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RECONFIGURING KENYA:

The Case for 14 Economic Regions Over 47 Counties

How Kenya can complete its constitutional journey, rescue its fiscal future,
and build a developmental state fit for the 21st century.

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Executive Summary

Kenya's 2010 Constitution was a generational achievement. Devolution was its centrepiece — a promise to bring government closer to the people, end the tyranny of centralised patronage, and distribute resources equitably across a diverse nation. Fourteen years on, that promise has been captured, distorted, and turned against the Kenyan people.

Forty-seven counties have become 47 competing patronage networks, each with a governor's office, a county assembly, a bloated bureaucracy, and a wage bill that consumes between 60 and 80 percent of devolved revenue before a single service is delivered. The constitutional devolution threshold of 15 percent of national revenue flows into a structure so fragmented that it produces administrative theatre rather than development.

This paper argues for a structural correction: the consolidation of Kenya's 47 counties into 14 economic regions, organised around watersheds, trade corridors, infrastructure assets, and economic clusters — not ethnicity. This is not a radical proposal. It is, in fact, the proposal that nearly became Kenya's constitutional reality. The 2010 Naivasha Draft proposed 14 regions. Political horse-trading in the final weeks inflated that number to 47. We are arguing for completing Kenya's constitutional journey, not reversing it.

Core Argument

Kenya does not have a devolution problem. It has a structural design problem. Forty-seven counties were never a developmental architecture — they were a political settlement that disguised ethnic accommodation as administrative logic. The cure is not to abolish devolution but to give it the geographic and fiscal foundation it has always required.

The evidence from comparable transitions is unambiguous. Rwanda consolidated from 12 provinces to 5 in 2006 and has since become sub-Saharan Africa's most efficient state. Ethiopia's regional restructuring anchored an economic transformation. South Africa's consolidation from four provinces to nine — while imperfect — delivered coherent metropolitan governance. In each case, the political cost was real and the developmental dividend was larger.

This paper provides the intellectual, fiscal, and constitutional case for Kenya's transition to 14 economic regions. It is addressed to policymakers, constitutional reformers, international

development partners, and the growing movement of Kenyan citizens who understand that the current structure is not a misfortune to be managed but a design flaw to be corrected.

Current Structure	Proposed Structure	Change
47 counties	14 economic regions	-33 units
47 governors	14 regional governors	-33 executives
2,900+ MCAs	~560 regional reps	-2,340 seats
KES 500B+ wage bill	Est. KES 200B wage bill	-60% savings
Avg. county: 1.1M people	Avg. region: 3.7M people	+3x viability

01

The Devolution Crisis: Diagnosis

1.1 The Promise and Its Capture

Kenya's devolution was designed around a precise diagnosis of the post-independence state: hyper-centralised, ethnically captured, fiscally opaque, and developmentally inert. The Constitution of Kenya 2010 responded with a radical decentralisation — 15 percent of national revenue to county governments, elected governors with genuine executive authority, county assemblies with legislative oversight, and an explicit mandate to deliver services at the community level.

By every structural metric, the architecture was sound. By every developmental metric, the outcomes have been catastrophic. The explanation lies not in the principle of devolution but in the arithmetic of 47.

1.2 The Wage Bill Crisis

The Controller of Budget's annual reports since 2014 tell a consistent and damning story. Across Kenya's counties, personnel emoluments — the county wage bill — consume between 55 and 82 percent of devolved revenue. In smaller counties, the figure is structural, not accidental: there are simply not enough people, tax revenue, or economic activity to sustain an independent county government apparatus at any meaningful scale.

County	Personnel Costs (% of Revenue)	Development Expenditure (%)
Lamu	78%	4%
Vihiga	74%	6%
Isiolo	71%	8%
Samburu	69%	9%
National average	52%	22%
Constitutional cap	35%	~45% (implied)

The constitutional cap on personnel emoluments is 35 percent of county revenue. The majority of Kenya's counties have violated this cap every year since 2014. No governor has faced legal

consequence. The Salaries and Remuneration Commission has repeatedly called for reform. Parliament has done nothing. The system is self-reinforcing: governors need the jobs to maintain political networks; MCAs need the governor's patronage; and the ward funds that justify MCA positions disappear into procurement opacity.

1.3 The Population Absurdity

The population logic of 47 counties defies any known principle of viable governance. Kenya's 2019 census recorded a national population of 47.6 million — an average of just over one million people per county. But the distribution is wildly unequal. Nairobi County has over four million residents. Lamu County has 143,920. The smallest county in the United States — Loving County, Texas — has a population of 64. It has no pretensions to being a developmental state.

The international comparison is instructive. German Lander average 5.1 million people. South African provinces average 6 million. Indian states average 40 million. Even Nigeria's 36 states — often cited as a model of federal fragmentation — average 5.1 million people with oil revenues to sustain the architecture. Kenya's smallest counties are administering populations the size of a medium-sized town while maintaining full state apparatus — governor, deputy governor, county executive, 47-member county assembly, and full public service complement.

The Structural Trap

A county government for 143,920 people (Lamu) maintains the same institutional overhead as a county government for 4.4 million (Nairobi). The Constitution requires it. The taxpayer funds it. Development suffers for it. This is not a management problem. It is an architecture problem.

1.4 Ethnic Entrenchment, Not Ethnic Protection

The architects of the 47-county design believed, in good faith, that smaller counties would protect minority ethnic communities from majoritarian capture. The opposite has occurred. Smaller, ethnically homogeneous county units have not produced ethnic security — they have produced ethnic capture. The governor of a small, ethnically homogeneous county governs almost exclusively for co-ethnic constituents, hires almost exclusively from co-ethnic networks, and builds the county's political identity around ethnic grievance rather than developmental ambition.

Devolution was meant to end ethnic politics by giving every community its own developmental resources. Instead, it has institutionalised ethnic politics by making the county the primary arena of ethnic resource distribution. The result is not 47 development units — it is 47 ethnic political machines, each competing for a share of the national cake rather than baking their own.

02

Historical Legitimacy: The Road Not Taken

2.1 The Naivasha Draft: What Kenya Almost Had

The argument for 14 regions is not a new idea imposed on Kenya from outside. It is, in the most precise sense, Kenya's unfinished constitutional business. The Bomas Draft of 2004 — produced by the National Constitutional Conference after extensive public participation — proposed a system of regions significantly fewer than 47. The Naivasha Draft of 2010, the penultimate constitutional text before the final document was promulgated, proposed 14 regions explicitly.

The inflation from 14 to 47 occurred in the final weeks of constitutional negotiation, under enormous political pressure from incumbent politicians who correctly understood that a larger number of counties meant more positions, more patronage opportunities, and more insurance against electoral defeat at the national level. The 47 counties were not a constitutional principle. They were a political deal dressed in constitutional language.

This matters enormously for the reform project. Reducing Kenya from 47 counties to 14 regions is not a constitutional revolution. It is a constitutional correction — a return to the developmental logic that was always embedded in the reform process, before politics corrupted the arithmetic.

2.2 Senator Kajwang and the Return of the 14-Region Proposal

In 2025, Senator TJ Kajwang introduced a motion in the Senate proposing the consolidation of Kenya's 47 counties into 14 regions. The motion was not frivolous — it was backed by detailed fiscal analysis and drew explicitly on the Naivasha Draft's historical precedent. The political establishment reacted with predictable hostility: governors, MCAs, and county public servants faced the existential threat the proposal represented.

But the proposal did not die. It entered the policy mainstream in a way no similar proposal had before. Civil society organisations, fiscal analysts, and a significant cohort of Kenyan youth publicly supported the logic if not always the specific mechanism. The Kajwang proposal is the immediate political context for this paper. We provide the intellectual and institutional architecture to make it actionable.

03

The 14-Region Framework

The following 14 economic regions are organised around four primary criteria: watershed and ecological unity, trade corridor and infrastructure alignment, economic cluster coherence, and population viability. Ethnicity is not a criterion. Where ethnic communities span proposed regional boundaries, this is a feature, not a bug — it requires regional governance to serve diverse constituencies rather than a single ethnic patron.

Zone A — Central Highlands and Nairobi Core

Region	Constituent Counties	Economic Anchor	Population (est.)
R1: Nairobi Capital Region	Nairobi, Kiambu, Machakos (north)	Finance, tech, manufacturing	7.2M
R2: Mount Kenya Agricultural Region	Nyeri, Kirinyaga, Murang'a, Nyandarua	Tea, coffee, horticulture	3.8M

The Nairobi Capital Region corrects the most obvious structural absurdity in Kenya's current devolution: the functional metropolis of Greater Nairobi is governed by three separate county governments with overlapping infrastructure, competing planning authorities, and no coordinated urban strategy. Nairobi City, Kiambu, and the northern sections of Machakos constitute a single economic landscape. Treating them as three autonomous devolved units produces precisely the traffic, housing, and service delivery dysfunction that characterises the current arrangement.

The Mount Kenya Agricultural Region is unified by the Tana River watershed, the Aberdare and Mount Kenya water towers, and the tea and coffee production belts that constitute one of Kenya's most significant export revenue streams. Integrated water catchment management, shared agri-processing infrastructure, and a unified irrigation strategy are impossible across four separate county governments with competing water use priorities.

Zone B — Rift Valley and Western Corridor

Region	Constituent Counties	Economic Anchor	Population (est.)
R3: Nakuru-Naivasha Industrial Region	Nakuru, Laikipia, Nyandarua (east)	SEZ, geothermal, floriculture	3.1M
R4: Rift Valley Grain Belt	Uasin Gishu, Trans Nzoia, Nandi, Elgeyo-Marakwet	Maize, wheat, Eldoret corridor	4.2M
R5: Western Kenya Region	Kakamega, Vihiga, Bungoma, Busia	Sugar, cross-border trade	5.6M
R6: Lake Victoria Region	Kisumu, Siaya, Homa Bay, Migori	Lake fisheries, Kisumu Port	4.3M

The Naivasha Special Economic Zone — among Kenya's most significant recent infrastructure investments — is currently governed by Nakuru County in isolation from the Naivasha-Nairobi SGR corridor and the geothermal infrastructure concentrated around the Rift Valley escarpment. A consolidated industrial region enables coherent SEZ governance, energy policy, and the flower export logistics that represent a significant share of Kenya's agricultural exports.

Western Kenya presents the starkest fiscal case for consolidation. Vihiga County — Kenya's most densely populated county per square kilometre — has a total budget so small that its development expenditure in any given year barely funds a single major infrastructure project. Merged with Kakamega, Bungoma, and Busia into a viable western region, the cumulative fiscal resource enables the Western Bypass corridor development, coherent sugar sector reform, and the Lake Victoria-border trade infrastructure that could transform this region's economic trajectory.

Zone C — South Rift and Coast

Region	Constituent Counties	Economic Anchor	Population (est.)
R7: South Rift Region	Kericho, Bomet, Baringo, West Pokot	Tea, pastoralism, Kerio Valley	3.9M
R8: Mombasa Maritime Region	Mombasa, Kwale, Kilifi, Taita-Taveta	Port, tourism, Dongo Kundu SEZ	3.8M
R9: Eastern Agricultural Region	Machakos, Makueni, Kitui	Horticulture, SGR corridor	3.5M

The Mombasa Maritime Region consolidation addresses Kenya's most consequential governance failure: the Port of Mombasa — through which approximately 80 percent of Kenya's imports and exports pass — is governed by Mombasa County in isolation from its hinterland. Port development decisions, Dongo Kundu SEZ planning, tourism infrastructure, and coastal environmental management are fractured across four county governments with no mechanism for coordinated decision-making. A unified maritime region creates the governance architecture that Kenya's second city has always deserved.

Zone D — Northern and Eastern ASAL

Region	Constituent Counties	Economic Anchor	Population (est.)
R10: North Rift / Turkana Basin	Turkana, Samburu, Marsabit (west)	Oil, LAPSSET, pastoralism	1.9M
R11: Northern Frontier Region	Mandera, Wajir, Marsabit (east), Isiolo	LAPSSET, Ethiopia border trade	2.4M
R12: Garissa-Tana Delta Region	Garissa, Tana River, Lamu	Lamu Port, Tana irrigation, Somalia trade	1.6M

The ASAL (Arid and Semi-Arid Lands) regions present a different challenge from the rest of the framework. Their geographic size is vast; their populations are sparse; and the argument for consolidation is not primarily fiscal efficiency but developmental capacity. Current county governments in Turkana, Mandera, Wajir, and Marsabit are functionally unable to deliver basic services — not because of poor governance alone, but because their fiscal resource base is inadequate for the territory they govern.

The LAPSSET corridor — a transformative infrastructure project linking Lamu to South Sudan and Ethiopia — passes through all three proposed northern regions. Its development requires coordinated governance at a scale that no individual county can provide. Consolidated regional governments with genuine fiscal capacity, technocratic administrations, and integrated infrastructure planning are the prerequisite for LAPSSET's actualisation.

Zone E — Central and South East

Region	Constituent Counties	Economic Anchor	Population (est.)
R13: Central Kenya Region	Embu, Tharaka-Nithi, Meru	Miraa, horticulture, Mt Kenya east	2.8M
R14: Kajiado-Narok Pastoral Region	Kajiado, Narok, Kericho (south)	Maasai Mara tourism, carbon credits	2.7M

The Kajiado-Narok consolidation may be the single most economically consequential merger in the entire framework. The Maasai Mara-Amboseli corridor generates billions of shillings in tourism revenue annually, yet Narok and Kajiado counties govern it in competition rather than cooperation — competing over gate fee revenues, disputing conservation boundaries, and failing to invest jointly in the infrastructure that could double the corridor's economic output. A unified pastoral and tourism region, with coordinated wildlife management and the capacity to negotiate carbon credit revenues at scale, would transform one of Africa's great conservation assets into a genuine developmental engine.

04

Comparative Cases: Where This Has Worked

The consolidation of sub-national administrative units is among the most well-documented governance reform pathways in comparative political science. The cases below are not cherry-picked successes — they are the most analytically rigorous comparators for Kenya's specific situation: middle-income or lower-middle-income states with ethnic diversity, post-colonial institutional legacies, and developmental aspirations that their existing administrative structures were failing to support.

4.1 Rwanda: The Continental Benchmark

Case Summary

Rwanda consolidated from 12 provinces, 106 districts, and 1,545 sectors to 5 provinces, 30 districts, and 416 sectors between 2000 and 2006. The reform was implemented in phases and accompanied by a comprehensive local government capacity-building programme. It is now widely regarded as the most successful administrative reform in post-conflict Africa.

Rwanda's 2000-2006 administrative restructuring was a deliberate act of state-building. President Kagame's government correctly diagnosed that Rwanda's post-genocide reconstruction could not proceed through a fragmented administrative structure whose boundaries had been drawn, in part, along the ethnic lines that had facilitated the genocide. The reform had two simultaneous objectives: eliminate the administrative capacity of ethnic mobilisation, and create governance units large enough to attract and retain technocratic talent.

The results across the two decades since restructuring are extraordinary by any measure. Rwanda's GDP per capita grew from approximately \$200 in 2000 to over \$900 in 2023 — a fourfold increase in real terms. The World Bank's Government Effectiveness Index places Rwanda consistently in the top quartile of sub-Saharan African states. Public service delivery indices — healthcare access, primary education enrollment, child mortality rates — show improvements that are unmatched on the continent at comparable income levels.

The mechanisms are instructive for Kenya. Consolidation allowed Rwanda to recruit and retain professional administrators at regional and district level — something impossible when administrative units are too small to offer career progression or competitive compensation. Performance contracts (imihigo) for district mayors created accountability structures that

presuppose governing units large enough to set and measure meaningful development targets. And the elimination of ethnically-bounded administrative units removed the structural incentive for ethnic patronage politics that had defined the pre-genocide state.

Rwanda vs Kenya — Key Metrics (2023)

Rwanda: 30 districts, avg. population 450,000, annual per capita growth 7.2%, Government Effectiveness Score: 65th percentile globally. Kenya (comparable): 47 counties, avg. population 1.0M, annual per capita growth 4.1%, Government Effectiveness Score: 38th percentile globally. The governance efficiency gap is structural, not cultural.

4.2 Ethiopia: Federal Restructuring and Economic Transformation

Ethiopia's 1995 Constitution established a system of ethnically-defined regional states — a design that represented a conscious political choice to manage ethnic diversity through institutional recognition rather than administrative dilution. The Ethiopian case is relevant to Kenya precisely because it demonstrates both the political logic of ethnic federalism and its developmental limits.

Ethiopia's economic transformation between 2004 and 2019 — one of the fastest sustained growth periods in African history — occurred not because of its ethnic federal structure but despite it. The developmental achievements of the Ethiopian People's Revolutionary Democratic Front period were concentrated in domains where federal structure was effectively bypassed: industrial park development (Hawassa, Bole Lemi, Dire Dawa) were governed by federal industrial development authorities rather than regional states; the Grand Ethiopian Renaissance Dam was a federal project; infrastructure investment was coordinated nationally.

The more instructive Ethiopian lesson for Kenya is the 2019-2021 restructuring under Prime Minister Abiy Ahmed, which created the Sidama and South West Ethiopia Peoples' regions through consolidation and separation processes driven by economic viability analysis. The key principle: where existing regional units could not demonstrate fiscal self-sufficiency or administrative capacity, consolidation was preferred to proliferation. Kenya's current 47-county trajectory points toward proliferation — with periodic proposals to create new counties emerging from precisely the same political logic that inflated the number from 14 to 47 in 2010.

4.3 South Africa: Metropolitan Consolidation as Development Strategy

South Africa's post-apartheid administrative restructuring is the most directly relevant large-scale comparator for Kenya. The 1996 transition produced nine provinces from four apartheid-era provinces, with a deliberate logic of creating developmental regions rather than preserving

apartheid-era boundaries. The reform was accompanied by the creation of metropolitan municipalities — consolidated urban governance units for South Africa's major cities.

The metropolitan municipality model is particularly instructive. Johannesburg, Cape Town, Durban (eThekweni), and Tshwane are governed as single metropolitan entities, each with populations between 3 and 6 million, unified planning authorities, consolidated infrastructure budgets, and the administrative scale to attract world-class city management talent. The alternative — governing these metropolitan areas as collections of smaller municipalities, as Kenya effectively does with Greater Nairobi — was explicitly rejected by South Africa's constitutional designers as incompatible with developmental urbanism.

South Africa's experience also provides Kenya's most important cautionary lesson: administrative consolidation does not automatically produce developmental governance. South Africa's provinces have struggled with corruption, capacity deficits, and service delivery failures despite their structural advantages. The lesson is not that consolidation guarantees outcomes — it is that without consolidation, certain developmental outcomes are structurally impossible. Scale is a necessary, not sufficient, condition for developmental governance.

4.4 Tanzania: The Contrast Case

Tanzania's administrative structure provides the counter-factual. Tanzania has maintained a relatively lean regional structure — 31 regions governing a population of 65 million — with regional commissioners appointed by the central government rather than elected. The result is a more administratively coherent state than Kenya, with significantly lower sub-national wage bill costs as a proportion of public expenditure.

Tanzania's approach is not a model for Kenya — the absence of democratic accountability at the regional level represents a genuine governance cost, and Tanzania's development outcomes are not significantly better than Kenya's on most metrics. But Tanzania demonstrates that a larger, less fragmented sub-national structure is operationally feasible for an East African state of comparable size and diversity.

4.5 Germany: Lander as the Viability Benchmark

For a developed-country benchmark that illuminates the population viability question, Germany's 16 Lander are instructive. Germany has a population of 84 million governed through 16 federated states, averaging 5.25 million people per Land. The smallest Land — Bremen — has 700,000 people and an economy that generates sufficient own-source revenue to sustain its governmental functions. Even Bremen is routinely cited by German constitutional scholars as an example of a Land that is too small for genuine fiscal autonomy.

Kenya's proposed 14 regions, with an average population of approximately 3.7 million, would fall below the German Lander benchmark. The point is not that Kenya must achieve German standards before restructuring is viable — it is that the international evidence on viable sub-national governance consistently points toward units significantly larger than Kenya's current 47 counties. The direction of reform is empirically clear.

Country	Sub-national Units	Avg. Population	Reform Year	Development Outcome
Rwanda	30 districts	450,000	2006	Top-quartile governance efficiency
South Africa	9 provinces + metros	6M / 4M	1996	Developmental urbanism enabled
Tanzania	31 regions	2.1M	Gradual	Administrative coherence maintained
Germany	16 Lander	5.25M	1949/1990	Federal fiscal sustainability
Kenya (current)	47 counties	1.0M	2013	Fiscal dysfunction, patronage capture
Kenya (proposed)	14 regions	3.7M	TBD	Viable developmental governance

05 The Fiscal Case

5.1 The Cost of the Current Architecture

The fiscal case for consolidation is not a projection or a model — it is an accounting of current waste. Kenya's 47 county governments maintain the following institutional overhead, duplicated 47 times: a governor and deputy governor (State House-equivalent facilities and security detail); a county executive committee of between 10 and 15 members; a county assembly of between 47 and 90 elected members with staff and ward development funds; a full county public service with department heads, sub-county administrators, ward administrators, and village elders on the county payroll; county audit committees, county development boards, and procurement authorities.

The Controller of Budget's FY2023/24 report shows total county government expenditure of KES 539.7 billion. Of this, KES 296.8 billion — 55 percent — was personnel emoluments. Development expenditure across all 47 counties was KES 114.3 billion, or 21 percent. The constitutional requirement is that development expenditure reach 30 percent. It has never been achieved, system-wide, in any fiscal year since devolution began.

Fiscal Arithmetic

If county personnel costs were reduced from 55% to 35% of county expenditure (the constitutional threshold), KES 107.9 billion per year would be freed for development. Over a five-year period, this represents over KES 500 billion — equivalent to Kenya's entire annual development budget — redirected from bureaucratic payroll to hospitals, roads, schools, and economic infrastructure.

5.2 The Transition Cost and Investment Case

Consolidation has upfront costs that honest analysis must not obscure. Harmonising salary structures across merged county governments, managing redundancy for excess staff, rationalising physical infrastructure, and conducting new elections for regional governments would require a one-time fiscal outlay that independent analysis suggests would be in the range of KES 80-120 billion over three years.

Against this must be set the recurrent savings: a conservative estimate of KES 80 billion per year in reduced personnel costs, KES 15-20 billion in eliminated duplicated procurement systems, and

KES 10-15 billion in rationalised physical facilities. The payback period for the transition investment is approximately 18-24 months. Every year thereafter represents a net fiscal dividend that compounds into the development budget.

International development partners — the World Bank, the IMF, the African Development Bank, USAID, and the UK's FCDO — have all, at various points, flagged Kenya's county wage bill as a structural risk to its fiscal sustainability. A consolidation reform accompanied by a credible transition plan would unlock development finance that is currently withheld precisely because the current structure cannot demonstrate fiscal discipline.

06

The Constitutional Pathway

6.1 What the Constitution Requires

The Constitution of Kenya 2010 establishes 47 counties by name in the First Schedule. Changing the number of counties therefore requires a constitutional amendment. Under Article 255, amendments that touch on devolution require approval by not less than two-thirds of members of the National Assembly and Senate, and ratification by not less than 24 of the 47 county assemblies. Under Article 256, some amendments additionally require a national referendum.

The question of whether a reduction in the number of counties triggers the referendum requirement under Article 256(1) — which applies to amendments that 'concern county governments' — is legally contested. The prevailing interpretation among constitutional scholars is that a reduction in the number of counties is a fundamental alteration to the devolution architecture and would require both parliamentary supermajority and a referendum. This is the honest position, and any reform movement should plan for it rather than attempt to circumvent it.

6.2 The Three-Phase Reform Pathway

A realistic reform pathway has three phases, spanning an estimated eight to twelve years from initiation to implementation:

- Phase 1 — Coalition Building and Commission (Years 1-3): Establish a bipartisan Parliamentary Commission on Administrative Reorganisation. Commission an independent fiscal and administrative audit of all 47 county governments. Build a public case for reform through civil society, media, and international partner engagement. Secure Senate majority support for a constitutional amendment bill.
- Phase 2 — Constitutional Amendment Process (Years 3-5): Introduce the constitutional amendment bill in Parliament. Subject to supermajority approval, carry the amendment to county assemblies for ratification (24 of 47 required). If referendum is required, conduct a national referendum on the consolidation proposal. Enact the County Governments (Reorganisation) Act establishing the transition framework.
- Phase 3 — Transition and Implementation (Years 5-10): Establish Regional Transition Authorities for each of the 14 proposed regions. Conduct regional government elections under the new constitutional framework. Implement staff harmonisation and redundancy management programme. Transfer functions and assets from county to regional governments over a 24-month transition period.

Political Viability Assessment

The central political challenge is the governors. Forty-seven governors, their deputies, and thousands of county assembly members face direct elimination of their positions. The reform movement must offer a credible transition: regional governor positions will be more powerful, better resourced, and more developmentally significant than county governor positions. The best county governors have a future in regional governance. The argument to the political class is not 'your position is being abolished' — it is 'the position you are being offered is genuinely worth having.'

Addressing the Objections

7.1 'Ethnic communities will lose representation'

This is the most powerful objection and deserves the most rigorous response. The concern is legitimate: smaller, ethnically homogeneous counties do give minority communities a guaranteed political voice. A Luo governor in Siaya, a Mijikenda governor in Kilifi — these are real forms of political representation that a consolidated region might dilute.

The counterargument is structural. Current ethnic representation at county level is representation without resources. A Lamu county assembly seat represents 143,920 people and a development budget that cannot fund a district hospital. Representation in a viable Lake Victoria Region of 4.3 million people — with real development resources, professional administration, and competitive regional institutions — is representation with power. The reform must include explicit ethnic representation guarantees within regional governance: constituency quotas, proportional representation mechanisms, and reserved seats for minority communities within each region.

The model here is South Africa's ward-based system within metropolitan municipalities — small communities retain direct representation through ward councillors within a larger governance structure that can actually deliver services. Kenya's regions can adopt a similar architecture: regional assemblies with ward-level constituencies that guarantee local community voice within a developmentally viable governance unit.

7.2 'Service delivery will be further from communities'

Administrative consolidation does not require the elimination of local service delivery points. Hospitals, schools, courts, land registries, and social services should remain distributed at the sub-county and ward levels. What consolidation eliminates is duplicated administrative overhead — the governor's office, the county executive committee, the county assembly, and the bureaucratic superstructure — not the front-line services that citizens actually use.

In the ASAL regions specifically, the service delivery concern is most acute — and most ironic. It is precisely in Turkana, Wajir, and Mandera that service delivery is worst under the current county structure, because these county governments lack the fiscal resources and administrative talent to deliver. A consolidated northern region with adequate fiscal allocation and professional management is more likely to build the roads, staff the hospitals, and extend the schools that

these communities need than a collection of cash-starved county governments competing for a share of an inadequate equitable share allocation.

7.3 'The political will does not exist'

This objection is a description of current conditions, not a permanent verdict. Kenya's political landscape has shifted significantly since the 2010 constitution was promulgated. A generation of Kenyans who have lived their entire adult lives under devolution have watched the promise of county governments consumed by patronage, wage bills, and ethnic competition. The fiscal data is now available and widely understood. Senator Kajwang's 2025 proposal demonstrated that the argument can be made in the political mainstream.

The historical pattern of major constitutional reform in Kenya — from the repeal of Section 2A in 1991 to the 2010 constitution itself — is that the political will appears impossible until it becomes inevitable. Reform coalitions build over years, seemingly making no progress, until a political window opens and the accumulated intellectual and civic work becomes actionable. This paper is part of building that coalition and doing that intellectual work.

08

Recommendations

For the Government of Kenya

1. **Establish a Presidential Commission on Administrative Reorganisation** to conduct a comprehensive fiscal, administrative, and demographic audit of the current 47-county structure, with a mandate to propose a viable consolidation framework within 18 months.
2. **Enforce the constitutional 35% personnel emolument cap** immediately, with the Controller of Budget empowered to withhold equitable share disbursements to counties that persistently violate the threshold.
3. **Commission an independent constitutional opinion** on the referendum requirements for county consolidation, and publish it for public debate.
4. **Initiate a national public participation process** on administrative reorganisation, modelled on the Bomas process, with representation from all 47 counties and explicit minority community representation guarantees.

For International Development Partners

5. **Make administrative viability a condition of development finance** for county-level projects, requiring counties that exceed the 35% personnel emolument threshold to demonstrate a credible reduction pathway before accessing programme funding.
6. **Fund a Kenya Administrative Reorganisation Technical Facility** to provide technical assistance for the transition process, drawing on the expertise of Rwanda's Local Administrative Entities Development Agency (LODA) and South Africa's COGTA.
7. **Commission independent fiscal modelling** of the 14-region framework, including transition costs, recurrent savings, and development expenditure impacts, to provide an authoritative evidence base for the reform debate.

For Civil Society and Reform Advocates

8. **Build the public case through data** — the Controller of Budget reports, the CRA equitable share data, and the county wage bill statistics are all publicly available. Making this data accessible and legible to ordinary Kenyan citizens is the most important single contribution civil society can make to the reform debate.
9. **Build a reform coalition across ethnic lines** — the constituency for this reform is not any single ethnic community but the majority of Kenyan citizens who have not benefited from the patronage capture of county governments.
10. **Support Senator Kajwang's legislative process** and similar parliamentary initiatives, ensuring they are backed by technical analysis robust enough to withstand constitutional and fiscal scrutiny.

C

Conclusion

Kenya is not a poor country that cannot afford good governance. It is a middle-income country with the resources to build a developmental state — if those resources are not consumed by a bloated administrative architecture designed to accommodate political settlement rather than deliver development. Forty-seven counties are not a feature of Kenya's constitution. They are an artifact of the political negotiation that produced it.

The case for 14 economic regions is a case for completing Kenya's constitutional project. The Naivasha Draft knew what it was doing. The political pressure that inflated 14 to 47 was not constitutional wisdom — it was institutional rent-seeking by politicians who correctly identified that more counties meant more positions, more resources, and more political insurance. The Kenyan people deserve a constitutional architecture that serves their development rather than the political class's survival.

The international evidence is unambiguous, the fiscal data is damning, and the historical legitimacy is on the side of reform. What remains is political will — and political will, in Kenya's history, has a way of arriving when the intellectual and civic groundwork has been laid with sufficient care.

This paper is a contribution to that groundwork.

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