

# Urban Land Use Policy in an Era of Constraints

These are times of widespread interest in "land use." But as land use has gained currency, it has come to mean different things to different interest groups. To some, it has to do with national resource use—the use of land for agriculture, grazing, forestry, extraction, or wildlife sanctuaries. To others, it has to do with use of state resources—the seacoast, lake country, mountains, or other areas of critical environmental concern. And to still others, it refers to land development in the urban scene for industrial, business, residential, or other uses. There are both positive and negative associations with land use. To many, land use is a tangible reflection of economic vitality and strength; to others, it means problems or destructive tendencies in man's activities.

One common denominator to these different perspectives is the interface between growth and finite resources—the need to come to terms with environmental overloads, energy resource shortages, and other resource problems that may adversely affect the economy and the well-being of millions of households. The seventies will undoubtedly be marked as a watershed, a time when Americans came to realize that many finite resources long taken for granted were after all limited, many of them nonrenewable or irreversibly damageable. In this essay, I shall be less concerned with this precarious balance as a problem than with governmental responses to this problem and how these impact on land use policies of local governments. Let me begin with the initiatives of the federal government and work downward to the local level.

## National Initiatives

No framework of urban land use controls directly mandated by Congress as such exists today. Under the division of powers in the American system, it is unlikely there ever will be one. Regulation of non-federal lands is a function left to the states, and federal intrusion on this function occurs only when there is an overriding national interest involved. Yet federally financed facilities under housing, transportation, health, education, and other categorical programs have a profound effect on land use. Also, continuing aid under these programs is often conditioned on the effectuation of supporting adjustments in

local land use regulations. More recently new federal initiatives in environmental protection and resource conservation portend pressures to bring local land use regulatory measures in line with national policies and standards. It is the intergovernmental context within which these initiatives are exercised which is the main focus of the discussion which follows.

As we enter an era of shortages, resource use strategies have taken two forms. The first is to turn to an alternative resource, while holding steady to traditional consumption levels. When the technology has not been developed or when time schedules for achieving the needed technology preclude any feasible or immediate substitutions, national policy follows a second-choice strategy in which consumption levels are brought into accommodation with a strict conservation policy, at least until technological developments permit a return to earlier consumption levels. In view of the extensive and diffuse patterns of interdependence that exist among the various sectors of the economy using the same resources, the likelihood of finding solutions under the first strategy is becoming less certain. Not only are substitutions becoming more difficult to develop, but the disruptive effects that substitutions have on the economy are proving more difficult to eliminate.

Material shortages are only part of the reason that national policy has shifted to a stricter conservation

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orientation in resource use. The environmental problems have been another major influence. In the domestic scene, these two not unrelated resource problems are exerting a marked influence on national policy. But, as recent history has shown, the methods for dealing with the two problems are not always compatible. In dealing with the energy problem, national policy shifted haltingly among the three strategies—a return to coal as a fuel in order to maintain consumption levels at their

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ascending growth rates, the use of nuclear reactors, and a policy course which aimed to adjust consumption levels to achieve some intermediate accommodations to the energy problems. All have environmental implications. As the events have shown, mass consumption habits and the nation's economic apparatus do not respond easily to these tradeoffs. Tremendous pressures were placed on Congress, and as a result, policy is a mix of all three strategies.

### **Sectoral Organization of Functions**

One outstanding characteristic of national policy has been a strong tradition of developing resources on a function-by-function basis. In both legislative conception and line agency implementation, agriculture, forestry, grazing, fish and wildlife management, mining, water resource development, recreation, transportation, and urban development have been conceived and developed largely as single-function programs. Good efficiency reasons exist for organizing single objective activities as separate programs, but when there is no policy-coordinating mechanism for examining the interface of sectoral activities in a multiple objective perspective, problems crop up. Spillover effects, secondary impacts, or outright conflicts can be taken into account by the agencies involved only after the fact. Although inter-agency coordinating committees do sometimes negotiate solutions, the forces for maintaining the autonomy of these agencies are strong. Each operates under policies largely developed through a paternalistic committee system in Congress responding to a fairly well-defined constituency of program beneficiaries—often particular regions or states.

Over the years, efforts to secure cross-sectoral coordination have been consistently rebuffed by various lobbies and coalitions of interest groups. As its succession of names implies, the National Resources Committee, Board, and Planning Board (NRPB) had rough going in the first federal effort at simply marshalling knowledge about the state of the nation's resources. It was seen as a threat to the autonomy of the agencies

charged with overseeing these resources. Congress scuttled this initiative in 1943, after a decade of effort.

While an NRPB pattern of monitoring trends has not reappeared, two devices of federal coordination have been initiated under the Office of Management and Budget (OMB)—one in a substate regional context under OMB Circular A-95, and the other in multi-state regions under OMB Circular A-105. The first move in this direction has evolved not out of a national interest, but out of local concern over the manner in which urban-oriented categorical programs were functioning at cross-purposes with one another. The A-95 review procedures came out of the Intergovernmental Cooperation Act of 1968, and were established to provide for a system of project notification and review through substate regional clearinghouses. While these procedures served to bring out conflicts in the effects of categorical programs in localities, they did not provide for coordination of federal programs at the national level.

A more likely source of coordination of single-purpose functions at the federal level might have come from the establishment in 1969 under OMB's Circular A-105 of ten Standard Federal Regions, each with a Federal Regional Council. However, this was and is a mechanism for the coordination of field operations of federal agencies and not a front-end effort at achieving policy coordination in the development and use of national resources.

### **Initiatives on Environmental Problems**

In the sixties, the air, water, and the land were undergoing visible transformation. For some time scientists had warned of the effects of air pollution on human health, and smog was becoming a permanent part of the urban scene. Though Los Angeles became the national symbol of the problem, by the sixties nearly every large metropolitan area in the country was experiencing some degree of air pollution problems.

Water was also coming into the public spotlight. People were discovering that water supplies were not limitless, and water quality was not always satisfactory. They were seeing places in which they had been swimming a few years earlier being declared unsafe and banned from use. The specter of industrial and domestic waste pouring into rivers and invading lakes and coastal beaches was receiving attention in the media. In addition to serious accumulations of industrial chemical wastes in sources of drinking water, attention was turned to the effects that pesticides used in agriculture and forestry were having on water quality, fish and animal life, and the human food chain. For the first time, the consequences of adhering to a fragmented approach to resource use were becoming visible to the public at large. Also, a long established scientific maxim concerning the interconnectedness of these natural systems was beginning to receive political recognition.

In response came the National Environmental Policy Act of 1969 (NEPA), and by executive action in 1970 scattered environmental programs were consolidated into one line agency, the Environmental Protection Agency (EPA). The 1969 act, providing EPA with a guiding philosophy, stated “it is the continuing policy of



the Federal Government, in cooperation with state and local governments, and other concerned public and private organizations, to use all practical means and measures, including financial and technical assistance, in a manner calculated to foster and promote general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."

Thus, in programs relating to environmental management, a new multiple function emphasis was beginning to emerge; a clear directive was issued by Congress to bring resource use policies of the nation into harmony with environmental processes. In the same legislation, provision was made for the preparation of environmental impact statements as a condition for the funding of relevant projects from federal sources. Through this mechanism has come the necessity of opening up communications across sectoral lines.

### Environmental Protection and Land Use

Standards to be met in achieving clean air and clean water were set forth in the Clean Air Act amendments of 1970 and 1977 and the Federal Water Pollution Control Act amendments of 1972 (P.L. 92-500). Although political pressures from the automotive industry have led Congress to slow down the stepwise advance in implementation of vehicular emission standards and thus the achievement of air quality goals, EPA has moved to bring "point sources" of air pollution into conformance—the smoke stack industries, chemical works, and other such activities. It has also broadened its thrust to control air pollution on other fronts, including, among other measures, an emphasis on land use planning and management—control over the location of such indirect sources as shopping centers, concentrations of employment, and recreation facilities which generate concentrations of traffic and a resultant accentuation of air pollution. Following from these activities on air quality came equally stringent moves to clean up the nation's water resources. In addition to requiring use of the best available technology in sewage disposal and industrial

waste treatment systems, EPA has taken the first steps to reduce pollution and sedimentation from "nonpoint sources"—from urban runoff, construction activities, and stream channelization projects. So, in improving both water quality and air quality, land use control has become a prominent option.

### State Perspectives

To a significant degree, state policies and state activities in resource use management have been determined by federal perspectives and initiatives. For a period in the thirties and forties when NRPB offered grants-in-aid, states were active in making state resource surveys and state development plans. But when Congress closed down the NRPB, the funds for state resource studies dried up and state planning agencies languished. It was not until the sixties that state planning gathered a new momentum. Again federal inducements gave strength to state efforts, this time from the Department of Housing and Urban Development (HUD) through federal aid made available to states in 1968 under Section 701 of the Housing Act of 1954, as amended. Using the shared federal-state financing arrangements under this program, states reestablished planning agencies and initiated tooling-up studies and planning investigations (for example, economic growth and population studies; resource use analyses, and state development studies).

The same two developments which precipitated the beginnings of a resource conservation policy at the national level figured prominently in state actions—primarily the deterioration in environmental quality, but also to some extent some disturbing trends in the use of prized state resources. While federal inducements to states served to stimulate state action, states have entered into conservation and corrective actions not only because federal funds were available for these purposes, but also because states wished to forestall exclusive federal control over matters in which states also had interests—notably in air and water quality control and more recently in energy resource development and conservation.

The state level is closer to environmental problems and controls, and often experiences political heat on these issues. There has been a strong predisposition in some states (for example, California and Florida) to take the initiative in ameliorating the problems. These states have had higher or stricter standards and therefore wanted a position of strength in protecting their interests.

### State Role in Environmental Protection

There have been state initiatives in both air and water quality which preceded programs on the national level. Although federal actions were usually more comprehensive when they eventually occurred, they benefited in many ways from earlier state experimentation. But with the enactment of NEPA, the Clean Air Act and P.L. 92-500, and the subsequent issuance of federal guidelines in which states were given a central role in administering EPA's clean air and clean water mandates, the states enacted environmental policy legisla-



Transportation accounts for one part of an interrelated urban infrastructure.

Photo courtesy of Raleigh Transit Authority, Research and Public Information Office

tion enabling them to function as partners in environmental protection and avail themselves of responsibilities for overseeing the application of national standards within the state.

State action in resource conservation received impetus from another source—the rise of public concern in coastal states over the destructive effects to marine resources of second home and related recreation developments and the potential for damage from planned offshore oil operations. In this instance state action was facilitated by the passage of the national Coastal Zone Management Act of 1972, with its financial incentives for action by coastal states. States responded in a variety of ways. In Oregon, coastal planning and management was organized as a single program dealing with the full expanse of the coastal zone. In California, coastal reaches were divided into six regions, with land use planning and management carried out somewhat autonomously in each. In North Carolina, the individual counties were given the option to develop land use plans and manage development, with the state Coastal Resources Commission standing by to take over where counties did not exercise this prerogative.

### **New State Interest in Land Use Policy**

Whereas state action in environmental protection and resource conservation has tended to follow federal initiatives in matters relating to land use, many states have moved ahead of national action. In part, this may be attributable to the state's primacy in local affairs. Since local units of government are created by the state and their powers thus derive from it, the states are much closer than the federal government to local concerns, among them land use. Characteristically, states release land use control powers to local units of government under home charter provisions and various enabling

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acts of the legislature, but usually under grants of authority carefully circumscribing the use of such powers. Land use planning and management functions have been defined with particular care because of the traditional sensitivity of constituencies to private property rights.

Precisely because of these conservative practices in releasing land use control powers to local units of government, state legislatures are constantly being approached by local delegations for various changes and adjustments in these powers. Legislatures have become quite conversant with land use problems as a result. Indeed, they have been “educated” to land use problems from two directions—traditionally from the bottom up, but more recently from the top down. While

states have been under pressures from local officials on land use matters for some time, in the seventies for the first time pressures were coming from federal sources, for example, from EPA in the control of “nonpoint sources” of air pollution (control over the intensity of industrial, retail and recreational development which generate traffic and thus concentrations of pollutants). Obviously, problems of water quality are closely linked with land conversion practices (control of silting) and with the intensity of land use (control of urban runoff), and similarly, the intensity of development and the efficiency of layout affect rates of energy use (control of gasoline consumption).

### **State Role in Pass-Through Programs**

The proclivity of Congress and the federal bureaucracy for insulated single-function approaches in the development of national policy has often complicated the role of the states in developing and applying land use policies. The federal guidelines in air pollution control and the incentives to states to assume responsibilities in administering national clean air standards, for example, served to create in state government a single-function approach to policy formulation. With policies and implementation standards set from above, state agencies charged with carrying out pass-through functions have little incentive or latitude to coordinate the impacts of single-function programs. As a result, the coordination

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function is passed on to local officials. Under the political heat generated at the local level, not only in administering the often unpopular regulations, but also in seeking some accommodation between local concerns and the sometimes conflicting requirements coming from above, there is a political feedback to state elected officials. There is thus a continuing political ferment, and, being in the middle, the states find their position extremely difficult.

### **States Assume a More Central Role in Land Use Policy**

Since a number of the more critical resource use problems dealt with via the federal pass-through programs have land use impacts, the states have begun to move toward the establishment of statewide land use policies. In part this development is a reflection of an effort to bring some balance to the segmented policy situation passed down from above, but in part it is also a recognition of the need to supply a more coordinated set of guidelines for local units of government. Stimulated by these interests and by the work of the American Law Institute in the redefinition of state and local land use functions under their Model Land Development Code, several state legislatures have begun the long process of overhauling their enabling legislation. The interest in



state land use policy is also a manifestation of growing pressures from within for the state to take a more positive role in overseeing the use of resources of particular state interest, particularly in setting development standards and practices along shorelines, at scenic spots, and in areas of special interest from a historical, ecological or resource conservation standpoint. For example, in North Carolina, the Land Policy Act of 1974 provided for development and submission to the General Assembly of a statewide land classification system to promote "the orderly growth and development of the state in a manner consistent with the wise use and conservation of the land resources."

Thus, after a long period of relative inactivity, the states have become active in defining a distinctive role of their own. Indeed, the new initiatives taking place at the state level may well be the first steps toward bringing statewide resource use policies and local land use policies into a single framework. Certainly the enlarging scale of many metropolitan areas and the proliferation of local units of government found there point to the logic of the state assuming a more influential role in land use management.

### The Urban Perspective

Local units of government, particularly in urban areas, contrast sharply with other governmental levels in terms of land use perspective. At the urban scale where the use of land and the complex activity systems it sustains are so markedly dependent on the smooth functioning of infrastructure (transportation, water supply, sewage disposal, power, and communications systems), there is an emphasis on the relatedness of these systems to one another and to land use. Because of the direct daily exposure to the effects when systems function at crosspurposes with one another, local officials are more attuned to the necessity of viewing the urban complex as a totality of related systems. The policies and standards contained in the various separate guidelines from above must somehow be brought into balance with local policies if the components of the total urban system are to function compatibly.

It is at the local level that resource-oriented policies from federal and state jurisdictions acquire saliency and have their workability determined. As various controls implementing these policies are put into effect, local constituencies soon grasp the costs and benefits and make their feelings known. But while urban officials are bound to recognize federal and state standards and follow guidelines as these apply in the local jurisdiction, in the course of developing land use policies for their jurisdiction they also have a primary commitment to look after the more parochial interests of residents and the local business community, and they are obliged to hear the concerns of special interest groups from both directions.

### Influences from Upper Levels of Policy-Making

There are at least four conduits for sectoral policies feeding into local land use policy-making from jurisdictions up the hierarchy—(1) shortage-related resource

use policies; (2) environmental protection policies; (3) housing and urban infrastructure policies; and (4) land use policies. These policies may be channeled directly from the national to the local level, or on their way down they may be augmented by state inputs. Some originate entirely from the state level. What I call "conduits" are more precisely functional groupings of land use-related policies that possess similarities in the way they affect localities. But since the transmission apparatus is typically designed to emphasize programmatic implementation of policies along vertical lines, with coordination along horizontal lines at national and state levels all but forgotten, "conduit" is an apt and descriptive term.

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“. . . land use policies provide an indirect approach to environmental protection . . .”

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Not since NRPB years has there been any rigorous effort to trace out either short- or long-term substantive implications of policies of individual resource development programs across functional program areas, identify inconsistencies and conflicts, and explore alternatives for bringing policies into a compatible and coordinated framework from the vantage point of the national interest. Some observers might claim that the budget review process of OMB at the national level and budget offices at the state level provide the necessary coordination, but with a primary emphasis on budget control, these offices tend to be concerned more with cost efficiency in program performance relative to legislated objectives than with policy analysis *per se*. If these budget agencies were assigned an active policy analysis role in the pre-legislative hearing stages in policy formulation and given a policy monitoring and program coordination role in examining substantive interactions among policies and implementing systems of the programs finally authorized by legislation, not only would national and state interests be better served, but the local implementing task would be infinitely simpler. Although project notification procedures and the assembly of agency comments in the A-95 processes and in the environmental impact reviews serve to point up policy inconsistencies, the administrative effect of these field-level mechanisms is more informational than coordinative. In any case, there is no provision for coordinative action at levels from which guidelines and funding originate.

### Resource Use Policies and Land Use

As we have seen, one conduit or grouping of policies from upper levels of policy-making that is beginning to have an effect on land use planning and management at the local level has to do with controls over resource use. Shortages in some kinds of resources have more land use implications at the local level than others. Some shortages will affect the makeup of a local area's economy and thus create realignments in land use patterns. The concern here is primarily with shortages

which are pervasive—energy shortages, particularly in petroleum products, and water supply shortages, to mention two very familiar examples.

We can anticipate that in the face of permanent scarcity there will be growing pressures on localities from national and state sources to include resource-demand-reducing emphases in land use policies. With respect to petroleum consumption, we can anticipate not only pressures for a shift in land transportation modes to gasoline-conserving solutions (for example, a shift in emphasis from individual private motor vehicle to mass transit systems or other shared forms of transportation), but also for structural changes in cities which may serve to reduce the length and frequencies of daily trips (for example, a change in development practices to emphasize higher density patterns, with land use distributions and mixes designed to reduce the necessity of trips). Similarly, water shortages in some parts of the country will call not only for state and, in some instances, federal action to settle on allocation policies, but in urban areas new policies in water use will become necessary. For example, dual supply systems may need to be introduced—one for drinking, kitchen, bath and laundry use; a second for yard and home systems of sewage treatment and water recirculation.

### **Environmental Protection Policies and Land Use**

A second grouping of national and state policies channeled to local units of government which eventually exert an impact on land use policies has to do with protection of the quality of air and water and the control of noise and solid wastes. In carrying out its responsibilities to clean up the environment, EPA and its state

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counterpart agencies, under the pass-through features of national legislation, jointly exercise responsibilities in the administration of standards. In the large metropolitan areas, state legislation frequently enabled state EPAs to pass on implementing responsibilities to metropolitan regional agencies. Thus, this conduit feeds into local jurisdictions a multiple set of environmental protection policies from national and state agencies.

As noted earlier, land use policies provide an indirect approach to environmental protection and provide a way of alleviating the so-called “nonpoint sources” of pollution. Under this heading are the possibilities of reducing pollution levels through density and location controls, through the preservation of open space, and by bringing more attention focused on environmental protection into the design of areas undergoing development. In air quality, EPA is calling for the introduction of land development standards which control the location and limit the size and concentration of traffic-

generating (thus air-polluting) land uses such as industrial centers, regional shopping centers, airports, race tracks, ballparks and other uses. Similarly, for water quality control and noise control purposes, EPA officials have been turning to land use policies and controls as one of the tools for achieving national standards.

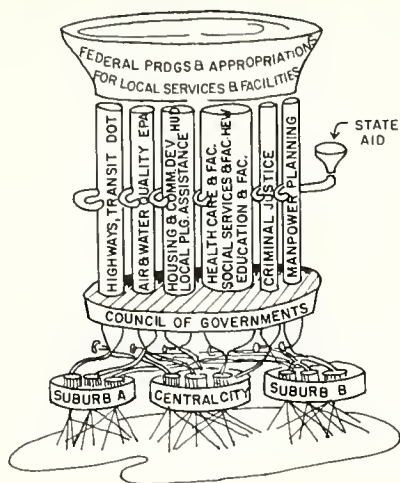
### **Urban Grant-in-Aid Policies and Land Use**

Still another conduit feeding into the land use policy-making task at the local level are policies that are imposed as conditions for federal and state grants-in-aid in urban programs. Over the years following the New Deal, these categoric programs multiplied; they encompassed such concerns as housing, urban renewal, sewage disposal plants, water systems, open space acquisition, highway improvements, airports, hospitals, health centers, neighborhood referral centers, and even local planning assistance. Some such programs have linkups with state counterpart agencies. For example, under federal aid highway legislation, the U.S. Department of Transportation (DOT), through partnership arrangements with state DOTs, established policies on right-of-way acquisition for urban-aid links in the Federal Primary Highway System, policies which become binding on localities if they expect to share in federal funding.

Each categoric program has had its own policy base, with a particular set of policy declarations of the Congress written into the original legislation, a set of standards, and a set of line-agency guidelines in implementation of the legislation. Where state link-up features were written into the federal legislation, there could be additional requirements added on at the state level. When the number and variety of these programs are considered, it takes no stretch of the imagination to see the plight of local officials. While the A-95 and A-105 review procedures and the NEPA environmental impact statement requirements have had the effect of informing federal and state agencies of projects being proposed for funding under categoric programs, and providing them with the opportunity to comment on conflicts or adverse effects, these provisions were not designed nor were they intended to bring the basic policies into harmony.

In the early seventies came the first structural approach to resolving the problem. This was the introduction of the revenue-sharing principle as a basic change in the approach to federal aid. The long period of study and debate in both the executive and congressional branches of government brought out two objectives of this new approach to federal aid relevant to the discussion here. Given the worsening fiscal plight of cities and the weak base of revenue support available to local units of government after the federal and state units of government had preempted the strongest sources of revenue, one key objective was to bolster the flagging fiscal situation with direct grants to be used as supplements to local general fund sources of revenues. A second objective was to abolish the proliferation of categoric programs and the confusion of uncoordinated qualifying requirements and to place the control over uses of the grants-in-aid in the hands of local governing officials.





INTERGOVERNMENTAL COOPERATION ... PUTTING IT ALL TOGETHER  
 Programs and appropriations are funneled through several levels of government before they reach local communities.

Drawing by F. Stuart Chapin, Jr. and Carolyn Mosher

Congress has chosen to take a slow transitional approach to implementing the change. Apart from general revenue sharing, the first step was a consolidation of housing and community development categorical programs into block grants for a specified range of activities eligible for funding. While this step eliminates problems of policy coordination between single-function categorical programs now grouped within the community development block grant, until other categorical programs are consolidated, the cross-function policy coordination problem, though reduced, remains. And of course, as other block grant program areas are established as contemplated, the problem of coordination between the new program areas may well remain, depending upon the guidelines for submission and approval of such revenue-sharing program proposals that are developed by administering federal and state agencies.

### Land Use Policies in Recent Federal-State Initiatives

The fourth conduit is directly concerned with land use policies. The recently revived state interest in land use matters is a major new source of influence being felt in local policy-making circles, but there are indications that national concerns are turning in these directions as well. The spate of activity in state legislatures during the seventies and the persistence of Congressional initiatives at the national level to provide backup to the development of state land use policies all point to the likelihood of a stronger state influence on local land use policy in the years ahead.

Some of the state initiative has been prompted by the enlarging territorial spread of urban land development patterns, a spread reaching well beyond the jurisdictional boundaries of local government. But in addition, state action is also prompted by the rapid growth in second-home and related recreational developments.

At the same time states have been turning to a long-postponed overhaul of local land development powers to bring some order out of enabling legislation that has grown by accretion and tinkering over the years and to bring outmoded practices in line with new and more efficient land use management approaches. The American Law Institute's Model Land Development Code is an attempt to deal with both the state and local land use functions in one integrated piece of legislation.

### The Unresolved Intergovernmental Problem

In an era of constraints, we can anticipate, then, that there will be increasing rather than reduced pressures of all kinds on local units of government, and we can anticipate that the layering of policies channeled down from above will create continuing tension in the merging of new with established land use policies. These tensions will mount not so much from any disagreement over the merits of the objectives as from the segmented way in which policies converge on localities, leaving to local units of government the very onerous task of reconciling cross-sectoral effects and conflicts. The task will be particularly difficult because local governments already have many critical concerns in harmonizing and making the infrastructure and land development systems of the urban area function as a coordinated and smoothly functioning whole. And of course the whole process is complicated by the substantial federal aid that usually accompanies sectoral programs in comparison to the relatively meager resources available to localities to work out these accommodations.

Although local planning and decisionmaking officials will need to adjust to these realities in the short run, in the long term some more tolerable means of relating federal, state, and local interests in urban land use policy must be devised. In the light of the experience in intergovernmental relations to date, it would appear that any long-term solution should seek to (1) reduce the number of sectors requiring intersectoral coordination, (2) improve the means of coordination between sectors, and (3) minimize intrusion on legislative control over resource allocation. At least two actions appear to merit consideration. One is an extension of the block grant mechanism to embrace more sectoral programs. This would serve to reduce the number of sectors requiring coordination at the national level, improve the opportunities for coordination at the local level, and further limit the number of programs where political conflict could arise in the resource allocation process. A complementing action would be the assignment of a stronger policy coordinating role to OMB, assigning it policy coordinating responsibilities for the Executive Office in the prelegislative stage in the development of national policy affecting land use and giving it an A-95 clearinghouse role at the national level in the coordination of sectoral policies that affect localities. The first action would require legislation, and the second would seem to be a prerogative open to the president. Local units of government should press for changes of these kinds.