

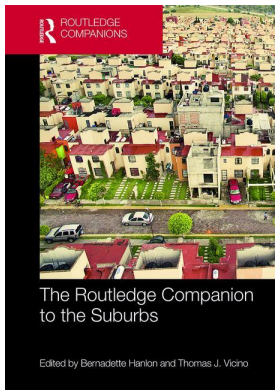
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### Dividing the metropolis

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# Dividing the metropolis

## The political history of suburban incorporation in the United States

*Jon C. Teaford*

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### Early history of municipal incorporation

Americans share a devotion to grassroots rule, but they do not share a uniform system of local government. Instead, each state has its own laws and traditions regarding the creation and powers of subordinate units, a reality that complicates the history of municipal incorporation in the United States. With its system of town government, New England stands apart from the rest of the nation. As early as 1816 the Supreme Judicial Court of Massachusetts ruled that the state's towns were municipal corporations (Williams, 1985, pp. 372–373, 421). Since the entire state was divided into towns, there were no unincorporated areas. Boston's metropolitan area has, then, been a collection of municipalities from the very beginning of European settlement in the seventeenth century. The Boston-area suburban units of Cambridge, Watertown, Sudbury, Concord, Dedham, Hingham, Medford, and Weymouth all date from the 1630s. New towns were created simply by a division of existing towns rather than being carved from unincorporated areas. The city of Boston itself expanded beyond its original boundaries by consolidating with existing adjacent towns, absorbing in the mid-nineteenth century the seventeenth-century creations of Charlestown, Dorchester, and Roxbury.

The remainder of the United States was divided into incorporated and unincorporated areas. Incorporated communities exercised the municipal powers specified by each state, whereas unincorporated areas were the domain of rural township and county authorities. State legislatures determined the procedures whereby an unincorporated community could achieve the status of municipal corporation. During the early nineteenth century, state legislatures generally granted municipal charters through the passage of special legislation. Each aspiring municipality needed to petition the state legislature for passage of a law granting the specific locality municipal status. Because of the large number of petitions for municipal incorporation, however, one state legislature after another abdicated direct responsibility for incorporating communities by adopting general legislation defining the procedure for incorporation. These general laws devolved the task of creating municipalities to county authorities and the local electorate. Petitions for incorporation would be submitted to a county court or governing board, which would then submit the question to the electorate in the area seeking incorporation. If the voters approved, incorporation was granted.

No matter whether through special legislation or a general statutory procedure, municipal status was easily achieved. Nineteenth-century American lawmakers regarded municipal incorporation as a basic right to self-government rather than a privilege bestowed on a few fortunate communities. If a community's voters wanted incorporation, lawmakers were willing to accede to their judgment. The result was a bumper crop of new municipalities, with the single state of Ohio claiming 419 municipal corporations as early as 1868.

As the population of America's metropolitan areas soared in the late nineteenth and early twentieth centuries, the urban fringe nurtured an especially large number of nascent municipalities. Chicago's Cook County witnessed the creation of ten municipalities during each decade from 1860 to 1890. In the 1890s, the number of new municipal corporations rose to 26, followed by 14 between 1900 and 1910. By the latter date 66 municipal corporations existed in Cook County. Pittsburgh's Allegheny County nearly matched this figure with 65 municipalities; 50 municipal corporations clustered in Bergen County, New Jersey, across the Hudson River from New York City; rapidly developing Los Angeles County could already claim 25 city governments.

The motives for, and circumstances surrounding, incorporation differed, but a common factor was the desire for improved services among suburban residents. In 1886, the Pittsburgh suburb of Wilkinsburg sought incorporation to provide such amenities as sewerage, fire protection, and street paving and lighting. Wary of the prospect of higher taxes, an incorporation opponent claimed that those seeking municipal status were "city fellers" who wanted to introduce new-fangled city improvements – such as sewers, paved streets, public water supply, and bath tubs – at the taxpayers' expense, "fellers who are too lazy to bring a tub up from the cellar on a Saturday night" (Teaford, 1979, p. 27). Four years later the Denver suburb of Elyria petitioned for incorporation because of poor drainage, the absence of electric street lights, an inadequate supply of drinking water, an overcrowded school, and the "widespread nuisance from the stench of dead animals" (Teaford, 1979, p. 27). One community after another cited poor or nonexistent services as a compelling reason for self-rule through incorporation.

Especially serious were the complaints about potential or real lawlessness and immorality. In Los Angeles County a number of communities incorporated to take advantage of California's local option liquor law and exercise the power to ban saloons. In 1886, Santa Monica citizens seemed motivated by the general disorder plaguing the seaside suburban community. According to one observer, incorporation would enable the town "to check the lawlessness of the Los Angeles hoodlums, male and female, who resort thither by the hundreds every Sunday. These toughs committed some of the most atrocious outrages against law and decency" (Bigger and Kitchen, 1952, p. 82). Similarly, the Chicago suburb of Oak Park incorporated in 1902 in part to avoid the threat from "a class of inhabitants that would favor the saloon" and "oppose Oak Park's well-known temperance policy" (Teaford, 1979, p. 18).

In contrast, a few communities incorporated to protect immoral pursuits. In 1903, a Los Angeles race track promoter incorporated his ranch as the city of Arcadia so that he could develop the Santa Anita raceway on the property with minimum interference from area police or bluenose do-gooders. Similarly, a Cleveland area devotee of horse racing imported temporary residents so that they could vote to incorporate his farm as the village of North Randall. It was a municipality custom-made as a site for horse racing, where local sportsmen could indulge in wagering under the jurisdiction of tolerant village authorities.

In other suburban communities, incorporation proponents pursued municipal status in order to benefit and protect manufacturing enterprises. During the 1890s, debt-burdened Hammond, Indiana, immediately east of Chicago, sought to annex the taxable property of the Standard Oil refinery in adjacent unincorporated Whiting. To thwart this predatory scheme and keep its tax

bill to a minimum, Standard Oil encouraged the incorporation of its industrial enclave. The result was yet another municipality, a Standard Oil jurisdiction, off limits to Hammond's tax collectors. Likewise, in 1901, the Carnegie steel company aided in the incorporation of its Pittsburgh-area mill town of Munhall in order to avoid paying taxes for the support of services in the surrounding rural township. In 1895, the Cudahy Packing Company moved its operations to the company-created municipal corporation of Cudahy in order to evade regulations that nearby Milwaukee might impose on malodorous meatpacking houses. Eleven years later meatpackers incorporated National City, Illinois, across the Mississippi River from St. Louis, to escape the jurisdiction of potentially meddlesome township officials and to reduce the tax bill on their extensive slaughterhouses.

### Suburban incorporation 1920s and 1930s

The acceleration of suburban growth during the emerging automobile age of the 1920s and 1930s produced hundreds of additional suburban incorporations. In Long Island's Nassau County, the number of municipalities rose from 20 to 65 between 1920 and 1940. St. Louis County was almost equally prolific with an increase from 15 in 1920 to 41 in 1940. Throughout the nation, 333 new municipalities appeared in metropolitan areas during the 1920s. The economic depression of the 1930s slowed the upward trend, but even that decade of hard times produced 158 additional suburban municipal incorporations (Hawley, 1959, p. 42).

Though the introduction of national prohibition in 1919 took the anti-saloon issue off the table, the motives for incorporation in the 1920s and 1930s did not differ greatly from those in earlier decades. Suburban residents and businesses wanted the improved services that corporate status could provide. In addition, they sought refuge from the higher taxes and regulations of neighboring communities. In 1921, oil was discovered on the site of Signal Hill, California, south of Los Angeles. Hundreds of oil derricks soon dotted the landscape, and in 1924, the oil town incorporated to protect its industry from annexation and regulation by nearby predatory municipalities and to ensure that local rule did not conflict with the needs of oil drillers. The city clerk explained:

Because of the proximity of Signal Hill to several incorporated cities . . . and because of the impossibility of conforming such a gigantic industry to the restrictions and ordinances of the average metropolitan city, it was deemed wise . . . to incorporate Signal Hill as a separate municipality.

*(Bigger and Kitchen, 1952, p. 91)*

Like Cudahy and National City, Signal Hill was a municipality tailor-made to protect the interests of a single industry.

An increasingly important motive for incorporation was the desire to preserve the community's existing or anticipated residential environment. In Nassau County, wealthy estate owners opted for municipal incorporation in order to prevent the development of small-lot residential subdivisions and avoid the tax levies necessary for urban improvements. As early as 1911, an estate owner secured incorporation of Saddle Rock, thereby relieving himself of the burden of paying for streets and sewers in nearby developments. Through incorporation he was able to escape higher taxes and preserve his semirural domain. In 1920, Saddle Rock had only 71 residents; 10 years later its population was 74, and in 1940, it had fallen to 69. Incorporation was, then, a means to perpetuate a privileged status quo. This Saddle Rock option appealed to other Nassau County gentry, accelerating the pace of incorporation in suburban Long Island. An account from

the early 1940s identified Center Island, Cove Island, Head of the Harbor, Matinecock, North Hills, Old Brookville, and Old Westbury as protected estate municipalities off limits to dense development (Dobson, 1942).

Enhancing the importance of land use control as a motive for incorporation was the introduction of zoning ordinances in the post-World War I period. Comprehensive land use zoning was a new and significant power exercised by municipalities and one more reason for Americans concerned about property values to cast their ballots for incorporation. Since a municipality could not forcibly be annexed to an adjacent city, homeowners in the Detroit suburb of Huntington Woods defended themselves from the advances of nearby Royal Oak and Ferndale through incorporation. Not only did incorporation allow Huntington Woods to preserve its independence, it enabled the new municipality to forcefully exploit single-family zoning and preserve its character as a residential refuge for the upper-middle class. In St. Louis County, elite Ladue incorporated to avoid annexation by adjoining Clayton and through zoning maintain its low-density residential environment. The municipality's zoning commission made clear its intention "to protect and continue the spacious residential character" and boasted that Ladue was "one of the few communities in St. Louis County that are unspoiled by uses generally objectionable to desirable residential sections" (Teaford, 1997, pp. 17–18).

By the onset of World War II, thousands of suburban communities had opted for incorporation for a variety of reasons. Both industrial and residential communities resorted to defensive incorporation to avoid annexation to adjacent cities with higher tax burdens and land use controls detrimental to the distinct interests of the incorporating municipalities. Suburbanites sought to keep the big central city at arm's length, but incorporation also defended against land grabs by nearby outlying communities. Thus, Whiting escaped the governance of Hammond, and Ladue avoided absorption by Clayton. Some communities incorporated to repel sin in the form of alcohol, and others chose independence to embrace race track betting. Many wanted better streets, drainage, lighting, and schools. No matter the motive, the prevailing tradition of permissiveness allowed virtually every crossroads hamlet or residential subdivision to establish itself as a municipality.

## Post-World War II incorporations

This openhanded attitude spawned an especially generous crop of new municipalities during the two decades following World War II. As new subdivisions sprouted up in former pastures, the suburban population soared. These new suburbanites demanded the services, protection, and self-rule offered by municipal government. The proliferation of new incorporations was most evident in St. Louis County, where the municipal count rose from 41 in 1940 to 84 in 1950 and 98 in 1960. Many of the freshly minted corporations were miniscule. In 1946 a subdivision of 11 acres incorporated as the village of Mackenzie. By 1951, St. Louis County included 26 municipalities with areas of less than 100 acres. In the especially fragmented north county region, nascent, and longer-standing municipalities fought mind-boggling territorial battles. In 1950, the municipalities of Bel-Nor, Hanley Hills, and Wellston each submitted papers for annexation of the same suburban tract. At the same time, residents of the territory in dispute filed an incorporation petition with the county court to become the independent municipality of Greendale, thereby endeavoring to escape rule by any of its warring neighbors. Meanwhile, through incorporation Pagedale thwarted the annexation attempts of Wellston and Hanley Hills. Commenting on this confusing scramble for territory and independence, Wellston's newspaper reported: "If everybody gets incorporated, a map maker who tries to make a map of each town in a different color is going to run out of colors" (Teaford, 1997, p. 67).

In Detroit's suburban Oakland County, the number of municipalities rose from 24 in 1940 to 38 in 1960, and nowhere were the annexation/incorporation battles harder fought than in Southfield Township. Whereas some Southfield residents wanted to incorporate the entire township, others sought to divide it into protected municipal fragments. In 1950, advocates for an independent Lathrup Village raced to submit their incorporation petition at the county courthouse before the township-wide party could do so. The Lathrup Villagers won by 20 minutes, leaving the courthouse just as the laggard township-wide petitioners were entering. Since the county processed incorporation papers in order of submission, the Lathrup Villagers could hold their incorporation election first. Succeeding at the polls, Lathrup Village incorporation advocates secured municipal independence and freedom from the larger township.

The Southfield Township struggle, however, was not over. The adjacent suburb of Oak Park mounted an unsuccessful campaign to annex a tax-rich section of the township, and the city of Berkley also cast greedy glances at unincorporated Southfield's lucrative territory. Meanwhile, in 1953 and 1955, two semirural tracts in northern Southfield Township incorporated as the municipalities of Franklin and Bingham Farms. Through the zoning protection afforded by incorporation, wealthy, large-lot Franklin could preserve what its municipal charter referred to as "our simple, rural way of life" (Teaford, 1997, p. 62). Likewise, as its name implied, Bingham Farms conceived of itself as a simple rural enclave for those wealthy and privileged enough to avoid middle-class subdivisions and commercial development. By the end of the decade the balkanization of Southfield was complete. The incorporation of Beverly Hills, a municipality whose name conveyed its pretensions, added another jurisdiction to the northern third of the township, and the city of Southfield governed the southern two-thirds.

In Southern California the story of municipal proliferation was somewhat different. By the mid-twentieth century, Los Angeles County provided a full range of services to unincorporated areas, thus eliminating a significant motive for municipal status. Between 1930 and 1954, only one new municipality was created in the county. In 1952, however, the city of Long Beach embarked on a campaign to annex the unincorporated tract-house community of Lakewood. This aroused consternation among residents and interested parties who felt incorporation was the best defense against Long Beach aggression. The opening of a Long Beach rehabilitation facility for alcoholics adjacent to Lakewood angered many Lakewooders and strengthened their desire to take charge of local land use regulation through municipal incorporation. Private utility companies serving unincorporated Lakewood also opposed absorption into Long Beach, a city serviced by municipal-owned utilities. Annexation would most likely mean a serious loss of paying customers. Los Angeles County sweetened the incorporation alternative by offering to contract its services to the new municipality. In other words, the municipality of Lakewood would retain satisfactory county services and avoid having to hire an expensive army of city employees. Consequently, the tax burden would not rise. Lakewood would maintain independence from Long Beach at no significant extra expense or loss of services. In 1954 Lakewood voters chose this low-cost, county-serviced municipal option, which became known as the Lakewood Plan.

The Lakewood Plan proved so attractive that it resulted in a wave of additional incorporations. Between 1954 and 1960, 26 communities with a combined population of 500,000 incorporated in Los Angeles County. As in earlier decades the motives for municipal independence were diverse. Both the cities of Industry and Commerce incorporated as tax havens for factories and warehouses. Largely devoid of homeowners, the City of Industry only met California's minimum population requirement for incorporation by counting as residents the occupants of a local mental hospital. Dairy farmers incorporated the city of Dairy Valley to protect themselves from suburbanites who complained of cattle barns infringing on their subdivisions. This agricultural municipality was the self-proclaimed "city of 500 people and 60,000 cows" (Schiesl, 1982, p.

230). Other communities incorporated to perpetuate their exclusive lifestyle. Like their wealthy counterparts in Franklin, Rolling Hills, residents sought to maintain their privileged large-lot, low-density existence. No matter the motive, the Lakewood Plan had broad appeal. It offered all the benefits of incorporation without the downside of higher taxes.

By the late 1950s, however, there was a growing outcry against the rampant fragmentation of America's metropolitan regions. Critics wrote of the crazy-quilt map of municipalities with an emphasis on the crazy. The incorporation free-for-all seemed to defy rationality and enabled privileged residents and businesses to escape their social responsibility to the metropolitan region as a whole. Moreover, with scores of municipalities exercising independent authority within a single metropolitan area, regional cooperation was difficult, if not impossible. Incorporation seemed a tool to perpetuate inequity and a roadblock to concerted regional action. Policymakers increasingly rebelled against the permissiveness of the past and sought to curb the seemingly mindless fragmentation.

The result was some effort to bring order to the creation of local government units. Like many other states, Minnesota had experienced a boom in municipal creations during the post-World War II period. During a single decade, 45 new municipalities arose in five metropolitan counties. Nearly half of these nascent cities had fewer than a thousand residents at the time of incorporation; one was home to only 43 people. By the close of the 1950s, 130 municipalities cluttered the map of the Twin Cities metropolitan area. Commenting on this proliferation of governments, a state legislative report lamented that "multiplying villages, like rabbits, can outdistance all progress achieved by otherwise intelligent planning" ("History of Municipal Boundary Adjustments," 2016). To forestall further chaotic governmental fragmentation, in 1959, the state legislature created the Minnesota Municipal Board to exercise administrative review over all municipal incorporations and boundary changes. Aspiring municipalities had to present their case before the state board and meet the board's standards. As a consequence, the rate of municipal creation plummeted, with the board closing the door on the incorporation of miniscule fragments. Whereas from 1950 to 1959, there were 62 municipal corporations created with an average area of 7.6 square miles, during the first two decades of the board's existence there were a total of only 15 new municipalities averaging 30 square miles.

Inspired by Minnesota, some other states took action. Michigan followed the Minnesota model and established a state boundary commission with veto power over new incorporations. In 1963 the California legislature delegated administrative review of municipal incorporations and boundary adjustments to county Local Agency Formation Commissions (LAFCOs). There was to be a LAFCO in each county, and this agency was to pass judgment on whether an aspiring municipality merited incorporation. By creating county boards rather than a statewide review commission, California lawmakers acceded to demands for local control. Yet, as in Minnesota the goal was to impose some order on the mad rush for local self-rule.

### More recent suburban incorporations

During the late twentieth and early twenty-first centuries, the perceived problem of proliferating municipal corporations seemed to be waning. Whereas 1,074 new municipalities incorporated nationwide in the 1950s, this number dropped to 338 during the 1980s, and to 148 from 2000 through 2009 (Rice et al., 2014, p. 141; Waldner et al., 2013, p. 63). This in part reflected a decline in population growth in the United States. The metropolitan population was increasing at a slower rate, so the need for new municipalities was diminishing. A less permissive attitude toward incorporation in states such as Minnesota also had an impact. Possibly significant was the rise of county governments as service providers to unincorporated suburban areas. In metropolitan areas

throughout the nation, counties expanded their role and in effect became unincorporated cities, offering the services and protection associated with municipal governments.

Yet, county rule did not satisfy some suburbanites, and in certain metropolitan areas this dissatisfaction produced a new wave of incorporations. Repeating the familiar rhetoric of past incorporation battles, suburbanites lauded government close to the people and complained of the distant authority of remote rulers in the county courthouse. The desire for self-rule for each fragment of the metropolis was not dead. Each community sought control over its own destiny and the power to pursue its own self-interests.

This new wave of incorporations redrew the map of Miami-Dade County, Florida. Between 1960 and 1991, no new municipality had formed in Miami-Dade. Instead, a county bureaucracy of 28,000 people supported by a budget larger than the outlays of 12 states had provided services for the growing portion of the population that lived in unincorporated areas. In the early 1990s, however, the wealthy communities of Key Biscayne, Pinecrest, and Aventura incorporated. Resentful that Aventura was paying too much to the county and receiving too little in return, an incorporation proponent argued, “We’re just not getting services. . . . We’re not getting the bang for our buck. We want lower taxes and far increased services” (Waldner and Smith, 2015, p. 187). Another incorporation advocate complained of distant government: “We don’t need to be going downtown to try to find a county commissioner to take care of our problems. We’re looking to have people in our own community in office” (Waldner and Smith, 2015, p. 187). Between 1997 and 2005 Sunny Isles Beach, Miami Lakes, Palmetto Bay, Miami Gardens, Doral, and Cutler Ridge likewise opted for independence from the county. A Cutler Ridge supporter of incorporation offered an argument heard throughout the county when she contended, “Incorporation will provide residents with a local government consisting of members of the community, elected by the community” (Teaford, 2008, p. 130).

The fragmentation of Miami-Dade also empowered African Americans who resented the dominance of white Cubans in county affairs. Incorporated in 2003, Miami Gardens had 105,000 residents, 79 percent of whom were black. With an African American mayor and city council, the newly independent suburb could proudly proclaim itself “the heart of Black Miami” (Teaford, 2008, p. 60).

Meanwhile, in the Atlanta metropolitan area county officials faced a similar suburban revolt. Georgia was one of the few states in which the state legislature still authorized municipal incorporation referenda through special legislation. Throughout the late twentieth century, a Democrat-controlled legislature had blocked incorporation efforts in Atlanta’s Republican north Fulton County suburbs. Municipal independence would erode the powers and tax revenues of the county’s Democratic commissioners. When Republicans won a legislative majority in the early twenty-first century, however, the gates opened for new suburban municipalities. In 2005, Sandy Springs led the way, with 94 percent of those voting in the incorporation referendum approving city status. The well-to-do community of 90,000 residents could now pursue its own destiny. One Sandy Springs resident explained, “My major thing is, let’s make the decisions here rather than downtown” in Atlanta’s county building (Teaford, 2008, p. 133). In 2006, two additional north county communities, Milton and Johns Creek, incorporated, followed by south county Chattahoochee Hills in 2007. In all three communities, more than 80 percent of those casting ballots chose municipal status. The state legislator who sponsored the bill to allow an incorporation vote in Milton argued, “Fulton County, with 850,000 residents . . . cannot provide true local government and local representation no matter how hard it tries” (Teaford, 2008, p. 134).

Critics of this fragmentation of Fulton County claimed racial motives underlay the incorporation movements. Generally affluent, predominantly white communities were abdicating their responsibility for paying for services in poor, black areas of the county, and white north Fulton



residents were escaping rule by African American county commissioners. Yet, black suburbanites also opted for independence. In 2016, the nearly 100,000 predominantly African American residents of South Fulton approved incorporation for their community. Like white north Fulton suburbanites, advocates of incorporation in South Fulton emphasized the need “to make local government more accessible, accountable, and responsive to citizen needs and desires because of smaller size and more direct access to local officials” (“Why Incorporate?: What Are the Advantages of Incorporation?,” 2016). In addition, the predominantly black city of Atlanta was seeking to annex most of South Fulton, and South Fulton residents seemed especially fearful that annexation would mean absorption into the inferior Atlanta school district, a change that “would be devastating to our children” (“Why Incorporate?: What Are the Advantages of Incorporation?,” 2016). Through incorporation South Fulton blacks could keep Atlanta at bay and assume control of their future.

On the west coast suburbanites were joining in the challenge to county rule. In Sacramento County, California, Citrus Heights incorporated in 1997, the first new municipality in the county in 51 years. Elk Grove and Rancho Cordova chose municipal status in 2000 and 2001, with residents expressing familiar complaints. An Elk Grove advocate of incorporation argued: “The time has come to abolish county governments . . . The counties have made bad decisions on land use planning and allowed leap-frogging development. They should get out the business” (Waldner and Smith, 2015, p. 191). In Rancho Cordova, it was reported that voters “frequently chafed at unpopular decisions made by haughty officials ‘downtown’” (Waldner and Smith, 2015, p. 191).

In Seattle’s King County, a new crop of cities likewise redrew the map of local government. Whereas no new municipalities were created in the county from 1962 through 1989, during the 1990s, ten communities opted for corporate status. Key to many incorporation efforts was a desire to wrest authority over land use planning from the county. After the county targeted Federal Way as a site for apartment complexes, the community incorporated in order “to clamp down on multi-family development and put a lid on growth” (Waldner and Smith, 2015, p. 198). A proponent of incorporation in Kenmore contended that “as a city, we can negotiate growth and density targets. . . . Although we will still have to accept some growth, we can better control how, when and where it goes and what it looks like” (Teaford, 2008, p. 137). Seattle-area residents reiterated oft-heard complaints about the remoteness of county officials. “When I realized King County planners hadn’t actually been here, I realized we needed more control,” observed a proponent of incorporation in Woodinville (Teaford, 2008, p. 137).

As seen in Florida, Georgia, California, and Washington, suburban America remained a battlefield for municipal status. Though the number of new municipalities had abated, and some states had imposed procedures aimed at limiting metropolitan fragmentation, the desire for self-rule still motivated suburbanites to seek independence from the big central city, from neighboring suburban cities, and from county commissioners and planners. In suburbia, big was not synonymous with good, and the refrain about government by friends and neighbors was still heard. Devotion to grassroots governance was secure and persistent.

The rhetoric about self-rule, however, had long provided a cover for the selfish interests of a variety of suburban players. Industrialists had exploited municipal incorporation to avoid regulation and higher taxes. Municipal status had also served the interests of teetotalers and race track gamblers. It was a method by which wealthy estate owners could maintain a bucolic existence free from middle-class riff-raff. And it enabled middle-class homeowners to exclude apartment dwellers and unsightly commerce. Through incorporation, black suburbanites in South Fulton could keep their children from the bane of Atlanta schools, and African Americans in Miami Gardens could wield power in an increasingly Hispanic Miami-Dade County.

Because of the generally permissive tradition of municipal incorporation in the United States, suburban Americans could separate themselves from other residents in the metropolis, wield power, and pursue policies tailored to their desires. Self-rule may often have been barely distinguishable from selfishness, but the American tradition, for better or worse, had prescribed that each metropolitan fragment had the right to follow its own destiny.

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