

strong they were able to protect themselves by getting constitutional restrictions on special legislation. Special legislation now is prohibited in almost two-thirds of the States.<sup>25</sup> In 1959 only 20 of the States were reported to have general statutes authorizing consolidations, and these varied with respect to permitting cities, villages, or towns to consolidate.<sup>26</sup>

The major strength of annexation as an approach to reorganization of local government in metropolitan areas is that it broadens the geographical jurisdiction of municipalities. Moreover, it is a flexible way of broadening jurisdiction. To the extent that it forestalls incorporations or creation of limited-purpose special districts, it keeps the governmental pattern from becoming more complex. Unlike limited-purpose districts as an approach to handling areawide problems, annexation strengthens rather than weakens general governments.

Annexation brings land development controls to the fringes of municipalities. If uncontrolled, such areas can be a source of trouble and cost for their own residents as well as for the nearby city. Annexation provides an absolute right of self-determination and local control where consent of the annexed area is required. In those States which regard annexation issues as affecting a broader territory than just the area to be annexed, and therefore do not give that area an absolute veto on annexation, local interests can be protected by establishing standards for determining the soundness of a proposed annexation, and by judicial or quasi-judicial review.

Limiting annexation to unincorporated areas reduces its effectiveness in metropolitan areas where the central city is already hemmed in by incorporated territory. However, communities outside the central city may find the method useful in expanding their territories.

Another weakness of the annexation method is that it may precipitate "defensive" incorporations by fringe communities that do not want to be absorbed by their big neighbor. The result is additional fractionalization of political authority. A related reflex action is that all the cities in the area may start competing for the annexation of unincorporated territory, producing a haphazard annexation pattern.

There have been examples of abuse of the annexation power by cities taking in attractive areas with high taxable value and minimum service needs, and carefully avoiding the problem spots. This abuse can be guarded against, however, by establishment of proper criteria for annexation and provision for approval by, or appeal to, a judicial or quasi-judicial agency.

Opposition by officials of the territory to be annexed reduces the political feasibility of the annexation approach. However, their opposition is likely to be less effective than if they were officials and employees of a more highly developed governmental unit.

Consolidation of two municipalities also produces a unit of larger geographical area and thereby increases the ability of local residents to control areawide problems. By reducing the number of governmental units in the area, it lessens the problem of coordinating the attack on these problems. It also makes possible economies of scale in operation

<sup>25</sup> Robert G. Dixon, Jr. and John R. Kerstetter, *Adjusting Municipal Boundaries: The Law and Practice in 48 States* (Chicago: American Municipal Association, 1959).

<sup>26</sup> *Ibid.*