



HANDBOOK

Ohio County Commissioners

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CHAPTER 77

PLANNING COMMISSIONS

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77.01 INTRODUCTION

Planning for the future needs of the county is an essential prerequisite for effective economic and community development initiatives and serving as a guide for local policy objectives. A comprehensive plan is an important tool to help the county assess future land use, zoning, building and infrastructure needs. A plan also provides a guide for emergency services delivery, protection of natural, cultural and historic resources, and can ensure adequate recreation and transportation systems. Finally, the plan can be used to develop capital expenditure plans to meet all of the above needs and to ensure prudent intergovernmental cooperation.

The major options under Ohio law for countywide planning include county planning commissions, regional planning commissions, joint planning councils, councils of government and interstate regional planning commissions, all of which will be discussed in this Chapter.

77.02 COUNTY PLANNING COMMISSIONS

County planning commissions may be created by the county commissioners under the provisions of [ORC Section 713.22](#). If the commissioners are requested to establish such a commission by a majority of the municipal planning commissions within the county, they must establish such a commission.

** Chapter 77 has been renumbered from Chapter 78, which was published in March, 2007. Electronic links have been added to update the Chapter.*

77.021 MEMBERSHIP OF COUNTY PLANNING COMMISSIONS

All three county commissioners are automatically members of a county planning Commission. The commissioners also appoint eight residents of the county who serve for three year terms, except that initial appointments must be made for staggered periods of time. The appointive members may be allowed compensation and may be reimbursed for expenses incurred in the performance of their duties as determined by the board of county commissioners. County commissioners, however, may receive no additional compensation. Members may hold any other public office and may also serve as a member of a municipal planning commission or regional planning commission unless a municipal charter prohibits such membership.

Membership on a county planning commission varies from county to county on the basis of whether any one municipality comprises at least 50% of the total county population; whether there exist any home rule townships in the county; and, if there are less than two townships in the county. Following are the membership requirements in four situations:

1. If a municipality contains at least 50% of total population of the county:
 - a. All three members of the board of county commissioners
 - b. Three individuals nominated by the city planning commission of the city which exceeds 50 percent of the total population of the county, and appointed by the board of county commissioners
 - c. Three individuals nominated by townships and appointed by the board of county commissioners. If there are one or more home rule townships in the county, at least one of these three representatives must be selected from nominations from a home rule township
 - d. Two residents of the county selected by the board of county commissioners. The board has discretion in selecting one individual residing in the unincorporated area and representing townships, and one individual residing in the incorporated area and representing municipalities
2. If no municipality contains at least 50% of total population of the county and has no home rule townships:
 - a. All three members of the board of county commissioners
 - b. Eight residents of the county appointed by the board of county commissioners
3. If no municipality contains at least 50% of total population of the county but has one or more home rule townships:

- a. All three members of the board of county commissioners
 - b. One resident of a limited home rule township in the county from persons nominated by home rule township(s) in the county, and appointed at the discretion of the board of county commissioners
 - c. One resident of the municipality with the largest population contained within the portion of the municipality located in the county from persons recommended by that municipality, and appointed at the discretion of the board of county commissioners
 - d. Six residents of the county appointed by the board of county commissioners
4. If the county contains two or less townships with unincorporated territory:
- a. All three members of the board of county commissioners
 - b. Eight residents of the county appointed by the board of county commissioners. If the population of any city located in the county exceeds 50 percent of the total population of the county, the board of county commissioners shall select three of the appointive members from persons nominated by the planning commission of that city

The law also provides options to boards of county commissioners to respond to a situation where the membership of a county planning commission should be altered to comply with the above membership requirements. Specifically, the law provides that if at any time a change occurs within a county so that the population of a portion of a city within the county exceeds or no longer exceeds 50 percent of the total population of the county or a township becomes a limited home rule township, within 30 days after the effective date of either of those types of change, the board of county commissioners, in the board's discretion, may make changes on the commission by resolution so that its membership representation complies with the above provisions.

If the board does not adopt a resolution to so change the commission's membership, the board shall phase in the necessary changes in the commission's membership by waiting until a member's term of office expires and appointing new members so as to meet the representation requirements as soon as possible without interfering with any member's term of office. These changes to the law on membership on county planning commissions was the result of the enactment of HB 187 and HB 544 during the 123rd General Assembly. For additional information refer to County Advisory Bulletins (CAB) [1999-10](#) and [2000-02](#).

It is advisable to have information available for new members. This information can cover topics of basic planning theory, conflict of interest, conducting board business, background about the community and any previous plans and current projects.

77.022 ALTERNATE MEMBERS TO A COUNTY PLANNING COMMISSION

Ohio law specifically allows members of a county planning commission to name alternates. There are two procedures for the naming of alternates. One procedure applies to county commissioners and the other procedure applies to appointive members of the commission. Two procedures were established to reflect the difference in how these individuals derive their membership. Specifically, individual county commissioners are statutorily required to serve on the commission, while the remaining appointive members serve based on their appointments by the board of county commissioners.

A county commissioner may designate an alternate by sending a letter of appointment to the alternate and a copy of that letter to the clerk of the board of county commissioners. At the next regular meeting of the board, the clerk shall inform the board of the designation of the alternate, and the board is to enter the designation on the journal.

An appointive member of the planning commission may designate an alternate by sending a letter of appointment to the clerk of the board of county commissioners designating an individual to serve as that member's alternate. At the next regular meeting of the board, the clerk is to inform the board of the designation of the alternate, which designation the board may either approve or disapprove. The board is to enter its decision on the journal and, if the alternate is approved, designate the name of the alternate on the journal. The clerk of the board shall notify the commission member of the board's action, and the commission member shall inform the alternate.

A designated alternate is to serve at the pleasure of the member who makes the designation. Removal of an alternate must be made by a letter of removal, delivered and journalized by the same method that the alternate was designated.

Once an alternate is designated for a member of the planning commission, if that commission member is absent from a planning commission meeting, the alternate has the right to vote and participate in all proceedings and actions of the commission at that meeting as if that alternate were the commission member.

Any alternate must be a resident of the county. While the legislation does not require an appointive member's alternate to reflect the member's township or municipal interests, a board of county commissioners should be aware of the current balance between townships and municipalities on the commission, and strive to maintain such balance, if possible.

77.023 SPECIAL PROVISIONS CONCERNING COUNTY COMMISSIONER VOTES ON COUNTY ZONING QUESTIONS BEFORE A COUNTY PLANNING COMMISSION

Some commissioners have expressed concern about their role as a member of a county planning commission as it relates to voting on issues related to county zoning. Because a county planning commission must make recommendations to the board of county commissioners on the adoption and amendment of a county zoning resolution, some commissioners feel they should not participate in a vote that is essentially a recommendation to themselves.

Ohio law allows a county planning commission to adopt a policy under which members of the board of county commissioners, as members of that commission, must abstain from participating and voting on the commission's recommendation, whenever a county planning commission is required by [ORC Section 303.07](#) to approve or disapprove, or make suggestions about a proposed county zoning resolution. This also applies to [ORC Section 303.12](#) on recommendations for the approval or denial of a proposed amendment. This provision, however, does not apply to county commissioners in the case of township zoning resolutions or amendments.

The policy may require that a quorum of the planning commission under these circumstances be determined on the basis of an eight-member commission instead of an eleven-member commission. ([ORC 713.22\(D\)](#)).

77.03 REGIONAL PLANNING COMMISSIONS

Regional planning commissions may be created by agreement among municipal planning commissions, township trustees and county commissioners of one or more adjoining counties under the provisions of [ORC Section 713.21](#) as a voluntary association of local governments. A regional planning commission may thus involve jurisdictions in more than one county. Examples of multi-county organizations include the Miami Valley Regional Planning Commission (MVRPC) and Mid-Ohio Regional Planning Commission (MORPC).

77.031 MEMBERSHIP OF REGIONAL PLANNING COMMISSIONS

There is no state statutory requirement concerning the number of members, their terms of office, and other organizational characteristics. These issues are left to be worked out with the local adoption of by-laws. The by-laws of a regional planning commission usually deal with allocating the costs of operation among the participating units of government; establishing officers and committees; determining the terms by which school districts, special districts and authorities, and other local units of government may participate in the activities of the regional planning commission; as well as meeting frequency and format. Before issues relating to the number of members of the commission and allocation of costs among participating governments become effective,

they must be approved by a majority of the municipal planning commissions, boards of township trustees and boards of county commissioners.

As mentioned under “Membership of County Planning Commissions” it is advisable to have information available for new members. This information can cover topics of basic planning theory, conflict of interest, conducting board business, background about the community and any previous plans and current projects.

77.04 POWERS OF COUNTY OR REGIONAL PLANNING COMMISSIONS

A county or regional planning commission is authorized to engage in a broad range of planning activities for the county as a whole or for areas made up of more than one political unit within the county. [ORC Sections 713.22](#) and [713.23](#) deal with the powers and duties of county and regional planning commissions and should be referred to for greater detail. The commission may make studies, maps, recommendations and reports relating to the physical, environmental, social, economic and governmental characteristics, functions, services and other aspects of the county.

It should be noted, however, that although the statute is broad, the commission has few powers of implementation. With the exception of the adoption and administration of subdivision regulations, the commission is largely an advisory body. In addition to the enumerated powers, the commission also has responsibilities related to the review of, and making recommendations regarding county and township zoning text and map amendments.

Although subdivision regulations are usually administered by the planning commission, the regulations must be adopted or approved by the county commissioners. The advisory capacity of the planning commission can include such things as countywide house numbering, emergency planning, capital improvement planning, assisting county departments with space and infrastructure plans and assisting with grants procurement and administration.

While the powers of county and regional planning commissions are almost identical, there are two major differences that are significant. A regional planning commission may establish an executive committee that may be given authority to make final decisions if authorized in the by-laws or rules of the commission. In such cases, the executive committee must report such actions to the full commission at the next meeting of the commission, but not later than 30 days after the action. Another significant difference is that a regional planning commission may own property. The rules or by-laws of the commission must, however, include provisions concerning the disposition of the property in the event the commission is dissolved (HB 355, 5/14/88).

77.041 PLANNING COMMISSION ECONOMIC DEVELOPMENT FUNCTIONS

While many county and regional planning commissions have traditionally been involved in economic development, a 1989 law (HB 173, 10/30/89) granted county

commissioners authority to create an office of economic development, propose a real property tax levy to fund the office and to develop an economic development program, and hire a director of economic development. Two or more counties may also establish a joint office.

The law ([ORC 307.07\(A\) \(1\)](#) and [713.23\(B\)\(8\)](#)) also allows the county commissioners to enter into an agreement with the county or regional planning commission to perform the duties and functions of the director of economic development. Such an agreement may not exceed three years duration, but may be renewed. The agreement must also specify a procedure to gain approval from the county commissioners for any actions, functions, or duties that [ORC Section 307.07\(B\)](#) gives to the director of the office of economic development. [Chapter 78 – Economic Development](#) of this *Handbook* explains in greater detail the organization and powers of economic development offices.

77.042 PLANNING COMMISSION COOPERATIVE PURCHASING PROGRAMS

In 1985, regional planning commissions were granted the authority to develop cooperative purchasing programs. The commission may perform the purchasing of supplies, services, materials, equipment and insurance on behalf of its members. The concept is that the commission would contract with a vendor for certain commonly used materials, supplies or services following county competitive bidding procedures and could obtain a better price because of quantity purchasing.

For a political subdivision to participate in such a contract, it must adopt an ordinance or resolution requesting to participate in such a contract and agree to be bound by any terms and conditions established by the commission. The political subdivision will then pay the vendor directly and is exempt from competitive bidding. If the subdivision participating in a contract has let bids for an item, they cannot purchase through the regional planning commission unless the commission contract would provide a lower price. The commission may also charge participating subdivisions an administrative fee to participate in the program ([ORC 713.23](#)). For further information refer to [Chapter 24 - Purchasing](#).

77.05 PROS AND CONS FOR COUNTY AND REGIONAL PLANNING COMMISSIONS

In counties with a small population and a limited number of municipalities, a county planning commission may be favored. The county commissioners could have more control over a county planning commission through their appropriation authority. The members are limited to 11 which is a workable number. If countywide coordination of planning is not important a county planning commission is adequate. If planning coordination between counties is desired a joint planning council might be considered, however, it is more unwieldy than a regional planning commission.

In counties having larger populations or many political jurisdictions that want to participate with planning at the county level a regional planning commission is often

avored. The cost of operation can be shared with other political subdivisions even though the county is typically the primary funding source; all political subdivisions could be members thus providing a better opportunity for coordination; special districts, school districts, conservancy districts, etc., could participate; there is complete flexibility in membership; the method of financing is flexible; and, it could be multiple county in membership and financing.

77.06 COUNTY AND REGIONAL PLANNING COMMISSION LEGAL AND FISCAL AGENTS

A regional planning commission is not a "county board" under the provisions of [ORC Section 309.09](#). The county prosecutor is thus not required to provide general legal services to a regional planning commission. The attorney general has apparently differentiated the function of legal advice to the regional planning commission under [ORC Section 713.21](#) from the enforcement of subdivision regulations.

The county prosecutor, thus, is the proper agent to institute court action to enforce any violation of the subdivision regulations (OAG 72-020). Some regional planning commissions therefore retain separate legal counsel.

For counties participating in a multi-county regional planning commission, the county auditor of the county with the largest population is the fiscal agent and the treasury of this county is the depository of the funds.

The regional planning commission, unlike a county planning commission, appropriates its own funds that are contributed by the various political subdivisions including the county. In the case of a county planning commission, the board of county commissioners is the appropriating authority.

77.07 CREATION & ADOPTION OF COMPREHENSIVE PLANS*

Preparing a comprehensive plan can be done in house by planning commission staff or by hiring a consultant. Either way the following elements are suggested for an effective comprehensive plan.

1. A section outlining the Goals and Objectives of the plan, incorporating the vision of the community's growth for the ensuing 5-10 year period and a statement of how the community should look and function when it is completely developed.
2. An Issues and Opportunities section outlining the development pressures and circumstances that are at the forefront of the planning process, and how the community can capitalize on these opportunities to shape its future.

**Excerpt from "The Regional Planning Commission Involvement in the Zoning Process and The Role of Comprehensive Plans" by Philip Laurien, AICP, former Director of the Delaware County Regional Planning Commission*

3. A Citizen Participation section that outlines the significant and ongoing participation of elected and non-elected community members in drafting the comprehensive plan. This section should incorporate the principles, assumptions and standards upon which the constituent proposals for the physical and socioeconomic development of the community are based.
4. A Population section with current and projected population statistics for the community.
5. A Land Use section that takes into account existing and natural conditions, and the proposed location, extent and intensity of future land usage.
6. A Housing section that analyzes existing housing resources and addresses future housing needs.
7. A Utilities and Public Service section analyzing the need for and showing the present and anticipated future location of public and private utilities as may be needed for the growth of the community. Such section should address the policy aspects of utility expansion, capacity and density of population and concurrence of needed utilities with growth.
8. A Natural Resources, Conservation and Preservation section which identifies such critical natural resources as slopes greater than 20%, 100-year floodplains, wetlands, prime agricultural yielding soils, soil suitability for septic systems and the location and development of significant mineral resources. A conservation segment of this section should identify preservation policies.
9. A Transportation section defining the location and types of facilities for all modes of transportation required for the efficient movement of people and goods. Such section should also anticipate a future network of potential transportation improvements as well as the policies that guide them.
10. A general Economic Conditions section that identifies the basis of the local economy and how the strength or weakness of said economy may affect the achievement of the comprehensive plan.
11. A Community Facilities section, showing the location, type, and need for educational or cultural facilities, historic sites, libraries, hospitals, fire and police stations and other related facilities, including their relation to the surrounding area.
12. A Recreation section which shows existing recreation facilities and which addresses future recreation needs.

13. A Comprehensive Land Use Plan Map at scale which is readable and which graphically depicts all of the recommendations and policies with regard to land use in the entire community.
14. An Implementation section making recommendations for zoning amendments to conform to the comprehensive plan.
15. Appendices or separate reports where appropriate that contain the underlying scientific and statistical data for the comprehensive plan and its constituent elements.

Once a plan is prepared and adopted by the planning commission, it is certified to the local governing body for their consideration and possible adoption. In the case of unincorporated territory, the county commissioners have the authority to adopt the plan.

It should be noted that while the county commissioners may adopt the plan for unincorporated territory under [ORC 713.25](#), this does not mean that a board of township trustees may not adopt a land use plan for its township. The attorney general (see [OAG 2003-022](#)) has ruled that both county commissioners and township trustees may adopt plans in the unincorporated area and thus different plans may exist for the same territory.

According to the attorney general, since [ORC Chapter 519](#) provides “a comprehensive system for land use management in the unincorporated territory of the township...” there is intrinsic authority for a township “to prepare and adopt plans for land use.” Further, the attorney general reasons that, “without these plans, it would be impossible for township officials to make reasonable decisions and recommendations when considering township zoning matters.” Finally the attorney general states that “no provision in the Revised Code prohibits a township from preparing and adopting such plans when a county has prepared and adopted plans.”

Once a county or regional plan is adopted, no public building, road, bridge, or other public improvement or utility whose construction or location would constitute a departure from the plan may be authorized by the county commissioners by other than a unanimous vote. If the county commissioners adopt a plan, the fact of adoption must be certified to the planning commission. The county planning commission then records the portion of the county plan adopted by the commissioners with the county recorder. For municipal territory the municipal council is the adopting authority. It also important to note that the ORC states that county or township zoning must be “in accordance with a comprehensive plan”.

77.08 JOINT PLANNING COUNCIL

Another planning organizational alternative, that has not been greatly used, is the joint planning council which is authorized by [ORC Section 713.231](#). Under this structure, any county or regional planning commission may join with other commissions by executing a

voluntary agreement. A county or regional planning commission may not form a joint planning council until the formation of the council is approved by a majority of municipal councils participating in the county or regional planning commission, and all boards of county commissioners approve the formation of the council.

The statute does not go into great detail concerning organization, membership, powers or financing. These particulars are left to agreement among the participating commissions.

This organizational alternative became effective in 1969 with the enactment of SB 285; while on the other hand, the county and regional planning commission law dates back to the 1920's.

The purpose of creating the joint planning council structure for planning was to provide a method to allow county and regional planning commissions to form voluntary cooperative relationships and provide intergovernmental forums to discuss shared problems and to develop solutions.

This approach was enacted as an alternative to councils of government (COG) because many local officials were concerned that COG's were a precursor to "regional government."

77.09 COUNCILS OF GOVERNMENT

Councils of governments, or COG's, were authorized in 1967. Unlike the joint planning council enabling legislation, more COG's have been established than joint planning councils. The enabling legislation for COG's, Chapter 167 of the Ohio Revised Code, is entitled "Regional Councils of Government". The growth in COG's is related in many ways to federal requirements to bring about greater cooperation among the local units of government within a "region" in the implementation of federal programs. This cooperation is particularly relevant to major metropolitan areas.

Many federal categorical grant programs encourage such organizations to assure that the programs are properly coordinated with projects of the adjacent cities or counties. These organizations also provide an organized forum to discuss common problems that do not stop at the county line. Many officials have recognized the value of these organizations for such purposes.

Equally important is the fact that some councils of governments have been designated as "area clearinghouses" under the provisions of a gubernatorial executive order issued pursuant to Section 107.18 (B) of the Ohio Revised Code. This area clearinghouse designation is issued to provide a mechanism for local governments to review federal grant programs which fall under the guidelines of Presidential Executive Order 12372 which is commonly referred to as the "A-95" process.

A regional council of government should not be equated with regional government. Ohio law does not give COG's authority to implement programs or deliver services unless the local unit of government holding the authority delegates such responsibility to the COG ([ORC 167.03\(C\)](#)). In addition, COG's have no powers of taxation.

77.091 FORMATION OF COG'S

COG's may be formed by an agreement between two or more counties, municipalities, townships, special districts or school districts or other political subdivisions of Ohio or other states. A COG, for example, may be made up of two townships, a school district, and a village, or any two such units of government that enter into an agreement.

77.092 MEMBERSHIP OF COG'S

Members of a COG are those units of government entering into an agreement forming the COG. The agreement forming the COG or its by-laws should carefully deal with the issue of representation. If the agreement does not provide otherwise, each participating unit is entitled to one member who must be an elected official.

77.093 WITHDRAWAL FROM COG'S

County commissioners may withdraw from a COG by simply passing a resolution to this effect and giving 60 days' notice to the COG. If, however, the original agreement or the by-laws provide for a period longer than 60 days, the provision of the agreement or by-laws prevails. Under no circumstances can an agreement or by-laws require a county or other political subdivision to be a member of a COG for more than two years.

77.094 POWERS AND DUTIES OF COG'S

Like the other planning structures, the powers and duties of COG's generally entail study, research and recommendation with perhaps a greater overall emphasis on coordination of planning and related programs on a broader intergovernmental basis. More specifics about these powers and duties can be found in [Chapter 167 of the Revised Code](#). The law specifically prohibits a COG from displacing any other planning commission in performing its statutory duties. Moreover, COG's have no responsibility for zoning or subdivision regulations as do county or regional planning commissions.

There is, however, one potentially important power that should be discussed. A COG may, if agreed to by local governments, "perform such other functions and duties as are performed or capable of performance by its members and necessary or desirable for dealing with problems of mutual concern" ([ORC 167.03\(C\)](#)). This language authorizes a COG to implement programs, but only with the full concurrence of each local unit of government. As an example of this, it has been found that a COG may "perform joint purchasing" operations on behalf of its members (OAG 69-013).

In a similar vein, a COG may contract with units of local government to "perform any function or render any service in behalf of....local units of government that the units themselves are legally capable of performing" ([ORC 167.08](#)). These two provisions of law tend to distinguish COG's from the other planning organizations because COG's may, under limited circumstances, actually become program operators and not simply planning agencies.

77.10 INTERSTATE REGIONAL PLANNING COMMISSIONS

An interstate planning commission is similar to a regional planning commission. Interstate planning commissions may be created by any board of county commissioners and the legislative authority of a municipality in Ohio or any adjoining state. The director of the Ohio Development Services Agency may be a non-voting ex-officio member of an interstate regional planning commission. Members serve without compensation, but are permitted expenses. The commission elects officers and establishes by-laws.

The commission may receive and expend funds from federal agencies, political subdivisions, other planning commissions and private sources. The commission may employ personnel and, obtain facilities and equipment as needed. For additional information refer to [ORC Sections 713.30](#), [713.31](#), [713.32](#), [713.33](#) and [713.34](#).

77.11 METROPOLITAN PLANNING ORGANIZATIONS

Metropolitan planning organizations (MPO) are those planning organizations designated as being responsible together with the state, for carrying out the provisions of federal law as a forum for cooperative transportation decision making.

Designation of a metropolitan planning organization shall be made by agreement among the units of general purpose local government and the governor. To the extent possible, only one metropolitan planning organization should be designated for each urbanized area or group of contiguous urbanized areas. There shall be such an organization for each metropolitan area of 50,000 population or more. The organizations are often incorporated as a part of either a regional planning commission or a council of governments.

The MPO's in Ohio are the most formalized regional units. The formation of these units is a federal government requirement in order to be eligible for federal financial assistance in the planning, design and construction of transportation facilities. The planning process is to be a continuous, comprehensive, cooperative, urban transportation planning process.

There are 15 MPO's in Ohio with three-fourths of the state's population in the 15 study areas; however, these areas contain less than one-third of the total population in 25 counties centered around 17 urbanized areas plus portions of five other counties adjacent to Toledo, Columbus and Akron.

The remaining one-fourth of the state's population live in the 63 counties located outside the boundaries of the MPO areas. In these areas of the state, regional planning is accomplished by either the county or local planning agencies.

77.12 OHIO'S INTERGOVERNMENTAL REVIEW PROCESS

Presidential Executive Order 12372, commonly referred to as the "A-95" process, issued July 14, 1982, provides for the review of applications for specified federal and federally assisted programs as designated by each state. In Ohio, state agencies and area clearinghouses participate in the intergovernmental review process in order to provide a review system that promotes consistent state, regional and local community development objectives, policies and priorities. Area clearinghouses are designated under the provisions of a gubernatorial executive order issued to provide a mechanism for local governments for the evaluation, review and coordination of selected federally assisted grant programs.

As of April 1, 1997, the State Clearinghouse, located in the Office of Budget and Management (OBM), discontinued their participation in the local review as designated by Presidential Executive Order 12372. While eliminating the State Clearinghouse, the OBM continued to recognize the need to allow opportunities for local and agency comment on federal grant applications.

Without the State Clearinghouse, Area Clearinghouses had to pursue a more meaningful relationship with local grant entities to ensure that appropriate desired communications are occurring between federal grant applicants and the Area Clearinghouse; the OBM facilitates such communications by maintaining lists of state agency contacts and Area Clearinghouse contacts. This action made the A-95 review process a voluntary activity for designated review agencies.

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