

The Bureaucratic Politics Paradox: The Case of Wetlands Legislation in Nevada

Rosemary O'Leary
Syracuse University

ABSTRACT

The importance of the environment in which public managers work and in which public organizations seek to thrive is undeniable. Organization theorists maintain that organizations both are shaped by and seek to shape the environment in which they exist. That public managers need to be aware of and work with forces in their environment is almost commonsensical. Yet there is little empirical evidence in either the organization theory literature or the bureaucratic politics literature of lower level and middle level professional career public managers actually attempting to shape their environment.

This article examines a successful clandestine effort by lower and middle level bureaucrats in the U.S. Department of Interior and the Nevada Department of Wildlife to have legislation enacted at both the federal and state levels that empowered them to make changes in their programs against the wishes of their superiors. The bureaucratic politics behind the legislation is documented and the paradox posed by these policy innovators who are also "organization deviants" is assessed. This is done by examining fourteen guidelines or lessons learned from the Nevada experience from the perspective of the "deviant" bureaucrats and assessing the implications of this phenomenon for public management.

In the waning hours of its final session of 1990, the U.S. House of Representatives passed S. 3084. That bill, which was signed into law by President Bush on November 16, 1990, as Public Law 101-618, was a path-breaking change in western irrigation policy.¹ The new law significantly addressed irrigation-induced water quality problems in several ways. First, the law settled a long-debated issue of whether the U.S. Department of Interior (DOI) has a right to buy water rights originally designated for Bureau of Reclamation irrigation projects and then to use those water rights to maintain wetlands areas. The law gave

¹The law also settled one hundred years of litigation over water rights in Nevada and California. For a summary of those portions of the law, see Rusco 1992.

The Bureaucratic Politics Paradox: Nevada Wetlands

DOI this authority. Second, under the new law the secretary of DOI was authorized to take such actions as may be necessary to prevent, correct, or mitigate for adverse water quality and fish and wildlife habitat conditions attributable to agricultural drain waste originating from federal irrigation projects. Third, the law ordered the DOI to close the "TJ Drain," a major irrigation runoff pollution site in Nevada.

The bill, sponsored by Senator Harry Reid of Nevada, officially was not supported by the U.S. Department of Interior (testimony of John Sayre, Constance Harriman, and Eddie F. Brown, assistant secretaries, DOI, February 6, 1990). The bill officially was supported, however, by a vast "web" comprised of environmental groups, Indian tribes, chambers of commerce, hunters, trappers, and conservation groups.² One strand of the web that many people will never know existed comprised career bureaucrats in the U.S. Department of Interior and the State of Nevada Department of Wildlife (NDOW). These public officials worked behind the scenes, first to develop support for the bill before Senator Reid decided to sponsor it and later as ghost writers of parts of the final Act. At some junctures they put their jobs in jeopardy by directly disobeying their superiors and promoting policies against which their organizations both officially and unofficially argued.

In this article I examine this strand supporting S. 3084 with the goal of documenting the bureaucratic politics behind the legislation and assessing the paradox posed by these policy innovators, who are also "organization deviants." I accomplish this by examining fourteen guidelines or lessons learned from the Nevada experience from the perspective of the "deviant" bureaucrats and by assessing the implications of this phenomenon for public management.³ Before I examine these guidelines, however, two caveats are in order: First, this study examines only *one* strand of the web that underlies the bill. As such, it is not meant to be a complete portrayal of how the bill became law. Nor is it meant to be an exhaustive study of all the actors behind the scenes. Rather, it is an examination of the actions of career civil servants to get their agenda on the table of policymakers. Second, I stumbled upon this research topic I was while a member of a National Academy of Sciences panel investigating irrigation-induced water quality problems in the western United States. Something just didn't ring true when some DOI employees initially maintained that legislation imposed "from outside the department" forced them to change their internal departmental policies. After confirming my suspicions through a private conversation with one of the speakers, I began this research. While

²Other scholars have referred to similar "webs" as issue networks (Hecl 1978), policy networks (Rhodes and Marsh 1992) and regulatory communities (Meidinger 1992).

³The author thanks the four main DOI and NDOW actors for their comments on a previous draft, which helped clarify these guidelines. Also of assistance were comments from Erroll Meidinger, James Pfiffner, Harry Lambright, and Patricia Ingraham.

the academy is aware of this project, it is separate from the ongoing work of the panel and in no way represents the conclusions of the panel or the academy.

PROMOTING CHANGE FROM OUTSIDE

The importance of the environment in which public managers work and in which public organizations seek to thrive is undeniable. Organization theorists such as Cyert and March (1963), Emery and Trist (1965), James D. Thompson (1967), Lawrence and Lorsch (1969), Aldrich (1972), Hall (1972), Rainey, Backoff, and Levine (1976), Adams (1976), Pfeffer and Salancik (1978), and Mintzberg (1979) all maintain that organizations both are shaped by and seek to shape the environment in which they exist. That public managers need to be aware of and work with forces in their environment is almost commonsensical. Faced with diverse interest groups, budget shortfalls, angry citizens, and pressures to do more with less, public managers are told that interactions with "outside forces" are important components of their jobs (Gaus 1947; Brownlow 1955; Wildavsky 1964; Stillman 1987; Rainey 1991; Daft 1992).

One need look no further than the *New York Times*' reports concerning supervisors in the U.S. Forest Service who maintain that politicians have asked them to cut down too many trees (Egan 1991) to realize that bureaucrats strive to affect their environment from both inside and outside the organization. Yet there are few academic studies, at the microlevel, of lower or middle-level professional career public managers actually attempting to shape their environment. The major categories of studies include those concerning whistleblowers (e.g., Frey 1982; Near and Miceli 1986; Fitzgerald 1989; Glazer and Glazer 1989; Jos, Tompkins, and Hays 1989; Johnson and Kraft 1990), intra-organization protesters (Gummer 1985; Truelson 1985), the "exit, voice, loyalty and neglect" responses of dissatisfied employees—which expand upon the work of Hirschman 1970—(e.g., Farrell 1983; Rusbult, Farrell, Rogers, and Mainous 1988; Withey and Cooper 1989; Golden 1992), and organization deviants (e.g., Ermann and Lundman 1978; Shaughnessy 1981; Punch 1984). Finally, while there is a rich literature on the topic of politics and bureaucracy (e.g., Meier 1993), little of this literature examines empirically the actions of lower level and mid-level bureaucrats to alter their environment.

The Nevada experience, then, has the potential of contributing to our knowledge of how career civil servants successfully affect their own organization's policies from outside of the

The Bureaucratic Politics Paradox: Nevada Wetlands

organization and the inherent paradox of this action. Sources of data for this study began with the testimony and reports of over fifty DOI employees at National Academy of Sciences meetings. Then, in the summers of 1991 and 1992 and the spring of 1993, seventeen key actors were interviewed in Nevada, Washington, D.C., Texas, and Arizona. Included in this group were DOI and NDOW employees, a farmer, the president of the Reno Chamber of Commerce, a Fallon Indian chief, environmentalists, hunters, and congressional aides.

Minutes of meetings of the Lahontan Valley Wetlands Association, a group comprised of diverse individuals including DOI and State of Nevada employees, were a major source of information concerning the strategy and tactics of the public employees who were studied. The minutes carefully document letters written, lobbying trips, tours coordinated, visits of reporters, and other actions that aided the bureaucrats.

DOI and State of Nevada records document the official positions against which these public servants rebelled. Congressional legislation and legislative histories provide insights into the testimony of key players before congressional committees, as well as the evolution of support in Congress for the Nevada wetlands. Newspaper reports and tapes of television newscasts were helpful in tracking public hearings and popular sentiment.

The job of data analysis and validation in such a study is described by Campbell (1975) and Yin (1981) as analogous to doing good detective work. A pattern-matching process that fit multiple implications derived from explanation or theory was utilized. "Chains of evidence" (Yin 1981) were established and the credibility/logic of explanations was analyzed. Arguments were pitted against each other to ascertain logical inconsistencies (Bozeman 1985). Conclusions were reviewed by major informants to insure more than a single perspective (Yin 1981; Bozeman 1985).

From these data, fourteen guidelines emerged, which explain how the Nevada public servants were able to affect their own organization's policies from the outside. The guidelines are discussed below, solely to illuminate the actions and rationale of the DOI and DOW employees. (They are not necessarily reflective of the author's opinion of good or bad public management techniques.) A final section discusses the implications of this phenomenon for public management.

**FOURTEEN GUIDELINES FOR
BUREAUCRATIC SELF-EMPOWERMENT**

RULE 1: Have a long-term vision as to goals but be flexible as to means.

In 1902, the United States initiated a program aimed at "making the deserts bloom." The seventeen western states were targeted for multimillion dollar irrigation projects with the goal of bringing inexpensive water to be used for communities and for farming. Today irrigation of about fifty million acres of land consumes about 90 percent of the water in the western United States. The Department of Interior's Bureau of Reclamation (BOR) is responsible for approximately one-fourth of the nation's irrigation projects. Water quality problems associated with DOI's irrigation projects include increased salinity, accumulation of trace elements such as selenium and boron, and pesticides (National Research Council 1989).

In interviews with the four major bureaucratic players in the Nevada case (hereafter referred to as "the Nevada Four"⁴) all emphasized that they had a shared long-term goal: save the Stillwater and Carson Lake (or Lahonton Valley) wetlands from Bureau of Reclamation irrigation practices at the Nevada Wetlands Project, which they as scientists concluded have a negative impact on the environment. These irrigation practices, say the scientists, divert water from the wetlands and induce water quality problems, such as the accumulation of trace elements which can be toxic to wildlife.⁵ This goal became their number one concern, overriding other "tedious bureaucratic responsibilities" with which they felt forced to deal. The goal became more important than pleasing their superiors, upholding departmental policy, or appeasing potentially hostile interest groups. When asked why the choice of this goal, each of the Nevada Four said, "because it was the right thing to do." Each described being driven personally, one spiritually, out of a deep concern for wildlife and a desire to "do something good for nature." Three of the four had a long-term personal connection to the area and had seen two other wildlife refuges in the area deteriorate (the Winnemucca Lake and Fallon wildlife refuges—see exhibit 1). Others pointed out that even the Fish and Wildlife Service made things difficult by focusing primarily on endangered species at the expense of wetlands. Hence, the goal became that of helping the ailing wetlands by increasing the flow of fresh water into them and cleaning up toxic sinks. If it meant changing national Bureau of Reclamation policies, as well as similar State of Nevada policies, then those changes would have to be made.

It should be noted that there were additional bureaucratic players behind the scene who worked on the Reid bill. The minutes of the meetings of the Lahonton Valley Wetlands Coalition, for example, document the participation of twelve additional DOI staff and five additional State of Nevada DOW employees.

The Stillwater Wildlife Management Area was established in Nevada in 1948. It comprises a waterfowl sanctuary of more than 24,000 acres. Up to 250,000 ducks, 13,000 swans, and 10,000 geese have used the area annually during wet year spring and fall migrations. The Stillwater Wildlife Management Area, together with nearby Carson Lake, comprise the largest primary wetlands within the Lahontan Valley (Anglin 1989).

The U.S. Department of Interior comprises several bureaus with conflicting missions. The Bureau of Reclamation, for example, was created in 1902 primarily to build dams, powerplants, and irrigation systems. Contrasted to this is the mission of the U.S. Fish and Wildlife Service of the DOI, created in part in 1871, which is "to conserve, protect, and enhance fish, wildlife and their habitats for the continuing benefit of the American people" (Office of Public Affairs DOI 1991).

Exhibit 1
The Destruction of Wetlands in Nevada

Area	Historic Acreage	Current Acreage	Acreage Lost	Percent Lost
Carson Lake	Over 25,600	1,900-7,500	18,100	71
Stillwater	33,400	1,400-16,144	17,256	51
Fallon	26,500	0	26,500	100
Humboldt	58,000	12,837	45,163	78
Winnemucca Lake	61,515	0	61,515	100
Total	205,015	36,481	168,534	82

Source: U.S. Fish and Wildlife Service, DOI (1987).

At the same time, each of the Nevada Four expressed surprise at the diverse incremental steps that comprised the means to their goal. One said what he originally visualized as a straight line became a series of zig-zags. There were many failures, benefactors who did not come through, sources of help (such as hunters and trappers) who were not initially thought to be allies, and other unanticipated sources of help and hindrance. Further, the task, in the end, proved to be more difficult and personally draining than they had originally anticipated. One put it this way: "If anyone told me at the beginning that this would entail over 100 interviews with reporters, over 120 newspaper articles, lobbying, report writing, forging coalitions with groups I never thought I could get along with, and four years of intense stress, I would have said 'forget it!'"

Despite occasional setbacks, the Nevada Four never gave up. They kept coming back. They kept their long-range goal in mind. They had a single focus.

RULE 2: Attack the bureaucracy from the outside, not from the inside.

The Nevada Four were insistent that attempting to change their bureaucracies from the inside would never work. The attack had to be from the outside. Their bureaucracies, they insisted, were unable to look objectively at their own problems. The most senior member of the Nevada Four talked about "banging . . . [his] head against a wall for twenty years" only to conclude that the goal of saving the wetlands would never come about by working within his own bureaucracy. A member of a Nevada wildlife protection group who is also a retired NDOW employee

The Bureaucratic Politics Paradox: Nevada Wetlands

said that the Nevada Four had been "emasculated—that's the only way to put it—emasculated from speaking" internally about the wetlands. Few individuals, they said, in a position of power within the DOI and the State of Nevada considered the wetlands important.

One person stated that James Watt, former secretary of DOI, started a trend of crippling parts of the organization by making changes that did not have to go through public review—changes that many felt violated congressional intent.⁶ Therefore, forcing public review through exposure and pressure became "the only way to work." Another member of the Nevada Four put it this way, "We couldn't attack from inside the organization because we are the bureaucracy." A third expressed his preference for action outside the organization by saying, "In order to create the amount of change that comes from enlisting one source of support outside of the agency, we would have to enlist ten sources of support from within the agency."⁷ A fourth said, "If you don't work outside the bureaucratic box, either you're going to be unhappy or you're stupid. . . . When your boss ties your hands and you can't get permission to do the right thing, the only other option is mutiny."

When attacking the bureaucracy from the outside, however, three of the Nevada Four emphasized the importance of understanding one's adversary. Know the enemy. One put it this way, "Know who is playing the game and their source of power. Otherwise you'll get stabbed in the back."

RULE 3: Sell your issue: proactively *develop* support.

⁶These actions by Watt were confirmed in accounts published in the environmental press (BNA *Environment Reporter*, May 13, 1983, p. 55; BNA *Environment Reporter*, June 22, 1984, p. 298; BNA *Environment Reporter*, October 12, 1984, p. 956).

⁷It is interesting to note that, according to Vietnam veteran (and political science scholar) James Pfiffner, in "normal" warfare, the U.S. armed forces strive for a ratio of three U.S. soldiers for every one enemy soldier. In guerrilla warfare, however, the ratio is ten to one—the number the Nevada Four felt they needed to change policies from within their own bureaucracy. (Comments of Pfiffner at the National Conference of the American Political Science Association, fall 1992.)

The Nevada Four were successful in developing grassroots support for saving the wetlands partially because they deliberately developed that support. Put another way, they aggressively marketed their issue. They initiated Saturday morning "donut tours" of the wetlands to educate citizens. They put together slide shows and arranged for an elected official to sponsor the presentation at the local Rotary Club, briefing him the hour before with "smart questions" he could ask and insightful points he could make. They drafted press releases that ended up on U.P.I. wire services. Over 120 articles about the wetlands were published in newspapers, including *U.S.A. Today* and the *New York Times*. One author described the media reaction this way: "The media response to efforts to publicize the plight of Stillwater was immediate and prolonged. Articles in major national newspapers and magazines and programs on national, regional, and local television programs made Stillwater a *cause celebre*" (Strickland

The Bureaucratic Politics Paradox: Nevada Wetlands

1992). Reporters were invited to tour the refuge and often gave the wildlife staff tips about how to get the maximum press coverage. Every request for an interview was granted, with paper summaries of the most salient points handed out to help promote accurate reporting. At times reporters were told, "Here's the story, but don't quote me." These confidences were always kept. At other times the public servants learned to answer the questions of reporters who didn't quite understand what the Nevada Four wanted them to learn by gently pulling them verbally in a specific direction.

Gruesome photographs of fishkills and deformed birds were distributed. Aggressive young reporters "on the way up—rising stars" were targeted and fed information. More than one of the Nevada Four described the process as "manipulating the press." Reno and San Francisco television stations sponsored a series of multinight specials entitled "Death In the Refuge" and "Wildlife Disaster." Television coverage was picked up by CBS, ABC, and CNN. Pieces of the television specials were consolidated into a video. Two hundred copies of the video were made and distributed. The subject was discussed in over thirty radio shows. Briefing books with simple one-line explanations of key points were assembled for legislators. Guided airboat and airplane rides were arranged. These public employees, trained as natural scientists, became experts in public relations.

"If you don't contact the media," one member of the Nevada Four explained, "nothing will happen." He then offered advice for all concerned public managers: Get to know reporters. Establish personal contact with them. Get them to trust you and vice versa. Send them blind carbon copies of everything you do.

"It got to the point where I concluded that being right was not enough," another of the Nevada Four said. "We had to convince others that we were right." When later asked if they had seized a "window of opportunity," one responded, "Window? No, we built the house. We started with the foundation, then built the structure, then the walls, the windows and the roof. Each press release, each contact with an interest group, each discussion with an elected official, was a brick in the house." Another emphasized the importance of developing support from the bottom. Only with this support was enough power gained to overrule the policies of what he called "Mr. Big," the government.

The Bureaucratic Politics Paradox: Nevada Wetlands

RULE 4: If a window of opportunity opens, seize it.

The Nevada Four's window of opportunity was a growing national interest in wetlands. During the 1988 presidential election campaign, George Bush called for "no net loss of wetlands" (*BNA Environment Reporter*, September 16, 1988). One month later, a national wetlands policy forum convened by the Conservation Foundation released more than one hundred recommendations for protecting wetlands (*BNA Environment Reporter*, November 18, 1988). Many of those recommendations became legislation that was hotly debated in Congress. In January, 1989, the DOI published a document that detailed the destruction of wetlands by federal programs (DOI 1989).

At the same time, Bureau of Reclamation projects continued to destroy thousands of acres of wetlands (National Research Council 1989). The Nevada Four pointed out these inconsistencies at every opportunity. The contrast was enough to obtain the attention of many individuals.

RULE 5: Look for a crisis.

In the spring of 1987, a crisis hit the Stillwater Wildlife Refuge: An estimated seven and one-half million tui chub fish were found dead. At first no one was certain of the cause of the deaths. But one of the Nevada Four, seeing an opportunity for national attention, pounced, and in the words of one of his colleagues, "played it to the hilt." Pictures of the fishkill were distributed. Reporters from across the nation were called and invited to the refuge to see the problem.

In the interviews it was emphasized that the cause of the deaths was unknown, but one possibility was selenium toxicosis associated with the drainage of some Bureau of Reclamation irrigation projects. Selenium toxicosis was the diagnosis at the Kesterson Wildlife Refuge in California, where thousands of wildlife died from such poisoning (Harris 1991). One San Francisco television reporter said during an evening news cast that the Stillwater situation could be "twenty times worse than Kesterson" if not treated (Davis 1987). The Kesterson nightmare was a national controversy that the DOI and the NDOW did not want repeated in Nevada.

The final cause of the fishkill, it was later discovered, was not selenium toxicosis. Ironically, it was partially due to a previous high-water year at the refuge. Carson sink became naturally high, causing an explosive increase in the number of fish.

The Bureaucratic Politics Paradox: Nevada Wetlands

When the water receded, the fish died from low-dissolved oxygen in the water as well as from stress caused by a tough winter. By the time the reasons for the fishkill were discovered, however, the Stillwater Wildlife Refuge had made it to the front page of many U.S. newspapers, a German newspaper, and the evening news of several major television stations.

The Nevada Four used both this crisis and other crises that occurred when hundreds of birds—including two bald eagles—died prematurely as an opportunity to get their agendas on the table of policymakers and as a "decisive trigger." (The concept of a decisive trigger comes from social learning theory [Bandura 1978] and holds that individuals usually must be able to vividly perceive a problem before it will be addressed by society.) "Things had to get bad before anyone would do anything," a member of an environmental group explained. The fishkill, then, became more a symbol of a threat than an actual threat.

RULE 6: Lobby.

The Nevada Four lobbied on behalf of their own programs. This lobbying took several forms including state, national, government, and public interest group contacts. All local contacts were utilized: friends, relatives, anyone who had a connection with state legislators. One of the Four had both a family friend and an uncle whose cousin was a state legislator, for example. These people were helpful in spearheading support for a wildlife initiative that was passed by Nevada voters by a margin of 2 to 1 on November 6, 1990, making available from \$5 million to \$9 million to acquire water rights for Stillwater and other Nevada wetlands (Strickland 1992).

When a U.S. senator was heard on the radio proposing \$1.2 million for dikes for the refuge that, in the opinion of the Nevada Four, were not needed, he was telephoned and asked if he would like to tour the refuge. Telling superiors in Washington that the senator had requested the tour, they took him out in an airboat and convinced him that the money could be better used to buy water rights for the refuge. The senator was successful in reprogramming the funds originally earmarked for construction to funds used to purchase water rights. This was the first time Congress had appropriated funds from a federal irrigation project for the acquisition of water to be used for wetlands (Strickland 1992). Some of the Nevada Four flew to Washington and met with congressional aides. "You'd be surprised how much access the average citizen has in Washington," exclaimed one of the Nevada Four. Another emphasized that he worked only with

The Bureaucratic Politics Paradox: Nevada Wetlands

staff, not the representatives themselves, because of his fear that his actions might come to the attention of DOI superiors.

Staff from some congressional offices flew to Nevada to meet with members of the Nevada Four. Several people recall fondly a night at a Basque restaurant in Reno, where the wetlands sections of the final Senate bill were sketched out on napkins. A map for the bill of the affected wetlands also was drawn up that night. Those same persons cooperated to write a section of the bill that mandated the closure of the TJ Drain. The TJ Drain is a toxic runoff site on Indian land that some of the Nevada Four had tried to shut down previously; they were unable to obtain permission from superiors to do so.

Other meetings of congressional staff and members of the Nevada Four are documented in the minutes of the Lahontan Valley Wetlands Coalition. The August 1988 minutes, for example, mention such a meeting that also included members of the media. The following issues were discussed:

How could one force the Bureau of Reclamation to implement the Fish and Wildlife Coordination Act? . . . Was it possible to obtain more funds for Stillwater? . . . Could funds be obtained from the Bureau of Reclamation?

At one time Senator Reid himself was given a tour of the wildlife refuge.

Members of environmental groups, such as the Environmental Defense Fund and the Sierra Club, were lobbied. These lobbying activities took two forms. The first primarily comprised members of the Nevada Four meeting with representatives of these groups in Washington, D.C. The Four were armed with a video of soaring white pelicans at Pyramid Lake, Nevada, with New Age music playing in the background to give the environmentalists what one called "warm fuzzies." Because of the great personal expense of such trips, however, the Four also pursued a second avenue. In one instance an official government business trip was scheduled in San Francisco. Afterwards, it was arranged for the group to participate in a wine and cheese party at the Environmental Defense Fund (EDF) office. During the reception, they discussed saving the wetlands. Several EDF staff persons expressed an interest in helping, and new partnerships were forged.

RULE 7: Locate your own source of funds.

At the Nevada Newlands irrigation site, neither the DOI nor the NDOW owned water rights, contrasted to some other DOI

The Bureaucratic Politics Paradox: Nevada Wetlands

irrigation projects. This yielded a situation, as one of the Nevada Four put it, where "The Indians had water rights, the farmers had water rights, the city of Reno had water rights, the developers had water rights. Everyone and everything seemed to have water rights except the wetlands." Outraged by an attorney's statement that the wetlands were a "bunch of parasites" because the only water they received was runoff from irrigation, and concerned with the lack of water reaching the wetlands because of a drought beginning in 1987 (plus measures to conserve water used in farming), one of the Nevada Four took action. He checked the files of the Truckee-Carson Irrigation District and developed a list of over 1,200 holders of water rights who were not using those rights. He then contacted a certified public accountant and obtained a statement that a donation of water rights is tax deductible. The owners of the inactive water rights then were contacted and asked to donate their water rights to the wetlands. Forty people initially donated nearly 130 acre feet of water. "This blew everything out of the water," exclaimed the public employee who initiated this action. "The rules of the game had changed. The old ways of operating no longer applied. We had shown that it was now possible to dedicate water rights solely to the wetlands."

Since that time, the Nevada Waterfowl Association has held dances and fundraisers; one of its founding fathers is a member of the Nevada Four. The August 1988 newsletter of the Lahontan Valley Wetland Coalition reported on the success of the first fundraiser:

The wetlands barbeque [sic] on August 21 at the Elks Club was a resounding success. The final accounting is not complete but Nevada Waterfowl Association estimates that approximately \$22,000 may have been netted. As a first event for a new organization, in fact two new organizations, the Nevada Waterfowl Association was founded a year ago; the Lahontan Valley Wetlands Coalition in March, this is phenomenal [sic]. Almost 400 tickets were sold in a little under four weeks. The smooth functioning of the raffle, the auction, ticket sales, and the excellent barbeque, is a tribute to . . . members who volunteered their time and expertise to the event.

The Sierra Club made an initial donation of \$2,000 (Strickland 1992). Over \$100,000 has been raised in this fashion and used to purchase water rights for the wetlands. One of the Nevada Four currently is pursuing a \$1.5 million donation from the Nevada Mining Association to be used for this purpose.

Droughts and protracted legal fights over water have discouraged some farmers in Nevada. Many want to leave farming. The NWA was happy to help them out: Unproductive farms have been bought solely for their water rights. (One news announcer

The Bureaucratic Politics Paradox: Nevada Wetlands

analogized this action to buying a bar to obtain the liquor [Davis 1987].) The land is then sold to city dwellers who want a week-end retreat away from the smog and to local residents who are able to tap into underground wells to meet their basic water consumption needs. The Conservation Foundation and the Environmental Defense Fund helped with legal work associated with the purchase of the water rights. As of spring 1993, approximately 50 percent of the water rights for land irrigated by the Newlands Project in Nevada had been purchased under this program.⁸

RULE 8: Embarrass the government.

Despite the impressive amounts of money raised privately for the wetlands, one of the Nevada Four insists that the real value of such action was in "embarrassing the government," particularly the DOI. He put it this way:

For years they told us the wetlands had no rights. For years they told us that nothing could be done to protect them. For years they refused to give us the money we needed to do our job right. For years we were told that there was not enough support to request funds to save the wetlands. We showed them. We showed them that there IS support out there among the average Joe Citizen.

By embarrassing the government—both the bureaucracy that the Nevada Four had been fighting for years and the politicians—there was a sense of vindication. Outside sources not only agreed with the public servants, but they were willing to put their money behind them. The fact that many of the outside forces were associated with conservation groups was also an important message to send "Mr. Big." Further, the Nevada Four had sent a message to their own bureaucracies that they were a force to be reckoned with and could no longer be ignored.

RULE 9: Bring in *anyone* who can help you.

The list of groups with which the Nevada Four linked up (sometimes formally, but usually informally) in order to form alliances is a long one. It includes the Reno Chamber of Commerce, the Pyramid Lake Paiute Indian Tribe, the Fallon Paiute-Shoshone Indian Tribe, the Truckee-Carson Irrigation District, the Nevada Waterfowl Association, Ducks Unlimited, the Nevada Organization for Wildlife, the Canvasback Club, the Greenhead Hunting Club, the Ormsby Sportsmen Association, Defenders of Wildlife, the Nevada Trappers Association, Friends of Pyramid Lake, the Environmental Defense Fund, the Sierra Club, the Conservation Foundation, the Audobon Society, the Humane Society, and the Nevada Wildlife Federation. In some instances

⁸This purchase of water rights only from willing sellers, as mandated by the Reid bill, has yielded the negative consequence of a checker-board pattern to farms that are and farms that are not irrigated. Some fear that this will eventually yield a situation where water will travel long distances only to serve one or two farms, wasting and possibly polluting the water as it travels in unlined canals.

The Bureaucratic Politics Paradox: Nevada Wetlands

these groups, such as those that comprised the Lahonton Valley Wetlands Coalition (LVWC), were begun by others, who turned to the Nevada Four for help in understanding the science behind the problem. While the two founders of the LVWC gained national prominence by winning the prestigious Chevron Conservation Award (Tina Nappe) and a Sierra Club Award (Rose Strickland) for their work on the Nevada wetlands, the minutes of the twice-a-month meetings of the LVWC show that the Nevada Four provided crucial scientific information in support of the coalition's efforts.

The minutes of the November 29, 1988, meeting of the LVWC, for example, discuss presentations by eight DOI employees concerning the possibility of purchasing water rights for the wetlands, while the minutes of the November 10, 1988, meeting document collaboration of the Nevada Four with members of the Nature Conservancy. Minutes of the January 12, 1989, meeting document the coauthorship by one of the Nevada Four of the LVWC's testimony for a legislative meeting with a member of the Sierra Club. The minutes of a June 1990 meeting of the LVWC thank two of the Nevada Four for their help. One is called "a 22 year employee of the Nevada Department of Wildlife whose knowledge of and concern for both the wetlands and the residents of Fallon [Nevada] have made him a key player in wetlands preservation." Both employees, the minutes continue, "have volunteered many hours to meet with interested groups and provide technical information needed to make informed decisions." Both were honored "for outstanding service to wetlands" at a June 1990 dinner sponsored by the LVWC. At an Audobon Society conference, a member of the LVWC referred to the Nevada Four as "the greatest repository of knowledge" for the environmental group (Nappe 1989).

One member of the Sierra Club, calling the Nevada Four "unsung heroes" said that they gave the LVWC data before they had been published by DOI. She continued:

Ironically, those data landed on the front page of *U.S.A. Today*. . . . We couldn't have done it without them. . . . They performed the highest form of service to their country [by helping us]. . . . At the same time, they were just as desperate as we were. They were not solving their problems alone. We helped each other out.

The desperation of the Nevada Four that drove them to forge coalitions with interest groups outside their organizations also was mentioned in a paper presented at an Audobon Society conference where the government workers were described as in

The Bureaucratic Politics Paradox: Nevada Wetlands

"high distress but limited as to how their anguish could be funneled" (Nappe 1989).

A recent article by one of the coalition's founders heralded the efforts of the Nevada Four:

Hunters and conservationists alike were impressed by the dedication and personal commitment of agency wildlife biologists who not only provided critical technical information but volunteered countless hours in fundraising and other organizational needs of the Coalition (Strickland 1992).

As was mentioned previously, a member of the Nevada Four was a founding father of another group that assisted in building support for the wetlands. That group, the Nevada Waterfowl Association, primarily was composed of hunters who saw the demise of the wetlands as a demise of their hunting grounds. While the group officially was headed by a local dentist, a member of the Nevada Four would ghost write letters to politicians, State of Nevada officials, and DOI officials; the dentist then would sign these letters. A member of that group had a friend who worked in the White House and proved to be a valuable ally.

Each group with whom the Nevada Four worked was an important strand in the web underlying the Reid bill. Each provided different sources of credibility and support. Often times, however, there was no progress until the third or fourth meeting with individual groups. This process was described as "uncomfortable" by one of the Nevada Four:

It's uncomfortable to seek out people who are not just like you. It's uncomfortable to expose yourself in public. It's uncomfortable to reach out to your enemies and then sit there and have them scream at you for three hours. But after all the screaming, those who stick around are there to help. And to those who leave you can always say, "you were invited and you didn't give us any ideas."

Once a positive relationship was established, the Four sent to members of the groups copies of key biological assessments documenting the degradation of the wetlands.

When asked why these linkages were so successful, one put it this way:

I would always try to establish a common ground with people to let them know "we're just like you." Find out what they like to do. Invite them to tour the refuge, or go fishing, or go golfing. Anything to get over the feeling that "you are my enemy." I cannot emphasize enough how important it was to find common interests, establish *personal* contacts with individuals.

The Bureaucratic Politics Paradox: Nevada Wetlands

It also was important to let those individuals know that their expertise was respected, one said. Personal relationships were important in other ways as well. One contact at the EPA was developed when an EPA employee came to the refuge to bird-watch. Another contact at the Council for Environmental Quality developed similarly. These personal contacts often paid off in terms of information tips. At one juncture, for example, a farmer whose support had been cultivated, but who had decided not to sign up officially as an ally, called one of the Nevada Four, warning him that he was about to "get the shaft" from a DOI manager. The tip was fed to environmental interest groups, such as Lahonton Valley Wetlands Coalition, which then successfully attacked the DOI hierarchy and protected the lower level DOI employee.

RULE 10: Build public-private partnerships.

One common theme in many of the guidelines discussed above is the building of partnerships with nongovernment people and associations. For example, the Environmental Defense Fund and the Nature Conservancy were asked for assistance. The strategy articulated by one of the Nevada Four included looking for "young and aggressive upstarts" in these organizations who were either "on their way up" or were trying to find ways to "make a name" for themselves. By selling the importance of the issue to these hand-picked dynamos, the Nevada Four developed powerful allies. As was mentioned previously, public-private partnerships were the initial catalysts for the idea that water rights could be purchased for the wetlands.

RULE 11: Build bridges among levels of government.

The Nevada Four had no time for intergovernmental turf fights for several reasons. First, since they hoped to hide most of their actions from those at higher levels in their hierarchies, they could not afford to take credit for successes. None of the four was interested in becoming a sacrificial lamb. In fact, one stressed the importance of giving others outside the government credit for any success. Second, they were dedicated to a goal, not personal aggrandizement. Protection of the wetlands came first. As one put it, "We could either spit in the wind or cooperate with each other. We did not have the luxury of *not* agreeing—or not working together. The protection of resources was the point, not power." Third, they were located in a rural area where people knew their neighbors. They were friends. Their children went to school with each other. Personal connections helped keep turf fights from developing.

The Bureaucratic Politics Paradox: Nevada Wetlands

Finally, this intergovernmental cooperation paid off financially. As was mentioned above, not only was money obtained from the federal government and from private individuals, it was obtained from the Nevada legislature.

RULE 12: Be willing to take risks.

At times, members of the Nevada Four put their jobs on the line. One recalled an incident when two of them had been asked by a superior to change a scientific report that concluded that Bureau of Reclamation practices would result in an annual average loss of about 15,000 acres of wetlands. He expressed his inner turmoil:

I never thought it would be that difficult [to say no]. I sat there and thought about the \$400 I had in my savings account in the bank, about how I was going to support my children. . . . As a family we were really stretched out [financially]. . . . It was a lot harder than I *ever* thought it would be to go that final step. I was real scared. In the end, however, I figured if you give in, they've got you.

He decided to tell his superior that he would reconsider his data; he then came back with a stronger report concluding that the proposed Bureau of Reclamation practices would result in a loss of "roughly 17,000-18,000 acres of wetlands" (USFW 1988). He gave the report to a friend at the U.S. Environmental Protection Agency (EPA) who forwarded it to the EPA regional director. The EPA regional director contacted the DOI, expressing his dismay.

At other times more subtle threats were made by superiors who discovered the Nevada Four's lobbying activities. For example, DOI employees were asked if they liked Puerto Rican rum, a not-so-veiled threat to have them sent to the DOI wildlife refuges in Puerto Rico, which were considered the worst assignments in the department. On other wildlife refuges, three employees were moved to less appealing assignments because of their opposition to official DOI policies (Harris 1991). These actions were talked about a lot—with the implied threat being "clean up your act or this could be you." "It was very intimidating," one of the Nevada Four admitted. "The government punishes risk takers."

"Your whole life can't be centered around a paycheck," explained another of the Nevada Four. "Money isn't the point. You have to follow higher values and be willing to take risks for those values."

The Bureaucratic Politics Paradox: Nevada Wetlands

RULE 13: Always maintain your professional credibility.

The Nevada Four's strong suit was their scientific knowledge. Each was trained as a biologist. Each emphasized that at every juncture they had to be certain about the biological facts in order to maintain professional credibility. While they were willing to think politically and use related crises to their advantage, they would point out the *possible* source of the problem only if all facts were not known. It was their allegiance to science that they perceived to carry them through the most difficult challenges. Factual information, they all agreed, was the key to their success. One had this advice for other career public workers: "People who want to do what we do have to be sure they're right. Don't get on thin ice. If you're wrong about your facts, you're dead."

RULE 14: Be prepared to be lonely.

Based on the thirteen guidelines presented above, one might get the impression that the Nevada Four were oblivious to the negative views of many within their organization. Nothing could be further from the truth. Trained as biologists, they were often ostracized for going against the scientific or political conclusions of their peers or for not following standard operating procedure. Some colleagues refused to speak with them, apparently afraid that they would be linked with them by association. One said he felt as if he had come down with "an instant case of leprosy." When they attended meetings with groups that were formerly thought of as "the enemy," some other government workers called the Nevada Four "traitors."

Other colleagues were helpful, but only in after-hours phone calls at home or unsigned notes sent in envelopes with no return addresses. While some superiors supported the Nevada Four behind the scenes, this support was rarely made public. One described being yelled at in a meeting, only to have his boss pull him over later, wink, and say "keep going." Another had what he called "close to a nervous breakdown" in the middle of the battle; he became completely paralyzed, his body "just shut down for three months." All described loss of time with their families and enormous stress.

One of the Nevada Four described his loneliness in this way:

It's as if there's this Mr. Big out there telling you not to do the right thing. There is an immense amount of career pressure. Don't go against Mr. Big or you will pay. We went against Mr. Big, and although we beat those bastards, we paid a heavy price.

THE BUREAUCRATIC POLITICS PARADOX

One contribution of the fourteen guidelines lies in the documentation of the actions of and the methods used by career public servants to affect the policies and programs of their bureaucracy from outside their organization. This case study presents a useful contrast to the stereotype of the lower- and mid-level bureaucrat interested only in a stable job, few risks, and a dependable retirement. Stillman (1987), for example, describes the common view of career bureaucrats as "essentially the 'doing' and 'implementing' functionaries of bureaucracy" (p. 131) who are "removed from the public" (p. 160): soldiers on the front line with a "head-down attitude."

Equally important, however, is the bureaucratic politics paradox this study highlights and the accompanying public policy tensions inherent in this phenomenon. The bureaucratic politics paradox represented by the case of wetlands legislation in Nevada, simply put, is that *there is a need for accountability and control in our public bureaucracies, while at the same time there is a need for innovation and change*. Put another way, there is a need in government for career bureaucrats who are policy innovators and risk takers; at the same time there is a need in government for career bureaucrats who are policy sustainers. Hence, the actions of the Nevada Four are not examined here as a problem to be solved but rather as manifestations of the complex political and social environment in which our public managers function.

Inherent in this paradox are many clashing public administration tensions and issues. These tensions include the need for control versus the perceived need to disobey, the need for hierarchy versus the need for local autonomy, and built-in tensions in the organization structures and missions of both the Department of Interior and the Fish and Wildlife Service. Other issues are: To whom are the Nevada Four accountable? To whom are they to be responsive? Whose ethical standards are they to follow to gauge whether their own behaviors are responsible?

Embedded in the cornerstones of public administration are the concepts of hierarchical control and accountability. In a large bureaucracy such as the DOI with a staff of approximately 72,000, or even in a small bureaucracy such as the NDOW with a staff of 206, it would be difficult to argue that there is not a valid need for control of employees and obedience to the policies and procedures dictated from the top of the organization. If all employees in these organizations actively disobeyed orders and made policy decisions based on their own personal agendas and

The Bureaucratic Politics Paradox: Nevada Wetlands

interests, no matter how heartfelt, chaos would reign and the organization might fail to exist as a coherent whole.

At the same time, the major force driving the Nevada Four was neither disobedience for the sake of disobedience nor pure self-interest. Rather, each expressed being driven by scientific and moral outrage at the environmental degradation caused by Bureau of Reclamation policies. Each expressed being driven out of a personal sense—one a spiritual sense—of what is right. Just as it is difficult to argue that there is not a need for obedience by employees, it is difficult to argue that, conceptually, acting on one's strongly held personal and spiritual beliefs *in this context* was improper. In fact, had there been a violation of the U.S. Constitution involved, at least one court has held that the employees would have a right to disobey the policies in question (*Harley v. Schuylkill County*, 476 F.Supp. 191 [1979]).

Thus, on the one hand the Nevada Four may be seen as refreshing winds of change—activist, caring public servants who are committed personally to protecting the environment. On the other hand, they may be seen as threats to accountability, control, and hierarchy since they took secret actions against the wishes of their superiors. There is a need for employees who are committed personally to the policy issues affecting or affected by an organization; at the same time there is a need for unified policy directions and actions as well as for standard operating procedures. And as is pointed out by Kaufman in his classic work, *The Forest Ranger* (1960), there is, at times, a need for hierarchy to counterbalance possible cooptation of public servants by local communities.

Complicating the issue, however, is the fact, as stated by a superior of one of the Nevada Four in an interview at DOI headquarters in Washington D.C., that the innovative ideas and desires of the Nevada Four most likely never would have been implemented had they continued to work solely through their own bureaucracies. The reasons are twofold. First, the contrary and competing missions of the various agencies that make up the Department of Interior, especially the Bureau of Reclamation and the Fish and Wildlife Service, yield a situation where nearly every decision that concerns irrigation-induced water quality problems is a compromise (although historically the Bureau of Reclamation has been the "favored" agency, primarily reflecting perceived societal preferences). As was mentioned previously, the Bureau of Reclamation was created primarily to build dams, powerplants, and irrigation systems. The U.S. Fish and Wildlife Service was created to conserve, protect, and enhance fish and

The Bureaucratic Politics Paradox: Nevada Wetlands

wildlife, as well as their habitats. While the airing of disparate views is often encouraged, according to senior DOI officials, for political reasons the Fish and Wildlife Service staff almost never obtain what they desire in terms of programmatic changes and resources. The tension here is among the realistic need for compromise in a large bureaucracy, a history of Bureau of Reclamation strength, and the sincere efforts of the Nevada Four to implement the mandates of the FWS and the NDOW to protect fish and wildlife and their habitats. Tied in with this are the sometimes competing missions within the Fish and Wildlife Service itself. The tasks of protecting endangered species and saving wetlands, for example, sometimes pull the service in different directions. In the past the wetlands have tended to get the short shrift.

ACCOUNTABLE TO WHOM? RESPONSIVE TO WHOM?

It is undeniable that the Nevada Four as public administrators must be accountable and responsive to the public. But, to paraphrase Frederickson's (1991, 395) question, what or who, exactly, is "the public" in this instance? The major categories offered by Frederickson include: the public as interest group, the public as consumer (of government products), the public as elected representative, the public as client (served by "street level bureaucrats"), and the public as citizen. Did the Nevada Four act in a manner that can be deemed accountable and responsive to the public? Yes and no.

Inherent in the bureaucratic politics paradox is the fact that the DOI and the NDOW as government organizations are to implement the will of the people as mandated by legislation enacted by elected representatives. At the same time, by not being constrained by the prevailing DOI and NDOW interpretations of congressional and state will and promoting new wetlands legislation, the Nevada Four promoted innovative policies that in the end also must be seen as the will of the people, since they were enacted by Congress and approved by the people of Nevada in a referendum. Both sets of legislation were supported by the public: interest groups, consumers, elected representatives, clients, and citizens. At the same time, both sets of legislation were opposed by differing factions of the public in each of the five Frederickson categories.

It is important to note that the Nevada Four clearly did not see their allegiance, accountability, and responsiveness to the organization as their priority. In fact, their comments make it clear that they consider the organization a barrier to "doing the

right thing." As Kathryn Denhardt maintains, "There has been too little emphasis placed on understanding the important dimensions of practicing administrative ethics *in an organizational setting*" (1988, p. viii). The paradox of this situation can be seen in the fact that the Nevada Four felt they had to "embarrass the government" to achieve their goals, when they are, of course, the government. In the end, their commitment can be seen not to organization, nor to the public as interest group, the public as consumer, the public as elected representative, the public as client, or the public as citizen. Rather, their commitment was to issues such as the protection of resources and to a personal sense of ethics.

The final issue then becomes, Whose ethics? Joel L. Fleishman writes that ethical behavior on behalf of a public official means acting with integrity. The author defines integrity as follows:

Simply put, "integrity" means having a genuine, wholehearted disposition to do the right and just thing in all circumstances, and to shape one's actions accordingly. There is no code of conduct declaring society's view of the right course of action in every situation, so each of us must puzzle out for ourself the moral solution to each dilemma we face (1981, 53).

Based on this definition, did the Nevada Four act with integrity? Yes and no. Assuming that they had a wholehearted disposition to do the right and just thing in all circumstances, the answer would be yes. Yet to many individuals, some actions of the Nevada Four crossed the line to unethical behavior. Examples include inviting the senator to tour the refuge and then telling their superiors that he had requested the tour, and inferring that selenium toxicosis might be the cause of the massive fishkill without having fully analyzed the issue.

To environmental and conservation groups, clearly part of the Nevada Four's public, however, their actions are examples of brilliant entrepreneurship. They clearly are considered a "heroic bureaucracy" (Couto 1991) in the eyes of these interest groups, consumers, clients, and citizens. Their actions were touted as the highest service to our country by a member of the Sierra Club. To others, however, some actions of the Nevada Four are seen as outrageous insubordination. It is indeed a part of the paradox that the "deviant" behavior of the Nevada Four can be looked at as an extremely savvy use of public management tools, such as the cultivation of the press and alliances with interest groups.

But suppose the Nevada Four were anti-Black, anti-Jew skinheads who used these tools to undermine federal civil rights

actions. Or what if they were antienvironmentalist bureaucrats bent on destroying wetlands and rerouting rivers in order to build more BOR irrigation systems and dams against the wishes of their superiors? Obviously, this savvy use of the same public management tools would most likely be looked at as manipulative, troublesome, and perhaps unethical. In fact, one of the Nevada Four who reviewed a previous draft of this article expressed a fear that it may become "guidance to mid-level bureaucrats whose political motivation and personal ambition exceeds ethical and legal standards and requirements."

This case study is an example of what Rohr calls "the problem of ambiguity" (1989, 290). The Nevada Four, like most public servants, have many masters and multiple directions of accountability. To some of those masters they are brilliant entrepreneurs. To others they are deviant insubordinates. Clearly, the bureaucratic politics paradox will continue to be an integral part of the exceedingly complex environment in which our public managers work.

REFERENCES

- Adams, Stacy.
1976 "The Structure and Dynamics of Behavior in Organization Boundary Roles." In M.D. Dunnet, ed. *The Handbook of Industrial and Organizational Psychology*. Chicago: Rand McNally.
- Aldrich, Howard E.
1972 "An Organization-Environment Perspective on Cooperation and Conflict Between Organizations and the Manpower Training System." In Anant R. Negandhi, ed. *Conflict and Power in Complex Organizations: An Inter-Institutional Perspective*. Kent, Ohio: Comparative Administration Research Institute.
- Anglin, Ron.
1989 *Legislative Briefing Book*. U.S. Fish and Wildlife Service, DOI.
1989 "You Don't Own the Blood of Mother Earth." Paper presented to the National Academy of Sciences/National Research Council Committee on Western Water Management. Reno, Nevada, Oct. 26.
- Bandura, A.
1978 *Social Learning Theory*. Englewood Cliffs, N.J.: Prentice-Hall.
- BNA
1983 "Court Enjoins St. George Basin Lease Sale Until Interior Considers Impact on Whales." *Environment Reporter* 14:(May 13): 55.
1984 "Conservationists Protest Wilderness Policy. Seek Protection for 25 Million Acres of Land." *Environment Reporter* 15:(June 22):298.
1984 "Court Reviews Interior Mining Rules, Remands Reclamation Bonding Requirements." *Environment Reporter* 15:(Oct. 12): 956.
1988 "Current Developments: Candidates Outline Environmental Issues." *Environment Reporter* 19:(Sept. 16):982.
1988 "Current Developments: National Wetlands Panel Seeks New Policy to Protect, Restore, Improve U.S. Wetlands." *Environment Reporter* 19:(Nov. 18): 1461.
- Bozeman, Barry.
1985 "Retrospective Technology Assessment: Method and Approach." Unpublished.
- Brownlow, Louis.
1955 *A Passion for Anonymity*. Chicago: University of Chicago Press.
- Campbell, Donald T.
1975 "Degrees of Freedom and the Case Study." *Comparative Political Studies* 8.
- Couto, Richard A.
1991 "Heroic Bureaucracies." *Administration and Society* 23:1:123-47.
- Cyert, R.M., and March, J.G.
1963 *A Behavioral Theory of the Firm*. Englewood Cliffs, N.J.: Prentice-Hall.
- Daft, Richard L.
1992 *Organization Theory and Design*. St. Paul, Minn.: West.

The Bureaucratic Politics Paradox: Nevada Wetlands

- Davis, Steve.
1987 "Death of a Refugee." KGO-TV. San Francisco.
1987 "Wildlife Disaster." KGO-TV. San Francisco.
- Denhardt, Kathryn.
1988 *The Ethics of Public Service: Resolving Moral Dilemmas in Public Organizations*. New York: Greenwood.
- Egan, Timothy.
1991 "Forest Supervisors Say Politicians Are Asking Them to Cut Too Much." *New York Times*, p. 1, Sept. 16.
- Emery, Fred E., and Trist, Eric L.
1965 "The Causal Texture of Organizational Environments." *Human Relations* 18:21-32.
- Ermann, M. David, and Lundman, Richard J.
1978 "Deviant Acts by Complex Organizations: Deviance and Social Control at the Organizational Level of Analysis." *Sociological Quarterly* 19:(winter):55-67.
- Farrell, Dan.
1983 "Exit, Voice, Loyalty and Neglect As Responses to Job Dissatisfaction: A Multi-Dimensional Scaling Study." *Academy of Management Journal* 26:596-607.
- Fitzgerald, A. Ernest.
1989 *The Pentagonists: An Insider's View of Waste, Mismanagement, and Fraud in Defense Spending*. Boston: Houghton Mifflin.
- Fleishman, Joel L.
1981 "Self-Interest and Political Integrity." In Joel L. Fleishman, Lance Liebman, and Mark H. Moore, eds. *Public Duties: The Moral Obligations of Government Officials*. Cambridge, Mass.: Harvard University Press.
- Frederickson, H. George.
1991 "Toward a Theory of the Public for Public Administration." *Administration and Society* 22:4:395-417.
- Frey, James H.
1982 "Controlling Deviant Organizations: Scientists as Moral Entrepreneurs." *California Sociologist* 5:1:33-50.
- Gaus, John.
1947 *Reflections on Public Administration*. Birmingham: University of Alabama Press.
- Glazer, Myron Peretz, and Glazer, Penina Migdal.
1989 *The Whistleblowers: Exposing Corruption in Government and Industry*. New York: Basic Books.
- Golden, Marissa Martino.
1992 "Exit, Voice, Loyalty and Neglect: Bureaucratic Responses to Presidential Control During the Reagan Administration." *Journal of Public Administration Research and Theory* 2:1:29-62.
- Gummer, Burton.
1986 "Committing the Truth': Whistle-Blowing, Organizational Dissent, and the Honorable Bureaucrat." *Administration in Social Work* 9:4:89-102.
- Hall, Richard H.
1972 *Organizations: Structure and Processes*. Englewood Cliffs, N.J.: Prentice-Hall.
- Harris, Tom.
1991 *Death in the Marsh*. Washington, D.C.: Island Press.
- Heclo, Hugh.
1978 "Issue Networks and the Executive Establishment. In Anthony King, ed. *The New Political System*. Washington, D.C.: American Enterprise Institute for Public Policy Research, 87-124.
- Hirschman, Albert O.
1970 *Exit, Voice and Loyalty: Responses to Decline in Firms, Organizations, and States*. Cambridge, Mass.: Harvard University Press.
- Johnson, Roberta Ann, and Kraft, Michael E.
1990 "Bureaucratic Whistleblowing and Policy Change." *Western Political Quarterly* 44:1:849-74.
- Jos, Phillip H.; Tompkins, Mark E.; and Hays, Steven W.
1989 "In Praise of Difficult People: A Portrait of the Committed Whistleblower." *Public Administration Review* 49:6:552-61.
- Kaufman, Herbert.
1960 *The Forest Ranger*. Baltimore: The Johns Hopkins University Press.
- Lahontan Valley Wetlands Coalition.
Minutes of Meetings, Mar. 23, 1988-Jan. 28, 1991.
- Lawrence, Paul R., and Lorsch, Jay W.
1969 *Developing Organizations: Diagnosis and Action*. Reading, Mass.: Addison-Wesley.
- Meidinger, Errol.
1992 Letter to author, Oct. 24.
- Meier, Kenneth.
1993 *Politics and the Bureaucracy*, 3d ed. Monterey, Calif.: Brooks/Cole.
- Mintzberg, Henry.
1979 *The Structuring of Organizations*. Englewood Cliffs, N.J.: Prentice-Hall.
- Nappe, Tina.
1989 "Working Together: Formation of the Lahontan Valley Wetlands Coalition." Paper presented at the Lahontan Audubon Conference, Mar. 24.
- National Research Council.
1989 *Irrigation-Induced Water Quality Problems*. Washington, D.C.: National Academy Press.
- Near, Janet P., and Miceli, Marcia P.
1986 "Retaliation Against Whistle Blowers: Predictors and Effects." *Journal of Applied Psychology* 71:137-145.

The Bureaucratic Politics Paradox: Nevada Wetlands

- Office of Public Affairs,
U.S. Dept of Interior.
1991 "Organizational Charts and
Bureau Descriptions."
- Pfeffer, Jeffrey, and
Salancik, Gerald R.
1978 *The External Control of Organi-
zations: A Resource Dependence
Perspective*. New York: Harper
and Row.
- Punch, Maurice.
1984 "The Divided Organization:
Deviance, Conflict and Defense
in Police Work." *Police Studies*
7:1:3-18.
- Rainey, Hal G.
1991 *Understanding and Managing
Public Organizations*. San
Francisco: Jossey-Bass.
- Rainey, Hal G.; Backoff, Robert W.;
and Levine, Charles H.
1976 "Comparing Public and Private
Organizations." *Public Adminis-
tration Review* 36:2:233-44.
- Rhodes, R.A.W., and Marsh, D.
1992 "New Directions in the Study of
Policy Networks." *European
Journal of Political Research*
21:2:181-205.
- Rohr, John.
1989 *Ethics for Bureaucrats*, 2d ed.
New York: Marcel Dekker.
- Rusbult, Caryl E.; Farrell, Dan;
Rogers, Glen; and
Mainous, Arch G. III.
1988 "Impact of Exchange Variables
on Exit, Voice, Loyalty and
Neglect: An Integrative Model
of Responses to Declining Job
Satisfaction." *Academy of Man-
agement Journal* 31:599-627.
- Rusco, Elmer.
1992 "The Truckee-Carson-Pyramid
Lake Water Rights Settlement
Act and Pyramid Lake." *Nevada
Public Affairs Review* 1:9-14.
- Shaughnessy, Michael F.
1981 "Social Control and Organization
Deviance." *Quarterly Journal of
Ideology* 5:2:26-33.
- Stillman, Richard J.
1987 *The American Bureaucracy*.
Chicago: Nelson-Hall.
- Strickland, Rose.
1992 "Stillwater: Its Friends and
Neighbors." *Nevada Public
Affairs Review* 1:68-73.
- Thompson, James D.
1967 *Organizations in Action*. New
York: McGraw-Hill.
- Thompson, Steve.
1987 "Wildlife Values and Problems
at Stillwater Wildlife Manage-
ment Area." U.S. Fish and
Wildlife Service, DOI. Nov. 5.
- Thompson, Steve, and Hollock, Bob.
1988 "Newlands Project Operating
Criteria and Procedures, Record
of Decision, Wetland Analysis." U.S. Fish and Wildlife Service,
DOI. Apr. 12.
- Truelson, Judith A.
1985 "Protest Is Not a Four Letter
Word." *Bureaucrat* (summer).
- U.S. Dept. of Interior.
1989 *The Impact of Federal Programs
on Wetlands*. Washington, D.C.:
U.S. Govt. Printing Office.
- U.S. Senate Committee on Energy and
Natural Resources.
1990 "Hearing Before the Subcom-
mittee on Water and Power:
Truckee-Carson-Pyramid Lake
Water Rights Settlement Act." Washington, D.C.: U.S. Govt.
Printing Office.
- 1990 "Reclamation Projects Authori-
zation and Adjustment Act of
1990." Washington, D.C.: U.S.
Govt. Printing Office.
- Wildavsky, Aaron.
1964 *Leadership in a Small Town*.
Totowa, N.J.: Bedminster.
- Withey, Michael J., and
Cooper, William H.
1989 "Predicting Exit, Voice, Loyalty
and Neglect." *Administrative
Science Quarterly* 34:3:521-39.
- Yin, Robert K.
1981 "The Case Study as Serious Re-
search Strategy." *Knowledge* 3.