

4. In a medium-sized residential-agricultural county, city annexation of 50 acres of land in an agricultural area was proposed, connected to the city by a long strip. Major shopping center land use was indicated by the proposal which appeared to have a speculative rezoning motivation.

The commission disapproved the proposal, on the recommendation of the executive officer (who is also a county planner), using the following grounds: a) the area was not growing rapidly enough to support a major center; b) to the extent the center was successful, it would harm the growth of the existing city business district; c) it would be expensive to serve; and, d) it would be a leap-frog development into an agricultural area, contrary to county policy and setting a dangerous precedent for the entire valley. Given the conservative nature of this county and the enthusiasm of the city for the annexation, the most effective grounds were probably the last.

Planning Coordination

5. In a medium-sized county, city annexation of 1,100 acres, in the process of being developed, was proposed. It presented LAFC with two problems:

—Though the area was already planned and zoned by the county some of the owners expected additional commercial zoning from the city. LAFC's solution was to ask the city to first pre-zone the area (by implication to agree not to change the existing zoning), which the city did.

—The fire district serving the area would have lost the heart of its assessed value as well as its only station (after annexation cities can still detach fire district territory without LAFC approval). LAFC's solution was to ask the city and district to first jointly work out fire protection problems (implying that the alternative was use of the District Reorganization Act). The two agencies reached an agreement under which the city would protect the remainder of the district.

LAFC then approved the annexation.

6. In a large county, rezoning of an unincorporated area parcel from residential to commercial was denied by the county. The owner then proposed annexation to the nearest city which would grant the rezoning. However, the annexation was contrary to several LAFC guidelines, even though this LAFC strongly favors city annexation: it had a cherry-stem shape, with a long connecting corridor running out from the city; it took in revenue-producing territory only, rather than including other land uses nearby; and it divided up an unincorporated area.

LAFC staff could have expanded its boundaries but the LAFC was not yet sure of the best long-term pattern of city government for this general area. So they asked the city to justify the rezoning; satisfied on this point they asked the county planning department if it could reconsider the rezoning in slightly different form, which it did and granted (the earlier denial had been on technical grounds). LAFC then denied the annexation.

APPENDIX B
STATEWIDE GROWTH OF CITIES AND DISTRICTS
1. NUMBER OF CITY AND DISTRICT FORMATIONS AND ANNEXATIONS

Fiscal Year ²	City			Special District ¹			Annexations
	Incorp.	Inhab. Annex.	Uninhab. Annex.	Dep. ³	Formation Indep.	Total	
1957-58	14	51	752	1105	1877	93(2982)	District reporting to the State has never been complete. ⁵
1958-59	4	50	882	3(1108)	53(1930)	56(3038)	
1959-60	12	147	1087	19(1127)	66(1996)	85(3123)	
1960-61	6	41	1019	34(1161)	8(2004)	55(3178)	
1961-62	5	56	1055	20(1181)	39(2043)	59(3237)	
1962-63	5	38	1031	42(1223)	63(2106)	105(3342)	
1963-64 ⁴	7	43	974	92(1315)	15(2121)	107(3449)	

Local Agency Formation Commission Law eff. Sept. 20, 1963. 40 LAFCs operative—12/1/63; 52—1/1/64; all—4/1/64.

1964-65	7	36	871	42(1357)	33(2154)	75(3524)
1965-66	3	61	820			

¹ Not including irrigation or school districts.

² District reporting is on fiscal year basis so city data also was compiled on this basis for convenience.

³ Includes those whose governing board is County Board of Supervisors or City Council.

⁴ Combined year—before and after L.A.F.C. formation. Figures include those which were in process prior to L.A.F.C. as well as those which resulted from L.A.F.C. action.

⁵ Not all district annexations, detachments, dissolutions, reorganizations, etc., were reported prior to the District Reorganization Act of 1965. Since this act went into effect (a nine-month period), the files of the Secretary of State show 27 district formations, 348 annexations, 42 detachments and 4 dissolutions. The number of detachments increased rapidly during this period, indicating the utility of the D.R.A. in providing a method for eliminating city-district overlaps.

Sources: City data—State Division of Highways, City and County Projects; District data—State Controller, Annual Reports of Financial Transactions and Office of Secretary of State.

APPENDIX B—Continued

2. CITY GROWTH—AREA AND POPULATION

	<i>Existing Cities</i>		<i>New Cities</i>		<i>Total</i>	
	<i>Population Increase *</i>	<i>Sq. Mile Increase</i>	<i>Population</i>	<i>Sq. Miles</i>	<i>Population Increase</i>	<i>Sq. Mile Increase</i>
1/1/59– 1/1/61	734,482	296	181,923	70	916,405	366
1/1/61– 1/1/63	789,039	229	89,860	41	878,899	270
1/1/63– 1/1/65	1,057,547	253	130,632	92	1,188,179	345

* Includes internal growth, as well as annexations

Source: Division of Highways

Note: As of 1/1/59, there were 351 cities with 10,383,903 population and 2,636 square miles. As of 1/1/65 there were 393 cities with 13,359,756 population and 3,617 square miles. The average city population had increased from 29,584 to 33,994, and size had increased from 7.51 square miles to 9.20; the percentage of the State's total population living inside municipal boundaries had increased from 68% to 72%. As of 10/1/66 there are 399 cities with an estimated total population of 14,100,000.

3. NUMBERS OF DISTRICTS, BY SELECTED TYPE¹

	<i>1955–56</i>	<i>1959–60</i>	<i>1963–64</i>	<i>1964–65</i>
Fire Protection	450	455	470	469
Sanitary and Sanitation	246	263	272	270
County Service Areas ²	12	35	171	211
County Water	125	168	205	209
Community Services ²	40	85	125	131
Park & Recreation	87	94	103	108
Other	1,820	2,023	2,103	2,135
Total	2,780	3,123	3,449	3,524

Source: State Controller, "Annual Report of Financial Transactions Concerning Special Districts of California."

¹ Excluding irrigation and school districts; the district types selected are those felt most closely related to urban growth. Numerous districts under "other" include cemetery, lighting, maintenance, reclamation, soil conservation, and California Water.

² In 1955–56, the community services district and county service area enabling statutes were new and just coming into use.

APPENDIX C
STATEWIDE SUMMARY OF LAFC ACTIVITY

Shown below are the number of proposals acted on by LAFCs, shown by year, type of proposal, and LAFC action. 1963 and 1964 are combined; the 1966 coverage ranges between five and seven months.

The data represent what was easily obtainable from each LAFC, and therefore combines certain variations in local reporting periods, terminology, and LAFC action.

	Cities			Districts			Total		
	Annexation	Incorporation	Detachment	Annexation	Formation	Detachment		Dissolution	Reorganization
<i>1963-64</i>									
Approved	865	4	-	1,189	67	5	-	-	2,130
Cond. Approved	122	-	-	118	14	-	-	-	254
Disapproved	16	-	-	10	7	1	1	-	35
Proposals, Subtotal	1,003	4	-	1,317	88	6	1	-	2,419
<i>1965</i>									
Approved	839	1	-	664	53	15	5	1	1,578
Cond. Approved	104	-	-	103	8	1	-	-	216
Disapproved	33	1	-	11	9	1	-	-	55
Proposals, Subtotal	976	2	-	778	70	17	5	1	1,849
<i>1966</i>									
Approved	509	3	4	358	17	89	7	5	992
Cond. Approved	38	-	1	63	15	4	2	2	125
Disapproved	14	-	-	6	3	4	1	1	29
Proposals, Subtotal	561	3	5	427	35	97	10	8	1,146
Total Proposals	2,540	9	5	2,522	193	120	16	9	5,414

APPENDIX D

SUMMARY OF L AFC CHARACTERISTICS BY COUNTY

(X = yes; - = no)

County	Type of County ¹	L AFC Activity ²	Executive Is Also	County Has			Planning Review of Proposals ⁴	L AFC-Related Studies Done or Set ⁴
				C.A.O. ³	Professional Planning Dept.	Gen. Plan ⁴		
Alameda	Large	Medium	Asst. CAO	X	X	X	X	X
Alpine	Small	Low	Clerk	-	-	X	X	-
Amador	Small	Low	Clerk	-	-	-	-	-
Butte	Medium	Medium	CAO	X	X	X	X	-
Calaveras	Small	Low	CAO	X	X	-	-	-
Colusa	Small	Low	CAO	X	X	-	-	-
Contra Costa	Large	Heavy	CAO	X	X	X	X	X
Del Norte	Small	Low	Clerk	-	-	X	X	-
El Dorado	Medium	Medium	CAO	X	X	X	X	X
Fresno	Large	Medium	Asst. CAO	X	X	X	X	X
Glenn	Small	Low	Clerk	-	-	-	-	-
Humboldt	Medium	Low	CAO	X	X	-	-	-
Imperial	Medium	Low	Clerk	X	X	-	-	-
Inyo	Small	Low	CAO	X	X	-	-	-
Kern	Medium	Medium	CAO	X	X	-	-	-
Kings	Medium	Low	CAO	X	X	X	X	-
Lake	Medium	Low	CAO	X	X	-	-	-
Lassen	Small	Low	Asst. CAO ⁶	X	X	-	-	-
Los Angeles	Large	Heavy	Clerk/Bd.	X	X	X	X	X
Madera	Small	Low	CAO	X	X	X	X	-
Marin	Medium	Medium	CAO	X	X	X	X	-
Mariposa	Small	Low	Clerk	-	-	-	-	-
Mendocino	Small	Low	CAO	X	X	-	-	-
Merced	Medium	Low	Planner	X	X	X	X	-
Modoc	Small	None	Engineer	-	-	-	-	-
Mono	Small	None	Dist. Atty.	-	-	-	-	X
Monterey	Medium	Medium	CAO	X	X	X	X	X
Napa	Medium	Medium	Planner	X	X	X	X	-
Nevada	Medium	Low	Clerk	-	-	-	-	-
Orange	Large	Heavy	Planner	X	X	X	X	-

Placer	Medium	Low	Asst. CAO							
Plumas	Small	Low	Clerk	X	-	X	X	X	X	X
Riverside	Large	Medium	CAO	X	X	X	X	X	X	X
Sacramento	Large	Medium	CAO	X	X	X	X	X	X	X
San Benito	Small	Low	Bldg. Insp.	X	X	X	X	X	X	X
San Bernardino	Large	Heavy	CAO	X	X	X	X	X	X	X
San Diego	Large	Heavy	Asst. CAO	X	X	X	X	X	X	X
San Joaquin	Medium	Low	Clerk	X	X	X	X	X	X	X
San Luis Obispo	Medium	Low	CAO	X	X	X	X	X	X	X
San Mateo	Large	Medium	CAO	X	X	X	X	X	X	X
Santa Barbara	Large	Medium	Asst. CAO	X	X	X	X	X	X	X
Santa Clara	Large	Heavy	CAO	X	X	X	X	X	X	X
Santa Cruz	Medium	Medium	Clerk	X	X	X	X	X	X	X
Shasta	Medium	Low	CAO	X	X	X	X	X	X	X
Sierra	Small	Low	None	X	X	X	X	X	X	X
Siskiyou	Small	Low	CAO	X	X	X	X	X	X	X
Solano	Medium	Low	CAO	X	X	X	X	X	X	X
Sonoma	Medium	Medium	CAO	X	X	X	X	X	X	X
Stanislaus	Medium	Medium	CAO	X	X	X	X	X	X	X
Sutter	Small	Low	Clerk	X	X	X	X	X	X	X
Tehama	Small	Low	Clerk	X	X	X	X	X	X	X
Trinity	Small	Low	CAO	X	X	X	X	X	X	X
Tulare	Medium	Medium	Clerk	X	X	X	X	X	X	X
Tuolumne	Small	Low	Clerk	X	X	X	X	X	X	X
Ventura	Large	Heavy	CAO	X	X	X	X	X	X	X
Yolo	Medium	Low	CAO	X	X	X	X	X	X	X
Yuba	Medium	Low	CAO	X	X	X	X	X	X	X

¹ Large: Over 1,000,000 population, or over 400,000 with 5% growth from 1960 to 1964, or over 200,000 population with 15% growth.

Small: Under 100,000, except for counties with 50,000 and 5% growth, or any counties with 15% growth.

Medium: The remaining counties.

² Heavy: 100 or more actions annually.

Medium: 25-100 actions annually.

Low: Less than 25 actions annually.

³ "CAO" covers the range from administrative assistant to the Board to county executive.

⁴ These are also broad terms; "yes" includes minimal situations.

⁵ Done by planning consultant.

⁶ Is an engineering aid regularly employed by a city.