

Title: **Municipality of Isabel vs. Municipality of Merida (892 Phil. 159)**

Facts:

1. **Creation of Isabel**: The Municipality of Isabel was formed by Republic Act (R.A.) No. 191 on June 22, 1947, out of eight barrios previously part of Merida, Leyte, with the government seat in Quiot.
2. **Boundary Marking**: To delineate the boundary between Isabel and Merida, stone markers were placed in designated areas. These markers, installed in 1947, had dimensions of 6×6 inches with “M” for Merida and “I” for Isabel.
3. **Boundary Dispute Origin**: A boundary dispute arose between the installation of MBM No. 5 by Isabel in 1981, which changed the boundary line and claimed a disputed area of 162.3603 hectares.
4. **Structural Encroachments**: Isabel’s jurisdiction led to structures within the disputed area, prompting Merida’s Barangay Benabaye to seek assistance.
5. **Fact-Finding Committee**: In response, Merida organized a boundary committee, and on April 6, 1990, the Sangguniang Bayan resolved to install new boundary markers.
6. **Sangguniang Panlalawigan Resolution**: The boundary dispute was adjudicated by the Sangguniang Panlalawigan in Merida’s favor, ordering the removal of Isabel’s MBM No. 5 and reconstruction of new monuments along the old boundary.
7. **RTC Decision**: The RTC overturned the Sangguniang Panlalawigan’s resolution, upholding that MBM No. 5 marked the accurate boundary and the disputed area belonged to Isabel.
8. **CA Decision**: Upon Merida’s appeal, the CA reversed the RTC’s decision and reinstated the Sangguniang Panlalawigan resolution, crediting the 1947 stone monuments.

Issues:

1. **Excessive Alteration of Boundaries**: Did the placement of MBM No. 5 alter the municipal boundaries beyond the original delineation?
2. **Existence and Significance of Boundary Markers**: What significance do the boundary markers (particularly the 1947 monument and MBM No. 5) have in determining the true boundary?
3. **Procedural Correctness**: Was the CA correct in reinstating the Sangguniang Panlalawigan’s findings based on the evidence provided?

Court’s Decision:

1. **Alteration of Boundaries**:
 - The Supreme Court held that any significant boundary changes must comply with

constitutional and statutory requirements, including a plebiscite.

- Existing boundaries from 1947, as marked, must be considered unless clearly altered per legislative act.

2. **Boundary Markers**:

- The original 1947 monument placed near the Doldol Creek, despite being unearthed only after the trial, holds substantial evidentiary value.

- The changing relocation of boundaries based on MBM No. 5, installed much later, was not consistent with the original delineation laws.

3. **Significance of Evidence & Procedural Correctness**:

- The CA correctly assessed that the Sangguniang Panlalawigan's decision had more weight given the contemporary understanding of the boundary from 1947.

- Tax declarations and residency of officials within the disputed area were additional supporting evidence that the area was part of Merida.

- Proper procedural due process followed by the CA in reinstating the provincial board's resolution as a factual determination relying on historical contexts.

Doctrine:

1. **Statutory and Constitutional Compliance**: Boundary alterations should strictly comply with statutory requirements and necessitate plebiscites for legitimate alterations.

2. **Historical Markers' Supremacy**: Markers identified contemporaneously with the creation of an LGU hold supreme evidentiary value unless lawfully altered later.

Class Notes:

- **Local Government Code Compliance**: Section 6, 10, & 441 emphasize the process for altering boundaries includes legislative acts and plebiscite approval.

- **Boundary Evidence**: Statements from contemporaneous witnesses (e.g., mayors), historical tax records, official cadastral maps.

- **Manual for Land Surveys**: Accurate placement and identification of boundary markers.

Historical Background:

- **Post-WWII Reorganization**: The case reflects post-WWII municipal reorganization efforts in the Philippines to better allocate governance among localities.

- **Legislative Intent**: Historical enactments delineating municipal boundaries illustrate the intent to create distinct territorial units, essential for local governance.

By assessing both historical and documentary evidence, the rulings illustrate the importance

of maintaining accurate territorial demarcations in the Philippines' local government system.