



POSITION PAPER OF THE LEAGUE OF CITIES OF THE PHILIPPINES ON THE CITYHOOD BILLS

The League of Cities of the Philippines (“League” for brevity), by way of Position Paper, respectfully manifests its **continuing opposition** to House Bill No. 4149 and Senate Bill Nos. 233 and 643, and further states that:

1. The League previously submitted its Position Paper¹ to House Bill No. 257 entitled, “An Act Exempting from Population and Land Area Requirements the Conversion of a Municipality into a Component City if it has a Locally Generated Average Annual Income of at least Two Hundred Fifty Million Pesos (P250,000,000), Amending for the Purpose Section 450 of Republic Act No. 7160, as amended, which was subsequently substituted by House Bill No. 4149.
2. The League expressed its opposition to the said Bill on the strong basis that the present statutory requirements for conversion are sufficient and that the same complement each other as indicators to become a sustainable city.
3. Subject for deliberation on the floor are Bills amending the statutory requirements for conversion as set forth in the Local Government Code of 1991, as amended.

House Bill No. 4149 – “An Act Exempting from Population and Land Area Requirements the Conversion of a Municipality into a Component City if it has a Locally Generated Average Annual Income of at least Two Hundred Fifty Million Pesos (P250,000,00), Amending for the Purpose Section 450 of Republic Act No. 7160, as amended.”;

Senate Bill No. 233 – “An Act Exempting from the Population and Land Area Requirements the Conversion of a Municipality into a Component City if it has a Locally Generated Income of at Least Two Hundred Fifty Million Pesos

¹ Official Position Paper on House Bill No. 4149. 21 November 2016. Annex A



(P250,000,000), Amending for the Purpose Section 450 of Republic Act 7160, As Amended, otherwise known as the Local Government Code of 1991”

4. The foregoing Bills seek to further amend Section 450 of the Local Government Code by allowing the conversion of a municipality into a component city if it has an average annual income of at least Two Hundred Fifty Million (P250,000,000) for the last two (2) consecutive years based on 2012 Constant Prices, as certified by the Department of Finance. This is without regard to its land area and population, exempting a municipality from the Twin Requirements of conversion.
5. The League welcomes the conversion of municipalities into cities because cityhood is their natural course toward economic development. However, the League reiterates its stance against artificially hastening such a process through unfounded interventions and outright disregard to general rules on the creation and conversion of local government units.

The Bills disregard the spirit behind the law on verifiable indicators of creation and conversion of local government units

6. It is a basic principle in economics that land, labor and capital are essential factors for production. This provides economic wisdom in putting population and land area requirement for the conversion of local government units in the Local Government Code.
7. It was contended by the proponents of the Bills that income is the most controlling among the requirements for conversion. The League is inclined to agree but with reservation due to the fact that the extent of the effect of income is dependent on population and land where gains of economic development physically manifest.
8. Time and again, the League has manifested that while it is true that income requirement is a verifiable indicator of the viability and capability of the local government units in handling its affairs, the same cannot stand on its own. It is well established that land area and/or population must complement the income, hence, equally important criteria for conversion.



9. Further, to exempt the financially viable municipalities from the requirements would render nugatory the spirit behind the statutory distinctions between a city and municipality. By removing the physical requirements, it begs the question on what constitutes a city?

The statutory requirements are sufficient and generally attainable

10. A remarkable growth of 143% in the number of municipalities converted into component cities in less than three decades indicates that the requirements are feasible and benchmarks are generally attainable. In fact, the number of cities ballooned from sixty (60) in the year 1991 to 145 in the year 2015.² Moreover, the law only requires compliance with either land OR population requirement.

There is no compelling reason that warrants an exemption to the general rule on requirements for conversion

11. It is well settled that the primordial reason for converting a municipality into a city is the economic viability. The conclusion that income is equivalent to economic viability is a sweeping generalization.
12. The League underscores that economic viability does not only relate to income or finances but it also relates to the careful management of resources with regard to territory, people and services.
13. The League stresses that the capability of a municipality to generate a high income is not enough to veer away from the established general rule absent careful scrutiny and peremptory cause that warrant the exemption.

² Table 1 Conversion Rate of Municipalities into Cities. Annex B



Legislative proposals on Special Assistance Fund and Equalization Fund as accommodation to address the gaps in Cityhood Bills

14. Since the league has manifested its opposition to the measures in the past deliberations, legislative proposals are crafted to accommodate the gaps anticipated as a result of the Cityhood Bills pending in Congress. These proposals will form part of the proposed measures with the objective of providing assistance to capital towns belonging to provinces without cities.

- I. **Special Assistance Fund** is hereby granted to the capital towns/municipalities of cityless provinces for a period of six (6) years from the effectivity of this act. This fund shall augment the locally generated income of the concerned municipalities, until the latter have attained or surpassed two hundred fifty million (P250,000,000.00) income threshold necessary for their conversion into component cities as provided under the preceding section.
- II. **Equalization Fund**, equivalent to the projected decrease of the Internal Revenue Allotment (IRA) share of existing cities as a result of the creation of additional cities under this Act, is hereby allocated in the General Appropriations Act. This fund shall be appropriately adjusted based on the number of additional cities to be created thereafter. This fund shall be distributed to all cities to finance their programs and projects, and to hasten their development.



15. The League expresses its concerns³ about the sustainability of the special assistance fund. There are at least twenty-seven (27) capital towns that would have shared this fund. The League respectfully requests the proponent to further elaborate on these areas, which hopefully would help establish the financial feasibility of the proposed fund.
16. The provision for Equalization Fund is aimed at mitigating such negative impacts of additional cities consequent to converting capital towns of provinces without cities. However, this does not address the debilitating impacts of this mad rush conversion to smaller or poorer cities.
17. Should the pending cityhood bills become law, the League foresees the need for establishing a 'buffer fund' in order not to hamper the continued economic growth and service delivery of its member cities. The League recommends defining the origin and computation of the Equalization Fund early at this stage to ensure its place in the General Appropriations Act. Without a clear funding source, it may yet result in unfunded mandates imposed on existing cities and capital towns, which defeats the purpose of the fund as defined in the legislative proposal.
18. Lastly, while the intent of the proposed legislative provisions is commendable, the addendums look past the issues inherent to the pending cityhood bills, as previously raised by the League, particularly the relaxation of the land area and population requirement in favor of a larger income threshold. The League also expresses its qualms on the sustainability and efficient use of these funds.
19. Hence, it is humbly submitted that Congress should thoroughly study, and consider the repercussions that will result from the relaxation of the statutory requirements.

³ Discussion Paper on Legislative Proposals on Special Assistance Fund and Equalization Fund. Annex C



**OFFICIAL POSITION PAPER OF THE
LEAGUE OF CITIES OF THE PHILIPPINES
ON HOUSE BILL NO. 4149 (SUBSTITUTING H.B. 257) WHICH SEEKS TO AMEND
SECTION 450 OF THE LOCAL GOVERNMENT CODE TO INSERT AN EXEMPTION
ALLOWING MUNICIPALITIES WITH LOCALLY-GENERATED INCOME OF
250 MILLION PESOS FROM THE LAND AREA AND/OR POPULATION
REQUIREMENTS TO CONVERT INTO COMPONENT CITIES**

I. INTRODUCTION

The League of Cities of the Philippines **vehemently opposes** House Bill 4149 which seeks to exempt municipalities with 250 million peso locally-generated income from population and/or land area requirements provided for by Section 450 of the Local Government Code.

At the outset, it must be pointed out that Section 450 must be read in conjunction with Section 7 of the Local Government Code which lays down the general rules on creation and conversion of local government units. The proposed bill completely disregards the rationale behind the minimum verifiable indicators of creation and conversion of local government units identified in Chapter II, Section 7 of the Local Government Code, to wit:

Section 7. Creation and Conversion- As a general rule, the creation of a local government unit or its conversion from the one level to another shall be based on verifiable indicators of viability and projected capacity to provide services, to wit:

- a. Income: It must be sufficient, based on the acceptable standards, to provide for all essential government facilities and services and special functions commensurate with the size of its population, as expected of the local government unit concerned;
- b. Population: It shall be determined as the total number of inhabitants within the territorial jurisdiction of the local government unit concerned; and
- c. Land Area: It must be contiguous, unless it comprises of two or more islands or is separated by a local government unit independent of the others; properly identified by metes and bound with technical descriptions; and sufficient to provide such basic services and facilities to meet the requirements of its populace.

Currently, Republic Act 9009 which amends Sec. 450 of the Local Government Code is the governing law as regards the city conversion. The said law provides that for a municipality to be converted into cities, they must have *"a locally generated average annual income, as certified by the Department of Finance, of at least One hundred*

million pesos (P100,000,000.00) for the last two (2) consecutive years based on 2000 constant prices, and if it has either of the following requisites:

- a contiguous territory of at least one hundred (100) square kilometers, as certified by the Land Management Bureau; or
- a population of not less than one hundred fifty thousand (150,000) inhabitants, as certified by the National Statistics Office”

We believe that the current law is sufficient for the conversion of municipalities. Section 450 already provides opportunity and leeway for municipalities to meet the cityhood requirements since it was liberally amended to either comply with the population or land area requirement. To waive all these requirements violate the intention of the verifiable indicators as reflected in the Local Government Code of 1991.

For clarity, the League fully supports and welcomes the development of municipalities into cities based on reasonable established criteria. We remain consistent with our principle to adhere with the rules and bases already set by the Local Government Code of 1991.

While it is true that income requirement is a controlling verifiable indicator of the viability and capacity of local government units in handling its affairs, the same cannot stand on its own. It is well established that land area and/or population must complement the income requirement and thus are equally important criteria for conversion to cities.

Under the proposed measure, the requirements of both land area and population have been set aside in favor of Php 250 Million locally generated income. The League humbly requests that the sponsor of the bill expound on the basis and rationale on why the income requirement was set at Php 250 Million.

II. THE TWIN CRITERIA AS A MINIMUM

As mentioned, Section 7 of the Local Government Code provides for the general rules for the conversion of a local government unit. While there is no hard and fast rule on the optimum populace for land area or city, there is value in pairing the locally generated income requirement with either land or population.

The sponsor of the Bill took note of small states specifically Monaco and San Marino. We respectfully point out that these are not analogous in the case of Philippine municipalities and cities particularly when these are small states in first world countries that do not operate under the same regulations as those in place in the Philippines.

In reality, there is a high demand for city conversion in the Philippines because of the assumption that becoming a city results in participation to a sizeable Internal Revenue Allotment. Once a municipality becomes a city, its IRA will increase tremendously. Population and/or land area as criteria cannot be sacrificed. A city with no sufficient

number of population and/or land will have no need for the excess in funds. It will only diminish the current IRA of affected cities and is a disservice to those cities with high population to the detriment of its inhabitants.

If that new city only has a small population and/or land area below the current requirement, and what will it do with the "windfall" of resources? By allowing municipalities with high income without complying with the land or population requirement to become cities, HB 4149 creates "artificial cities," or those with high capacity to spend and provide but with meager population and/or land area to spend it in. Further, this will result in an uneven distribution of resources across cities.

With respect to the land area requirement to become a city, a local government unit with a larger land area naturally will have more capacity to become cities as it develops and would thus need more national support to maintain the territory.

III. THE POLITICS OF CONVERSION

A. The diminishing IRA per capita of cities. While it is true that becoming a city provides the so called "increase in the IRA", an aspiring city shall also have to deal with the diminishing IRA per capita of cities.

The exodus of municipalities eager to be converted into cities had impacted on the anticipated increased of the existing cities' IRA share. One way of concretely translating the impact of conversion is through the IRA per capita or by measuring how much a typical LGU can spend for its inhabitant. Table 1 presents IRA per capita of cities as opposed to IRA per capita of provinces and municipalities. In periods where census of population is released, column 3, 5 and 7 shows that starting 2005, inhabitants of provinces and municipalities are better off in terms of the amount of money that their LGU can spend for them. In fact, an inhabitant of a province or municipality enjoys 1,500 pesos more than an inhabitant of the city.



**Table 1. COMPARATIVE IRA PER CAPITA OF CITIES
(1996, 2005 and 2011)ⁱ¹**

1	2	3	4	5	6	7
TYPE OF LGU	Population (1995)	IRA PER CAPITA (1996)	Population (2000)	IRA PER CAPITA (2005)	Population (2007)	IRA PER CAPITA (2011)
Cities and Component Barangays	17.07M	981.36	26.09 M	1,650.56	33,698,991	2,290.51
Provinces, Municipalities and Barangays	50.69M	815.95	50.42 M	2,153.35	54,871,009	3,822.72
DIFFERENCE		165.41		-502.79		-1532.22

This draws us to the conclusion that a newly converted city cannot fully depend on IRA alone to finance the demands of urbanization.

B. Conversion greatly affects smaller cities more than the bigger cities. On average, each city loses 3 million pesos when a municipality converts into a city. Based on LCP experience, every time the IRA is slashed, smaller cities felt it more than the bigger cities. Conversion affects smaller cities that are greatly depend on the IRA to finance the bulk of social services more than the big cities.

Based on Section 284 of the Local Government Code, cities get 23% of the Internal Revenue Allotment. This amount is divided among cities using the formula 50% population, 25% land area, and 25% equal sharing. Often, cities with large population keep their share intact because 50% of the IRA is computed based on population. The same story can be shared with regard to land area. Cities with bigger land area tend to get more because 25% of the IRA is based on land area. This means that the chance of a small city to get a bigger share on the IRA is through equal sharing. Seventy percent of the IRA formula is already enjoyed by bigger cities.

¹The IRA per capita is simply the ratio of the IRA share of a certain type of LGU to its population. To resolve the issue of double and triple-counting inhabitants in deriving the IRA per capita (arising from the fact that provincial and barangays residents are also residents of either a city or a municipality), the population is dichotomized as either city or non-city residents. This approach allows the computation of the city IRA per capita (represented by the combined IRA share of cities and their component barangays divided by the total city population), and the non-city IRA per capita (represented by the combined IRA share of provinces, municipalities and their component barangays divided by the total municipal population).

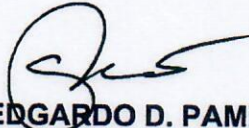
The real story behind conversion is it impacts the smaller cities more than the bigger cities. The result is stunted development. This is where the concept of "preparing a city" becomes urgent and merits the attention of legislators.

IV. CONCLUSION

In conclusion, the League supports the conversion of municipalities to cities provided they meet the criteria already established in the Local Government Code of 1991 i.e. income and, land area or population. Philippine municipalities are not comparable with states and cities in highly developed economies. The League believes that the shortsightedness of HB4149 will be a disservice to majority of the Philippine cities.

To reiterate, we believe that the current law is sufficient for the conversion of municipalities. Section 450 already provides opportunity and leeway for municipalities to meet the cityhood requirements since it was liberally amended to either comply with the population or land area requirement. To waive any of these requirements violate the intention of the verifiable indicators as reflected in the Local Government Code of 1991.

Lastly, we would like to request the Committee that any bill on conversion should be thoroughly studied, debated, and deliberated to eliminate any lasting negative repercussions. We checked our records and we have not received any notice for the deliberation of House Bill 257 or HB 4149. We would be happy to share with the Committee our insights on the issue of conversion.



Mayor EDGARDO D. PAMINTUAN
National President



Table 1. Number of Regions, Provinces, Cities, Municipalities, and Barangays in the Philippines from 1990 to 2015

Admin. Units	1990	1995	2000	2005	2010	2015
Regions	15	16	16	17	17	17
Provinces	73	77	78	79	80	81
Cities	60	65	96	117	138	145
Municipalities	1,537	1,542	1,513	1501	1,496	1,489
Barangay	41,502	41,929	41,943	41,980	42,025	42,036

Source: Consolidated Information from the Philippine Statistical Authority

Table 2. Capital Towns in the Philippines

Municipality	Land Area (km ²)	Population (2007)
1. Alabel, Sarangani	510.98	71,872
2. Baler, Aurora	92.55	34,492
3. Bangued, Abra	105.7	46,179
4. Basco, Batanes	49.46	7,517
5. Bayombong, Nueva Vizcaya	136	54,417
6. Boac, Marinduque	212.7	50,823
7. Bongao, Tawi-Tawi	365.95	95,055
8. Bontoc, Mt. Province	396.1	24,798
9. Cabarroguis, Quirino	260.2	28,024
10. Catarman, Northern Samar	464.43	81,067
11. Daet, Camarines Norte	46	94,184
12. Ipil, Zamboanga Sibugay	241.6	60,686
13. Jolo, Sulu	22.24	140,307
14. Jordan, Guimaras	126.11	32,524
15. Kabugao, Apayao	935.12	14,529
16. Kalibo, Aklan	50.75	69,700
17. Lagawe, Ifugao	208.91	17,373
18. Siquijor, Siquijor	90.7	23,271
19. Mambajao, Camiguin	89	35,308
20. Mamburao, Occ. Mindoro	283.51	34,487
21. Nabunturan, Compostela Valley	231.3	67,365
22. Naval, Biliran	108.24	44,288
23. Prosperidad, Agusan del Sur	505.15	75,390
24. Romblon, Romblon	86.87	37,544
25. San Jose, Antique	48.56	54,871
26. San Jose, Dinagat Island	27.8	28,398
27. Virac, Catanduanes	152.4	64,554

Source: Consolidated Information from the Philippine Statistical Authority



LEAGUE OF CITIES OF THE PH ANNEX C

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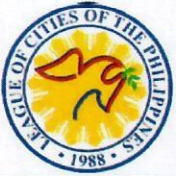
Discussion Paper on the Legislative Proposals on Special Assistance Fund and Equalization Fund

Through the initiative of Senator Angara, legislative proposals are crafted to accommodate the gaps anticipated as a result of the Cityhood Bills pending in Congress. These proposals will form part of the proposed measures with the objective of providing assistance to capital towns belonging to provinces without cities:

- I. **Special Assistance Fund** is hereby granted to the capital towns/municipalities of cityless provinces for a period of six (6) years from the effectivity of this act. This fund shall augment the locally generated income of the concerned municipalities, until the latter have attained or surpassed two hundred fifty million (P250,000,000.00) income threshold necessary for their conversion into component cities as provided under the preceding section.

- II. **Equalization Fund**, equivalent to the projected decrease of the Internal Revenue Allotment (IRA) share of existing cities as a result of the creation of additional cities under this Act, is hereby allocated in the General Appropriations Act. This fund shall be appropriately adjusted based on the number of additional cities to be created thereafter. This fund shall be distributed to all cities to finance their programs and projects, and to hasten their development.

Since the subject matter of these legislative proposals is deemed part of the overall discussion on the conversion of municipalities through legislation, the League expounds its view on these provisions in conjunction with its position on the three (3) pending bills in Congress as earlier issued. At the onset, the League would like to clarify that it welcomes the graduation of municipalities into cities because cityhood is their natural course toward economic development. At the same time, however, the League reiterates its stance against artificially hastening such a process through unfounded interventions and targets and disregard to general rules on the creation and conversion of local government units.



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The Cityhood Bills

House Bill (HB) 2040 seeks to grant the exemption to capital towns provinces without cities from the prescribed income requirement of PhP120 million. HB 4149 and Senate Bill (SB) 233, meanwhile, pursue the relaxation of the population and land area requirements for municipalities with locally-generated income of at least PhP250 million.

Over thirty municipalities could immediately apply for inclusion in the roster of cities, if these bills were enacted. Possibly, more could bid for city status in the long run.

The League of Cities of the Philippines (LCP), in an earlier position paper, has formally expressed its concerns about such a rush to cityhood and has strongly called for adherence to the twin requirements of the Local Government Code.

The Philippines witnessed a remarkable growth in the number cities after the enactment of the Local Government Code. The conversion rate of municipalities into cities¹ has accelerated almost exponentially after 1991, resulting in more than twice the number of cities, from 60 in 1990 to 145 in 2015.

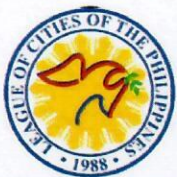
Sections 7 and 450 of the Local Government Code, as amended by RA 9009, determine city conversion by setting measurable targets for income, population, and land area. The steady rise in the number of graduating municipalities in less than three decades indicates that these benchmarks are generally attainable, not to mention that the law only requires compliance with either land or population requirement. Notwithstanding, Congress is in the move to liberalize the requirements in order to hasten the conversion of municipalities into cities.

DISCUSSION

I. Special Assistance to Capital Towns

The provision for a special assistance fund is aimed at augmenting the locally-generated income of the capital towns of provinces without cities until they attain or surpass the income requirement for cityhood, which is set at Php250 million. The League supposes that this benchmark is based on HB 4149, which notably also exempts a municipality from the population and land area

¹ Table 1 Conversion Rate of Municipalities into Cities



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requirements pursuant to the Local Government Code. Such disregard for the wisdom of setting verifiable indicators of cityhood in the Code is the reason for the League's staunch stance against HB 4149. The proposed bill is currently being deliberated in Congress. As such, the basis of the special assistance fund by extension is also in question.

The Php250-million threshold remains a point of contention among stakeholders because it has no other basis except a Committee Report dated 16 March 2015. Accordingly, the League has called for further research and vetting on baselines and growth indexes to arrive at an appropriate level of local income that will determine whether it is economically viable for a municipality to convert. While the PhP250-million threshold is indeed a huge figure, especially when compared with that of the Code, it is also unprecedented. As such, it is difficult to ascertain how it should physically manifest in would-be cities in terms of development, especially when the conditions for land area and population are disregarded. Against this backdrop, the League maintains that allocating a substantial amount of resources to achieve an unsubstantiated local-income target constitutes an improvident use of public funds.

To clarify, the League is not opposed to the idea *per se* of providing capital towns with financial assistance into cityhood, but to the particular provisions of the proposed bill (i.e., HB 4149) it is anchored to. The League expresses its concerns about the special assistance fund's sustainability for the next six years if the legislative proposal becomes part of the law. There are at least twenty-seven (27) capital towns² that would have shared this fund. The proposed provision is silent on how the fund would be computed to ensure it would serve its purpose to the capital towns (i.e., reaching the PhP250 million local income), where the money would be sourced, and how it would be divided among the recipients. The League realizes that the proposal is just a portion of a bill in the making and, as such, respectfully requests the proponent to further elaborate on these areas, which hopefully would help establish the financial feasibility of the proposed fund.

II. Equalization fund

If all the aforementioned capital towns were converted, the existing cities would experience a considerable decrease in the additional Internal Revenue Allotment (IRA) they receive annually. There is an estimated reduction of 16.4%, assuming that the IRA for LGUs increases by 25% yearly. Note, however, that

² Table 2 List of Capital Towns



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between 2010 to 2015 LGUs have only received annual increases of 10% to 15% in their IRAs so the potential reductions could be substantially larger.

The provision for Equalization Fund is aimed at mitigating such negative impacts of additional cities consequent to converting capital towns of provinces without cities. Should the pending cityhood bills become law, the League foresees the need for establishing a 'buffer fund' in order not to hamper the continued economic growth and service delivery of its member cities. The League recommends defining the origin and computation of the Equalization Fund early at this stage to ensure its place in the General Appropriations Act. Without a clear funding source, it may yet result in unfunded mandates imposed on existing cities and capital towns, which defeats the purpose of the fund as defined in the legislative proposal.

Mechanisms and benchmarks must be in place to ensure that recipients will use the additional funds to improve their service delivery performance. Coming from a perspective where newly converted cities had been exempted from the verifiable indicators of cityhood prescribed by the Local Government Code, the League has serious reservations that the fund will be used efficiently. With levels of population and/or land area below the requirement, additional cities may fail to maximize the additional resources they would receive because they do not have a commensurate level of assets (i.e., population and land) to invest in for further development.

CONCLUSION

While the intent of the proposed legislative provisions is commendable, the addendums look past the issues inherent to the pending cityhood bills, as previously raised by the League, particularly the relaxation of the land area and population requirement in favor of a larger income threshold. The League also expresses its qualms on the sustainability and efficient use of these funds.

Land, labor, and capital have always been the factors of production, which fuels economic development in a geographical area. This provides economic wisdom in putting population and land area requirement for the conversion of LGUs in the Local Government Code. Proponents of the cityhood bills argue that income is the most controlling variable; however, the extent of the effect of income will always depend on population and land where the gains of economic development physically manifest. The League appreciates the importance of helping capital towns develop to become cities, but the end goal should not be



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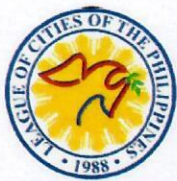
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earmarked on a larger, albeit, baseless income threshold. Instead, the journey towards cityhood should be marked by the growing potential of a municipality's asset for development, and improved capacities of the local government to respond to such increasing demands.

Sections 7 and 450 of the Local Government Code adequately facilitate the conversion of LGUs and, to a certain extent, prevents the reckless rush toward cityhood. As such, the League does not see the necessity in further relaxing these requirements. On the contrary, the League believes that additional indicators such as the presence of critical social infrastructure (e.g., schools, hospitals) will serve as a better determinant of a municipality's readiness in operating as a city. The League believes that it is also time to discuss and debate what really constitutes a city.



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Barangay	41,502	41,929	41,943	41,980	42,025	42,036

Source: Consolidated Information from the Philippine Statistical Authority

Table 2. Capital Towns in the Philippines

Municipality	Land Area (km ²)	Population (2007)
1. Alabel, Sarangani	510.98	71,872
2. Baler, Aurora	92.55	34,492
3. Bangued, Abra	105.7	46,179
4. Basco, Batanes	49.46	7,517
5. Bayombong, Nueva Vizcaya	136	54,417
6. Boac, Marinduque	212.7	50,823
7. Bongao, Tawi-Tawi	365.95	95,055
8. Bontoc, Mt. Province	396.1	24,798
9. Cabarroguis, Quirino	260.2	28,024
10. Catarman, Northern Samar	464.43	81,067
11. Daet, Camarines Norte	46	94,184
12. Ipil, Zamboanga Sibugay	241.6	60,686
13. Jolo, Sulu	22.24	140,307
14. Jordan, Guimaras	126.11	32,524
15. Kabugao, Apayao	935.12	14,529
16. Kalibo, Aklan	50.75	69,700
17. Lagawe, Ifugao	208.91	17,373
18. Siquijor, Siquijor	90.7	23,271
19. Mambajao, Camiguin	89	35,308
20. Mamburao, Occ. Mindoro	283.51	34,487
21. Nabunturan, Compostela Valley	231.3	67,365
22. Naval, Biliran	108.24	44,288
23. Prosperidad, Agusan del Sur	505.15	75,390
24. Romblon, Romblon	86.87	37,544
25. San Jose, Antique	48.56	54,871
26. San Jose, Dinagat Island	27.8	28,398
27. Virac, Catanduanes	152.4	64,554

Source: Consolidated Information from the Philippine Statistical Authority