1-1-1977

Public participation and bureaucratic accountability : water resources planning in New England.

Stuart G. Koch
University of Massachusetts Amherst

PUBLIC PARTICIPATION AND BUREAUCRATIC ACCOUNTABILITY: WATER RESOURCES PLANNING IN NEW ENGLAND

A Dissertation

By

Stuart George Koch

Submitted to the Graduate School of the
University of Massachusetts in partial fulfillment
of the requirements for the degree of

DOCTOR OF PHILOSOPHY

August 1977

Political Science Department

Office of Water Research and Technology
United States Department of the Interior
Project No. O.W.R.T. B-044-Mass.
Contract No. 5-28504

PUBLIC PARTICIPATION AND BUREAUCRATIC ACCOUNTABILITY: WATER RESOURCES PLANNING IN NEW ENGLAND

A Dissertation

By

Stuart George Koch

Approved as to style and content by:

Lewis C. Mainzer, Chairman of Committee

Bernard Berger, Member

Robert A. Shanley, Member

Glen Gordon, Department Chairman
Political Science

ACKNOWLEDGEMENTS

This examination of the impact of citizen participation on bureaucratic accountability grew out of the author's involvement in a study of public participation in water resources planning, conducted at the Institute for Man and Environment (IME), of the University of Massachusetts. That project, which provided the data base for this research, was supported in part by funds provided by the United States Department of the Interior, Office of Water Research and Technology.

I would like to express my gratitude to the many people who have contributed to this dissertation, especially my Advisor, Dr. Lewis C. Mainzer, and Dr. Madge O. Ertel, the Principal Investigator of the IME Project. Professors Robert A. Shanley and Bernard B. Berger, as members of my Dissertation Committee, also offered many suggestions which have been incorporated below. Jenene Geerdes and Bill Nothdurft, who were associated with the IME Project, assisted in designing and conducting the survey. In addition, staff members of the New England River Basins Commission proved extremely helpful in providing all information requested by the author. Their contributions, as well as those of the citizen participants in the case-studies, are appreciated. Mrs. Mildred Tubby typed the final manuscript.

Finally, I would like to add a special thanks to my grandmother, Mrs. Viola M. George, to whom I dedicate this dissertation.

ABSTRACT

Public Participation and Bureaucratic Accountability: Water Resources Planning in New England

(September 1, 1977)

Stuart G. Koch, B.A., Ursinus College
M.A., Ph.D., University of Massachusetts

Directed by: Professor Lewis C. Mainzer

Because of their specialized knowledge and political skills, administrators play a major role in public policy-making. This study examines that role, with emphasis on one policy area, water resources. The central question explored is: "How can public bureaucrats, who may be motivated by a number of political, organizational, professional, and personal concerns, be held accountable, so as to enhance the creation of responsible public policies?" Through the use of three case-studies of water resources planning, one approach to this problem, that of increasing public participation in administrative activities, is assessed.

Generally, the study reveals public participation to be a concept rich in theory and practice. Both the general arguments for public participation and the specific requirements for citizen involvement in water resources planning are examined. One initial conclusion is that, of the many arguments advanced, the most significant are that participation enhances both democracy and the quality of public policies.

The specialized literature focusing on the techniques for involving the public in water resources planning is also reviewed.

An examination of three regional studies conducted by the New England River Basins Commission: the Long Island Sound Study, the Southeastern New England Study, and the Connecticut River Basin Supplemental Study, found many citizens participating through elaborate programs employing widely-used techniques, such as advisory groups and public meetings. As indicated by a survey of 1400 meeting attenders, these participants proved to be particularly well-educated, affluent, active, involved in local government, and environmentally oriented. Demographically, they were not broadly representative, especially of lower-income, minority, and working-class groups. Nevertheless, these participants influenced the respective plans by (1) providing supplemental information, (2) assessing methodologies, (3) raising broad value considerations, (4) focusing attention on current problems, and (5) helping to evolve politically acceptable plans.

In terms of enhancing bureaucratic accountability, citizen participation in these studies may be viewed as an imperfect mechanism. The citizens lacked real decision-making authority; moreover, problems of representativeness, program structure, role, timing, parochialism, and limited information characterized their participation. However, the

major conclusion of this analysis is that, despite these problems, public participation served to increase the accountability of the planners by bringing to the studies a knowledge of local conditions and a range of values which, while limited, exceeded that of the planners. It also fostered other channels of control through the Congress and fellow professionals. Thus, citizen involvement increased the likelihood that effective and responsive plans would result. This analysis found that more systematic participation, especially the later stages of policy-making (authorization, funding, and implementation), is needed, as are other reforms. In general, citizen participation, then, should be limited to an advisory role, and within that framework it should be pursued as one of several interrelated means by which bureaucratic accountability and responsible public policy can be realized.

TABLE OF CONTENTS

LIST OF TABLES

LIST OF ABBREVIATIONS

BAC	Basin Advisory Committee
CAC	Citizens Advisory Committee
CAG	Citizens Advisory Group
CRC	Citizens Review Committee
CRBP	Connecticut River Basin Program
LISS	Long Island Sound Study
NERBC	New England River Basins Commission
NEPA	National Environmental Policy Act
R/PAC	Research/Planning Advisory Committee
R/STF	Regional/Scientific Task Force
SAG	Science Advisory Group
SENE	Southeastern New England Study
SMT	Study Management Team

INTRODUCTION

This study focuses primarily on the role of bureaucrats in public policy formulation in one substantive policy area, water resources.[1] Within this framework, the following analysis examines the extent to which public administrators create public policies and explores the question of how accountable bureaucratic policy-making and responsible public policies can be realized. Through the use of three studies of water resources planning, the author evaluates "public participation" as a means to this end.

The recent expansion of the role of administrators in policy-making in water resources and other policy areas poses certain potential hazards for a democratic society, since most public administrative policy-makers are not readily subjected to direct popular control. The question of how to enhance the accountability of these bureaucrats has been recognized as an important concern by many authors. The literature of public administration has dealt with this concern for accountability in a variety of ways:

---

[1]The term "bureaucrat" is used throughout this study in a neutral, descriptive manner to designate those individuals who work in the American public service. It is used below synonymously with other terms, such as "public administrator" or "public bureaucrat." Although many people use the term in a pejorative sense, clearly no such connotation is intended here.

1. Different authors have argued that the control of bureaucracy lies in the strengthening of the accountability of administrators to either the President, the Congress, the courts, fellow professionals, or the public at-large. These authors have deemed their particular approaches preferable for increasing the accountability of all bureaucratic policy-makers in the American public service.
2. Other authors, such as Herbert Kaufman and Norman Powell, have sought to develop an overview of these different approaches to controlling bureaucracy.[2] Such studies have helped to clarify the compatability of, or the tensions between, various means for holding any or all public bureaucracies accountable.
3. Still other authors, including Marilyn Gittell, have analyzed the application of one of the above approaches to given agencies or policy areas.[3] Such studies have also sought to evaluate the specific

---

[2]Herbert Kaufman, "Administrative Decentralization and Political Power," Public Administration Review, XXIX (January/February 1969), pp. 3-15; Norman J. Powell, Responsible Public Bureaucracy in the United States (Boston: Allyn and Bacon, Inc., 1967).

[3]Marilyn Gittell, Participants and Participation (New York: F. A. Praeger, 1967); Mario Fantini, Marilyn Gittell and Richard Magat, Community Control and the Urban School (New York: Praeger Publishers, Inc., 1970).

techniques utilized to implement particular approaches.

4. Finally, Hanna Pitkin and other authors have, at a theoretical level, discussed what it means to be "accountable" or "representative."[4] These works have aided in the understanding of what are very complex political concepts.

In part, the literature suggests that the term accountability, like other related concepts such as representation, has an imprecise meaning. To say that administrative officials in a democratic society should be accountable is, generally speaking, to say that they should be answerable legally and/or politically for the discharge of their duties. Traditionally, authors have focused on the negative aspects of this concern, seeking ways either to prevent bureaucrats from abusing their powers or to punish them if they did so. However, as Hanna Pitkin observes, such concerns for accountability have offered few insights into how administrators ought to act in policy-making and other related activities.[5] Similarly, there has been relatively little discussion of the specific ways in which different means of providing accountability can improve administrative policy-making performance.

---

[4]Hanna Pitkin, The Concept of Representation (Berkeley: University of California Press, 1967).

[5]Ibid., pp. 55-59.

Research Needs

Given this state-of-the-art, one can identify several basic needs for further research on the subject of administrative accountability. For example, there is a need to understand better the role which bureaucrats play in the formulation of public policies. Second, there exists the need to determine what impact the efforts to increase accountability, by various alternate means, has on bureaucratic behavior and on the policy outputs and outcomes which result. Third, further case-studies are necessary to evaluate the application of given approaches to accountability, particularly in policy areas not adequately examined at present. Certain approaches for increasing administrative accountability may be more appropriate in certain policy areas than in others. Fourth, where certain approaches seem useful, there is the need to evaluate specific techniques for holding administrators accountable.

The Research Design of the Study

The following study attempts to address itself to these research needs and seeks to provide new insights into the accountability of bureaucratic policy-makers. In order to do so, it focuses on one proposed means for insuring accountability, public participation, in one policy area, water resources. The core of this research is an analysis of public participation in three regional planning studies

conducted by the New England River Basins Commission, an agency encharged with coordinating federal, state, and interstate plans for the development of water and related land resources in its region. These three studies are the Long Island Sound Study, the Southeastern New England Study, and the Connecticut River Basin Supplemental Study.

Chapter One begins by assessing the role which public administrators play in the formulation of our nation's policies, the problems which this role poses for a democratic society, and the resulting needs for and means of attaining bureaucratic accountability. A broad and positive orientation toward the subject of accountability is adopted. To this author, the critical, yet frequently ignored, aspect of the concern for bureaucratic accountability is the need to ensure that bureaucrats create policies which are "responsible."

This orientation to the concept of accountability reflects the fact that many special interests compete with "the public interest" in the creation of public policies. The demands of a host of political actors, apart from duly elected or appointed officials, impinge upon the discretion of bureaucrats in the policy-making process. In addition, professional and organizational concerns weigh heavily on the minds of bureaucratic policy-makers. Following this discussion, the author examines in depth the particular problems of bureaucratic accountability in water resources planning and policy-making.

The second chapter explores the many dimensions of the case for public participation in administrative decision-making. Clearly, public participation may have merits which are distinct from its merits for enhancing accountability and which may affect one's assessment of citizen involvement in policy-making. However, the author gives particular attention to an evaluation of public participation as one of several proposed means for enhancing the accountability of bureaucratic policy-makers. With this background, the study examines the current requirements for citizen involvement in water resources planning and the various modes by which the public has been involved in this enterprise.

The next three chapters center on public participation in the three case-studies. Chapter Three examines the background of the New England River Basins Commission and its three regional programs, the objectives of public participation in these programs, and the strategies used to involve the public in them. The methodological techniques employed in this endeavor are outlined below in Appendix A. Chapter Four traces the impact of public participation on the three separate planning processes and the planning documents which the respective staffs produced, while Chapter Five evaluates the impact of citizen involvement on the accountability of the planners and other administrators involved in these planning efforts.

Finally, armed with the insights provided by these

case-studies, the author, in Chapter Six, assesses both the impact of citizen participation on bureaucratic accountability and public policy within the realm of water resources and the general impact of citizen participation on bureaucratic accountability and public policy. The appropriateness of public participation as one of several means of enhancing bureaucratic accountability in water resources planning and in public policy-making in general is considered.

However, before beginning this consideration, it would seem appropriate to recognize the limitations upon this effort. They are of several varieties. First, there are the general limitations inherent in an essentially case-study approach. One must be cautious in applying the conclusions reached below about the three NERBC Studies to other water resources planning efforts. Similar caution must be observed in applying the conclusions about citizen participation in water resources planning and policy-making to other policy areas. Second, the following analysis does not examine all the possible impacts of citizen involvement in administrative decision-making, such as its effects on the individual self-development of those participating. It does permit the author to study in detail one particular concern meriting attention, knowing that other concerns beyond the purview of this study do exist. In addition, the focus on one specific policy area, water resources, permits the author to consider the applicability of the concept of public participation and of specific

participation techniques to this policy area, as distinct from others.

CHAPTER I

BUREAUCRATIC ACCOUNTABILITY AND RESPONSIBLE PUBLIC POLICY: PROBLEMS IN WATER RESOURCES PLANNING

Public administrators in the United States create as well as execute public policies and programs. As the scope of national public policies has expanded dramatically in the United States in recent decades, so has the role of public administrators in defining such policies. This trend is evidenced in the literature of public administration and related fields. In the post-war era, writers, starting with Paul Appleby, have increasingly rejected the separation of politics and administration which characterized the earlier analysis of Frank J. Goodnow.[1] Instead, most observers currently view these two processes as being inexorably linked, and many focus their attention specifically on bureaucratic policy-making.[2]

Public Policy-Making by Bureaucracy

The role of administrators in making public policy has many dimensions. This reflects the fact that the term "public

---

[1]Paul Appleby, Policy and Administration (University, Alabama: University of Alabama Press, 1949).

[2]For a discussion of the politics-administration relationship see Lewis C. Mainzer, Political Bureaucracy (Glenview, Illinois: Scott, Foresman and Company, 1973), pp. 69-72.

policy" lacks precision and encompasses a broad range of activities. Most commonly the term is used by authors to describe a settled course of action, including goals and strategies for reaching those goals, which is adopted or followed by government.[3] However, in practice, such courses of action, or policies, are formed in a variety of ways. They may be formally enunciated in statutes or agency guidelines, or they may develop over time in a less deliberate manner, as the sum of individual decisions by governmental officials. The latter suggests that policies may be unannounced, unrecognized, or unintended. Therefore, administrative involvement in the creation of public policy, like policy-making itself, occurs at a variety of junctures and with varying degrees of formality.

One way in which bureaucrats create public policy is by participating in the process by which legislation is formulated and enacted. They initiate budget requests, as well as propose and influence legislation. Indeed, administrative power with respect to the creation of the federal budget and the drafting of bills has grown steadily in the last five decades. Bureaucrats also contribute to the legislative process by such diverse means as testifying at hearings, giving informal advice, and performing long-term planning and policy analysis, which often becomes a basis for later legislation.

Public administrators, particularly those in regulatory

---

[3]Carl J. Friedrich, Man and His Government (New York: McGraw-Hill, 1963), p. 70.

agencies, also create policies through the use of formal "rule-making" powers. Rule-making is a distinctly legislative function, which serves to define and clarify the general mandates of the Congress. Given the imprecision of the standards established by law, as seen in such phrases as "just and reasonable rates" and "public interest, convenience, or necessity," such activities serve to create policy.[4] For example, when the Interstate Commerce Commission formulates rules governing the operation of the railroads, it is making transportation policy. Such policies are further defined and reinforced through the adjudicative mechanisms within these same agencies.

In addition, bureaucrats routinely create public policy as they administer federal laws and programs. Because of the general nature of the legal framework within which administrators operate, as mentioned above, bureaucrats exert considerable discretion in the implementation process. In part, they make policy by establishing agency guidelines governing the implementation of national programs. Typically, such guidelines set forth additional criteria for distributing benefits and services, as well as procedures for handling individual cases. Moreover, administrators, as described by Francis Rourke, make final decisions, choosing among alternatives and determining "how the power of the state should be

---

[4]Mainzer, p. 40.

used in specific cases."[5] Taken individually, these decisions have policy implications; taken collectively, they constitute public policy. Thus, the discretionary powers which bureaucrats enjoy in performing their administrative duties necessarily involve them in policy-making.[6]

Although these different dimensions of policy-making are in many ways distinct, they are highly interrelated. Decisions made and lessons learned in implementation are likely to be reflected later in formal proposals for legislation. Where the direction of laws or rules ends and bureaucratic discretion begins is difficult to determine. In short, public policy-making is in practice a continuous process in which policies are being formulated--both implicitly and explicitly--as they are being administered.[7] The incremental nature of American public policy-making, which has been depicted by Aaron Wildavsky, Charles Lindblom and other authors, emphasizes the present importance of administrators in the creation of public policy.[8]

Both the specialized knowledge and the political power

---

[5]Francis E. Rourke, Bureaucracy, Politics, and Public Policy (Boston: Little, Brown and Company 1969), p. 50.

[6]Ibid., p. 55.

[7]Carl J. Friedrich, "Public Policy and the Nature of Administrative Responsibility," reprinted in Francis Rourke, ed., Bureaucratic Power in National Politics, 2nd ed. (Boston: Little, Brown and Company, 1972), pp. 316-325.

[8]See Aaron Wildavsky, The Politics of the Budgetary Process (Boston: Little, Brown and Company, 1964), Chapters 4 and 5.

of administrators enhance this role. With regard to the former, it is clear that bureaucrats are of necessity involved in the many dimensions of policy-making because they are sources of specialized knowledge rarely equalled elsewhere in government. This knowledge may reflect their particular education or training (expertise), but frequently it stems simply from the extensive division of labor in the organizations in which they work and their closeness to the actual implementation of ongoing policies.[9] As a result, other political institutions, such as the Congress, typically rely on the specialized information supplied by administrators in their own policy-making activities. Another result is that such institutions delegate considerable authority to appropriate agencies.

Bureaucrats function not only as experts, however, but also as political actors in their own right. Despite the reluctance of most administrators to acknowledge their political activities, they frequently engage in lobbying and public relations efforts to promote their policy positions.[10] To aid in these efforts, administrators cultivate the support of clientele and other groups with which they share general policy concerns. Such interest-group support varies consider-

---

[9]Peter Woll, "Bureaucrats as Policymaking Agents," in John M. Nickerson, Roy W. Shin, and Roger Teachout, eds., A Study of Policymaking (Berkeley: McCutchan Publishing Corp., 1971), pp. 125-126.

[10]Ibid., pp. 128-132.

ably from one situation to another and may at times dissipate. In the long run it has proven to be an important source of political strength for bureaucrats, although the price of maintaining constituency support, of course, is to accept constituent policy views as a major influence on agency decision-making. Both lobbying by administrators and constituency support strengthen the position of agencies in bargaining with other political institutions on questions of policy and, thus, increase administrative involvement in the creation of public policy.

In summary, bureaucrats play a varied and influential, if not dominant, role in public policy-making at the present time. This role is enhanced by several factors, including the political strength of the bureaucrats, the importance of their expertise in an increasingly complex society, and the very inseparability of administrative and policy-making functions. Furthermore, the nature of these factors suggests that administrators will continue to influence American public policy in the foreseeable future. Indeed, most observers would seem to agree with the following assessment of Norman Thomas:

> It is doubtful that any modern industrial society could manage the daily operation of its public affairs without bureaucratic organizations in which officials play a major policy-making role.[11]

---

[11] Norman C. Thomas, Rule 9: Politics, Administration, and Civil Rights (New York: Random House, 1966), p. 6.

Bureaucratic Accountability and Democracy

From the perspective of Norton Long and other authors, this increased involvement by bureaucrats in policy-making serves to foster the democratic nature of American government.[12] Long argues that bureaucrats are in general more demographically representative of the public than are most elected officials. He concludes, therefore, that, since such characteristics affect the decisions which an individual makes, policies created by administrators, rather than by elected officials, will more accurately reflect public needs and preferences.[13] Certainly, the linkage between one's background, one's demographic characteristics, and subsequent decisions requires much greater scrutiny. This need is indicated in the contemporary literature of "representative bureaucracy." However, Long's basic thesis that bureaucracy may in various ways enhance democratic government is an important one.

In other respects, however, administrative policy-making poses potential problems for democracy in the United States. These problems center primarily on the accountability of those bureaucrats who engage in policy-making activities. A basic criterion of democratic government in the United

---

[12] Norton Long, The Polity (Chicago: Rand McNally and Company, 1962), p. 70.

[13] Ibid.

States or elsewhere is that its public officials, as representatives of the people, should be accountable to the citizenry for their actions in office. The term "accountable" in this context means that governmental officials should be answerable both legally and politically to the public for the performance of their duties.[14] This concept is intended to ensure that officials will be responsive to public needs and preferences and that government "by the people" will prevail. It follows from this that governmental officials, including administrators, should be accountable for the policies which they create.

However, to the extent that administrators supplant elected officials or their appointees as the authors of public policy, such accountability becomes difficult to achieve. In general, the loci of governmental decision-making becomes less accessible to the public. As Frederick Mosher observes, the vast majority of public administrators, who are hired rather than elected or appointed, are several steps removed from direct public control.[15] Consequently, those methods traditionally employed to insure the accountability of Congressional or Presidential policy-makers seem less appropriate for their bureaucratic counterparts. For

---

[14]For further discussion see Mainzer, pp. 11-13, 68.

[15]Frederick C. Mosher, Democracy and the Public Service (New York: Oxford University Press, 1968), p. 3.

example, elections provide a direct, although infrequent, mechanism for holding Congressmen and Presidents answerable, but bureaucrats are far less subject to their pressures. Administrators are not directly subject to popular election.

Although bureaucratic policy-making is likely to exhibit a trustee dimension, a general commitment to serve the interests of the public, there is, argue Doerksen and Pierce, little direct accountability involved.[16] As bureaucratic involvement in policy-making has increased, the accountability of American policy-makers has apparently declined. A broad range of authors share Carl Friedrich's assessment that "administrative responsibility has not kept pace with our administrative tasks."[17]

This general concern for accountability is not meant by most authors as an indictment of either bureaucracy or individual bureaucrats, nor is it intended as such by this author. It stems less from a concern for individuals deliberately abusing their power than from a recognition that bureaucratic policy-making, an important function which is not subject to the electoral process, is a highly complex process in which a variety of political, organizational, professional, and human factors intervene. In recent years, many authors

---

[16] Harvey R. Doerksen and John C. Pierce, "Citizen Influence in Water Policy Decisions: Context, Constraints, and Alternatives," Water Resources Bulletin, XI (October 1975), p. 961.

[17] Friedrich, p. 319.

have increasingly focused on the impact of these factors on public policy.

Intervening political factors. The political environment in which bureaucrats operate is such that the demands of a host of political actors, apart from duly elected or appointed officials, impinge upon the discretion of bureaucrats in public policy-making. Most contemporary studies of Congress, including one by Green, Fallows, and Zwick, indicate that in practice the passage of a given legislative act depends as much upon its base of political support as upon its own intrinsic merits.[18] To muster such support, administrators interact with various interest groups and with other bureaucrats in other agencies, as well as with key Congressmen and executive officials. The result is that in many instances, policy develops as a series of compromises which reflect, in Graham Allison's words, "the pulling and hauling that is politics."[19] However, as critics of "interest-group theory" point out, such compromises may represent only the interests of major political actors and not necessarily those of the public at large.

Intervening organizational factors. Various organizational characteristics and concerns also limit the ability of

---

[18] Mark J. Green, James M. Fallows, and David R. Zwick, Who Runs Congress? (New York: Bantam Books, 1972), Chapter 2.

[19] Graham T. Allison, The Essence of Decision: Explaining the Cuban Missile Crisis (Boston: Little, Brown and Company, 1971), p. 144.

administrators to define and act in the interests of the public. Their impacts vary considerably. First, the hierarchical nature of public organizations may curtail full and rational discussion of the issues at stake in a policy-decision. Rourke, for example, concludes:

> The inequality of power inherent in hierarchy means that the views of highly placed individuals carry immense weight, not because of the persuasiveness of their arguments but simply because of the exhalted status from which they speak.[20]

Second, the fact that bureaucratic decision-making is often closed to the public has similar ramifications. While this may permit a more candid discussion of the issues involved, it makes it difficult for certain political groups to participate and obscures the real sources of influence on decisions.[21]

Third, many authors have observed that concerns for an organization's survival or betterment, as well as for the public welfare, frequently weigh on the minds of administrators and color their perceptions of reality. Such arguments are admittedly difficult to substantiate, yet many interesting case-studies which document such concerns have been performed. In the extreme, such pressures may cause administrators, as Coates describes, to pursue policies designed primarily to further the organization itself and to avoid those innovative

---

[20] Rourke, pp. 106-107.

[21] *Ibid.*, pp. 114-115.

policies which might jeopardize the existence of that body.[22]

Intervening professional factors. The growing professionalism present in federal agencies has a similar and equally important effect. At present, one or more professional groups can usually be identified with any agency subunit; in long-established organizations, one such group frequently has emerged as dominant. For example, Foresters play a decisive role in the Forest Service, as do Foreign Service Officers in the State Department. In such instances, observes Frederick Mosher, each profession

> brings to an organization its own particularized view of the world and of the agency's role and mission in it. The perspective and motivation of each professional are shaped at least to some extent by the lens provided him by his professional education, by his prior professional experiences, and by his professional colleagues.[23]

The likely result of this process is that policies formulated by such agencies will reflect, at least in part, the standards and values held by the dominant professional group or groups within that organization.

However, critics, such as Robert Goodman in his After the Planners, argue that the standards and values held by a profession need not necessarily be appropriate for or reflect those of society at large.[24] They represent the culmination

---

[22] R. Coates, "Why Public Participation is Essential in Technology Assessment," Public Administration Review, XXXV (January/February 1975), p. 67.

[23] Mosher, p. 122.

[24] Robert Goodman, After the Planners (New York: Simon and Schuster, 1973), p. 12.

of debate within a select, homogeneous group with a particular orientation and hence the values of only one segment of society. Also, notes Mosher, the policies formulated by such professionals within agencies are likely to focus primarily on work substance, at the expense of broader value questions.[25] Furthermore, the resultant policies may unduly emphasize the preservation or elevation of the profession itself and, as a result, hamper innovation or change.

Intervening personal factors. Finally, personal factors may also at times intervene in the creation of public policy. First, like some of the factors discussed above, personal factors may affect the administrator's view of the situation. In Allison's words:

> . . . each person comes to his position with baggage in tow, including sensitivity to certain issues, commitments to various programs, and personal standing and debts with groups in the society.[26]

It seems reasonable to assume, then, as did Long, that a bureaucrat's social background will influence the policy decisions which that individual makes, although such relationships are difficult to measure. However, the backgrounds of administrators in given agencies, and their resultant sensitivities, commitments, and debts do not necessarily reflect those of the general public. While progress has been made in achieving "representative bureaucracy," the latter is still

---

[25]Mosher, p. 108.

[26]Allison, p. 166.

more a theoretical construct than a reality. Second, personal concerns about one's career may also affect one's policy decisions. It is difficult to imagine, for example, an administrator supporting policies which when implemented would terminate his job or injure the organization or section with which he is identified.

Thus, individually and collectively these various political, organizational, professional, and personal factors press upon bureaucrats as they formulate public policy. Although their influence varies considerably in given cases and certainly requires further study, their general impact is a cause for genuine concern. The pressures upon administrators to serve only segments of the public, their agency, their profession, or themselves, rather than the public at-large, are quite real. Their existence underscores the need for enhancing the accountability of public administrators. It is upon this concern for increasing bureaucratic accountability that this study focuses.

Bureaucratic Accountability and Responsible Public Policy

Sharing this concern, many authors have explored a variety of ways of controlling public bureaucracies and their policy-making activities. In the past, these approaches have been legalistically-oriented and focused primarily on the question of how to prevent administrators from overstepping their proper authority. However, in an era when bureaucratic

policy-making has in practice expanded tremendously, such approaches--while important--are no longer adequate in scope. Their major shortcoming is that they show scant regard for the quality of the public policies which administrators help to produce on a day-to-day basis. A more policy-oriented, less legalistic approach to the subject of administrative accountability is required, one aimed at motivating bureaucratic officials to use their power and the limited resources of government to serve the interests of the citizenry in the best way possible. This study seeks to provide such an approach by discussing bureaucratic accountability in terms of policy-making performance. In so doing, it explores the critical question: "How can public administrators be held accountable so as to ensure that they create responsible public policies?"

The use of the term "responsible," in this sense, requires clarification. In general, if accountability is to be discussed in terms of policy-making performance, as this author proposes, criteria for judging that performance must be established. Admittedly, this is a difficult task, for such criteria cannot be scientifically formulated.[27] Thus, authors who have addressed this problem have, at times, disagreed on specific criteria. Still others, such as Thomas Dye, have sought to avoid such value-laden questions, pursuing

---

[27] Robert C. Fried, Performance in American Bureaucracy (Boston: Little, Brown and Company, 1976), p. 8.

instead the analysis of how policies are made.[28] The assumption made by this author is that the term "responsible" which has been widely applied to American government, public bureaucracies, and their activities possesses sufficient content to provide a broad, flexible series of standards by which public policies can be judged. As the writings of Charles Gilbert and Norman Powell suggest, the term "responsible" is multidimensional and reflects both the different roots of American public administration and the criteria traditionally used by authors to evaluate public policy.[29]

Despite the complexity of the term, the many meanings of "responsible" fall logically into three distinct categories which may be used as criteria for policy evaluation. To say that a public policy is "responsible" is to say that it is lawful, that it is responsive, and that it is effective. Each of the terms describes an element of responsible public policy.

1. Lawfulness: A policy which is lawful is consistent with the concepts of "the rule of law" and "due process." In the American system of constitutional government, public policies may be evaluated in terms of how well they adhere to existing laws and regulations, as well as to the Constitution

---

[28]Thomas Dye, Understanding Public Policy, 2nd ed. (Englewood Cliffs, New Jersey: Prentice Hall, Inc., 1975), p. 5.

[29]Norman J. Powell, p. 6.

itself. Also, the concern for individual rights in the Constitution requires that policies provide procedural safeguards to protect the freedom of individual citizens. Such safeguards are intended to guarantee that decisions will be "predictable, understandable, and equitable."[30]

2. Responsiveness: Because American public policy is formulated in a democratic setting, it may also appropriately be judged on the degree to which it responds to public needs and preferences. Rourke comments that traditionally the major test of responsiveness has been how well policies reflect the preferences of the people at large, or their designated representatives.[31] Public needs, however, must also be taken into account since public preferences may not be formulated, may not be clear, or may be based on the misperceptions of the situation (false-consciousness). In any case, the needs or preferences to which policy responds must be broad-based, considering, as Richard Flathman argues, the consequences for all members of the society.[32]

3. Effectiveness: Thirdly, given the limited resources available to government, one may evaluate public policies on the basis of their "mean-end effectiveness."[33]

---

[30] Fried, pp. 44-45.

[31] Rourke, p. 3.

[32] Richard Flathman, The Public Interest (New York: John Wiley and Sons, Inc., 1966), p. 41.

[33] Michael D. Reagan, "Policy Issues: the Interaction of Substance and Process," Polity, I (Fall 1968), p. 47.

Here the criterion is whether a given policy is more likely than alternative policies to bring about desired outcomes. "Effectiveness" in this sense is relatively synonomous with the term "efficiency," providing that the usage of the latter encompasses social and political, as well as economic costs. The focus on efficiency has been a prominent theme in the literature of public administration in this century; the current concern for effectiveness underscores the importance of what is usually referred to as "policy analysis."

Clearly, these criteria focus on a broad range of concerns, concerns which are not always compatible.[34] What is efficient may not accord with public preference or procedural safeguards. For example, the suggestion by a federal agency to reduce parking spaces and increase fees in cities in order to reduce automobile traffic and, thus, pollution may be effective if implemented, but is currently judged as unacceptable to the public. It is, therefore, impossible to define one responsible public policy for a given sitaution, for there always exists a number of alternatives for blending the above three criteria.

The above discussion, however, suggests that general criteria for policy evaluation do exist and that to the extent that one or more of these criteria are ignored, the interests of the general public will suffer. The very complexity of these criteria increases the likelihood that they will not be

---

[34]Rourke, pp. 3-6.

given full consideration by bureaucratic officials and other policy-makers, emphasizing the need for providing sufficient supervision to make sure that they are. The many dimensions of responsible public policy also suggest that efforts to enhance bureaucratic accountability require a multitude of institutions and mechanisms.[35]

The Role of Bureaucrats in Water Resources Planning

The problem of ensuring that public administrators create responsible public policies is, then, a broad concern, one which arises wherever bureaucrats engage in policy-making activities. This study focuses on the policy-making role of public administrators and the concern for bureaucratic accountability in one substantive policy area, water resources, and in one particular policy-making activity, water resources planning. Underlying this approach is the assumption that the problems of administrative accountability and their relationship to responsible public policy may be usefully explored and better understood by focusing on a single policy area. William Lambright's Governing Science and Technology is evidence of the utility of this approach.[36] Moreover, it is quite possible that certain mechanisms for enhancing accountability may be more appropriate in certain policy areas than in others.

---

[35] Powell, p. 8.

[36] William H. Lambright, Governing Science and Technology (New York: Oxford University Press, 1976).

Because primary attention is given below to overt planning activities, this study focuses more on explicit rather than informal or unintended policy-making.

Water resources planning is a complex policy-making process in which administrative officials play a clearly predominant role. It is the task of identifying water-related needs and problems and of developing and evaluating alternative methods and strategies for solving them.[37] Typically, water resources planning is undertaken in the form of multi-year studies, or investigations, by governmental agencies, either individually or in coordination with one another. The scope of these planning studies varies considerably in terms of both the geography and concerns examined. A study may focus on the problems of a given community or on those of an entire river basin or region. It may deal with a specific water-related concern or may encompass multiple concerns, such as water supply, water quality, marine transportation, erosion, flood control, land-use, electrical power generation, fish and wildlife, and recreation. A given study may examine the construction of flood-control dikes in a given city or the total uses of water resources in an area such as the Long Island Sound region. In any case, the final products of this process are usually planning reports, which serve as the basis for further policy-making activities, including the authori-

---

[37] Lester A. Tinkham, "The Public's Role in Decision-Making for Federal Water Resources Development," Water Resources Bulletin, X (August 1974), p. 692.

zation and funding of given water projects.

Regardless of the precise scope of given planning studies large-scale water resources planning in the United States lies in the domain of the governmental bureaucracy. At the federal level alone, the list of agencies which are involved in water resources planning is a seemingly endless one. It includes the United States Army Corps of Engineers, the Bureau of Reclamation, the Soil Conservation Service, the National Weather Service, the Federal Power Commission, the Fish and Wildlife Service, the Bureau of Outdoor Recreation, the Environmental Protection Agency, and the Department of Housing and Urban Development. The Tennessee Valley Authority, joint federal-state River Basins Commissions, the Water Resources Council, and various special commissions also engage in water resources planning. Of these, in terms of longevity and prestige, the Corps of Engineers is the senior partner. To the Water Resources Council falls the major responsibility for coordinating the activities of these various organizations.

It should be acknowledged that President Carter and the Office of Management and Budget are currently seeking to increase their supervision over the planning of water projects. However, the above agencies, rather than the President or Congress, dominate water resources planning for the reasons that have been suggested above, their expertise and their

political influence.[38] First, such efforts require a variety of skills in hydrological engineering, in planning techniques and methodologies, and in other specialized areas. In addition to academia and private consulting firms, governmental agencies are the major supplier of this expertise. Few Congressmen, Presidents, and appointed officials are skilled in these areas. Second, the political activities of these agencies foster their role in water resources planning. As is discussed below, several of the agencies are significant political actors in their own right, the Corps of Engineers being a classic example. They are also strongly supported by powerful client groups such as the National Rivers and Harbors Congress and the National Reclamation Association. In addition, the nature of the planning itself, including the large scale of activity, the detailed level of analysis, and the particular geographic focus of the studies increase the importance of administrative officials in water resources planning.

Problems of Accountability in Water Resources Planning

Given the predominant role played by governmental agencies in water resources planning, problems of accountability arise. In general, the planners and other officials who perform such studies, are, as Mosher describes, several

---

[38] Arthur Maass, "Congress and Water Resources," in Francis Rourke, ed., Bureaucratic Power in National Politics, 2nd ed. (Boston: Little, Brown and Company, 1972), pp. 139-151.

steps removed from popular control.[39] The ability of citizens to hold those involved in water resources planning accountable in order to ensure that responsible plans are developed is, therefore, strained. In the area of water resources, the seriousness of this problem is increased by: the independent stature of several of the planning agencies; certain characteristics of water resources planning; and the particular political, organizational, professional, and personal factors which intervene in the planning process.

The stature of the planning agencies. Several of the agencies traditionally involved in water resource planning are generally recognized by observers as being powerful political actors. A variety of factors account for this, including the nature of the services which they provide, their strong interest-group support, and their own political skills. The Corps of Engineers, which enjoys a special relationship with the Congress, is probably the foremost example of these variables at work.

> The Corps of Engineers builds flood control, water supply, waterways improvement, shore protection, and recreational projects throughout the country and can provide each and every Congressman with visible evidence of what that Congressman has done lately for his constituency.[40]

As a result the agency receives broad Congressional support for its activities. The Corps of Engineers is also supported by

---

[39] Mosher, p. 3.

[40] Fried, p. 112.

numerous interest groups, particularly the influential National Rivers and Harbors Congress. The latter is an unusally strong lobbying group consisting primarily of key members of Congress and representatives of industries affected by Corps' projects. Corps members themselves serve in an ex-officio capacity. Finally, Elizabeth Drew and other authors note that Corps of Engineers personnel are quite astute politically, especially in their dealings with legislators.[41]

In practice, the Corps of Engineers has gained Congressional approval for projects despite, in given instances, the opposition of the President, the Secretary of the Army, or the Office of Management and Budget (or its predecessor, the Bureau of the Budget).[42] What is, perhaps, even more significant is that the Corps is not really accountable in practice to the Congress as a whole but rather to the public works committees and the appropriations subcommittees of both houses.[43] In its 1973 report the National Water Commission cited the fragmented nature of Congressional decision-making in project authorizations:

---

[41]Elizabeth B. Drew, "Dam Outrage: The Story of the Army Engineers," in Stephen E. Ambrose and James A. Barber, Jr., eds., The Military and American Society (New York: The Free Press, 1972), pp. 279, 282.

[42]William O. Douglas, "The Corps of Engineers; the Public Be Damned," in Walt Anderson, ed., Politics and Environment (Pacific Palisades, California: Goodyear Publishing Co., 1970), p. 282.

[43]Maass, p. 144.

> When an individual Representative or Senator perceives a local stake in the authorization of a project or project survey, he can often command considerable resources in producing congressional action. Mutual respect for a colleague's constituency affairs and his acknowledged superior insight into what may be best for his district or State inhibit congressional resistance at this stage. With the aid of tacit rules of mutual noninterference and accommodation Congressmen have ordinarily been able to obtain authorization for local projects wherever there is substantial local support for them.[44]

As a result of this relationship the Corps and other agencies such as the Bureau of Reclamation and the Soil Conservation Service possess considerable latitude in terms of their operation. Broad supervision of their planning activities is lacking, nor is there evidence that these plans are carefully scrutinized later in the policy-making process. Dorothy Gallagher's reporting of a statement by Harold Arthur, Chief of Design and Construction for the Denver office of the Bureau of Reclamation, exemplifies this problem. Arthur noted that the process of Congressional authorization for a dam

> is our words coming back at us. In other words, we propose to do something at a certain place . . . We draft the authorization language in most cases. So authorization is a mere reflection of what we propose to do.[45]

While it is possible that public support for such projects

---

[44] U. S. National Water Commission, Water Policies for the Future: Final Report (Washington, D.C.: U.S. Government Printing Office, June 1973), p. 389.

[45] Dorothy Gallagher, "The Collapse of the Great Teton Dam," The New York Times Magazine, September 19, 1976, p. 103.

and the latter's political benefits may have diminished somewhat with the rise of environmental concerns, and that organized opposition to particular projects may arise, at present these agencies retain considerable political power and independence.[46]

The characteristics of water resources planning. Certain characteristics of water resources planning in the United States also diminish the accountability of the bureaucratic officials involved in such efforts. First, there is a plethora of agencies engaged in water resources planning, with overlapping responsibilities. Particularly in comprehensive studies involving several agencies--usually with a minimum of coordination--it is difficult to trace the origins of various recommendations. Where state and local agencies are involved, the problem is compounded by the fact that the planning efforts typically cut across state and local political boundaries. In contrast, planning and policy-making in other policy areas, such as housing or education, appear to be concentrated in fewer departments or agencies.

Second, water resources planning is a technical process. Because technical planning studies are rooted in complex assumptions and methodologies which are difficult for anyone not involved in the programs to understand, they are not readily subject to lay review. The reports themselves are frequently written in a technical language, or jargon, which

---

[46]National Water Commission, p. 389.

is difficult for political officials, such as Congressmen, or citizens to read and comprehend. The length of many planning reports, which may represent several years of work, also impedes legislative or citizen review of planning activities. This problem is certainly not unique to water resources; it occurs in many other policy areas as well, depending in part on the level of the study being undertaken. However, the problem would seem to be at least as severe in water resources as it is in other substantive areas.

Third, water resources planning involves dealing with potential benefits and costs which are difficult to quantify. It is an imprecise science, and individuals with different perspectives, with different assumptions and methodologies, frequently disagree on such calculations--even within the scope of a given planning study. This is particularly true when attempts are being made to quantify the environmental and social benefits and costs of potential projects. For example, the ill-fated Teton Dam, which collapsed in mid-1976, provides a case in point where knowledgeable individuals disagreed in assessing a number of environmental and safety issues related to the building of the structure.[47] Various experts disagreed in part on the recreational value of the wilderness area which would be altered by the proposed dam.[48] The existence of such debates and the imprecision of the

---

[47]Gallagher, pp. 95-103.

[48]*Ibid.*, pp. 95-96.

planning techniques in water resources mean that there is no one set of objective standards and no fixed body of knowledge by which agency performance can be judged. Those standards, which are prescribed in federal laws and in agency guidelines, allow for considerable interpretation. This problem is, of course, a general one which confronts those who seek to perform public policy analysis. However, as certain authors have observed, it may well be more difficult to quantify certain aspects of decision-making in dealing with domestic policies, such as water resources, than in dealing with military or defense policies.[49] This would appear particularly true in terms of comparing the ability of alternative means to meet a prescribed goal.[50]

Fourth, most current studies indicate that planning efforts which are linked to water-related concerns are of relatively low salience, unless a particular crisis is involved. For example, Russell Dynes and Dennis Wenger, in their study of the perceptions of seventy-four community leaders, found amongst these individuals a distinct lack of awareness of and consensus regarding water-related problems.[51] The environ-

---

[49] Charles E. Schultze, The Politics and Economics of Public Spending (Washington, D.C.: The Brookings Institution, 1968), p. 3.

[50] Ibid.

[51] Russell R. Dynes and Dennis Wenger, "Factors in the Community Perception of Water Resource Problems," Water Resources Bulletin, VII (August 1971), pp. 644-651.

mental movement has seemingly made elected and appointed officials and the general public more conscious of water-related concerns than they were previously. However, the level of interest in water resources often remains quite low; water resources planning efforts are frequently future-oriented and less demanding of immediate attention than other public concerns. In such cases, planners perform their tasks far removed from public attention.

Several aspects of water resources planning, then, the excessive number of agencies involved, the technical complexity of such studies, the methodological imprecision of water-related planning, and the relatively low salience of these undertakings, hamper the quest for accountability. Even when citizens or their elected representatives are interested in such concerns, it is difficult for them to identify the agencies, the assumptions, and the issues upon which to focus. When these obstacles are surmounted, they are faced with the equally difficult task of actually affecting the behavior of the planning agencies.

Factors intervening in water resources planning. In addition, particular political, organizational, professional, and personal factors intervene in water resources planning. First, in the case of the former, political pressure is likely to be exerted upon bureaucratic policy-makers by key Congressmen and by private concerns whose interests may be affected by planning recommendations. Elizabeth Drew points to the

successful efforts of the late Senator Robert Kerr (D-Oklahoma), a key member of the Senate Public Works Committee, in promoting a massive navigation project to provide Tulsa with an outlet to the sea.[52] She also notes that private local interests, especially barge companies, real estate agents, contractors, and industries, frequently join together--usually through a Chamber of Commerce--to request and support particular projects.[53] They may form special interest-groups, such as the Florida Waterways Association, to lobby for their goals. Thus, political factors may influence which water-related problems are studied or the recommendations of the planning effort once it has begun.

Second, organizational pressures may also influence water resources planning. As discussed above, the organizational structure of the planning agency or its inaccessibility to the public may prevent a full discussion of the merits of a given study. Moreover, concerns for organizational betterment may influence planning efforts. Rivalries between competing water resources agencies, such as the Corps of Engineers and the Bureau of Reclamation, are intense. Also the fact that planning may lead to subsequent involvement in more detailed studies or in construction--more opportunities for the agency--may influence planning recommendations. In

---

[52] Drew, p. 280.

[53] Ibid., p. 281.

1973, the National Water Commission reported:

> The Commission does not find it surprising that Federal construction agencies tend to color their calculations with self-interest in making project evaluations.[54]

Under such pressures, it is difficult for members of these organizations to plan objectively.

Third, professional factors intervene in water resources planning. A prominent role is played in such efforts by members of the engineering profession, a trend that has in part grown out of the long history of the Corps of Engineers in water resources development. In the eyes of many observers, the dominance of engineers had had a significant, but adverse, effect on water resources planning. Daniel Hoggan and his associates summarize this effect as follows:

> Engineers, reflecting their training and background, have basically approached planning problems as professional builders. Their training in engineering, mathematics, and the natural sciences has resulted in a tendency for them to adopt an axiomatic approach to problem solving that rarely led to questionning of fundamental postulates, particularly with respect to human behaviour. Consequently, water planning has characteristically emphasized structural solutions that were calculated to be the most efficient physically and economically. Mounting criticism of this type of planning in recent years has been that it does not include the consideration of non-economic values, such as aesthetic quality and social welfare. But a much more fundamental and crucial criticism is that few planners ever considered social solutions to planning problems.[55]

---

[54] National Water Commission, p. 407.

[55] Daniel H. Hoggan, et al., A Study of the Effectiveness of Water Resources Planning Groups, A Final Report (Logan, Utah: Utah Water Research Laboratory, Utah State University, March 1974), p. 26.

Similarly, Hoggan argues that water resources planners have tended to play a "confirming role." Using projections of past trends, they tend to focus on the future as a fixed state and plan to meet those needs. Seldom do they consider the option of altering those trends and, hence, the future needs for which they are planning.[56] Survey research by Raymond Wilson supports these criticisms.[57] Despite the apparent importance of such broad policy questions, the practitioners in water resources planning seldom engage in such debates.

Such criticisms have been addressed to the planning profession, as a whole. Indeed, as reflected in the literature, especially in the Journal of the American Institute of Planners, the planning profession has been marked by controversy since the 1960's.[58] A school of such authors as Paul Davidoff has sought to integrate social concerns into planning. Davidoff specifically called for the judging of plans by the standard of "redistributive justice."[59] Yet, as Davidoff acknowledges, social concerns have had a limited

---

[56] Ibid., p. 30.

[57] See Raymond H. Wilson, Toward a Philosophy of Planning: Attitudes of Federal Water Planners, Environmental Protection Agency Report No. EPA-R5-73-015 (Washington, D.C.: U. S. Government Printing Office, 1973).

[58] See Paul Davidoff, "Working Toward Redistributive Justice," Journal of the American Institute of Planners, XLI (September 1975), pp. 317-318.

[59] Ibid., p. 317.

impact on the planning profession in general.[60] This remains particularly true for water resources planning in particular.

Fourth, administrative officials involved in water resources planning are also subject to particularly strong personal pressures which may influence their decisions. The salaries of many officials are charged directly to the planning studies and the construction projects in which their agencies engage, and their tenure in these agencies is dependent on the continuance of such efforts. For William Douglas, this explains why such individuals strive to create new roles for their agency.[61]

The force of these particular political, organizational, professional, and personal factors; the problems inherent in water resources planning itself; and the autonomy with which several planning agencies function underscore the need for increasing the accountability of the bureaucratic officials who plan for the use of the nation's water resources. At many junctures in the planning process, specialized concerns and interests confront administrators, as they go about their policy-making activities. The presence of these interests reduces the likelihood that the water resources plans which administrators create will be responsible plans, plans that are lawful, responsive, and effective. There is, then, a

---

[60] Ibid., p. 318.

[61] Douglas, p. 272.

real need to hold bureaucratic officials answerable for the plans which they formulate. In doing so, care must be exercised. Measures designed to increase accountability may in the extreme stifle the creativity of individual administrators and deprive them of their individual dignity and of opportunities for self-development. With this caution in mind, the remainder of this study focuses on this basic question: "How can the accountability of water resources administrators be enhanced in order to ensure the development of responsible water resources plans?"

Alternative Ways of Enhancing Bureaucratic Accountability

In seeking to increase bureaucratic accountability, in water resources or in other policy areas, authors have explored a variety of significantly different approaches. Various authors argue that the control of bureaucracy lies in the strengthening of the accountability of administrators to either the Congress, the President, or the courts, to fellow bureaucrats or professionals, or to citizens themselves. Each of these alternatives provides a potential way of increasing the accountability of the bureaucratic officials who engage in water resources planning.

Control by the Congress. Herman Finer, Joseph Harris, and many other authors look to the Congress as the institution

best suited for holding administrators accountable.[62] They note that as a body of elected representatives, Congress is the appropriate institution for the task, and it possesses a variety of means for exerting control. It has power over substantive policies and programs and over agency budgets. In addition, it can exercise control over the structure of public organizations, over personnel, and over the administrative procedures which agencies utilize. Oversight is practiced both by the committees and by the General Accounting Office. Stemming from these are also numerous informal means of control.

However, a variety of problems are associated with Congressional control of administration. Senators and Representatives, even their staffs, may lack the information necessary to supervise bureaucratic officials, especially since the former's time is divided between many activities. Control appears particularly weak, notes Powell, where agencies and their supporters possess significant political resources and rewards.[63] Moreover, the fact that Congressional power is fragmented, entrusted to committees and influential chairmen and other leaders, makes it likely that specialized interests will intervene. Given what has been said about the relationship between Congress and the water resources agencies above,

---

[62]See Joseph P. Harris, Congressional Control of Administration (Washington, D.C.: Brookings Institution, 1964).

[63]Powell, p. 70.

these problems would seem to be particularly severe in this policy area.

Control by the executive branch. Other observers, citing the President's powers as chief executive and commander-in-chief, his control over appointed officials, and the status of the Office of Management and Budget (OMB) as a policy coordinator and "clearinghouse" for legislation, have emphasized executive control as a means of increasing administrative accountability. The concern for centralization has long been a prominent theme in the literature of public administration. This was the thrust of the 1937 Brownlow Committee report and was repeated in the Hoover Commission studies. In the area of water resources, this theme is reflected in the report by the National Water Commission in 1973.[64] Accountability in this case would center on the President and his appointed officials.

Critics have challenged the feasibility of this approach. As Richard Neustadt points out, Presidential power is not all-encompassing; it frequently depends on the Chief Executive's ability to persuade.[65] In practice, the record of the President, his appointed officials, the White House Staff, and OMB in controlling agencies is a checkered one. Executive control is limited by the sheer size of the

---

[64] National Water Commission, Chapters 9 and 10.

[65] Richard E. Neustadt, Presidential Power (New York: John Wiley and Sons, Inc., 1960), pp. 33-37.

federal bureaucracy, by the system of separation of powers, and by the employment security which bureaucrats enjoy. In water resources, the special relationship between the Congress and certain agencies and the vast number of agencies involved in policy-making hamper executive control.

Control by the courts. Reliance on the courts also offers an approach to enhancing bureaucratic accountability, for judges have a variety of means by which they can control agency activities. Walter Murphy maintains that the foremost of these legal instruments is "the authority to decide cases between parties, one or both of whom may be a state or federal official acting in the name of his government."[66] Judges also possess tools to carry out their decisions, including injunctions, declaratory judgments, and writs of habeas corpus, as well as ability to cite individuals for contempt of court.[67]

In practice, the use of the courts is a slow and costly process. Moreover, since court control of bureaucracy proceeds on a case-by-case basis, with particular emphasis on procedural requirements, there is often a lack of guidance on broad policy questions. For example, in cases dealing with environmental impact reporting requirements, the courts have focused on the procedural requirements

---

[66] Walter F. Murphy, "The Framework of Judicial Power," in Alan Shank, ed., American Politics, Policies and Priorities (Boston: Holbrook Press, Inc., 1974), p. 352.

[67] Ibid.

of the reporting process and not on the substance of the reports themselves.[68] In addition, the courts must rely on others to initiate action.

Control by professionals. In an approach quite different from the above, Carl Friedrich and other authors, including those in the school of the New Public Administration, have emphasized the accountability of bureaucratic officials to their fellow professionals. Friedrich advances the view that public officials must be responsive to two factors: technical knowledge and popular sentiment. Given the need for expertise, the task of determining whether or not a policy meets the first test, that it reflects the "existing sum of human knowledge concerning the technical issues involved," must fall to professional groups.[69]

This view is also central to the authors who comprise the school of the New Public Administration. What distinguishes this latter perspective from the above, however, is its concern for social change and its subsequent focus on both organizational change and on the personal commitment of professionals within public bureaucracies to achieve this end. Critical of the concern for efficiency which pervades bureaucratic theory, the authors of this

---

[68] Joseph L. Sax, Defending the Environment; A Handbook for Citizen Action (New York: Vintage Books, 1970), pp. 131-135.

[69] Friedrich, p. 320.

school, such as George Fredrickson, seek to substitute for it the goal of justice, or "social equity."[70] To achieve this goal, the New Public Administration calls upon professionals in office to act as advocates for the disenfranchized members of society.[71]

Whether or not public administration can continue to function in such an atmosphere remains questionable. The pursuit of such vague goals is bound to engender many debates and conflicts which professionals may not be able to resolve. But what is even more significant is whether, in light of criticisms of professionalism raised above, these kinds of self-controls are adequate. This concern is appropriate in dealing with water resources professionals, as well as with those in other policy areas.

Control by citizens. Finally, in order to increase the accountability of administrators, still other authors have advocated that citizens be more directly involved in public policy-making. As noted by Herbert Kaufman, this focus on "public participation" differs significantly from previous efforts to centralize control over administration in the hands of the President or to achieve a neutral and

---

[70] H. George Frederickson, "Organizational Theory and the New Public Administration," in Fred A. Kramer, ed., Perspectives on Public Administration (Cambridge, Ma.: Winthrop Publishers, Inc., 1973), p. 196.

[71] Mainzer, pp. 132-135.

competent public service within the framework of the merit system.[72] Instead, it seeks to integrate citizen participants into the workings of the administrative process, thereby enhancing their control over administrative decision-making. The actual degree to which citizens should participate, however, remains a source of confusion and controversy.[73]

Public participation in administrative decision-making is not without its critics. Various authors have raised serious questions concerning the overall effects of citizen involvement on both administrative accountability and the policies which public bureaucrats create. It seems clear that tensions do exist between public participation and the alternative modes of enhancing accountability discussed above. For example, public participation appears more compatible with a decentralized, than with a centralized, decision-making structure.[74] These tensions warrant further study.

Given the concerns for accountability expressed above, the following examines the debate over citizen participation within the context of one policy area, water

---

[72] Kaufman, p. 3.

[73] See Sherry A. Arnstein, "A Ladder of Citizen Participation," Journal of American Institute of Planners, XXXV (July 1969), p. 217.

[74] Kaufman, p. 3.

resources. The primary focus of the study is on the impact of public participation on bureaucratic accountability. Using a case-study approach, the author assesses public participation as a method for enhancing the accountability of water resources administrators in order to foster the development of responsible water resources plans. This focus on citizen participation in water resources planning may provide insights into the more general question of the role which citizens can play in increasing the accountability of all bureaucratic policy-makers and in formulating responsible public policies, in general.

CHAPTER II

PUBLIC PARTICIPATION IN WATER RESOURCES PLANNING: THE RATIONALE AND THE EXPERIENCE

"Public participation" is an elusive term which, like many others used in political discourse, lacks a precise meaning. One can say that citizens participate in politics and policy-making in innumerable ways. For example, citizens participate politically by voting, by joining and working for political parties, by writing letters to public officials, and by becoming involved in administrative activities, either as advisors or as decision-makers. All of these forms of participation are important, yet they differ significantly, as in the level of citizen involvement which they require and the weight of influence which normally results. Thus, a certain amount of confusion often accompanies the usage of the term public participation or its equivalent, "citizen participation."

This study of public participation in water resources planning and its effects on bureaucratic accountability focuses on citizen involvement in administration. The terms public and citizen participation and citizen involvement are used interchangeably below to refer to efforts to integrate citizens directly into administrative activities. Even in

this context, as exemplified by Arnstein's "ladder," of participation, a range of activities is encompassed, including both those in which citizens advise officials and those in which citizens actually make decisions.[1]

To assess the impact of citizen participation in water resources planning on the accountability of the planners involved and on the quality of the plans themselves, more of an understanding of the nature of citizen involvement in such activities is required. Providing such an overview is, however, a difficult task. Public participation in water resources planning is both a subject whose merits academicians, as well as practitioners, continue to debate and a practice required by federal laws, executive orders, and agency guidelines. It is rooted in both theory and practice. One can identify a substantial body of literature, by such authors as Peter Bachrach and Carole Pateman, which explores the theoretical aspects of public participation.[2] At a general level, these authors present arguments for participation, regardless of the policy area involved. In addition, given the present broad-ranging requirements for public participation in water resources and other policy areas, the term possesses a growing empirical referent, a record of

---

[1]Arnstein,

[2]See Peter Bachrach, The Theory of Democratic Elitism, A Critique (Boston: Little, Brown and Company, 1967); Carole Pateman, Participation and Democratic Theory (Cambridge: Cambridge University Press, 1970).

recent experiences in implementing the concept. Yet it seems fair to say that the efforts to implement public participation in water resources planning and other administrative activities have outrun efforts to understand the varied implications of doing so or to evaluate the newly-developed record of such participation.[3]

Some attempts have been made within the past decade, by Moynihan, Strange, and other authors, to link more closely the theories and the practices of public participation.[4] Within the realm of water resources, a specialized literature focusing on public participation in water-related planning has developed during the 1970's. This literature offers an interesting mixture of "what is" with "what ought to be." Both of these dimensions are important in assessing the nature of citizen participation in water resources planning.

To understand the role which citizen participants can and do play in such planning activities, the following examines, first, the rationale for public participation in water resources and other policy areas. Not all of these arguments are related directly to the subject-at-hand, bureaucratic accountability, but a broad view is required to

---

[3]Daniel Moynihan makes the same point with regard to public participation in the "War on Poverty." See Daniel Moynihan, Maximum Feasible Misunderstanding; Community Action in the War on Poverty (New York: The Free Press, 1969), *im passim*.

[4]*Ibid.*; John Strange, "Impact of Citizen Participation on Public Administration," Public Administration Review, XXXII (September 1972), pp. 457-470.

provide a balanced assessment of citizen involvement. Second, these different arguments for participation are assessed. Third, the specific federal requirements for participation in water resources planning are examined. These are particularly significant in that they have determined the context of citizen involvement in this field in the 1970's. The degree to which citizens currently participate in water resources planning reflects this mandate. Fourth, the following will explore the various modes by which the public can be involved in the planning, or decision-making, process.

The Rationale for Public Participation

The rationale for public participation in administrative decision-making is not bound by the limits of particular policy areas. The arguments for such involvement apply similarly to water resources and other substantive policy areas. The critical question is: "Why should citizens participate in the administrative activities of government?" There is no one answer to this query.[5] Those who have explored this question have found their interests shared by others from a broad range of disciplines, including political science, psychology, and sociology. Practitioners responsible for providing various public services have expressed an interest in this subject, as have the clients who receive these services. Authors have examined public participation from

---

[5]Doerksen and Pierce, p. 956.

different perspectives and have responded to the above question in different ways. The rationale for public participation consists, then, of a number of arguments, not all of which are directly related or necessarily accepted by particular supporters of the concept.

Examinations of the rationale of public participation vary considerably in terms of their scope. Whereas some authors have concentrated their attention on one or two particular considerations, others such as David Hart and Norman Wengert have sought to provide an overview of the varied arguments for citizen involvement.[6] Developing such an overview, however, is difficult in part because some authors fail to discuss certain of the concerns raised by others. Moreover, authors at times couch quite similar concerns in different terminology, making differences seem more serious than is really the case. To varying degrees, then, the categories of individual authors fail to correspond.

One can identify, in the public participation literature, five prevalent arguments for integrating citizens into administrative decision-making. Public participation may be advanced as a way of (1) strengthening the bonds of

---

[6]David K. Hart, "Theories of Government Related to Decentralization and Citizen Participation," Public Administration Review, XXXII (September 1972), pp. 421-428; Norman Wengert, "Where Can We Go with Public Participation in the Planning Process," Social and Economic Aspects of Water Resources Development, Proceedings of the 1971 National Symposium of the American Water Resources Association (Ithaca, New York, June 21-23, 1971), pp. 10-11.

community, (2) furthering individual self-development, (3) improving the quality of public policies, (4) facilitating the implementation of public programs, or (5) increasing government by the people, including the disadvantaged members of society. Collectively, these arguments may be said to comprise the logic of public participation.

(1) Participation and community. From the sociological viewpoint, participation offers a means of counteracting the erosion of the community, a trend which has characterized post-war American society.[7] Citing the works of William Kornhauser, Daniel Moynihan, and Maurice Stein, Richard Cole argues that increased industrialization, bureaucratization, and urbanization, accompanied by changing familial and religious conditions, have loosened the bonds of society.[8] As this process continues, the sense of community which human beings, as social animals, require is rapidly disappearing.

A principal danger in this situation is that other forces will move to fill this void. Cole and these other authors find implicit in these developments the potential that citizens will, in Stein's words, "become increasingly dependent upon centralized authorities and agencies in all

---

[7]Richard L. Cole, Citizen Participation and the Urban Policy Process (Lexington, Ma.: D. C. Heath and Co., 1974), p. 2.

[8]Ibid.

areas of life."[9] Manipulation and totalitarianism are likely to result as group identification, which for Kornhauser is an essential ingredient of democracy, disintegrates.[10] To the extent that it would foster group identification and community involvement, and hence a sense of community, increased direct participation by individual citizens in the political process is one way of reversing these tendencies. In many ways it appears to be a more feasible alternative than attempting to alter the basic trends mentioned above. In addition, public participation offers a way of directly limiting the political power of the elites in society.

(2) Participation and self-development. Others, including many political scientists, while sharing some of the same concerns, center their attention on the individual citizen, rather than on society as a whole. Authors such as Peter Bachrach and Carole Pateman observe that genuine participation in the American political system by large numbers of citizens is rare.[11] For example, Ira Katznelson and Mark Kesselman maintain that, despite the existence of legal equality ("one man; one vote") and numerous procedural guarantees (such as free speech), inequalities in the social

---

[9] Ibid., p. 3.

[10] Ibid., p. 2.

[11] Bachrach, pp. 93-95; Pateman, op. cit.; for a general discussion see Ira Katznelson and Mark Kesselman, The Politics of Power (New York: Harcourt, Brace, Jovanovich, Inc., 1975), pp. 241-283.

structure and in the distribution of resources impede mass participation.[12] Therefore, these authors see that individuals have little control over the decisions that affect their lives; they lack, according to Bachrach, "the opportunity for development which accrues from participation in meaningful political decisions."[13] The human dignity and individual growth called for in classical political thought by Rousseau, Mill, and other theorists are absent under these conditions. Moreover, the realization that one cannot influence government is likely to lead to a diminished sense of political efficacy and to related feelings such as apathy and, perhaps, alienation.[14]

Direct participation by citizens in the decision-making processes of government is necessary to alleviate these problems and to permit individuals to realize their full potentials.[15] Thus, these authors call for more participation by citizens, not only in the public, but in the private sector, the work place, as well. While restricted to the public realm (and, perhaps, insufficient by the standards of Bachrach, Pateman, and other theorists), the integrating of citizens into public administrative activities

---

[12]Katznelson and Kesselman, pp. 19-32.

[13]Bachrach, pp. 95, 98.

[14]Pateman, p. 46.

[15]Cole, p. 6.

addresses this need for increased participation. Accordingly, public participation may be advanced as a means of enhancing the self-development of individual citizens.

(3) Participation and public policy. Apart from or in concert with the above, some proponents of public participation view it primarily as a means of improving the quality of American public policies. As noted earlier, many critics judge bureaucratic decision-making to be too complex, too impersonal, too biased, and too closed a process and attribute many of the perceived deficiencies of current public policies to their bureaucratic origins.[16] In particular, they argue that decision-making by administrators all too often leads to policies that are ill-conceived in terms of objectives and strategies, that are biased toward the interests of given agencies or professional groups, and that ignore basic concerns common to all citizens or to particular segments of society.[17] In response, these authors advance the superiority of the participative method of decision-making, a logic stemming in part from the Hawthorne

---

[16] Adam Davis, Jill Anderson, and Richard Gough, Alternative Information and Interaction Approaches to Public Participation in Water Resources Decision-making; A Statement of the Arts Report (Raleigh: Water Resources Research Institute, University of North Carolina, April 1975), pp. 1-2.

[17] For a general discussion see Victor A. Koelzer, "A Proposed National Organizational Structure for Water Resources Planning," Water Resources Bulletin, IX (February 1973), pp. 167-180.

studies of the 1920's and 1930's, but here expanded to the general citizenry as well as employees.[18]

From this perspective, numerous gains in improving public policies may be realized by increasing public participation. As noted by Harvey Frauenglass, citizen involvement may assist administrators in gathering information about policy problems and potential means of solving them.[19] First, the knowledge which citizens have about local conditions may usefully supplement the information otherwise available to planners and other administrators. Second, citizen input may assist administrators in identifying problems and solutions where such tasks are highly dependent upon social preferences and values. Richard Tucker observes, for example, that standards of "environmental quality" are "perception-oriented"; in defining or seeking to achieve such standards

> more is dependent on intangibles and personal value preferences and less on traditional benefits and cost associated with national economic development.[20]

---

[18] Daniel A. Mazmanian, "Citizens and the Assessment of Technology: An Examination of the Participation Thesis," a paper prepared for delivery at the 1974 annual meeting of the American Political Science Association, Chicago, August 29-September 2, 1974, pp. 5-6.

[19] Harvey Frauenglass, "Environmental Policy: Public Participation and the Open Information System," Natural Resources Journal, XI (July 1971), p. 489.

[20] Richard C. Tucker, "Planners As a 'Public' in Water Resources Public Participation Programs," Water Resources Bulletin, VIII (April 1972), p. 261.

Citizen participation can bring information about such preferences into the decision-making process. Third, individual citizens with specialized backgrounds--as in academic disciplines or business--may possess knowledge or expertise in certain substantive areas that exceeds that of the administrators, themselves. Such participants may provide information especially valuable to decision-making.

In addition, proponents of public participation argue that it will improve the quality of public policies by forcing administrators to take a more broad, objective view of policy questions than is presently the case. Where administrators fail to take into account important considerations, citizens will raise them. The assumption is that such an interaction between administrator and citizen will cause the former to be more careful and thorough in their analysis. This will help to allay the impacts of agency and professional biases on resultant policies.[21] Given these varied arguments, it may be said in summary, according to Arnold Bolle, that the authors who share this view of public participation also share the basic democratic assumption:

> that men in the aggregate pooling of their resources --their shares of the truth so to speak--will in the long run do a better job of guiding their destiny than will any leader, no matter how able.[22]

---

[21] Doerksen and Pierce, p. 956.

[22] Arnold Bolle, "Public Participation and Environmental Quality," Natural Resources Journal, XI (July 1971), p. 503.

In this instance, greater public participation and better public policies are viewed as going hand-in-hand.

(4) Participation and policy implementation. Other authors, while concerned about the quality of public policies, focus on public participation as a means of facilitating the implementation of plans and policies. Those adopting this approach are disturbed by the tendency of many plans, despite considerable expenditures of time and money, to "gather dust" on office shelves, that is, to go unimplemented. In other cases, the implementation of plans or policies moves slowly; therefore, governmental units encounter delay in dealing with given problems. This may be due to the sheer complexity of the implementation process or to opposition on the part of affected citizens. Presumably, the latter will fail to support and, perhaps, resist new policies, unless they approve of--either really understand or at least trust in--the nature of the suggested changes.

As described by the League of Women Voters, the implementation process involves a myriad of governmental units which are subject to "pressures of political expediency and private interest."[23] Thus, concerted effort on the part of citizens is necessary to overcome these obstacles and to transfer broad-based plans into action. Citizens who have participated in the planning process and who understand it

---

[23]The League of Women Voters Educational Fund, The Big Water Fight (Brattleboro, Vt.: The Stephen Greene Press, 1966), p. 120.

will be better able to develop such implementation strategies. Certain authors, moreover, argue that public participation is likely to develop a trust between administrators and citizens which will increase the latters' commitment to given plans and their implementation.[24] Finally, Paulette and Klatt also argue that for implementation to occur successfully plans must take into account "extra-technical influences," namely, "socio-political realities."[25] In this sense, citizen involvement in the planning process will permit planners to gauge public reaction to various possible alternatives and, thereby, help produce final plans which are politically feasible and likely to be implemented. For example, L. Douglas James argues that if one were constructing a non-structural flood control program, one should select alternative measures shown to be acceptable to citizens in the communities in question.[26] In these varied ways, then, public participation can be seen to facilitate policy implementation.

(5) Participation and democratic government. Finally,

---

[24] Katherine P. Warner, Public Participation in Water Resources Planning (Arlington, Va.: National Water Commission, July 1971), p. 35.

[25] R. G. Paulette and W. R. Klatt, "Water Resources Management; Planning for Action," Water Resources Bulletin, X (April 1974), pp. 386-387.

[26] L. Douglas James, "Formulation of Nonstructural Flood Control Programs," Water Resources Bulletin, XI (August 1975), p. 705.

public participation has been advanced as a method for enhancing democracy, for increasing the control of individual citizens over their government. As mentioned above, the administrators who play such a major role in public policy-making are not readily subjected to elections and, hence, popular control. Moreover, they may be subjected at times to political pressures exerted by interest groups, bodies which either singly or collectively do not represent the public at-large. They are also susceptible to the various organizational, professional, and personal pressures discussed above. Public participation represents a means of overcoming these problems.

Public participation fosters democracy in numerous ways. In contrast to the traditional mechanisms of representative democracy, it allows citizens to be actually involved in decision-making, be it as advisors or actual decision-makers. For many authors, including Milton Kotler, who emphasizes the latter role and who calls for popular assemblies in neighborhood communities, decision-making directly by citizens epitomizes democracy.[27] However, in present-day America, with all its complexities, Kotler's concept of direct, or "deliberative" democracy seems of

---

[27]Milton Kotler, Neighborhood Government: The Local Foundation of Political Life (Indianapolis: The Bobbs-Merrill Co., Inc., 1969), *im passim*.

limited applicability.[28] The integration of citizen participants into administrative activities, often in an advisory capacity, offers a more feasible, if limited, way of involving citizens in government. In light of the shortcomings of elections already mentioned, public participation does offer a more direct means of increasing the control of citizens over public officials.

Public participation also enhances democracy by serving to educate citizens. Involvement in administrative activities offers citizens insights into the nature of related public policies. Presumably, informed, knowledgeable citizens will be better able to carry out their other democratic responsibilities.[29] Although empirical evidence is weak in this regard, Almond and Verba's findings also suggest that the participants' sense of political efficacy will rise following such involvement and that this will encourage their involvement in other public activities.[30]

In addition, some authors also argue that public participation will further democratic government by providing access for groups who have not participated in government through more traditional means. Viewed from this perspective,

---

[28] For more discussion of this point see Mainzer, pp. 143-148.

[29] Pateman, p. 110.

[30] Gabriel A. Almond and Sidney Verba, The Civic Culture (Princeton: Princeton University Press, 1963), pp. 46, 47, 297-299.

citizen participation offers a way of improving the status or power of particular groups, especially the disadvantaged, so as to obtain better services or a more equitable redistribution of income or power.[31] In three different respects, then, public participation leads to a greater citizen voice in government.

In summary, citizen participation has been construed as a means to enhance (1) community, (2) individual self-development, (3) the quality of public policy, (4) policy implementation, and (5) citizen control over public officials. Whereas certain authors have accepted this logic in whole, others have chosen to focus on selected aspects of it. Pateman, for example, discusses citizen participation in terms of its impact on self-development, largely to the exclusion of the other arguments. Other observers have also defined certain of these arguments in quite specialized ways. For example, when many proponents of citizen involvement in the "War on Poverty" spoke of increasing citizen participation, they were speaking primarily of increasing political control by the black poor, the dominant poverty group in big cities, rather than by the public at-large.[32] Despite these variations, these five general arguments comprise the basic rationale for citizen participation in public administration.

---

[31]Cole, p. 10.

[32]Mainzer, p. 139.

They form the theoretical underpinnings of a concept which has currently gained wide application. As such, they hold countless implications for citizen participation in water resources and other policy areas; they have helped to shape the broad tenor of the public participation phenomenon.

The Rationale for Public Participation: An Assessment

In viewing this rationale for citizen participation in administrative decision-making, this author finds certain of the arguments more important and compelling than others. In particular, the arguments that citizen participation should be pursued in order to foster either community--and its related goals--or individual self-development provide a weak basis for integrating citizens into public administration. The realization of these goals is too complex, too elusive, and too improbable to justify the elaborate procedures necessary to involve the public in administrative activities.

Community and self-development as rationales. In examining the realities of citizen participation, Riedel postulates that "most people do not want to become involved in policy formulation beyond the very impersonal (secret) act of voting."[33] Unlike Pateman and Bachrach, many

---

[33] James A. Riedel, "Citizen Participation: Myths and Realities," Public Administration Review, XXXII (May/June 1972), p. 213.

authors agree the opportunity to participate has an inherently limited appeal to most Americans now and in the foreseeable future. The likelihood that participation in administrative decision-making will not become widespread diminishes its chances for advancing either community or individual self-development.

More specifically, there are numerous problems in viewing citizen participation as a means for improving community. First, given the above observation, it is difficult to perceive of citizen participation reaching sufficient proportions to counteract effectively those trends, such as industrialization, urbanization, bureaucratization, and changing religious and familial conditions, which are perceived to erode community. Moreover, it is unclear whether citizen participation responds to the essential causes of anomie. If one attributes anomie, as did Durkheim, to "the lack of rules to live by and loss of values to pursue," the linkage seems improbable.[34] If one attributes anomie in part to the leadership of society losing its closeness to the people, citizen participation may help to overcome such feelings, although there is no certainty that this will happen.[35] Much will depend on the nature of the interactions which occur. Second, one can find little evidence in present

---

[34]For a discussion of anomie see Robert E. Lane, Political Ideology (New York: The Free Press, 1962), p. 407.

[35]Ibid., pp. 407-408.

or past societies that if communities became more cohesive, the influence of elites would be reduced.[36] This part of the community-oriented rationale for participation does not appear convincing. Third, as seen in the Green Amendment (which returned substantial control over poverty and community action moneys to elected officials), political considerations further limit the scope of citizen participation and its potential for developing community. Opportunities to participate which prove circumscribed may cause frustration that gives rise to, rather than prevents, anomie and alienation. In short, the formidable nature of the opposing trends and various political realities suggest that public participation in public administration is not likely to foster community to any significant degree.

With regard to the goal of individual self-development, similar problems arise. First, it seems doubtful that public participation will become widespread enough to aid the self-development of most citizens. Those currently most restricted in terms of personal growth are least likely to participate politically. Moreover, as Pateman's focus on participation in the work place indicates, the participatory theorists maintain that citizen participation cannot become rooted in the political system unless it is widely practiced

---

[36] Some authors, such as Elton Mayo, have concluded that elites and community go together--the alternative being anomie.

in many institutional settings, such as corporations and schools, as well as in the more traditional political arenas.[37] Second, if--as Riedel also indicates--those citizens who do participate are likely to confine themselves to one or two issue areas, it seems presumptuous to say that their participation will amount to control over the extremely varied decisions that affect their lives.[38] Third, it seems unlikely that citizens, if they were so inclined, could wrestle control over the important decisions affecting their lives from governmental officials or other influentials who for political, professional, organizational, and personal reasons resist such efforts. It should be noted that many of those who advocate greater citizen participation are not so sanguine as to expect decision-making by citizens to supplant decision-making by bureaucrats; they seek greater citizen input and, if possible, a greater degree of citizen control than before. However, for these reasons, individual self-development, like community, is not likely to accrue on a broad basis from citizen participation in administrative activities.

Implementation as a rationale. Viewing citizen involvement as a means of facilitating the implementation of plans provides a rationale for public participation that is more compelling than the above, but is, nevertheless,

---

[37] Pateman, p. 110.

deficient in several respects. It does seem accurate to say that citizens who have participated in planning efforts, who understand them and who--one must add--support them, will lend badly-needed support to the plans as implementation begins. Likewise, citizens can help to produce politically feasible plans, ones acceptable to their communities. However, there are several limits to this logic. For example, it is quite conceivable that citizen recommendations may not be attuned to the current political realities; nor are public preferences easily ascertained. Indeed, public preferences with regard to alternative policy options may not develop.

Also, as Jerry Delli Priscoli concludes, public participation is unlikely to resolve major disagreements of opinion with regard to policy questions.[39] In such instances, public participation may serve to crystallize opposition to the eventual policy recommendations and, thus, impede implementation. Regardless, participation itself will not necessarily generate support for the implementation of a plan. Daniel Mazmanian's research indicates that even when citizens are highly satisfied with the participation process itself, this is unlikely to affect their attitudes toward the substantive elements of a plan or policy. Citizens may be satisfied

---

[39] Jerry Delli Priscoli, "Citizen Advisory Groups and Conflict Resolution in Regional Water Resources Planning," Water Resources Bulletin, XI (December 1975), p. 1241.

with the opportunities and mechanisms for participation, yet dissatisfied with resultant products or *vice versa*. Their basic concerns shape their evaluation of a given policy and, hence, their support for it.[40]

The major deficiency of this argument, however, is that it treats the act of implementation as an end in itself, when it may more reasonably be viewed as a means to an end. The argument diverts attention from the quality of the policy being implemented, a factor of crucial importance. When divorced from the merits of the policy involved, these notions of facilitation and trust-building approach--in the extreme--manipulation. For example, Daniel Mazmanian argues that the Army Corps of Engineers initially embraced the participation concept in the early 1970's, in large part because it saw such involvement as a vehicle for gaining public acceptance of its plans.[41] This implementation argument has in part a self-serving appeal to administrative organizations. Thus, while the problem of implementing good policies is real and while citizen participation may offer needed remedies in this regard, the focus of the above argument on simply the process of implementation forms an inadequate rationale for citizen participation.

---

[40] Mazmanian, pp. 39-40.

[41] *Ibid.*, pp. 2-3, 34-35.

Responsible public policy as a rationale. Given the above problems, the two remaining arguments provide the most compelling reasons for involving citizens in administrative activities. Public participation may be advanced primarily as a means of enhancing administrative accountability and of improving the quality of public policies. These two goals prove highly interrelated, since it is difficult to conceive of achieving one objective without the other. Jointly, their realization results in the formulation of responsible public policy, policy which is effective, responsive, and lawful.

Since few authors have examined what public participation actually accomplishes in practice, further assessment of the ability of citizen involvement to foster these goals is required. Thus, the following analysis explores the hypothesis that citizen participation enhances the formation of responsible public policies by increasing both administrative accountability and the quality of particular policies. This hypothesis focuses on the extent to which the integrating of citizen-supplied information and value preferences into bureaucratic decision-making is likely to result in policies which are more technically sound, more carefully analyzed, and more responsive to public needs and preferences, than would be the case without public input.

In proceeding, it is important to note that various authors question the linkage between citizen participation and responsible public policy. They doubt, specifically,

the former's ability to increase either bureaucratic accountability or the caliber of public policies. Their counter-arguments serve as a useful basis for discussion.

First, certain authors maintain that citizen participation will not advance the cause of democratic government, or administrative accountability, because the number of people likely to become involved will not properly represent the public at-large.[42] They find support for this contention in the history of the Community Action Program where participation, in terms of turnout for neighborhood elections, proved low.[43] Whether citizen participants are elected, appointed, or self-selected has apparently little bearing.

Complicating this problem is the tension between citizen participation and other methods of providing accountability. To the extent that citizens either make decisions themselves or advise bureaucrats on policy matters, they exert control, or influence, over administrative decision-making. To varying degrees the responsibility of bureaucratic officials for the decisions in question diminishes. The administrators are less answerable than before to the President, his appointed officials, the Congress, or the courts. Thus, these more traditional lines of

---

[42]Doerksen and Pierce, p. 958; Warner, p. 24.

[43]Mainzer, p. 141.

accountability will prove even weaker than was previously the case, as will accountability to one's fellow professionals. If accountability to a relatively unrepresentative group of citizens is in effect being substituted for accountability to these elected or appointed officials, democratic government will likely suffer in the process as its representative qualities decline.

For other reasons, as well, authors who focus on democracy as an essentially electoral process argue against increased participation in government. They maintain that limited participation is healthy for the preservation of a democratic political system.[44] As summarized by Pateman, Bernard Berelson's thesis is that "limited participation and apathy have a positive function for the whole system by cushioning the shock of disagreement, adjustment, and change."[45] Citizen participation is likely to create conflict and make the political system less stable. Robert Dahl, moreover, argues that those lower socio-economic groups which participate least in the system possess authoritarian tendencies which potentially jeopardize the substantial freedoms currently enjoyed in our present democratic government.[46] For these different reasons, then, authors challenge

---

[44]Joseph Schumpeter, Capitalism, Socialism and Democracy (New York: Harper and Row, 1962), p. 262.

[45]Pateman, p. 7.

[46]For a discussion of Dahl's views, See Pateman, p. 10.

the statement that public participation leads to greater control over government by the general citizenry.

Miller and Rein and other authors similarly question whether or not citizen participation will lead to better public policy.[47] They see that the relationship is anything but automatic. Instead, integrating the public into administrative decision-making may well be a costly, time-consuming process which bears little fruit. Resources that could go into substantive professional planning are diverted to participation activities. Augustine Fredrich cautions that this may damage the technical soundness of a plan and "result in public choices based on inadequate data and information."[48] Equally important is the suspicion of some authors that citizen participants, compared to administrators, lack the basic competence necessary to create coherent, efficient public policies. These authors argue that citizens lack the specialized knowledge and expertise of bureaucrats, especially with regard to recent technical, methodological, or other innovations.[49] Moreover, they are

---

[47] S. M. Miller and Martin Rein, "Participation, Poverty and Administration," Public Administration Review, XXIX (January/February 1969), pp. 15-25.

[48] Augustine J. Fredrich, "Public Participation--Poison, Placebo, or Panacea," unpublished paper presented at the ASCE Specialty Conference on "A Better Life through Water Resources Planning and Management" at Fort Collins, Colorado, July 9-11, 1975, p. 5.

[49] See Bernard B. Berger, "Citizen Participation in Comprehensive River Basin Planning," printed in the Federal

more inclined to focus on parochial concerns and present, as opposed to future, needs. Given the pressures participants are likely to exert, they may be a disruptive influence on both the process as a whole and on the administrators personally.[50] Thus, to the extent that the citizens are incorporated in the decision-making process, these authors envisage the quality of public policies, like bureaucratic accountability, declining.

Many of these criticisms offer serious challenges to the arguments that public participation in administration provides a means of improving the quality of public policies and of holding public bureaucrats answerable to the citizenry, so as to insure the formation of responsible public policy. Nevertheless, certain of these criticisms are less persuasive than others. For example, the argument for limiting participation and emphasizing the importance of stability, gives little attention to the needs of individuals who fare poorly under present distributions of power. In doing so, it underestimates the need for and the utility of change. Indeed, this basic argument seems short-sighted; the most stable political system in the long run is one which responds to the needs of various groups in society, including those who do not participate by voting. Therefore, more rather than less opportunity for participation seems likely to

---

Register, Tuesday, December 21, 1971, Vol. 36, No. 245, Part II; presented at the Conservation Foundation's Environmental Forum, Washington, D.C., March 9, 1972, pp. 12-13.

[50] Frauenglass, p. 489.

provide for such a stable system.

Similarly, this author is less confident than Dahl in ascribing authoritarian tendencies to currently non-participating citizens. Even if such tendencies do exist, they would seem to stem in part from feelings of exclusion from the political process. Increased participation may assist in alleviating such tendencies. The fact that participation is not likely to be widespread does not necessarily diminish its symbolic value in this regard.

The more serious of the charges expressed above are the following. First, citizen participation is unrepresentative (undemocratic) and, therefore, the preferences voiced by participants are not likely to reflect genuine public concerns. Second, participation undermines other channels of accountability including control by elected or appointed officials more attuned and answerable to public desires than are those citizens who participate in administrative activities. Third, it is a costly and time-consuming proposition which is likely to detract from substantive policy-making activities. Fourth, citizens provide uninformed and parochial inputs which, if followed, reduce the technical quality and professional objectivity of the resultant policies.

These criticisms are extremely varied and directly opposed to the positive arguments for participation advanced above. Little reconciliation of these competing arguments for and against public participation has occurred. At

present, individuals concerned with different values have developed contrasting orientations toward the subject and, therefore, disagree on whether participation is likely to foster or impede efforts to create responsible public policy. Since this goal and its two component elements, increasing accountability and improving public policy, provide the main rationale for citizen participation in administrative decision-making, there exists a general need to examine these underlying arguments more carefully. In particular, it is necessary to consider the appropriateness of these various arguments in light of recent experiences in implementing the concept. These recent experiences may provide further insights into the relationship between responsible public policy and citizen participation.

In summary, authors have viewed citizen participation as a means of fostering community, self-development, implementation, the quality of public policy, and/or administrative accountability. By stressing different arguments, they arrived at different expectations of how participation should be structured. As might be anticipated, administrators have emphasized the role of public participation in implementing policies and in trust-building, whereas citizen activists have emphasized the role of citizen involvement in increasing citizen control and improving public policies. Similarly, administrators have sought to limit participants to an advisory capacity, while many citizens have desired a more direct

role in decision-making.[51]

Amidst these many claims, the arguments for participation as a means of providing better policies and democratic government prove the stronger, suggesting that citizen participation will lead to the formation of responsible public policy. Several other authors disagree. The following seeks to assess these particular arguments in light of the growing record of citizen participation. This is done by focusing on citizen participation in water resources planning.

The Requirements for Public Participation in Water Resources Planning

In order to understand and evaluate the role of citizen participants in water resources planning it is also necessary to examine the legal requirements for public participation in this policy area. In this case, the focus is on those standards applicable at the federal level. Even more directly than the rationale for participation, these requirements form the general framework within which citizen involvement occurs. It is these rules which have governed efforts in the 1970's to implement public participation and which have played a major part in determining the current level and nature of such participation in federal water resources planning.

---

[51] Warner, p. 23.

Public participation in water resources planning is not an entirely "new" phenomenon; it is, however, one which has changed remarkably in recent years, particularly within the period of the early 1970's. This change reflects new mandates for citizen participation at the federal level, as well as at the state and local level.

In the past, as today, agencies sought to mobilize community support for local projects. Indeed, such demonstrations prove an integral part of the process of seeking authorization and funds from Congress for water-related projects.[52] Yet although one can identify many past instances of citizen involvement in the planning projects of the Tennessee Valley Authority (TVA), the Soil Conservation Service, the Army Corps of Engineers, and other agencies, the record of public participation in water resources planning has long been an uneven one. The nature and scope of the interaction between citizen and planner depended upon the exigencies of the situation, varying considerably from agency to agency and from project to project. Typically, such interaction occurred late in the planning process in a limited manner and without precise guidelines. Not infrequently, the interaction which evolved drew criticism from many observers, as in the case of the TVA where Philip Selznick charged that "grass roots democracy" really meant

---

[52]Gallagher, pp. 16, 98, and 108.

selling out to powerful local interests.[53]

In contrast, within the past decade, citizen participation in public decision-making has become a more deliberate process and, indeed, a legal requirement. Increasingly during this period, laws and agency regulations have called for direct citizen involvement in planning and policy-making. The precise origins of this more systematic involvement are difficult to trace. As Lewis Mainzer observes, citizens interested in farming have participated for decades in agricultural policy-making through an elaborate network of elective farmer committees.[54] More recently, however, this movement toward increased citizen participation gained impetus at the federal level with the passage of the Economic Opportunity Act of 1964. As described by Daniel Moynihan, the inclusion of the words "maximum feasible participation" in that act set in motion a chain of events which led to public participation in the policy-making and implementation processes of the "War on Poverty."[55] These developments resulted primarily from the political pressures exerted by center-city residents and from the desires of these residents and administrators in the new Office of Economic Opportunity to redistribute political power in order to reallocate

---

[53]See Philip Selznick, TVA and the Grass Roots (Berkeley: University of California Press, 1949).

[54]Mainzer, pp. 136-137.

[55]Moynihan, Chapter 5, pp. 75-101.

public resources.[56]

The literature of citizen participation still strongly reflects this urban focus. However, the participation phenomenon has since spread to other policy areas and to other levels of government, as public agencies and other public bodies have involved citizens in their functioning in a more direct and unprecedented manner. In the area of water resources, this trend was accentuated by the rise of the environmental movement in the late 1960's. Many environmentalists focused on citizen participation as a mechanism for injecting their concerns into the policy-making process. These political considerations seem particularly important in explaining the growth of the public participation phenomenon in water resources planning. One document produced by the Bureau of Land Management summarizes this period as follows:

> Numbers of the public were becoming vocal, active, aggressive, and successful. After years of seeming indifference, people were now taking responsibility for environmental preservation. They had become committed, and the news media's extensive coverage of their actions reinforced the whole phenomenon. In this context, it was politically opportune to write a national policy statement on the environment which recognized the concerns and a valid participatory role for the individual citizen.[57]

---

[56] Mainzer, p. 139.

[57] Bureau of Land Management, "Public Participation in the Environmental Assessment Process; Training Session Notebook" (Washington, D.C., 1974), p. 14.

What is new about public participation in the 1970's is the growing number of federal and other requirements for such involvement in public decision-making and the extent to which citizens have in fact been integrated into the workings of public agencies. This is true in water resources, particularly at the national level where a number of recent Congressional acts, executive orders, and administrative guidelines require public participation in the policy-making process. Included in the former category are such major pieces of legislation as the National Environmental Policy Act of 1969 (NEPA), the Federal Water Pollution Control Act (FWPCA) Amendments of 1972, and the Coastal Zone Management (CZM) Act of that same year.[58]

While the above suggest that the time was "ripe" for providing for public participation in water resources planning, the precise rationale behind this legislative mandate is difficult to ascertain. The laws themselves, like the executive orders and administrative guidelines, provide little help in this respect. However, some insights into the intent behind these requirements for citizen involvement can be gained by examining pertinent Congressional hearings and reports.

In examining these varied sources, one finds some

---

[58] NEPA: Public Law 91-190 (42USC4321 et seq.); FWPCA: Public Law 92-500, October 18, 1972 (86STAT.817); CZM Act: Public Law 92-583, October 27, 1972 (86STAT. 1280).

specific references to citizen participation, although the discussion of the intent behind such requirements proved less extensive and systematic than one might reasonably expect. For example, neither the House nor the Senate Reports on the CZM bill explained the rationale for the participation requirements therein.[59] It is also the case that the references to citizen involvement frequently centered on the legal rights of citizens to bring suit rather than on participation in administrative decision-making *per se*. However, the hearings and reports presented various arguments for participation, many of which paralleled those discussed above. In part, those giving testimony relevant to these various acts perceived participation as a way of providing that policies would be in accord with public desires, as well as a way in which valuable information could be gained. For example, Sydney Howe, President of the Conservation Foundation, in testifying at the FWPCA hearings argued that public participation was needed to provide for openness in government, ending the "secret dialogue between the control agency and the polluter."[60]

---

[59] U.S. House Committee on Merchant Marine and Fisheries, *Report on the Coastal Zone Management Act*, 92nd Congress, Second Session, House Report 92-1544, May 5, 1972; U.S. Senate Commerce Committee, *Report on the Coastal Zone Management Act*, Senate Report 92-753, 92nd Congress, Second Session, April 19, 1972.

[60] Sydney Howe, Statement, Hearing of the Subcommittee on Air and Water Pollution, Committee on Public Works, U.S. Senate, 92nd Congress, 1st Session, March 18, 1971

Much of the testimony regarding water resources planning was imbued with environmental concerns, causing citizen involvement to take on a particular significance. Specifically, the Congressional hearings and reports leading to the adoption of various water-related acts advanced citizen participation as a means of insuring that the environmental aspects involved in such efforts would be adequately assessed. Concerns for the environment and for public participation intertwined.

The hearings prior to the passage of the National Environmental Policy Act illustrate this point. As stated in the report of the Senate Interior and Insular Affairs Committee (July 9, 1969), there existed two reasons for paying increased attention to environmental affairs: (1) mounting evidence of environmental mismanagement and (2) the increasing importance attached by citizens to environmental quality. Given these concerns, the report proposed that new means and procedures be devised "to preserve environmental values in the larger public interest."[61] Greater public participation in decision-making involving environmental questions readily gained acceptance in these hearings as one such new means toward this end. Seemingly, this view of participation engendered little debate.

(S 641), Water Pollution Control Legislation--1971, Part 2, p. 624.

[61] Congressional Record, July 9, 1969, pp. 71, 74; as quoted in Bureau of Land Management, pp. 10-11.

More specifically, the basis for public participation in environmentally-related decision-making rested on at least three different themes which recurred throughout the discussions over NEPA. First came the concept that every individual citizen possessed the right to a clean and healthful environment; this theme found clear expression in the preliminary drafts and the actual text of NEPA.[62] The right of citizens to be involved in federal actions affecting the environment--as do most water resources decisions--became a logical extension of this right.

Second, the Congressional hearings clearly reflected the theme that environmental protection was a task which required the cooperation of all citizens. As one Congressional report on NEPA stated:

> The cumulative influence of each individual upon the environment is of such great significance that every effort to preserve environmental quality must depend upon the strong support and participation of the public.[63]

Furthermore, the Senate Public Works Committee, in favorably reporting upon the proposed FWPCA Amendments, stated that the way in which pollution control measures are implemented depends "to a great extent, upon the pressures and persistence which an interested public can exert upon the govern-

---

[62] Congressional Record, December 20, 1969, p. 2, Document No. 2; as quoted in Bureau of Land Management, pp. 12-13.

[63] Congressional Record, October 8, 1969, pp. 20 and 23; as quoted in Bureau of Land Management, pp. 13-16.

mental process."[64] Because of both the physical and the political complexities involved in environmental protection, participation was viewed as necessary to implement such policies. As Mrs. Donald Clusen of the League of Women Voters succinctly stated, "The Public is clean water's best lobby."[65] Finally, these various statements supported the argument that citizens possess information which can usefully contribute to environmental policy-making.

The Congressional rationale for public participation was, then, at best somewhat vaguely stated in these documents. In general citizen involvement was perceived as integral to the formulation and implementation of responsible water resources policies. Primarily, it promised to provide for the adequate consideration of environmental concerns, thereby increasing the likelihood that the resultant policies would be balanced and sound assessments which reflected public needs and preferences.

Despite the often superficial discussions of the merits of participation which accompanied the writing of the aforementioned laws, NEPA, the FWPCA Amendments, and the CZM

---

[64] U.S. Senate Committee on Public Works (92nd Congress, 1st Session), Report, Federal Water Pollution Control Act Amendments of 1971, Senate Report No. 92-414, October 28, 1971, p. 12.

[65] Mrs. Donald Clusen, Statement, Hearing of the Subcommittee on Air and Water Pollution, Committee on Public Works, U.S. Senate, 92nd Congress, 1st Session, March 18, 1971 (S 641), Water Pollution Control Legislation--1971, p. 648.

Act clearly required public participation. NEPA's statement of the rights of citizens to a healthful environment provided citizens with a broad legal basis for participation; its requirements for the filing of Environmental Impact Statements as part of the planning process also gave citizens an avenue for involvement, using the courts.[66] In addition, NEPA called upon the Council on Environmental Quality to consult with the public in performing its tasks.

The Federal Water Pollution Control Act Amendments and the Coastal Zone Management Act specifically required citizen participation in the administration of their provisions. For example, Section 101(e) of the FWPCA Amendments provided for citizen involvement in the "development, revision, and enforcement of any regulation, standard, effluent limitation, plan, or program" established by the Environmental Protection Agency or the states under that act.[67]

Supplementing the citizen participation provisions of these laws are two Presidential executive orders, E.O. 11472 and E.O. 11514, issued in 1969 and 1970, respectively. One portion of the former established the Citizen Advisory

---

[66] C. G. Morley, "Public Participation: A Right to Decide," in Agassiz Center for Water Studies, The Allocative Conflicts in Water Resources Management (Winnipeg: University of Manitoba, 1974), pp. 520-521.

[67] Bruce A. Bishop, Structuring Communications Programs for Public Participation in Water Resources Planning (Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, May 1975), p. 2.

Committee on Environmental Quality; Section 2(b) of the latter called for the development of procedures "to ensure the fullest practicable provision of timely public information and understanding of Federal plans and programs with environmental impact in order to obtain the views of interested parties."[68]

Taken collectively these laws and executive orders provided the mandate for citizen participation in water resources decision-making. They gave scant attention to the form which it should take. To the administrative organizations fell the task of developing procedures for involving the public. Thus, the more detailed requirements for citizen participation in water resources planning are found in the sets of guidelines developed by appropriate organizations to guide the administration of these other laws and orders.

Included in this group are the planning and policy-making guidelines established by the Water Resources Council (WRC), the Council on Environmental Quality (CEQ), and the Environmental Protection Agency (EPA). The former provides the most far-reaching and definite standards for public participation in water resources planning; however, the CEQ and EPA guidelines are also broadly applicable because of

---

[68] Executive Order 11514, "Protection and Enhancement of Environmental Quality," March 5, 1970, in Council on Environmental Quality, Environmental Quality; Third Annual Report of the Council on Environmental Quality (Washington, D.C., 1972), Appendix D, p. 362.

the general importance of water quality issues. The Water Resources Council guidelines for citizen participation are found in its "Principles and Standards for Planning Water and Related Land Resources."[69]

The "Principles and Standards" emphasized that plans should "be directed to the improvement in the quality of life by meeting current and projected needs and problems as identified by the desires of people in such a manner that improved contributions are made to society's preferences for national economic development and environmental quality."[70] More specifically, the Council stated:

> Direct input from the public involved at the local and regional levels is important and will be accomplished by:
>
> a. Soliciting public opinion early in the planning process;
>
> b. Encouraging periodic expression of the public's views orally, and recording their opinions, and considering them;
>
> c. Holding public meetings early in the course of planning to advise the public of the nature and scope of the study,

---

[69] U.S. Water Resources Council, "Principles and Standards for Planning Water and Related Land Resources," Federal Register, Vol. 38, No. 174, Part III, September 10, 1973; The Council on Environmental Quality, "Preparation of Environmental Impact Statements--Guidelines," Federal Register, Vol. 38, No. 147, August 1, 1973, pp. 20550-20561; Environmental Protection Agency, "Public Participation in EPA's Water-Pollution Control Activities," in EPA's Managing the Environment (Washington, D.C., 1973), pp. 162-167.

[70] Water Resources Council, p. 24785 (p. 13 of separate text).

opening lines of communication, listening to the needs and views of the public and identifying interested individuals and agencies;

d. Making available all plans, reports, data analyses, interpretations, and other information for public inspection.[71]

Furthermore, the Council guidelines directed planners to secure public participation "through appropriate means of public hearings, public meetings, information programs, citizens committees, etc."[72] In short, the "Principles and Standards" prescribed that a variety of mechanisms be used to involve the public in water resources planning and that they be employed early in and periodically throughout the planning process.

It is really these guidelines, rather than the laws or executive orders which go the furthest in prescribing the form that public participation in water resources planning must take. While the term "citizen participation" potentially encompasses many levels of public involvement in decision-making, it is significant that the type of participation outlined in the "Principles and Standards" and these other sources is of a specific nature. Public participation in water resources planning, as called for in these sources, is to be of an advisory nature. These guidelines instruct water resources planners to consult with citizens and to

---

[71] Ibid., p. 24827 (p. 96 of separate text).

[72] Ibid.

consider their comments, but they are not bound to accept this advice. This contrasts with certain other programs, such as those for "community action," where citizens were delegated decision-making power. Regardless of the precise role played by citizen participants, decision-making authority in water resources planning rests exclusively with the administrators and other public officials. This point must be kept in mind in assessing the general impact of citizen participation and its specific effects on the accountability of water resources planners and other administrators.

Current Techniques for Involving Citizens: The Literature of Participation in Water Resources Planning

While both these general requirements and the broad rationale discussed earlier set the general framework for public participation in water resources planning, they give little insight into how the concept is actually implemented. Ironically, notes John Dixon, the vagueness of both the rationale and the requirements has led to a situation where the administrators themselves have been charged with designing a system by which others can hold them accountable.[73] It has been the administrators, the planners, who, largely on a case-by-case basis, have integrated citizens into water

---

[73] John Dixon, "How Can Public Participation Become Real?" Public Administration Review, XXXV (January/February 1975), p. 70.

resources planning through the creation of public participation programs tailored to their particular studies. The design of these programs has varied considerably in terms of the level of citizen involvement and the specific participation techniques employed. The more widely used (traditional) techniques are listed in Table 1. As reported by Thomas Wagner and Leonard Ortolano, some planners have also begun (on a limited basis) to employ computer-based modeling and simulation exercises.[74]

To understand and assess the role of citizen participants in water resources planning, it is necessary to examine not only the rationale and the requirements of public participation, but the efforts to operationalize the concept, as well. We must explore in more detail the techniques used to provide public participation and the variables affecting their usage. An examination of the literature of citizen participation in water resources planning is central to this task.

The primary emphasis of the literature of public participation in water resources planning has been on the operationalizing of the concept. Indeed, most authors who have contributed to this literature have focused primarily on the question: "How can citizens best be integrated into

---

[74]Thomas R. Wagner and Leonard Ortolano, "Analysis of New Techniques for Public Involvement in Water Planning," Water Resources Bulletin, XI (April 1975), pp. 329-344.

TABLE 1

Public Participation Techniques Widely Used in Water Resources Planning

Advisory Committees or Task Forces

Brochures, Circulars, Pamphlets, and Workbooks

Establishment of Field Offices

Field Trips and Site Visits

Informal Meetings with Small Groups and Community Organizations

Local Planning Units

Mailings to Potentially Interested Citizens and Groups

Mass Media Releases and Materials

Model Demonstration Projects

Public Displays

Public Meetings, Hearings, and Workshops

Questionnaires or Surveys

Responses to Public Inquiries[75]

the planning process?" Mindful of the current requirements for participation discussed above, many authors in recent years have apparently accepted citizen involvement in water resources planning as "given." This focus on the best techniques for involving citizens also reflects the fact that a significant portion of this specialized literature has been developed under the sponsorship of public agencies,

---

[75]Bishop, p. 52.

including the Corps of Engineers, in need of substantive information about developing and implementing public participation strategies. For example, the Corps' Institute for Water Resources has sponsored and published a number of studies of citizen participation, including those by Bishop (1975), Borton and others (1970), Dahlgren (1972), Hanchey (1975), Ragan (1975), and Widditsch (1972).[76]

In focusing on the integration of citizens in water resources planning, authors have examined numerous different, and at times highly specialized, concerns. Most, however, have centered their attention on the traditional techniques for involving the public, as listed above in Table 1, although they have done so using a variety of approaches. Authors such as Bruce Bishop and Katherine Warner have sought to develop an overview and evaluation of alternative participation strategies used in a variety of planning investigations.[77]

---

[76]The references for these studies published by the U.S. Army Corps of Engineers, Institute for Water Resources, Ft. Belvoir, Va., include: Bishop, op. cit., Thomas E. Borton, Katherine P. Warner, William J. Wenrich, The Susquehanna Communication-Participation Study, IWR Report 70-6 (December 1970); Charles W. Dahlgren, Public Participation in Water Resources Planning: A Multi-Media Course, Professional Development Paper 72-1 (April 1972); James R. Hanchey, Public Involvement in the Corps of Engineers Planning Process, IWR Report 75-R4 (October 1975); Leonard Ortolano, Water Resources Decision-making on the Basis of the Public Interest (February 1975); James F. Ragan, Public Participation in Water Resources Planning: An Evaluation of the Programs of 15 Corps of Engineers Districts, IWR Report 75-6 (November 1975); Ann Widditsch, Public Workshop on the Puget Sound and Adjacent Waters Study: An Evaluation, IWR Report 72-2 (June 1972).

[77]Bishop (1975), op. cit.; Warner, op. cit.

Others have employed a more selective approach, looking primarily either at the participation programs employed in a given planning effort or at one specific technique designed to facilitate citizen involvement. These approaches are not mutually exclusive, and certain authors have combined the two by focusing on one particular method within the framework of a given case-study. With regard to the former category, numerous informative case-studies of citizen participation have been performed, including, for example, examinations of the "Brandywine Plan" by John Keene and Ann Louise Strong (1970), of the Corps' Susquehanna Study by Thomas Borton and others (1970), and of "fishbowl planning" in the Corps' Seattle District by several authors.[78] More recently, as is reflected in this study itself, authors have also examined the citizen participation programs of planning studies performed by various river basins commissions. Authors who have focused on specific techniques within the framework of case-studies include Ann Widditsch (1972) in her study of public workshops and Madge Ertel (1974) and Robert Shanley (1976) in their studies of citizen advisory groups.[79] In general, this research has endeavored to learn

---

[78] John Keene and Ann Louise Strong, "The Brandywine Plan," Journal of the American Institute of Planners, XXXV (January 1970), pp. 50-58; Borton, op. cit.; Howard L. Sargent, "Fishbowl Planning Immerses Pacific Northwest Citizens in Corps Projects," Civil Engineering, XLII (September 1972), pp. 54-57.

[79] Widditsch, op. cit.; Madge O. Ertel, Citizen Advisory Groups in Water Resources Planning (Amherst, Ma.:

from and build upon current attempts to involve citizens in planning activities.

Still other authors have adopted different approaches to the study of citizen participation in water resources planning. A number of studies have focused on the attitudes about water resources held by either community leaders or citizens at-large, as well as on the level of information on the subject possessed by these individuals.[80] One rationale of these studies is that in order to create workable plans, administrators must take such factors into account. As noted by L. Douglas James, the eventual implementation of programs depends on community reaction to planning proposals, as affected by citizen attitudes and knowledge.[81] Together, these various studies provide a great deal of useful information about the public participation strategies currently used in water resources planning.

Because many of these studies have relied on a case-study approach, one must exert caution in generalizing about these current strategies for citizen involvement. Ira Sharkansky has found, for example, that interest in and

---

Water Resources Research Center, University of Massachusetts, 1974); Robert A. Shanley, Attitudes and Interactions of Citizen Advisory Groups and Governmental Officials in the Water Planning Process (Amherst, Ma.: Water Resources Research Center, University of Massachusetts, August 1976).

[80] For further discussion, see Dynes and Wengert, op. cit.

[81] James, p. 305.

attitudes toward certain policy areas and participation itself vary from one region to the next.[82] Nevertheless, an overview of the participation techniques used in various planning investigations may be developed. Foremost among these techniques employed by planners have been the use of advisory committees, public meetings (of all sorts), the media, and communications materials developed by the planners themselves. Each of these may be examined more closely.

Advisory committees. The use of citizens', and at times scientific, advisory committees is wide-spread in water resources planning, although these groups vary considerably in terms of size, frequency of meeting, and level of involvement. Selection procedures also differ, although planners usually strive to achieve a balance of different groups. The merit of this technique lies in the opportunity which it offers to a limited number of citizens for participating more directly in the planning process than they could through other participation strategies. Experiences with these groups, however, suggest that performance depends greatly on the caliber of the people involved, who must be willing to contribute substantial amounts of time to these activities, and on the willingness

---

[82] Ira Sharkansky, Regionalism in American Politics (Indianapolis: Bobbs-Merrill and Co., 1970), Chapter 3.

of administrators to deal with them.[83] The history of this approach also suggests that particular problems accompany the use of these committees. In terms of the interests and demographic characteristics of its members, these groups tend to be unrepresentative.[84] The very closeness of the relationships involved may also lead to tensions between administrators and citizens, if they disagree on issues or if the advisors feel their recommendations are not being heeded. David S. Brown notes, therefore, that the performance of advisory committees can be improved by clearly defining their particular mission, by developing staff assistance, and by improving their selection and operating procedures in order to provide a better mix of "establishment" and other interest group members.[85]

Public meetings. Public meetings have also proven to be a frequently used and flexible tool for integrating citizens into the decision-making processes of water resources planning. Planners have at times utilized formal public hearings to solicit citizen comments. These normally provide a transcribed record of citizen comments, but also have certain costs, particularly in terms of little citizen-

---

[83] David S. Brown, "The Management of Advisory Committees: An Assessment for the 1970's," Public Administration Review, XXXII (July/August 1972), p. 336.

[84] Ibid., p. 339; Bishop, p. 65.

[85] Brown, pp. 340-341.

administration dialogue. On other occasions, as in the Corps' "fishbowl planning" approach in their Seattle District, planners have also held quite informal public meetings or workshops in order to facilitate such interaction.[86]

In general, experiences with this strategy indicate that public meetings perform two basic functions; first, they serve to inform those who attend about the details of planning projects, and, second, they provide individuals with an opportunity to voice their concerns. However, this technique for participation also gives rise to various problems. The citizens attending these meetings often lack basic information about the planning investigations, especially if these studies are at an early stage.[87] Like the advisory group members, the citizens attending are frequently unrepresentative of the public. Attendance fluctuates greatly. Finally, many citizens demonstrate at these meetings a local orientation, at the expense of regional concerns. In light of these problems, Ann Widditsch emphasizes the importance of distributing information prior to such meetings and of advertising the meetings to maximize turnout.[88] Such efforts seem likely to provide for citizen inputs from a more substantial, more interested, better informed, although still unrepresentative group.

---

[86] Sargent, pp. 54, 57.

[87] Brown, pp. 340-341.

[88] Widditsch, op. cit.

Mass media techniques. Most planning studies also make use of the media in their public participation programs. Given the budget limitations of planning studies, the primary effort of most planning staffs has been directed at securing "free" coverage, through the issuing of "news releases" of noteworthy events. In the case of radio and television, some planners have exercised other options, such as appearing on scheduled programs featuring guest speakers. Probably the greatest coverage in terms of substantive information about the planning studies has been through the newspaper.

The use of the media is significant in that it permits the planners to inform large numbers of citizens about given planning projects and to announce other participation opportunities, such as public meetings. Nevertheless, as Bishop points out, the use of the media does not in and of itself usually provide direct involvement, although some methods for establishing two-way communication do exist.[89] Also, to the extent that planners rely on the use of the press release, the final decision on what is printed is made by the media staffs, and coverage on crucial events may be incomplete or in other ways inadequate. Suggestions for improving the use of the media in planning decision-making, however, have been explored; Kahle and Lee, for example,

---

[89] Bishop, pp. 69-72.

stress the importance of taking local attitudes into account in designing media programs.[90]

Staff communications materials. In addition to utilizing the media to reach the general public, many planning staffs have also developed their own communications materials, such as notices of upcoming meetings, fact sheets, brochures, and summaries. Once they have established a mailing list, the planners frequently send such materials directly to potentially interested individuals. They may also be distributed in bulk to individual groups or at public meetings. In practice, the quality of these materials and their distribution vary considerably.

With an ample distribution, the use of these materials permits planners to reach a broad audience and, in so doing, to retain control over the presentation of the information. The developing and mailing of the above, however, is expensive. Frequently, these methods have produced only one-way communication; however, as exemplified in the Corps' Seattle District "fishbowl planning," this approach can be used to foster two-way exchanges.[91] A number of studies have used their own questionnaire to seek public

---

[90] R. Kahle and R. L. Lee, A Q-Methodological Study of Attitudes Toward Water Resources and Implications for Using Mass Media in Dissemination of Water Research Results (Columbus, Mo.: Water Resources Research Center, University of Missouri, 1974), im passim.

[91] Sargent, pp. 54-57.

feedback. These various devices may also invite citizens to contact the planning staff. James Hanchey observes that these methods seem potentially useful in determining public priorities and attitudes, a task recognized by all as being exceedingly difficult.[92] With this goal in mind, Wagner and Ortolano urge planners to expand their usage of brochures designed to provide feedback.[93]

In general, the participation programs of water resources planning investigations have incorporated a mixture of these techniques at well-defined stages of the studies.[94] This makes it difficult to assess the relative merits of each. After surveying over 500 planning agencies, private organizations, and other groups, the Warner study recommended the use of advisory committees, informal contacts, and public meetings.[95] Robert Wolff found that Corps planners viewed workshops and brochures as more useful than the media in involving the public.[96] However, these authors seem to agree that a varied, multi-faceted public partici-

---

[92]Hanchey, p. 22.

[93]Wagner and Ortolano, pp. 340-342.

[94]Ortolano, pp. 3-9, 3-10.

[95]Warner, p. 14.

[96]For a summary of Wolff's findings see: Wagner and Ortolano, p. 330; Robert D. Wolff, Involving the Public and the Hierarchy in Corps of Engineers Survey Investigations (Stanford, Ca.: Civil Engineering Department, Stanford University, Report EEP-45, 1971).

pation program is essential.

The precise way in which planners have employed these participation techniques, however, has varied greatly from one study to the next. As Warner observes, different dimensions of these techniques may be emphasized, and planners have alternatively used these techniques to inform and educate the public, to gain reaction to specific proposals, or to generate a broad interaction between citizens and administrators.[97] In general, the resources at the disposal of the planners and the manner in which they have utilized them has had a significant impact on the degree to which citizens have participated in these investigations.

The observations of varied authors suggest that several other factors have also influenced citizen involvement in water resources planning and caused variations in participation from one study to the next. The level of participation has been influenced by the degree to which citizens: (1) are aware of the issues involved, (2) perceive themselves being affected by the decisions, (3) believe that they can influence decisions, and (4) feel that it is worth the effort to do so.[98] These variables in turn are likely to be affected by the geographic and functional scope of the planning investigation, the seriousness

---

[97] Warner, p. 23.

[98] *Ibid.*, p. 8.

of related problems in recent years, the activity of interest groups in the area, and other distinctly local or regional conditions, such as those mentioned earlier in connection with Sharkansky's research.[99]

In summary, the literature of citizen participation in water resources planning provides insight into both the range of variables affecting participation and the advantages or disadvantages of given participation strategies, as used in various studies. The above findings suggest that public participation in water resources planning cannot be assumed, but must be cultivated through well-designed, somewhat aggressive, programs begun early in the studies. The literature also suggests, but does not explore, the likelihood that different mechanisms are appropriate to and needed for different cases. To date, planners have been free to structure their individual advisory programs as they have seen fit. Given this state-of-the-art, further research is necessary. In particular, we must examine more systematically how the employment of these various strategies affects the realization of the positive goals envisaged by many for public participation. We also need to know more specifically about how the usage of these various strategies can be improved to achieve the effects desired, especially the increasing of bureaucratic accountability and of the

---

[99] Ibid., p. 37.

quality of public policy.

The Rationale and the Experience: An Overview

A broad range of arguments exist for integrating citizens into administrative decision-making. The most compelling of these are that public participation will enhance both administrative accountability and the quality of public policy. This logic for participation applies to water resources as well as to other policy areas. Given this logic and the various other political considerations, public participation has become mandatory in water resources planning. At the heart of this effort, however, has been the aim of injecting a greater appreciation for environmental concerns into the planning process, thereby creating more responsible policies. Various Congressional hearings and reports reflect these goals.

Indeed, in the 1970's, public participants have been integrated into various planning projects, establishing a record of experiences warranting study. Agencies and individual authors have responded by evaluating the techniques used in the public participation programs associated with water resources planning efforts. This literature recommends various ways of improving current programs.

Nevertheless, at least two basic sets of needs exist for further research focusing on citizen participation.

First, there is a need to explore the varied impacts of public participation. To what extent does citizen involvement in water resources planning, or in policy-making in other substantive areas, achieve the goals which comprise the rationale for public participation? To date, few authors have examined this question. More efforts are needed to determine what public participation really accomplishes so that this enterprise may be properly evaluated. Second, if public participation is judged worthwhile, the need exists for further study of the techniques used to integrate citizens in administrative decision-making in order to improve the quality of that involvement.

In light of the concern for bureaucratic accountability expressed earlier and the relative strengths of the above arguments for participation, it seems particularly important to examine the effects of public participation on the accountability of the planners and other administrators who make public policies, in this case those associated with the use of water resources. Therefore, the following analysis explores public participation as a method for enhancing the accountability of water resources administrators, so as to ensure the creation of responsible water resources plans. Certainly, the other possible impacts of public participation in water resources planning, such as its effects on the individual self-development of the involved citizens,

warrant further examination, but these concerns lie essentially outside the scope of this study.

CHAPTER III

THE NEW ENGLAND RIVER BASINS COMMISSION: THREE CASE-STUDIES OF PUBLIC PARTICIPATION

Water resources planning is an extremely detailed and complex policy-making activity. In exploring the intricacies of water resources planning and the role that citizen participants can play in the process, the following analysis utilizes a case-study approach. This approach focuses primarily upon the New England River Basins Commission (NERBC) and three largely autonomous planning programs run by that organization.

Nationally, the NERBC is one of six such regional commissions created to coordinate public decision-making concerning the use of water and related land resources. As noted earlier, a host of agencies at all levels of government have traditionally engaged in water resources planning. One apparent consequence of this multiplicity of effort has been that plans and policies in this area have frequently been rather disjointed, at times even conflicting.[1] One

---

[1]For discussion see: Victor A. Koelzer, "A Proposed National Organizational Structure for Water Resources Planning," Water Resources Bulletin, IX (February 1973), pp. 167-180.

approach to alleviating this problem has been the use of interagency coordinating committees, frequently under the leadership of the Corps of Engineers. This method of coordination is still prevalent in the South. The creation of river basins commissions in other regions represents a new, although not radically different, approach to coordination.[2] Thus, the New England River Basins Commission (NERBC), on which this study focuses, exists as a relatively new mechanism designed to promote coordination among the many state, interstate, and federal organizations involved in water resources planning in its host region, New England.

The New England River Basins Commission came into existence with the signing by President Johnson of Executive Order 11371 on September 6, 1967. This action, in accordance with Title II of the federal Water Resources Planning Act of 1965, followed the requests for the creation of the Commission made by the New England Governor's Conference and the Governor of New York. The geographical scope of the NERBC, which was modified soon after its inception, encompasses the New England states, the North Shore of Long Island, and the Housatonic River Basin in New York.[3]

---

[2]Martha Derthick, Between State and Nation: Regional Organizations of the United States (Washington, D.C.: The Brookings Institution, 1974), Chapter Four.

[3]The scope of the NERBC was expanded to include the North Shore of Long Island Sound to permit the undertaking of a comprehensive study of Long Island Sound.

Organizationally, the Commission's membership includes representatives of ten federal agencies, six interstate and regional agencies, and the six New England states, as well as New York. (These are identified in Table 2.) Its operating budget, which was $380,000 for fiscal year 1976, is borne by both the federal government and the member states.[4] NERBC also receives separate appropriations for carrying out special planning projects. The leadership of the Commission similarly reflects this federal-state partnership. The NERBC's Chairman is a Presidential appointee; the Vice Chairman is a state member. The Commission itself meets quarterly, often in two-day sessions, while the Chairman and a staff of about forty people carry out the day-to-day administrative responsibilities of the organization, primarily from NERBC's office in Boston, Massachusetts.

The duties of the NERBC and its staff revolve around four basic tasks. First, the Commission, as mentioned above, serves as the principal agency for coordinating water and related land resource plans on a regional basis. For example, staff members provide technical assistance in planning to state personnel. Second, it prepares and updates regional plans for developing these resources. Third, NERBC is charged with recommending long-range planning priorities for

---

[4]The New England River Basins Commission, 1975 Annual Report (Boston, 1975), Appendix D.

TABLE 2

THE MEMBERS OF THE NEW ENGLAND RIVER BASINS COMMISSION

State	Federal	Interstate
Connecticut	Department of Agriculture	Atlantic State Marine Fisheries Commission
Maine	Department of the Army	Connecticut River Valley Flood Control Commission
Massachusetts	Department of Commerce	Interstate Sanitation Commission
New Hampshire	Department of Health, Education and Welfare	Merrimac River Valley Flood Control Commission
New York	Department of Housing and Urban Development	New England Interstate Water Pollution Control Commission
Rhode Island	Department of the Interior	Thames River Valley Flood Control Commission
Vermont	Department of Transportation	
	Atomic Energy Commission	
	Environmental Protection Agency	
	Federal Power Commission	

Source: New England River Basins Commission, "A State-Federal Partnership," pamphlet distributed by NERBC, Boston, undated, p. 11.

the region. Fourth, it recommends and performs planning studies on problems of regional importance.[5] In these ways, it seeks to improve the management of the region's resources so as to:

> provide a healthy attractive environment fit for man to live in, while at the same time supporting an economy which provides decent opportunities for the people of the region.[6]

The Commission, then, is involved in a broad range of planning activities.

Conducting planning investigations has in practice proven to be an important function performed by the New England River Basins Commission; this is true in other regions as well. NERBC, since its inception, has sponsored or co-sponsored a variety of such studies, such as one examining the economic and environmental effects of off-shore oil production and shipment.[7] More importantly for this analysis, NERBC has also played a leadership role in three major subregional comprehensive planning programs, two of which have recently been completed. These include studies of water and related land resource problems in the two-state Long Island Sound area and the three-state Southeastern New England area. A third study of flood damage reduction and flood plain management in the four-state Connecticut River

---

[5] Ibid., p. 5.

[6] Ibid., p. 10.

[7] See NERBC, 1975 Annual Report, p. 7.

basin is in its later stages of preparation. These investigations are referred to below as the Long Island Sound (LISS) Study, the Southeastern New England (SENE) Study, and the Connecticut River Basin Program (CRBP) Supplemental Study. All three are classified by the Water Resources Council as Level B studies. As defined by the Water Resources Council, a regional or river basin (Level B) plan is a

> preliminary or reconnaissance-level water and related plan for a selected area. These are prepared to resolve complex long-range problems identified by less detailed studies such as framework studies and the national assessment. They may vary widely in scope and detail, but will focus on middle term (15 to 25 years) needs and desires and involve Federal, State and local interests in plan development. They also identify and recommend action plans and programs to be pursued by individual Federal, State and local entities.[8]

The Origins of the Three Studies

The LISS, SENE, and CRBP Studies all began during the early 1970's. In all three instances concerns expressed by citizens and public officials gave impetus to the initiation of the studies. In the Long Island Sound area, concerns about water-related problems voiced by many individual citizens, officials, and organized groups in the late 1960's led Senator Abraham Ribicoff (D-Conn.) to hold three public meetings to evaluate the situation. These meetings demon-

---

[8]Bishop, p. 107.

strated broad public support for a study of the Sound's problems.[9]

Following the Ribicoff hearings, NERBC gave approval to an initial program for studying the Sound, and in January 1971 the Water Resources Council assigned the Commission and its member agencies to prepare a plan of study, a detailed planning guide, for the study of the Sound's water and related land resource problems. With the assistance of interim citizens and science advisory committees, NERBC developed, approved, and published this document.[10] It called for a three and a half year study, costing about three million dollars. Officially, the study started on July 1, 1971; however, because of delays in funding, it did not open its New Haven, Connecticut office until April 1972 or fully begin until later that year.

The Southeastern New England Study began in a similar way, also with funding delays. Following two years of discussion, Congress appropriated money for the SENE Study for fiscal year 1970, but it was impounded by the Bureau of the Budget until January 1, 1971. Throughout this early

---

[9]See: "Preserving the future of Long Island Sound," Hearings before the Subcommittee on Executive Reorganization and Government Research of the Committee on Government Operations, U.S. Senate, on S.2472, U.S. Government Printing Office, Washington, D.C., 1970.

[10]New England River Basins Commission, Plan of Study; Long Island Sound Regional Study (Boston, August 1, 1971).

period, the New England Governors' Conference strongly supported the study. Once funds were received, the plan of study commenced; it was published in April 1972.[11] Also, as in the LISS Study, an Interim Citizens Advisory Committee assisted the staff in formulating recommendations regarding a permanent advisory group structure for the SENE Study.[12] To complete the inception of the study, a SENE office was opened in Boston, Massachusetts.

The background of the Connecticut River Basin Program's Supplemental Study is somewhat more complex. This NERBC Study followed and supplemented a 1970 comprehensive study of the Connecticut River basin, which was conducted by a Coordinating Committee directed by the Corps of Engineers.[13] Considerable public criticism of the nine-volume Corps' report accompanied its release. Citizens objected to its recommendation of building seven dams in the basin and to a perceived lack of consideration of environmental and social impacts which would result from these and other proposals. Such public comments drew support

---

[11] New England River Basins Commission, Southeastern New England Water and Related Land Resources Study; Plan of Study (Boston, April 1972).

[12] Southeastern New England Study, "Report of the Interim Citizens Advisory Committee," 1971.

[13] Connecticut River Basin Coordinating Committee, Connecticut River Basin Comprehensive Water and Related Land Resources Investigation (October 1970).

from Representative Silvio O. Conte (R-Mass.) and other legislators.

When, as prescribed, the Corps distributed the report to other public agencies for a 90-day review period, the newly established New England River Basins Commission appointed a Citizens Review Committee (CRC), composed of scientists, businessmen, and interest-group members, to assist it. The CRC proved a highly competent panel, and their report was generally applauded. Bernard B. Berger attributes this to the following conditions:

> The charge was clear and specific; the issues were important and timely; the members of CRC were well-informed on these issues; a time limit of 90 days provided a useful spur to Committee effort; NERBC's Chairman gave unstinting encouragement and support; and the media's attention was focused on the Committee. In addition, the skepticism concerning the impartiality of CRC expressed by a very highly motivated group of "concerned citizens" (Connecticut River Ecology Action Committee) provided a further incentive to produce a well-reasoned set of recommendations.[14]

Significantly, the CRC's report also criticized the inadequate examination of environmental impacts in the Corps' study.[15]

NERBC, in developing its own 1980 Connecticut River Basin Plan, took this and other criticism into account. The

---

[14]This quote is taken from a letter to the author. See Berger, op. cit., for further information.

[15]Report of the Citizen Review Committee of the Connecticut River Basin Comprehensive Water and Related Land Resources Investigation to the New England River Basins Commission (Boston, February 1, 1971).

1980 Plan called for the creation of a supplemental study to reexamine the flood management recommendations of the Corps' comprehensive plan. The 1980 Plan also called for the inclusion of both citizen and science advisory groups in the follow-up planning program.[16] The CRBP Supplemental Study began officially on July 1, 1972, with an office in Hanover, New Hampshire. In contrast to the broad-ranging LISS and SENE Studies, it focused on only one aspect of water resources management, flooding.

The Organization of the Studies

Significantly, the LISS, SENE, and CRBP Studies involved a team approach to planning. While the NERBC's own staff personnel guided and dominated the planning process, participants from the broad range of agencies comprising the Commission's membership played an important role in the studies. This can be seen in the funding of the three studies. NERBC's share of the funding for each study was approximately 17% for the LISS Study, 20% for the SENE Study, and 28% for the CRBP Study, figures quite high by current level B standards.[17] Other moneys for the studies went directly to the associated agencies, such as

---

[16] New England River Basins Commission, The NERBC 1980 Connecticut River Basin Plan (Boston, January 1, 1972).

[17] Derthick, pp. 146, 155.

the Bureau of Outdoor Recreation or the Corps of Engineers. The NERBC staff had no control over these expenditures. This working arrangement, which reflected the nature of the New England River Basins Commission itself, necessitated a rather complex organizational structure. An understanding of this management structure is important to examining the role of citizen participation in the studies and the accountability of the administrators involved in these investigations.

Atop this structure stood the NERBC. The Commission set broad policies for the studies. It also reviewed and passed final judgement upon the reports of the studies. Once it adopted these reports, the Commission sent them to the Water Resources Council for forwarding to the President, Congress, and the state governors and legislatures. It also requested necessary personnel and funding to perform the studies and, where necessary, reallocated those funds at its disposal.

Each study had its own Coordinating Group which met quarterly over a one- or two-day period. These Groups, headed by the Chairman of NERBC, consisted of representatives holding policy-making positions in the agencies involved in the respective studies. The Coordinating Groups for the LISS, SENE, and CRBP Studies made basic policy decisions within the context of the studies and dealt with substantive

questions which arose. The Coordinating Groups also reviewed reports prior to their submission to the Commission, made personnel and budget recommendations to the Commission, and coordinated the work of all agencies associated with their study.[18]

In each study, a Study Management Team, consisting of the study manager, his staff, and representatives from the agencies, met quarterly, as well. The Study Management Team focused its attention on the coordination of operational matters. The members were generally more actively involved in the mechanics of the planning process than were the Coordinating Group members.[19]

The day-to-day planning efforts of the LISS, SENE, and CRBP Studies centered on NERBC's staff personnel assigned to each study and on the planners in the various associated agencies who shared a similar role. NERBC's own personnel formed the core staffs for the three studies. These LISS, SENE, and CRBP staffs consisted of a study manager, one or two professional planners, a public information specialist, and varying numbers of assistants and secretaries. These staffs in effect managed the planning programs. They assumed responsibility for compiling the work of the

---

[18] New England River Basins Commissions, People and the Sound: A Plan for Long Island Sound--Supplement, Vol. 2 (Boston, July 1975), p. 19.

[19] Ibid.

associated agency planners, for writing the draft and final planning reports, for directing the citizen participation programs, and for conducting the routine business of the studies from their respective offices.

The planners from the associated agencies performed many of the substantive planning tasks needed for the studies, such as the gathering of data, the identification of problems, and the formulation and analysis of alternative action proposals. In doing so, the agencies performed specific tasks assigned to them in the plans of study. Agencies working in the functional areas of the LISS and SENE Studies--for example, recreation and transportation--met periodically in Work Groups to coordinate their efforts. Each Work Group, under the direction of a lead agency, produced a joint report for use by their study's staff in plan formulation.[20]

These Work Groups and the individual agencies worked closely with the staffs of the studies. Numerous telephone conversations filled the voids between meetings. This was also true of the relationship between the LISS, SENE, and CRBP staffs and their respective Coordinating Group and Study Management Team members. Despite the lack of fiscal control over the associated agencies, the LISS, SENE, and CRBP staffs, by nature of their roles in the studies, could

---

[20] *Ibid.*

at times influence agency activities. The staffs also could directly supervise the performance of a limited number of planning tasks performed by private consulting firms or by NERBC's own central staff.[21]

The Objectives of Citizen Participation in the Studies

As suggested above, public participation was in fact integrated into the complex planning processes of the LISS, SENE, and CRBP Studies. At their inception, NERBC explicitly recognized the need for citizen involvement in the studies. Several factors helped to account for this. The NERBC Chairman, himself, prior to his involvement with the Commission had served in a leadership capacity with a well-known conservationist group and was, therefore, quite accustomed to working with the public and disposed in that direction. It was also clear by the start of the studies that citizen participation would in the near future become mandatory in such planning efforts. In addition, staff personnel were cognizant of both the strong traditions for participation and the sophistication of interest-groups in New England.[22] Finally, NERBC's successful experience with the Citizens Review Committee may have encouraged further

---

[21]The staffs had particular control over the legal and institutional portions of the studies.

[22]From a telephone interview by Madge Ertel with the Chairman of NERBC, Mr. Frank Gregg, July 1976.

such efforts.

In assessing citizen participation in these studies, it is appropriate to begin with an examination of the expressed objectives of citizen involvement in these planning programs. These objectives prove significant for a number of reasons. First, since they presumably guided the planners in the studies, they may provide insights into the "logic" which the public participation programs followed. Second, the objectives can be evaluated for their appropriateness and their completeness. Third, they can potentially be used as a framework for evaluating the programs as they evolved.

The objectives of citizen participation in the three studies can be found in the LISS and SENE Plans of Study and in the 1980 Plan, as well as in various staff memoranda.[23] While these discussions are by no means identical, they do provide a comparable overview of the subject. As one examines them, one finds a variety of objectives, some quite similar to those discussed earlier.

One objective of public participation by citizens and scientists in the studies, discussed in these documents, was to provide information about local conditions to

---

[23]For example, see Long Island Sound Study, Citizen Advisory Committee Memorandum, No. 74-16, November 27, 1973.

supplement the knowledge of the planners. As stated in the LISS Plan of Study, one objective was "to make use of the knowledge of people who live near the Sound and who are close to its problems."[24] This same source acknowledged that users of the Sound "have a close working knowledge of the area that will be a valuable aid to the study team."[25] In a related vein, the LISS Plan of Study also stated that scientists, by contributing scientific information and technological data, could have a similar impact.[26]

The 1980 Plan identified a second objective of citizen participation, the development of management plans "that are responsive to public needs and preferences."[27] Although neither the SENE or LISS documents proved quite as explicit, they also viewed public participation as a way of identifying and exploring a broad range of viewpoints and value considerations. At a minimum, this theme suggested that citizens could make planners more aware of value considerations. At a maximum, as in the 1980 Plan, it recognized that public participation could potentially enhance the responsiveness of government.

Given the assumption that most citizens are not

---

[24] NERBC, LISS Plan of Study, p. 5-1.

[25] Ibid.

[26] Ibid., p. 6-1.

[27] NERBC, 1980 Plan, p. 125.

aware of water-related problems, the study documents viewed the educating of the citizenry about public problems and proposed solutions as a third objective of citizen participation. This objective sought to enable citizens to participate more meaningfully in the planning process--perhaps, to facilitate the achieving of the first two objectives or, perhaps, to build support for implementation.[28]

The latter also found expression in the study documents as a fourth objective. The SENE Plan of Study saw citizen participation as a means "to provide citizen commitment to the final plan through active involvement in actual plan formulation processes."[29] Another stated objective of citizen participation was, then, to increase the likelihood that plans will be implemented. Some observers might view the pursuit of this objective by an agency as a form of cooptation. Clearly, however, NERBC's intentions seem more honorable. Since the Commission's legal mandate limited its activities strictly to planning (as opposed to implementation), its efforts to generate action on the plans were not aimed at providing a continuing role for the organization in the implementation process.

Collectively, these NERBC documents stated that citizen participation should be pursued in order to (1) supply

---

[28]NERBC, LISS Plan of Study, p. 5-1.

[29]NERBC, SENE Plan of Study, p. 6-3.

administrators with additional factual information about local conditions; (2) indicate to planners the values and preferences of citizens; (3) inform citizens about public problems and alternative solutions; and (4) facilitate the implementation of the final plans. These objectives clearly required public participation programs designed to provide a two-way dialogue between planners and citizens. Ideally, the planners would provide sufficient information to the citizens, so that they could participate meaningfully in the studies; the citizens would provide the staffs with feedback as to their preferences and assessments and with additional information. Given such an interaction, citizen participation would result in technically sound, responsive plans that would in all likelihood be implemented.

These objectives for citizen participation in the LISS, SENE and CRBP Studies resemble those which comprise the general rationale for participation, as discussed above. The one exception is that the study documents made no mention of the value of participation to individuals in terms of their own self-development. The writers of these documents did not express this concern. It is also true that these early texts did not systematically examine the implications of these objectives. For example, the documents did not elaborate upon the potential impact of these objectives on the democratic nature of government in New England or New

York State. They centered more on the mechanics of how to involve the public in the planning process. Significantly, the role of citizens in supplementing the factual knowledge of the planners received a more forceful statement in these materials than in much of the literature of citizen participation. This subject is pursued in later chapters.

In general, however, the LISS and SENE plans of study and the 1980 Plan presented only superficial examinations of the objectives for public participation; ostensibly, they in themselves provided little guidance to the planners and citizens involved in the studies. The discussions of participation in these NERBC documents do, nevertheless, suggest that the broad goals for participation discussed above are readily applicable to these three studies and that these goals may appropriately be used to evaluate the LISS, SENE, and CRBP public participation programs.

The Public Participation Programs of the Studies

In order to describe and evaluate the public participation programs of the LISS, SENE, and CRBP staffs, one must understand the nature of planning processes used in the three studies. Particularly important is the fact that the scope of the three studies dictated a long and complex planning process aimed at gathering information about the study area, assessing problems and their alternative solutions,

formulating a plan of action, and reporting the findings.

During the first phase of the studies, the agency personnel (the work groups) gathered and organized information about the water and related land resources and their usage in the study areas. Essentially, this involved creating inventories of previously existing data. Second, the agencies, assisted by the LISS, SENE, and CRBP staffs, analyzed this information and assessed the particular problems to be faced in planning for their regions. Third, the associated agencies and the staffs evaluated alternative plans for resolving the problems which they had identified, using benefit/cost calculations. Fourth, the staffs of the three studies formulated comprehensive plans which sought to select those proposals for best achieving overall goals for the respective regions. In so doing, the staffs, while continuing to assess alternative recommendations, integrated the separate agency efforts into internally consistent plans.[30]

Finally, the staffs published draft planning reports on their findings and released them for a 90-day period of review by the study participants, other federal and state agencies, local and regional officials, and the general public. At the end of this time, the LISS, SENE, and CRBP staffs revised their draft reports, subject to the approval

---

[30]NERBC, LISS Plan of Study, pp. 4-3 to 4-22.

of the Study Management Teams, the Coordinating Groups, and the Commission.

In order to integrate citizens into this complex planning process, the LISS, SENE, and CRBP Studies utilized public participation programs comprised of numerous related elements. These programs, which proved similar in all three studies, included the use of citizens and science advisory groups, three series of public meetings, and a variety of other communications strategies. Responsibility for carrying out these programs rested with the public participation coordinator and, ultimately, with the study manager of each study. Throughout each study, the public participation coordinator served in a full-time capacity; however, the talents of these individuals and the demands upon the LISS, SENE, and CRBP staffs led to their involvement in substantive planning activities.[31] The public information officer for the Commission assisted these individuals at various junctures. Given the importance of these citizen participation programs in channeling citizen involvement in the studies, it is appropriate to examine their various component elements in greater detail.

The citizens advisory committees. At the heart of the participation program of each study stood an active

---

[31]For example, the SENE coordinator, a planner by training, did much of the staff's work on the recreational elements of the plan.

regional Citizens Advisory Committee (CAC). These committees numbered thirty, thirty-two and approximately thirty-three members in the LISS, CRBP, and SENE Studies, respectively. Because the SENE Citizens Advisory Committee operated in a more informal manner than did the two others, the number of its members can only be estimated.[32] During their most active period, the advisors to the CRBP and LISS Studies met monthly, while those associated with the SENE Study met quarterly. It should also be noted that the SENE Study, at the suggestion of its interim advisory committee, provided for a second level of involvement by the establishment of twelve Basin Advisory Committees.[33]

Despite the formal adoption of this two-tiered advisory group structure by the SENE Study, the differences here between that program and the LISS and CRBP Studies proved to be largely semantic ones. In practice, SENE's Basin Advisory Committees consisted of those individuals who attended open sessions comparable to the public meetings, or workshops, held in the other studies. They did not form cohesive, working groups that met with reasonable frequency. Therefore, it seems useful to consider what the staff termed "Basin Advisory Committee" meetings as simply public

---

[32] In practice, the SENE staff invited those non-member citizens who attended the CAC meetings to participate in the sessions.

[33] SENE Study, "Interim CAC Report."

meetings. Having done this, one finds that the citizens advisory committees operated in a quite similar manner in all three studies.

The New England River Basins Commission chose the members of these advisory committees by means of elaborate selection procedures. In the LISS Study, the Governors of New York and Connecticut each appointed eight members, and the NERBC Chairman selected fourteen. Similarly, in the CRBP Study, the four governors each appointed six members and the Chairman picked eight. Reflecting its more complex structure, the SENE Study utilized a different formula. The Chairman appointed outright nine at-large members. Later the Chairman appointed two additional members selected at each of twelve public meetings (Basin Advisory Committee meetings) held throughout the region.

In all three instances the study staffs generated lists of suitable individuals with the help of interested groups. These lists guided NERBC and the various governors in making their selections. It is significant that the generation of this list and the formalities of appointment caused considerable delay in selecting advisory committee members. Observers of the LISS Study reported that in New York gubernatorial appointees were screened at the local level, a time-consuming process.[34] New Hampshire also

---

[34]Ertel, p. 21.

encountered delays in making its selection for the CRBP Study. Finally, the filling of all positions in the SENE Citizens Advisory Committee had to await the holding of the first series of public meetings. As a result, in all three studies the CAC members entered the planning process somewhat later than intended and did not fully participate in the early phases of planning.

In selecting these citizens advisory committee members, the staffs of the three studies and of the Commission sought to draw upon individuals of diverse interests and backgrounds. For example, the LISS Plan of Study called for an advisory committee representing:

conservation interests
commerce and industry
outdoor recreation
public health
planning and design professions
academic interests
youth and the elderly
low income groups
historic and cultural interests
transportation and utilities
local government
state legislators[35]

Ideally, NERBC envisaged a citizens advisory committee in each study which would reflect the broad range of interests of different segments of the public with a stake in water resources planning.

In practice, such a broad mixing of interests did

---

[35]NERBC, LISS Plan of Study, p. 5-3.

not occur. Low-income citizens and minority group members displayed virtually no awareness of the studies or interest in advisory groups membership, although in the LISS Study a black member (a professional by training) became the first CAC Chairman. Time and monetary considerations also limited the participation in the CAC's by low-income people and by moderate-income people, as well. Staff reimbursement for travel and related expenses offset some of the outright monetary costs of involvement. However, the fact that the CAC activities required substantial investments of time and that the meetings in all three studies typically occurred during the day precluded many citizens from becoming involved, even if they had desired to do so.

Some people oriented toward business concerns did become members of the citizens advisory committees and active participants in the planning processes, especially in the LISS Study. But when compared with the above costs of involvement, the potential impacts of the planning programs on business affairs did not seem sufficiently important to stimulate the broad interest of business people in the CAC's or in the studies themselves.[36] On the other hand, individuals oriented to conservationist and environmental concerns showed considerable interest in the LISS, SENE, and CRBP

---

[36] Southeastern New England Study, "Progress Report, September 1972-September 1973," (1973).

Studies and equal willingness to participate in their citizens advisory committees. As noted above, citizens sharing such concerns were in part responsible for the initiation of the CRBP Supplemental Study, and the CRBP staff later indicated that they viewed these citizens as their main constituent group.[37]

In terms of the personal characteristics of the advisory committee members, a 1974 study of the LISS, SENE, and CRBP citizen advisors by Madge Ertel proved quite revealing. The Ertel study, based on survey research, found that the citizen advisors were "relatively affluent, well-educated, professionally and organizationally active, and well experienced in the kinds of issues related to the study programs."[38] Over 60% of the advisors surveyed had engaged in graduate work; nearly 40% had received graduate degrees. Similarly 60% of the advisors had average family incomes exceeding $20,000 per year, with over 30% exceeding $35,000 per year.[39] In addition, the groups contained a disproportionate number of men, although the SENE committee--which had the fewest female members--did have a woman Chairperson. Most of the women associated with the studies either were at

---

[37]From an interview with CRBP Study Manager, Mr. David Harrison, June 21, 1976.

[38]Ertel, p. 40.

[39]*Ibid.*, pp. 34-36.

the time, or had been, active in the League of Women Voters, an organization with a demonstrated interest in water resources.[40]

These findings indicate that the citizens advisory committee members associated with the studies represented neither a broad range of substantive interests nor a cross-section of the citizens living in the three regions. Most of the members displayed a distinctive, in some cases long-term, interest in environmental concerns and proved better educated and more wealthy than most citizens. In these senses, they were, as the literature suggests most advisory groups are, unrepresentative. This profile also reveals that these participants brought to the studies a considerable knowledge about the topics at hand.

Also significant is the fact that the level of involvement of these advisors in the three studies varied from one individual to the next. Over the course of the investigations, participation varied considerably as a "self-selection" process began to operate.[41] Many of the advisory committee members became unwilling or unable to continue a commitment to the studies over their taxing three to four years of operation. As a result, active participation in the committees' activities diminished over

---

[40] Ibid., pp. 29-32.

[41] Ibid., p. 47.

time. The second Chairman of the LISS CAC reported that the genuinely active membership of the committee consisted of a nucleus of about seventeen or eighteen members (out of thirty).[42] Committee rules provided for the replacement of "inactive" individuals, but this was not done.

Numerous resignations and subsequent reappointments of new members occurred in all three studies, but especially in the CRBP Study where the turnover rate exceeded fifty percent. An added causal factor in this case may have been the extremely limited focus of the study, which examined only one aspect of water resources, flooding. Because the reappointment process followed the same procedure as the initial selection, the staffs encountered delays in filling vacancies on the committees. This exacerbated the problems of representativeness.

Such events are not uncommon in long-standing volunteer groups.[43] New priorities intervene and the interests of active individuals may shift. Also, several members may not have initially understood the extensive nature of the commitment being asked of them by the three staffs. One member reported not being consulted prior to his appointment.[44] At least one member resigned in actual protest to

---

[42] From a letter to Madge O. Ertel from Roger Shope, Chairman of the LISS CAC.

[43] Ertel, pp. 47, 55.

[44] Ibid.

the course of the planning investigation, a rare occurrence. Clearly, however, this "self-selection" phenomenon did have implications for the three participation programs. As noted by Madge Ertel:

> . . . it meant that those members who did choose to participate actively were in a position to exert a weight of influence which distorted the "balance of interests" which was the objective of the appointment process.[45]

It must also be kept in mind that certain individuals, while generally inactive, may have participated at critical instances and through other means than attending meetings.

Those advisory committee members who did participate actively in the LISS, SENE, and CRBP Studies engaged in a broad range of planning activities. The plans of study and later memoranda assigned several types of functions to the CAC's, such as:

1. helping to guide the planning processes by identifying goals and objectives, major issues, and public preferences;
2. reviewing the working documents and the final planning reports of the studies;
3. facilitating general public awareness of and contribution to the studies, by communicating with other individuals and groups; and
4. aiding in the adoption and implementation of the

---

[45] Ibid., pp. 47-48.

studies' plans.[46]

With varying degrees of emphasis and success, the LISS, SENE, and CRBP citizens advisory committees did perform these duties. Their role in the implementation process, however, goes beyond the scope of this investigation.

The CAC members did, indeed, provide on-going supervision of the planning programs. In the LISS and SENE Studies, the advisors formulated lists of objectives to be pursued by the staffs.[47] In all three studies, the CAC members evaluated the presentations, working documents, and final reports prepared by the LISS, SENE, and CRBP staffs and the associated agencies. Individual members attended not only the regular CAC meetings, but work group, study management team, coordinating group, and Commission meetings as well.

Involvement in the activities of the work groups, while encouraged and coordinated by the staffs, proved to be uneven and somewhat sporadic. Only some individuals chose to participate to this degree, and frequently those that did complained that they did not receive sufficient

---

[46]NERBC, LISS Plan of Study, pp. 5-2, 5-3; Ertel, p. 80.

[47]Long Island Sound Study, Citizens Advisory Committee, "Goals for the Region Report," CAC Memorandum No. 74-14; SENE Study, "Memorandum from CAC and R/STF; Goals and Objectives for the Southeastern New England Study," May 1974.

information from these groups.[48] However, in general, the CAC members reviewed considerable amounts of study materials forwarded directly to them, and frequently responded individually by mail or phone, as well as collectively at meetings. In the SENE Study, the CAC Chairman regularly visited the staff's office and became integrated into its operation. Many CAC members, then, played an active role in the planning processes of the LISS, SENE, and CRBP Studies. A detailed description of these activities and an assessment of their impact on the planning processes and the plans of these studies is presented in the next chapter.

Moreover, the CAC members in all three studies undertook numerous activities intended to broaden public participation in the planning efforts. As observed by the Ertel study, CAC members perceived this as an important activity.[49] The LISS, SENE, and CRBP CAC's organized public information subcommittees to facilitate public involvement in the studies. The resulting linkages which the advisory committee members provided between the staff and other citizens proved to be significant, functioning in both a direct and indirect manner.

In an indirect sense, the CAC members broadened public involvement in the studies by adding the names of local

---

[48] Long Island Sound Study, "Minutes of CAC Meeting No. 9, March 7, 1973," p. 2.

[49] Ertel, p. 80.

residents to the studies' mailing lists, reviewing public meeting and general informational materials, helping the staffs to interpret comments made at public meetings, and arranging meetings between the staffs and local leaders. In the SENE Study, for example, the staff asked the citizen advisors to help identify citizens to invite to the first series of public meetings, and they responded accordingly. In all three studies, the CAC members assisted the staffs in ascertaining whether or not public materials and meeting presentations were sufficiently clear and free of technical jargon so that citizens could readily comprehend them. This activity took place in both committee and subcommittee meetings and occurred prior to the first and second series of public meetings in the studies more so than before the third rounds of meetings. One related problem which arose on several occasions was that the staffs did not distribute the materials early enough to give adequate time for CAC review.[50] It should also be noted that the LISS CAC frequently pressed the staff for more publicity about the study, but without any demonstrable effect.[51]

More directly, CAC members spoke to individuals and

---

[50]For example, Janet W. Dakin (Chairman, CRBP Public Information Committee), "Report to the CAG on Phase One Forums," December 14, 1973, p. 1.

[51]This concern was voiced by one CAC member at a LISS Coordinating Group Meeting on May 7, 1973, as well as at several CAC meetings.

groups about the studies, sent articles and letters to local newspapers to publicize the studies, and helped to organize and run many of the public meetings. The first two types of activities reflected primarily individual initiative. The staffs made no systematic attempt to use CAC members as spokesmen for the studies. It is likely that staff members considered such a strategy a risky proposition, given their lack of control over individual CAC members.

The public information subcommittees as groups helped the staffs to plan for the public meetings. During the initial public meetings, the CAC members assisted in selecting the cities and towns and particular facilities where the meetings were held. In some cases CAC members made the meeting arrangements. Excluding the final series of public meetings in the LISS and SENE Studies, the staffs did try to integrate the CAC members into such activities as moderators or discussants. Many CAC members, however, did not attend these functions. CAC involvement in the final series of meetings of the LISS and SENE Studies proved quite limited, and those people attending spoke as individuals rather than as representatives of the CAC's.

In examining these various activities it is very difficult to evaluate how successful CAC members were in involving more citizens in the studies. Responses to the questionnaires used in this research indicated that 21.3%

of the citizens attending the final series of public meetings in all three studies had personally discussed the studies with a CAC member and that this figure was considerably higher for the CRBP Study (28.2%) than for the LISS Study (17.0%). When the CAC members who themselves attended these meetings are controlled for, these figures decrease by several percentage points. Using this indication, one finds that less than 20% of the citizens attending the meetings, who were not themselves CAC members, had discussed the studies with the members of the citizens advisory groups. The responses also indicated that governmental officials attending the meetings were more likely to have been in contact with CAC members than were other citizens.[52] This suggests that the CAC members played a limited role in directly informing other citizens about the studies, although this activity proved more successful in the CRBP Study and in reaching local governmental officials.

The CAC members, then, helped to inform other citizens about the studies by (1) facilitating citizen-planner contact, (2) reviewing public materials, (3) helping to arrange and participating in public meetings, (4) generating publicity, and (5) informally discussing aspects of the studies with other individuals. Their direct communications

---

[52]Of the public officials who responded, 30.1% had discussed the studies with a CAC member, but only 16.9% of the respondents who were not officials had done so.

with others proved circumscribed, but this should not necessarily detract from their indirect informational activities. The impacts of the latter are impossible to assess precisely, but certainly more systematic use of the CAC members in this regard was possible.

In general, rather small, selected groups of citizen advisors actively participated in the LISS, SENE, and CRBP Studies. Although these individuals represented a narrow cross-section of interests, they were well-informed on water resources issues. Given this knowledge, they played a major role in guiding the planning process and in informing other citizens about the studies.

The science advisory committees. In each of the three studies, a science advisory committee also participated in the planning process. These science committees were labeled "the Research/Planning Advisory Committee" (R/PAC), the "Regional/Scientific Task Force" (R/STF), and the "Science Advisory Group" (SAG) in the LISS, SENE, and CRBP Studies, respectively. They numbered twenty-nine members in the LISS Study, eight in SENE, and thirty-seven in CRBP. Unlike the citizens advisory committees discussed above, these science committees did not operate in a parallel manner. The LISS Study's R/PAC, which perceived its role to be quite different from that of the CAC, functioned inde-

pendently of that body.[53] It met as frequently as once a month, using at times a seminar format. In the SENE Study quite the opposite occurred; the small R/STF and the regional CAC formed a collective entity which met on a quarterly basis. Over the course of the CRBP Study its citizens and science advisory groups blended these approaches meeting separately for a time and later jointly, at monthly intervals. In all three studies the science advisors made substantial contributions as individuals apart from the group meetings.[54]

The members of the science advisory committees in all three studies were individuals appointed because of their professional backgrounds. Most, but not all, of the science advisors taught at colleges and universities in New England and New York; they had a broad range of specialties applicable to the studies. In contrast to the selection of the citizen advisors, the NERBC Chairman appointed all the science advisors. As a result, in both the LISS and CRBP Studies the science committees began operating before the CAC's did so. With R/PAC, R/STF, and SAG, as with the three

---

[53] On several occasions R/PAC members discussed merging their activities with those of the CAC; however, several members argued for a distinctly professional, or scientific, role in the study. They viewed their inputs as distinct from those of the lay citizens.

[54] The Chairman of CRBP's SAG, Prof. Bernard Berger, in an interview with the author in June 1976, indicated that he felt that science advisors could contribute more usefully in this manner than by attending group meetings, in part because of their busy schedules.

citizens advisory committees, a self-selection process began immediately, so that the working membership of the committees proved much smaller than the original totals.

Here, too, other commitments may have intervened, or the scientists may have been disillusioned due to the complexity of the studies or their uncertain role in them. This self-selection process occurred most rapidly in the CRBP Study where the precise nature of the study took considerable time to evolve. In commenting upon CRBP's Science Advisory Group (SAG), Bernard Berger observed that

> such groups are not very effective unless the charge given is clear and specific, and of a nature amenable to approach. Put in another way, I believe SAG could have been more effective if well-defined problems were presented to them. This is not the way it worked. The members of SAG were asked to carry on a continuing review of an evolving plan to anticipate problems. This process produces a welter of possibilities whose evaluation and screening are time-consuming and uncertain. Almost inevitably special studies are recommended. Such studies normally would require funding support. I believe many SAG members dropped out because they felt they could not make an input beyond identifying areas requiring special study.[55]

It is difficult to say what impact the self-selection process had on the behavior of the groups. In the CRBP Study, it appears to have been the "hard" scientists, the specialists, who dropped out, leaving behind generalists who shared broad ecological concerns.[56] On Long Island, the

---

[55] From a letter to the author from Prof. Berger. These same observations were also expressed by Prof. Berger in the June, 1976 interview.

[56] Ibid.

research-oriented scientists lost interest as the study progressed. Nevertheless, a number of scientists stayed active in the LISS, SENE, and CRBP Studies throughout their duration.

They, like the citizens advisory committee members, engaged in a broad range of planning activities, which had been defined earlier in the plans of study and other initial documents and included:

1. using their knowledge to assist in the studies, especially by coordinating them with related research;
2. identifying tasks requiring special studies, possibly by outside consultants, and facilitating this research;
3. outlining long-term research agenda for the study areas; and
4. discussing and, if possible, reconciling issues concerning the methodologies and results of the studies.[57]

With considerable variation from study to study, all three science advisory committees pursued these tasks. Their efforts are described and evaluated in detail in the next chapter.

The science advisors, then, brought to three studies

---

[57]NERBC, LISS Plan of Study, pp. 6-4 and 6-5; NERBC, 1980 Plan, p. 126.

considerable expertise in a variety of professional fields. A simplified selection process led to their early involvement in the studies, although many individuals were unwilling or unable to sustain this commitment. Those who remained active did perform a variety of tasks, some of which proved similar to those of the citizen advisors and some of which required more technical expertise.

The public meetings. The LISS, SENE, and CRBP staffs utilized numerous public meetings to integrate citizens into the studies. The format and timing of these meetings proved similar in all three programs. For example, each of the studies held three series of public meetings at comparable stages in the planning process. A first series of meetings, held early in the LISS, SENE, and CRBP planning processes, served to inform citizens about the studies and to gauge their general preferences and priorities with respect to water-related issues. A second "round" of meetings at the midway point of the studies permitted citizens to examine and respond to initial alternative recommendations for action. Finally, a third round of meetings during the official 90-day review period for each study provivided citizens with an opportunity to evaluate the LISS, SENE, and CRBP draft planning reports.

In total, the LISS staff organized and conducted thirty-one formal public meetings over the course of the

study: ten in the first series of meetings, thirteen in the second, and eight in the third. SENE and CRBP held thirty-three and twenty-seven meetings, respectively, which similarly were divided into three groupings. Within a given series, the meetings were held in locations throughout the planning area within a relatively compact time-frame. Table 3 illustrates this format.

Attendance at these meetings varied considerably from study to study and from meeting to meeting. It proved greatest in the more densely populated Long Island Sound area where about 900, 1800 and 580 individuals attended the meetings. Fewer people attended the CRBP and the SENE meetings, totals of about 1400 and 1200, respectively.[58] Of the three study areas, the Connecticut River Basin was certainly the least densely settled. In the SENE Study, the fact that citizens in the planning area lacked a regional identity made it difficult for the staff to stimulate public interest and participation in the program. This identify problem stemmed in part from the planning area's being neither a hydrological unit, nor a region in any other exclusive sense.[59] As exemplified in the final

---

[58]These figures appeared separately in various study materials and in CAC Minutes.

[59]The original intent of the Basin Advisory Committees was, therefore, to generate participation on a subregional basis, but apart from two or three areas this strategy never developed.

TABLE 3

THE CONNECTICUT RIVER BASIN PROGRAM'S PUBLIC MEETING LOCATIONS

First Series October/November 1973	Second Series June to September 1974	Third Series February/March 1976
Middletown, Ct.	E. Hartford, Ct.	E. Hartford, Ct.
Windsor, Ct.	Northampton, Ma.	Northampton, Ma.
W. Springfield, Ma.	W. Springfield, Ma.	W. Springfield, Ma.
S. Deerfield, Ma.	Keene, N.H.	Keene, N.H.
Brattleboro, Vt.	Brattleboro, Vt.	Brattleboro, Vt.
Hartford, Vt.	Hartford, Vt.	Lebanon, N.H.
Littleton, N.H.	Littleton, N.H.	Whitefield, N.H.
	Claremont, N.H.	Claremont, N.H.
	St. Johnsbury, Vt.	St. Johnsbury, Vt.
	Groveton, N.H.	
	Greenfield, Ma.	

Source: Connecticut River Basin Program, Local Perspectives on Flood Management Planning in the Connecticut River Basin; Report on Phase 2 Local Meetings, November 30, 1974, p. 16.

series of public meetings in Rhode Island, where less than a total of a hundred people attended four sessions, the Boston-based SENE Study had difficulty attracting followers in Rhode Island.

A number of individual meetings in the three studies

drew audiences of a hundred or more residents, but most proved less successful. The low points of participation occurred at given meetings in New York City and Keene, New Hampshire where only about a dozen residents attended. The LISS staff held the former meeting outside the actual boundaries of the study in an unsuccessful effort to reach national and regional interest-groups based in the city. The latter meeting was held by the CRBP staff on the night of one of New England's worst snowstorms in the winter of 1975-1976. All three studies did hold most of their meetings at night in order to bolster attendance.

In order to attract citizens to these meetings the LISS, SENE, and CRBP staffs employed a variety of techniques. First, all three staffs circulated news releases to local newspapers and other media outlets in the study areas. These served both to inform citizens about the studies and to announce the meetings; the coverage varied considerably. For example, the newspaper coverage prior to the final series of meetings in each study appeared most widespread in the LISS Study.[60] Within each study variations also occurred. In the SENE area, the coverage was greater in Massachusetts than in Rhode Island; within Massachusetts, it was greater in the Cape Cod and North Shore areas than else-

---

[60]Each staff employed a newsclip service to provide it with a complete record of all coverage in the area. These were studied by the author and are the basis for these comments.

where. Certain newspapers printed only part of the information in the releases, while others provided additional coverage. The schedules of the public meetings generally appeared only once, if at all, in a given newspaper.[61] Unlike the others, the CRBP staff did effectively use radio and television to announce the meetings, by scheduling a large number of appearances by the study manager and agency personnel on various "news" and "talk" shows.

Second, the staffs mailed materials directly to citizens in the planning areas to announce upcoming public meetings, using internally prepared mailing lists. These lists included the names of citizens known or thought to be interested in the studies. Local, regional, and state officials and environmental groups were well-represented on these lists.[62] The staffs frequently added the names of individuals who had attended previous meetings, as well. This approach was exemplified in the preparations for the final series of meetings in each study. Prior to these meetings the LISS and SENE staffs sent summaries of the

---

[61]For example, the Boston Globe's coverage consisted in total of two news articles, one mention in a regular column, and two editorials; only one of the former gave the dates, times, and locations of the meetings. This did, however, appear on the first page of the "New England" section of the Sunday Globe. In other papers, the limited exposure did not gain such a prominent position.

[62]This statement is based primarily on the author's examination of the LISS Study's mailing list.

draft reports, printed in the form of tabloid newspapers, to interested citizens.[63] The LISS staff mailed over 500 summaries to public officials, interested citizens, and groups. The SENE staff reported mailing 4,000 summaries, some of which were mailed in bulk form to interested groups and organizations for distribution to their members. The CRBP staff, lacking time and money for such a publication, sent out approximately 1500 copies of the draft report itself, along with explanatory materials and meeting announcements.[64]

The staffs supplemented these techniques with numerous informal contacts with citizens. In addition, the SENE staff directly called the better than 200 local governments in their planning area to inform them about the meetings nearest them. The survey administered to the citizens attending the final meetings indicated that of the three studies, SENE had the highest percentage of governmental officials in the composition of its audiences, slightly over 50% compared to 39.2% for CRBP and 23.7% for LISS. Even

---

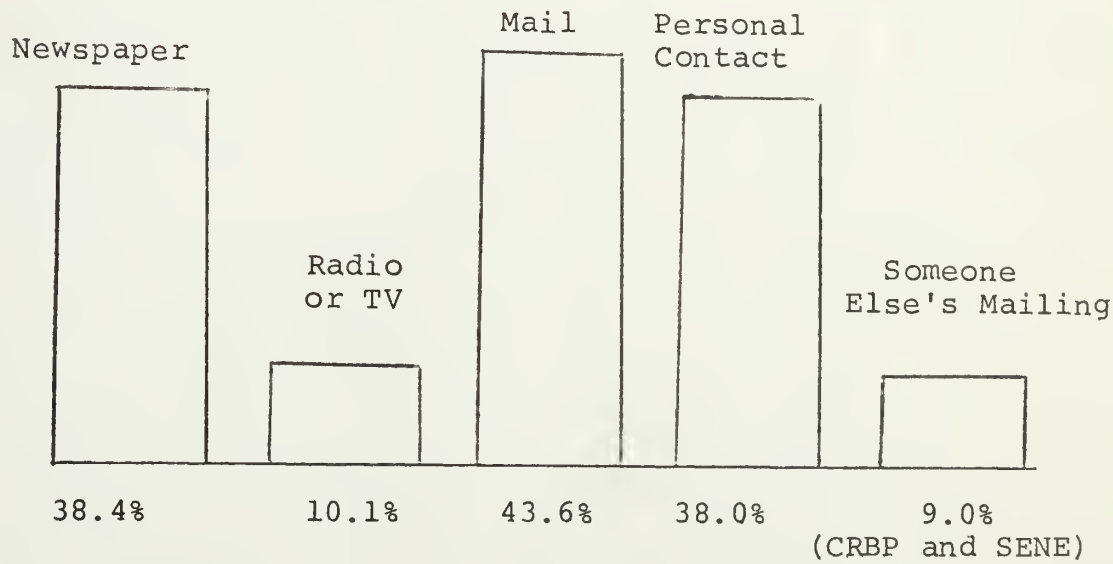
[63] Southeastern New England Study, "How to Guide Growth in Southeastern New England; A Management Proposal for Public Discussion," May 1975; Long Island Sound Study, "Urban Sea- People and the Sound; A Plan for Long Island Sound," November 1974.

[64] Connecticut River Basin Program, The River's Reach; A Plan for Flood Damage Reduction and Flood Plain Management in the Connecticut River Basin; 90 Day Public Review Draft, December 1975.

more clearly, however, the survey results, as shown in Table 4, attested to the importance of the direct mailing procedure. Of those attending the final meetings, 43.6% said that they had heard about the study by mail compared to 38.4% by newspaper, 38.0% by talking with other citizens, and 10.1% by radio or television. In the SENE and CRBP Studies, 9.0% of the citizens said that they had seen the materials mailed to another individual.

TABLE 4

HOW THE CITIZENS HEARD ABOUT THE MEETING*



*Note: Respondents could select more than one answer. That the percentages add up to more than 100% reflects that some citizens heard about the meeting by more than one method.

These aggregate figures also demonstrate the importance of the newspaper in informing citizens about the meetings. However, in the SENE Study, where only 26.2% of the respondents had heard about the meeting through this means, the use of the newspaper proved of marginal utility. This was apparently due to the factors discussed above. The figure for the use of radio and television in motivating attendance was significantly higher (20.3%) in the CRBP Study, reflecting that staff's aggressive approach to these tools.

The survey also assisted in identifying the salient characteristics of those citizens who had heard about the final series of LISS, SENE, and CRBP meetings and had chosen to attend. In terms of their demographic characteristics, the citizens attending the final meetings were both well-educated and relatively affluent, as can be seen in Tables 5 and 6. Among the respondents to the survey, 37.7% indicated that they had done graduate work or received a graduate degree, while 13.1% reported an educational level of high school completion or less. Over a third of the citizens participating in the survey (35.4%) stated that their annual family incomes exceeded $20,000. This figure proved highest in the LISS Study (40.5%). Another 30% of the respondents in all three studies indicated that their income fell in the range from $13,000-$20,000. Interestingly, 9%

TABLE 5

THE EDUCATIONAL LEVELS OF THE RESPONDENTS

		High School or Less	Some College or College Degree	Graduate Work
LISS	N	51	221	172
	%	11.4	49.9	38.5
SENE	N	37	165	148
	%	10.4	46.5	41.7
CRBP	N	58	152	102
	%	18.4	48.1	32.3
Total*	N	146	538	422
	%	13.1	48.1	37.7

*1.0% missing observations.

TABLE 6

THE ANNUAL FAMILY INCOME LEVELS OF THE RESPONDENTS

		$8500	$8500-$13,000	$13,000-$20,000	$20,000
LISS	N	37	67	129	181
	%	8.3	15.0	28.9	40.5
SENE	N	32	57	118	124
	%	9.0	16.1	33.2	34.9
CRBP	N	29	55	97	91
	%	9.2	17.4	30.7	28.8
Total*	N	98	179	344	396
	%	8.8	16.0	30.8	35.4

*9.0% missing observations.

of the respondents refused to answer the income question posed in the questionnaire. Overall, the results proved quite similar to those of surveys administered earlier by the LISS and SENE staffs. A LISS survey taken at the meetings in the Spring of 1973 revealed that about 35% of the citizens attending those meetings had professional or graduate degrees and nearly 50% had family incomes of over $20,000 per year.[65]

The survey of the third round meetings did not examine the racial characteristics of the citizens participating. However, attendance by minority group members at the meetings appeared to be very low, virtually non-existent, and the staffs acknowledged this situation.[66] No representatives of identifiable ethnic or minority groups spoke at any of the meetings.[67] These conclusions were reinforced by the first LISS survey during which 609 (95.9%) respondents identified themselves as Caucasian, 9 (1.4%) as black, 1 (0.1%) as Puerto Rican, and 16 (2.5%) as other.[68]

The general survey also indicated that the citizens participating in the planning process were actively involved

---

[65] Long Island Sound Study, "Report of the Public Workshops of May/June 1973," August 21, 1973, p. 3.

[66] Based on interviews with SENE and LISS staff members.

[67] In the meeting summaries, the names of the organizations which the speakers were representing were listed; no identifiable minority group organizations were listed.

[68] LISS Study, "Report of May/June Workshops," p. 3.

in public affairs. A total of 39.1% of them had attended one to five other public meetings or hearings in the past year; 44.8% had attended more than five. These figures were higher for governmental officials than for non-officials, reflecting that public officials typically attend many meetings, but they remained quite high for both groups. As noted above, the public meetings were attended by a disproportionate number of public officials, especially those at the local level. Over a third (36.7%) of the citizens who answered the questionnaire held an elected or appointed office in government, primarily in a city or town. In the SENE Study, this was true for 50.7% of the respondents.

The task of examining the attitudes and interests of the respondents proved interesting, but was limited by the size of the questionnaire. The respondents, for example, exhibited a strong preference for local involvement in water resources planning. The majority of the respondents in each study felt that planning decisions concerning the use of water and related-land resources should be made primarily at either the local or regional level or by local and state governments working together. Very few favored state or federal primacy in such a role. Indeed, a concern for "home-rule" surfaced at many meetings.

For the SENE and CRBP meetings an item was added to

the questionnaire to examine the one major concern in which each respondent was most interested. As noted in Table 7 each respondent could choose from among five alternatives. The results indicated that the citizens participating in the survey were primarily interested in concerns for the environment and community betterment. Several individuals commented that they viewed these two categories as related.

TABLE 7

THE MAJOR CONCERN OF INTEREST TO THE RESPONDENTS
(by percent)

	Environ-ment	Industry/ Commerce	Private Property	Community Betterment	Recreation
SENE	42.8	1.7	3.4	19.4	2.3
CRBP	36.4	4.4	20.6	21.8	0.6

Relatively few respondents were primarily interested in industrial or commercial concerns in the narrow sense of the terms, apart from community betterment. In responding to a related question used in all the questionnaires, less than ten percent (9.7%) of the citizens indicated any industrial or commercially motivated interest, regardless of priority, in the studies' recommendations. Respondents at the CRBP meetings, as evidenced in Table 7, reported particular interest in concerns for private property. This apparently reflected the nature of the study's recommendations which

if implemented would affect property rights and values in flood-prone areas.

Finally, the survey provided a brief examination of the knowledge about the studies possessed by the citizen participants. At the SENE and CRBP meetings, about half (52.7% and 44.6%, respectively) reported that they did not know enough about the studies to be able to offer comments at that meeting. This seemingly reflected the fact that less than one-third (31.0%) of the respondents had attended an earlier public meeting sponsored by the studies.

In general, then, those individuals who attended the LISS, SENE, and CRBP meetings displayed a variety of characteristics which set them apart from other citizens. They were particularly well-educated, affluent, active, and involved in local government. Few were minority group members. They were oriented toward concerns for the environment and their community rather than business, per se. About half considered themselves inadequately informed about the studies.

The extent to which the citizens who attended these meetings actually participated in the planning process varied from individual to individual. Some sat and listened and, perhaps, responded in some way after the meetings; others made statements or asked questions ranging in nature from very superficial to quite specific or detailed.

The activities undertaken by the citizens at the

meetings varied also with the ways in which the meetings were organized. The LISS and SENE staffs in their earlier meetings adopted a workshop format. In these instances, the citizens in attendance engaged in small group discussions which addressed given concerns and which utilized special materials prepared for these sessions, with CAC assistance. Both the LISS and SENE staffs, as mentioned above, also administered questionnaires to supplement the oral comments of the citizens. In the former study, the staff distributed one questionnaire at its first meetings in the Spring of 1973 and included a second in an issue of the "Urban Sea," a staff publication, printed in the Spring of 1974. This latter survey was designed to be completed at the second series of meetings or mailed to the LISS Study office. These questionnaires provided the staffs with information about the demographic characteristics and preferences of participating citizens. However, design problems, as pointed out by CAC members and other observers, limited the utility of the first LISS questionnaire.[69]

The final series of public meetings in the LISS, SENE, and CRBP Studies followed a similar format, but differed somewhat in terms of their tenor. Each meeting began

---

[69] Jenene Geerdes, Communications Aspects of the Long Island Sound Study, unpublished master's thesis, Graduate School of Corporate and Political Communication, Fairfield University, June 1975, pp. 37-39.

with a presentation, complete with slides, which summarized the draft report. Following this, the study manager called upon citizens to present their comments. In the LISS Study, the staff conducted this final meeting quite formally, in the manner of a hearing. Little interaction occurred between the staff and the citizens, as the staff rarely responded to the public comments. At the SENE and CRBP meetings, which were generally smaller in size, considerably more two-way communication took place. Also, the SENE and CRBP meetings differed somewhat from those of LISS in that the staffs focused their presentations and slides more on the problems in the local areas where the meetings were being held. Despite such variations, all the meetings held throughout the three studies encompassed two distinct activities: first, the staffs providing basic information about the studies to the participating citizens, and second, the citizens presenting their comments about the studies to the staffs. The nature of these comments and their impact on the LISS, SENE, and CRBP Studies are examined in the next chapter.

In summary, citizens other than the members of the citizens and science committees also participated in the planning processes of each study at three rather distinct intervals by attending and commenting at formal public meetings conducted by the LISS, SENE, and CRBP staffs, at

times with the assistance of CAC members or other public agencies. The staffs utilized a variety of means to attract citizens to these meetings, but not all segments of the public responded. Low-income people and minority group members did not genuinely participate in the meetings. Nevertheless, a substantial record of public comments was built up.

Other participation techniques. The LISS, SENE, and CRBP staffs also used other communications strategies, primarily to inform the public about their studies. The magnitude of these undertakings did not, however, approach that of the above efforts, nor were the techniques as comparably used in all three studies.

Among the three programs, only the LISS staff produced its own newspaper publication, entitled the "Urban Sea," which appeared four times during the study. As noted above, its second issue contained a public questionnaire, while its fourth and final issue consisted of a summary of draft plans for the Sound. The LISS staff printed and distributed these in large quantities. Fifteen thousand copies of the last summary issue were circulated in the region, many at the final meetings. As reported by one observer, the "Urban Sea" issues contained both attractive and unattractive design features, and proved rather costly, but provided both a great deal of information about the LISS study and a certain

continuity to its public participation program.[70] Although neither the SENE nor CRBP Studies used this informational device in a comparable way, all three of the studies did on occasion distribute brochures and other public materials.

The LISS Study also organized a speakers' bureau to provide staff presentations to interested community groups. The CAC played a minimal role in this activity. In practice, the staffs of LISS, SENE, and CRBP all gave presentations of study-related topics to interested community organizations, such as Chambers of Commerce. All three staffs also successfully arranged additional meetings with key interest-groups, though not with minority groups, to discuss the studies. In addition, the CRBP staff, prior to certain of its public meetings, arranged discussion sessions with local officials and community leaders.

Finally, it should be noted that the staffs frequently communicated with individual citizens in the planning areas in a variety of informal ways, including in person, by phone, and by mail, particularly during the 90-day review periods. Thus, individuals did participate in the studies outside of the more structured activities discussed above.

Thus, the LISS, SENE, and CRBP staffs, for a broad range of reasons, sought to involve citizens in the three studies. Because the planning processes proved so long and

---

[70] Ibid., pp. 23-28.

complex, they evolved elaborate, quite traditional mechanisms in order to do so, including advisory groups, public meetings, and other communication techniques. Participation through the public meetings was restricted to a few well-defined stages. For the most part, the citizens participating were people of means and education who were concerned about a relatively narrow range of interests, largely environmental in nature. In terms of their demographic characteristics and substantive interests, then, they were not broadly representative of the public at-large. Lower-income, minority, and--to a lesser extent--blue-collar individuals were not effectively involved in the studies. Nevertheless, a recent study by Lester Milbreath demonstrates that lower-income people and blacks do have some distinctive preferences and feelings about water resources questions.[71] It should be noted that other participation techniques, such as random sample surveys, which may have helped to discern the attitudes and interests of such groups, were not employed by the staffs.

While these problems existed, many citizens availed themselves of the above opportunities to participate, involving themselves to varying degrees and with varying amounts

---

[71]See Lester Milbreath, An Extra Dimension of Representation in Water Resources Planning: A Survey Study of Erie and Niagara Counties (Buffalo: State University of New York, 1976).

of information about the tasks at hand. It remains to examine the actual impact of those who did participate on the three NERBC Studies and the effects of their involvement on the accountability of the administrators associated with these planning programs.

CHAPTER IV

THE EFFECTS OF PUBLIC PARTICIPATION ON THE PLANS

In order to understand and assess the effects of citizen participation on the accountability of the administrators who carried out the LISS, SENE, and CRBP Studies, it is necessary to go beyond the above description and analysis. One must also consider actual impact of citizen inputs on the planning process of the three studies and on the final plans, themselves. The final and, perhaps, most critical test of citizen participation is what it achieves in terms of public policies, policy outputs, and actual program accomplishments. Accordingly, significant insights into the suitability of citizen participation, as a mechanism for enhancing accountability and in turn responsible public policy-making, are to be gained by examining the impacts of the citizen participants on the three NERBC Studies.

This is admittedly a difficult undertaking for a variety of reasons. First, the scope of the interactions between the citizens and the planners proved enormous. Second, the citizens had an impact on the studies through a variety of both formal and informal mechanisms, such as advisory group meetings, public meetings, meetings with

private organizations or interest groups (or their leaders), and letters, phone calls, or visits to the study offices. Not all of these interactions, including private conversations between interest-group leaders and staff members could be observed. Third, citizen recommendations in some instances paralleled those of agencies or individuals who were members of the study itself; subsequent impacts cannot be solely attributed to the public. Fourth, at times different groups, such as the citizens and science advisory committees, took the same position on a particular matter. In these instances it is difficult to know how much influence to attribute to one group versus the other. Fifth, given human nature, different people offered different explanations for different events.

Within these limits, the following examines the impact of citizens on the planning processes and the plans of the three studies. The focus is primarily, but not exclusively on the citizens' comments during the advisory group and public meetings conducted by the staffs and the staffs' responses to these inputs. These inputs have been documented in various minutes and reports. The author's discussions with various citizens and attendance at many of these activities supplemented these formal records. The staffs' responses are gauged by changes in the planning processes and substantive changes in the planning documents.

Interviews with staff members helped to clarify these impacts. Particular attention is given to the differences between the draft reports, or plans, of the studies and the final versions produced after citizens had had an opportunity to comment on the documents during a 90-day review period.

The Impact of Citizen Participants in the LISS Study

Public participants have had an identifiable impact on the planning process and the planning reports of the Long Island Sound Study. One can trace both certain staff activities and substantive portions of the planning reports back to essentially citizen inputs. The task here is to identify this impact and its consequences for the Long Island Sound Study. Because the Citizens Advisory Committee (CAC) members, the members of the Research/Planning Advisory Committee (R/PAC), and the other public participants differed in terms of the nature and the level of their involvement in the planning process, their impacts on the LISS Study varied. Therefore, they are treated separately below.

The impact of the Citizens Advisory Committee members.

The members of the Citizens Advisory Committee brought to the LISS Study a concern for the non-degradation of the Sound, for swift action in confronting water-related problems, and for the evolution of governmental structures

to manage the Sound's resources. In arguing for these and many more specific concerns, the CAC influenced the planning process. Although relations between the CAC and the staff became strained at times, in general they improved over the course of the study.

Discussions of their role in the LISS Study preoccupied the advisory committee members during their first meetings in the fall of 1972. At their sixth meeting that December, the CAC began to examine the substantive elements of the planning process. In the months that followed, the members focused primarily on several major issues raised in the Long Island Sound area, the goals of the study, and the initial reports produced by the work groups.

A major debate in the region at this time centered on a proposed bridge over the Sound and an Environmental Impact Statement on that structure released by the Metropolitan Transportation Authority. Although the LISS staff did not initially address the bridge issue, the CAC adopted a negative stance on the proposed project and called upon the NERBC to oppose it.[1] After much delay and considerable persuading by the CAC, the Commission did so. This, then, proved to be a successful effort by the CAC both at focusing the staff's attention on immediate concerns, even during an

---

[1]Long Island Sound Study, "Minutes of CAC Meeting, No. 7," January 10, 1973, p. 2.

early stage of plan formulation, and at broadening the scope of the study beyond its original purview.

Early in 1973, the CAC also produced a very general statement outlining goals for the LISS Study, thus beginning one of the major tasks assigned to it in the Plan of Study. Later in November at a two-day meeting, the citizen advisors drafted a more detailed statement of the problems existing in the Sound region and the CAC's goals and priorities for the study. The LISS staff studied this document, called "Goals for the Region," and distributed it to all other members of the planning team, urging their consideration of it.[2] As a result, this statement did have an impact on the study, although this impact varied considerably from one work group to another. Certain work group leaders did report that they had incorporated the CAC-defined goals in their reports.[3] Others found certain goals either too vague or, more frequently, too detailed to be used. The LISS staff and work group personnel also considered some goals to be outside the scope of the study; few were rejected on the basis of merit alone.[4]

In certain cases, this exercise had a direct impact

---

[2]Long Island Sound Study, Citizens Advisory Committee, "Goals for the Region" Report, CAC Memoranda No. 74-14.

[3]Long Island Sound Study, "Minutes of CAC Meeting, No. 19," January 22, 1974.

[4]Ibid.

on the study in that it identified goals which had hitherto received scant attention in the planning effort. For example, the goals document focused specifically on the problem of access to the recreational resources of the Sound by citizens within the region, especially urban residents--a concern ignored by the recreational work group up to that time. "Goals for the Region" established such access as a high priority for the study and subsequently the planners focused more attention on this issue. The LISS staff, which shared this broad concern, pressed the agencies in the recreational work group to address the problem of "access," pointing out that the citizens perceived it as important. The CAC goals statement thus became a vehicle which assisted the LISS staff in guiding the work groups in the direction that the staff, as well as the citizens, desired. In this instance, the LISS staff used the goals document to enhance their quite weak control over the agencies in the work groups.[5]

During this period, the CAC also began to review the inventory data and, later, the interim reports of the work groups. Work group leaders, the representatives of federal agencies, attended several CAC meetings and briefed the committee on their progress. With the assistance of the

---

[5]This assessment is based on the author's interview with the second LISS Study Manager, David Holmes, September 9, 1975.

LISS staff, individual members also received the work groups' reports and attended work group meetings. While several CAC members frequently complained that that work group materials were not adequately circulated and that the citizens were not fully integrated into the work group activities, individual CAC members did have some impact on work group operations.

One important example involved the participation of a CAC member, the owner and operator of a marina on the Sound, in the recreational work group. Based on his experience, this individual criticized the methodology employed to calculate the number of boats using the Sound. Over a period of several months, the CAC, the LISS staff, the Corps of Engineers, and this individual discussed this issue; in the end the procedure was modified.[6]

The CAC members who became involved with the transportation work group met with less success in seeking to persuade the transportation planners to include mass, land transportation in their studies. While the citizens argued that such concerns had a tremendous impact on the Sound, the LISS staff and the other members of the planning team concluded that such questions lay outside the boundaries of the study.[7] Mass land transportation in the region was not

---

[6]Long Island Sound Study, "Minutes of CAC Meeting, No. 18," November 27, 1973, pp. 1-2; see also Ertel, p. 85.

[7]LISS Study "Minutes of CAC Meeting, No. 18," p. 3.

studied in detail, although the final report and the Land Use and Marine Transportation reports briefly discussed these concerns--probably more than would have been the case without citizen involvement.[8]

In general, the level of interaction between the planners and the citizens disappointed the CAC members. Frustrated by the perceived slow pace of the planning process and their difficulties in dealing with the work groups, the CAC formulated and then "tabled" a resolution to resign en masse from the study.[9] The CAC withdrew this resolution at the next meeting both because it felt the study was progressing more satisfactorily and because, as one member reported, the CAC recognized that to resign would end their opportunities for affecting the study.[10] The CAC did, however, ask various legislators to examine their complaints.

One staff member, who had worked extensively with citizens groups before, commented that he had never witnessed such an adverse relationship between planners and citizens. While these pressures were borne primarily by the LISS staff, the other agencies felt them as well. In general, this

---

[8]New England River Basins Commission, People and the Sound; Land Use (Boston, 1975) and People and the Sound; Marine Transportation (Boston, 1975).

[9]Long Island Sound Study, "Minutes of CAC Meetings, No. 12, 15 and 16."

[10]LISS Study, "Minutes of CAC Meeting, No. 18"; also CAC Memorandum of October 5, 1975.

episode did seem to provide an impetus for accelerating the pace of the study and for enhancing staff control over the associated agencies in the work groups. From this point on relations between the CAC and the LISS staff improved significantly.

During the next year and a half of the study, the CAC focused primarily on the specific proposals developed by the planners. At a meeting in early 1974, the members objected to several proposed sites for marina development. The staff eventually dropped two of these sites and deleted the specific figures for the third from the plan.[11] As the study progressed, the CAC began reacting to the draft materials produced by the LISS staff, as well as the legal and institutional report produced by outside consultants.

In June of 1974, the CAC reviewed the preliminary draft of the "Plan Summary," especially the recommendation for centralizing petroleum receiving, storage, and distribution in the Sound region. The CAC supported this concept, although several members specifically objected to the proposed building of off-shore berths for tankers.[12] One later wrote a detailed letter to the staff arguing against such berths at one particular site. Although these comments did

---

[11] LISS Study, "Minutes of CAC Meeting, No. 19."

[12] Long Island Sound Study, "Minutes of CAC Meeting of June 3, 1974," pp. 1-3.

not result in basic changes in these recommendations, the staff did in the report discuss the "pros" and "cons" of the off-shore proposals. At the June meeting, the CAC also criticized two recreational proposals which called for state acquisition of properties; the staff dropped these recommendations.[13]

Soon afterwards, the CAC reviewed the legal and institutional report, which became the basis for management proposals in the LISS plan. The members, who had repeatedly emphasized the importance of interim and long-term management structures for the Sound, endorsed the report with some additional comments. They suggested that the staff clarify the importance of these recommendations for local governments and that the name "Long Island Sound" should be included in the titles of the new structures.[14] The staff followed this advice; the language of the management section of the final plan reflects the strongly-felt concerns voiced by the citizen advisors.[15]

Following the release of the LISS staff's draft planning report in late 1974, the Citizens Advisory Committee

---

[13] Ibid., p. 3.

[14] Long Island Sound Study, "Minutes of CAC Meeting, No. 24," September 18, 1974, p. 8.

[15] See New England River Basins Commission, People and the Sound; A Plan for Long Island Sound--Supplement (Boston, 1975), pp. 181-203.

concentrated on the review of this document. This review took place at two meetings, the final product being a written report summarizing the CAC reactions.[16] The CAC endorsed the study's draft recommendations across a broad range of substantive topics, such as flood damage reduction, mining, and commercial fishing. They again placed particular emphasis on the management recommendations. In other areas, the CAC approved of the general recommendations with some significant reservations and exceptions.

The major criticisms offered by the CAC covered a broad range of topics, including that the staff should:

(1) grant more attention to the nutrient problem in the western Sound and to the goal of shellfishable waters;

(2) emphasize recycling wastewater on Long Island;

(3) focus more on the conservation of lands and less on their development for recreation;

(4) reconsider its recommendations for recreational ferries;

(5) set limits on the size of petroleum-carrying vessels entering the Sound;

(6) deal more fully with the subject of land transportation;

---

[16] Long Island Sound Study, "CAC Comments on the LISS Draft Plan," CAC Memorandum No. 75-15, February 25, 1975.

(7) drop its recommendations for reliance on nuclear power;

(8) establish clearer priorities.[17]

The comments did have impacts on the final LISS plan, although these cannot be attributed to the CAC alone. In many instances, the citizens attending the last series of public meetings voiced concerns similar to those of the CAC, as did several R/PAC members. Thus, citizen influence must be attributed to all three groups. The impact of these final CAC comments and other similar ones is examined below.

The impact of the Research/Planning Advisory Committee members. Individually and collectively, the members of R/PAC also had an impact on the Long Island Sound Study. Their contributions, which were not limited to their particular areas of expertise, reflected the dual role of the R/PAC members as both "citizens" and "scientists." In many instances, the R/PAC focused on broad policy questions regarding the Sound. As described by Madge Ertel, the members also sought to coordinate the study elements into a "conceptually meaningful, interdisciplinary whole."[18]

R/PAC involvement in the LISS Study was highlighted by a series of "scientific seminars" held in the fall and winter of 1973. At these seminars the R/PAC members

---

[17] Ibid.

[18] Ertel, p. 97.

presented formal papers on a broad variety of subjects related to the Sound, including land use, wetlands, mining, fishery management, power, the ecology of the region, food production, and transportation. These meetings, attended primarily by the scientists comprising R/PAC and a few staff personnel, served to promote both the discussion of the Sound's problems among professionals and the exchange of related information between various disciplines. In this sense, the potential value of the seminars went beyond their contribution to the LISS Study itself.

The impact of these R/PAC seminars and later meetings on the study varied among subject areas. Most observers and the staff acknowledged the particular impact of R/PAC's comments on the fisheries management section of the draft and final reports.[19] One R/PAC paper entitled, "Prospects for Managing the Fisheries of Long Island Sound" and subsequent comments proved particularly important in this regard.[20] The R/PAC recommendations called for a fisheries management program focused on resident species within the Sound and clarified the need for more data. R/PAC scientists criticized much of the available information on fisheries in the Sound as inadequate and cautioned against

---

[19] NERBC, People and the Sound--Supplement, p. 19; see also LISS Study, "CAC Minutes, No. 19."

[20] J. L. McHugh and H. M. Austin, "Prospects for Managing the Fisheries of Long Island Sound," unpublished paper presented at December 1973, R/PAC Seminar, sponsored by the Long Island Sound Study.

approaching this section of the report in a promotional manner. The final LISS plan gave the establishment of a fisheries management program a high priority.

During these seminars, R/PAC members identified other particular problem areas which they felt the staff should consider: access to the Sound, eutrophication in the Sound, the impact of New York City sewerage on water quality, and land transportation. In particular, they urged that the methodological limits of not including New York City in the boundaries of the study should be detailed.[21] The concern for access, which was also shared by the Citizens Advisory Committee, did become a major concern of the study. As one staff member indicated, however, the staff found R/PAC's emphasis on greater access in urban areas somewhat restrictive and preferred to think in terms of access along the entire coastline. In general, the staff and the work groups responded to the other concerns by discussing these matters in their report. Several of the seminar papers were cited in the functional area reports, as, for example, the Land Use report. However, problems of timing adversely affected the use of these seminar papers, for they dealt with rather broad concerns, yet prior to their completion the staff had begun to focus on more specific concerns faced in writing the draft plan.

In several meetings in 1974, R/PAC members commented

---

[21]Comments made at R/PAC meeting January 23, 1974.

on the initial draft recommendations being produced by the LISS staff. Again they voiced concern about New York City's part in polluting the Sound, water quality in the western Sound, and land transportation.[22] In addition, R/PAC members criticized the lack of priorities in the study, a broad citizen complaint. The latter criticism did result in substantial re-editing of the report by the staff. R/PAC's participation in the study waned during these later stages, in part because certain professionals lacked interest in the reviewing process. R/PAC made no effort to provide a collective written response to the final draft plan.

The impact of public meeting attenders and other participants. Other citizens also had an impact on the LISS Study by participating in other ways, such as by attending public meetings or by contacting the staff directly. The public meetings were held in three series between 1973 and 1975. As noted above, citizens attending the first two series were asked by the staff to respond to two different questionnaires designed to measure citizen preferences.

The staff structured the first series of meetings to focus on five major issue areas: electrical power generation, oil, water quality, recreation, and land use. Within these areas the staff sought to identify broad public attitudes, so as to guide later recommendations. In general, the

---

[22]Comments made at R/PAC meeting August 6, 1974.

citizens' comments and their questionnaire responses demonstrated their support for more strict water quality standards (even with a tax rise), for restricting growth, for opening new recreational sites, for reducing the impact of power generating and petroleum handling facilities on the Sound, and for preserving natural shoreline landscapes.[23] Environmental concerns received particular support. The attenders did not agree on the desirability either of state involvement in land-use decisions or of excluding non-residents from local beaches.[24] For the most part, the staff acted in accordance with these broad preferences; however, because they were quite general and at times even contradictory, the direct impact of these early meetings on the study appears marginal. Part of the problem lay with the design of the questionnaire, itself, which asked rather broad, unstructured questions.

During the second series of public meetings, citizens reacted to both broad approaches to problems and to tentative proposals of a more specific nature. Their comments generally reinforced the preferences expressed at the first meetings. The citizens also supported the establishment of a coastal management program, cluster development, a fish-

---

[23] Long Island Sound Study, "Report of the Public Workshops of May/June 1973," dated October 19, 1973.

[24] *Ibid*.

eries resources program, and the centralization of petroleum handling facilities.[25] They reacted negatively to certain other proposals, including those for a saltwater fishing license, certain recreational sites, and increased roads leading to beach areas.[26] The staff, as a result, abandoned the controversial fishing license proposal. It responded to certain of the citizen comments regarding recreational sites and activities, but not to others. In the final plan, the staff also gave emphasis to those areas of agreement outlined above. In addition, comments made at one meeting and repeated later caused the staff to examine an option which they had not previously considered: the public acquisition of privately-owned islands near one urban center.[27] This recommendation became a part of the final plan.

Public reaction at the third round of public meetings, which followed the public release of the draft plan, proved more specific in nature. The citizen comments focused primarily on over a dozen broad recommendations and on the specific recreational proposals for given locali-

---

[25] Long Island Sound Study, "Results of the Opinion Poll conducted by the Long Island Sound Regional Study," July 9, 1974.

[26] Ibid.

[27] Long Island Sound Study, "Selected Newsclips of Spring 1974 Public Meetings," May 31, 1974.

ties.[28] At several meetings, the attenders also criticized the alleged lack of publicity surrounding the study. Citizen comments at these meetings supported the LISS Study's draft recommendations in a broad range of functional areas.[29] (See Table 8.) These recommendations remained essentially the same in the final report. Other elements of the report drew a more mixed reaction. For example, while some residents approved of the study's call for increased state involvement in land-use management, others disapproved, objecting to any diminishing of local authority. These latter comments did not result in fundamental changes in the staff's management recommendations, although the staff did redraft certain portions of the report, pointing out the important role of and the benefits for local government in their proposals.[30]

Some citizens, in contrast to others who favored

---

[28]These may be identified by reading the minutes of the various public meetings of January 1975, as prepared by the LISS staff.

[29]These issues were categorized by first identifying the issues raised in the minutes of the meetings and then by counting the number of statements both for and against the staff's recommendations. First-hand observation of these meetings assisted in this exercise.

[30]The staff summarized in outline form citizen and agency comments and their reaction to them in the last section of the final report, People and the Sound--Supplement, pp. 216-220. To assess the accuracy of this summary, the author compared the texts of the draft and final reports. See p. 220.

TABLE 8

CITIZEN REACTION TO THE LISS DRAFT REPORT AT THE LAST SERIES OF PUBLIC MEETINGS

Elements of the LISS plan receiving public support	Elements of the LISS plan receiving mixed reaction	Elements of the LISS plan criticized
Water Quality	Management Proposals	No Limit on Vessel Size
Port Consolidation of Pipeline Extension	Public Access	Artificial Island
Flood Control	Recreational Ferries	Nuclear Power
Water Treatment & Holding Tanks		Lack of Strategies & Priorities
General Approach and Intentions	Recreational Proposals--Especially Developed Aspects	Acceptance of Population Growth

increased public assess to the Sound, stressed concerns for private property. The staff's commitment to increasing access, which the CAC supported, did not diminish. The LISS staff did, however, reconsider its recommendations for particular recreational sites. In doing so, its response varied with the location in question. In some instances, the staff provided more details about its recommendations. In other cases, the staff toned down its proposals, qualified them in other ways, or dropped them entirely--largely because of citizen, as well as CAC comments.[31] Certain recommendations remained unchanged despite citizen comments. Also, as a result of public comments, the staff qualified its proposals for recreational ferries, emphasizing the need for more study.[32]

Citizens united in their criticism of several of LISS's draft recommendations and of the staff's perceived failure to consider certain problems or alternatives. The public meeting attenders, like the CAC members, called for a ban on supertankers in the Long Island Sound. One former Coast Guard officer submitted an extensive brief arguing for a size limit on vessels entering the Sound.[33] The staff

---

[31] Ibid., p. 218.

[32] Ibid., p. 219.

[33] Long Island Sound Study, "Minutes of New London Public Meeting," January 7, 1975, p. 4.

acknowledged this oversight and incorporated such a limit in the final plan.[34] The citizens attending the meetings also opposed, as did the CAC members, the study's endorsement of nuclear power. The staff responded by emphasizing energy conservation and by expanding the discussion of the "pros" and "cons" of nuclear power in the text of the final report; the call for new nuclear facilities remained, however.[35] Meeting attenders also criticized the plan's lack both of attention to the subject of limiting growth in the region and of a sense of strategy for action. These comments led to more discussion of population growth in the final report, although the staff felt it inappropriate for it to seek to limit growth. The staff also revised the "Plan Summary," inserting more dates and cost figures, to add more of a sense of strategy.[36]

In a variety of ways, then, the comments made by citizens at the public meetings had an impact on the final LISS report. The same was true with regard to the comments of the citizen and science advisors. Where the comments made at the public meetings and at the CAC and R/PAC sessions coincided, they became mutually supporting. Overall, the staff incorporated numerous citizen inputs in the LISS plan.

---

[34] NERBC, People and the Sound--Supplement, p. 219.

[35] Ibid.

[36] Ibid., pp. 216-217.

The Impact of Citizen Participants in the SENE Study

Similarly, as one examines the history of the Southeastern New England Study, it is possible to identify the particular impact made by advisory committee members and the other public participants on the planning process and the resulting planning documents. Citizen participants in the SENE Study, as in the Long Island Sound Study, had a distinct influence on the substantive content of the planning reports. However, as noted earlier, the SENE Study's Citizen Advisory Committee and its relatively small Regional/Scientific Task Force operated as one advisory group, with the members meeting jointly. Since in practice they constituted one advisory committee, their impact on the study is assessed accordingly, immediately below. The impact of the other participants, who were not as deeply immersed in the planning process, is considered in the next section.[37]

The impact of the Advisory Committee members. In general, the members of the Citizen Advisory Committee and the Regional/Scientific Task Force brought to the SENE Study a variety of general concerns. These included, specifically, concerns for guiding growth in the region, for public access

---

[37]As mentioned above the SENE public participation program called for the formation of Basin Advisory Committees (BAC's), but the BAC's consisted of whoever attended the publicly announced meetings. Therefore, in this report what the SENE staff at times called BAC meetings are simply referred to as public meetings, not as advisory committee meetings.

for recreational opportunities, for the conservation and non-degradation of existing resources, for using groundwater supplies, and for local involvement in resource management. The interactions between these groups and the SENE staff reflected these concerns. It seems fair to say that the final report did likewise. However, the influence of the advisory committee members may be discussed in more specific terms to understand their impact on the study.

Although as the study began the advisory committee members focused their attention on their own role in the study and their committee's internal operation, they quickly became involved in the more substantive aspects of the planning process. This involvement started with their review of the socioeconomic and environmental base reports being prepared for the SENE staff by the Economic Research Service and two other organizations. The intent of these reports was to provide basic information about present and future conditions, so that present and future needs could be addressed by the staff. The advisory groups, significantly, took issue with the methodology used in the reports to make projections about population growth and other variables and with the resulting figures themselves. They contested both the accuracy of the projections and acceptance of identifiable trends as "given" quantities upon which planning should

focus.[38] In so doing they had a distinct impact on the planning process. This impact, as described by SENE staff members, was to modify both the projections used by the staff and the way in which the staff used them. From that point on, the staff emphasized a flexible approach to future needs.[39] The review also underscored the appropriateness of the staff's considering ways in which such trends might be altered.

Following this review, the advisory committees began an examination of early recommendations for the study and of the study's goals and objectives. The committees passed a resolution calling upon the New England River Basins Commission to encourage Rhode Island's consideration of the proposed Big-Wood Reservoir in a statewide and interdisciplinary context; the Commission did so.[40] More important for the study itself, however, was the advisory committees' lengthy examination of SENE's goals and objectives.

At a two-day meeting at Woods Hole, Massachusetts, in late 1973 and in meetings through the Spring of 1974, the Citizens Advisory Committee and the Regional/Scientific Task Force explored these goals and objectives. During the ini-

---

[38] Southeastern New England (SENE) Study, "Minutes of Meeting No. 5 of CAC and R/STF," March 26, 1973, p. 5.

[39] Southeastern New England Study, "Progress Report, September 1972 to September 1973," p. 2, and an interview with SENE's Public Participation Coordinator, Priscilla Newberry, November 6, 1975.

[40] Ibid., p. 4.

tial meeting at Woods Hole, the SENE staff and Study Management Team members asked the citizen advisors to identify and rank the study's objectives. Their own lack of information and the ambiguity of the objectives troubled the citizens, who pressed for explanations from the staff. While advisory committee members expressed considerable dissatisfaction with the structure of the meeting, it did have certain positive results. It resulted in the identification of certain new objectives, such as the concern for locating power plants, and in the staff's reassessment and reorganization of its previously stated objectives.[41] In the period following this meeting the staff and a Goals and Objectives Subcommittee from the advisory groups sought to encapsulate these goals and objectives in a written report, the final version of which was circulated in May, 1974.[42] The value of this process went beyond the importance of the six-page report itself. Probably, the most significant impact which these exchanges between citizens and staff had was in crystallizing the latter's perceptions of the goals and objectives to be pursued.

In the next several months, the SENE staff produced

---

[41]Southeastern New England Study, "Minutes of Quarterly Meeting of CAC and R/STF," February 11, 1974, pp. 2-4.

[42]Southeastern New England Study, "Memorandum from CAC and R/STF; Goals and Objectives for the Southeastern New England Study," May, 1974.

a draft planning report for the entire region and more localized reports for the ten planning areas into which the region was divided. Specific ideas generated by the advisory group members, acting jointly or individually, became incorporated in these reports. One member's comments, for example, led directly to the study's call for state-wide boating advisory committees to examine boating and marina needs. From this point until the end of the study, the advisory groups' activities centered on the review of these and subsequent draft planning documents. Three meetings, a two-day session at Plymouth, Massachusetts, in early September, 1974, and two in 1975 were devoted to these concerns.

The Plymouth meeting afforded the advisory group members an opportunity to review collectively the draft plan in detail. Four groups working simultaneously within different subject areas provided a point-by-point analysis of the draft report; their comments had a significant influence on the content of subsequent drafts of the report. The citizens' comments had a particular impact in the land use sections of the plan, where they criticized the staff's concept of confining development to five designated areas. The arguments of the CAC and R/PAC members that planned development should be spread more equitably to other areas prevailed. The staff later abandoned the concept of "development districts" in favor of the more general approach of "guiding

growth."[43]

The citizen and science advisors also offered a broad range of other specific criticisms, far too numerous to describe here in full. A sampling of these included the recommendations that the SENE staff should:

(1) place more emphasis on the interrelationship between water supply and water quality;

(2) elaborate upon public rights to beach access;

(3) de-emphasize the concern for aquaculture;

(4) no longer recommend regional conservation commissions;

(5) not discuss time-zoning of beaches for fishing and swimming;

(6) call for swimming in reservoirs;

(7) identify more fully relevant decision-makers who will implement the SENE plan;

(8) reconsider the use of the word "preservation" where the intent is regulation;

(9) modify its water quality recommendations to permit discharges that do not deteriorate the water quality of the stream; and

(10) elaborate upon existing programs and sources of funding.[44]

---

[43]Southeastern New England Study, "Minutes of Quarterly Meeting of CAC/RSTF," September 5 and 6, 1974, p. 7.

[44]Ibid., pp. 3-10.

These and other proposed changes varied from quite fundamental to quite minor (editorial) recommendations. Most of the proposals were adopted outright by the staff; in some cases they were not. However, even in some of the latter cases, for example with the "swimming in reservoirs" recommendation, the citizens' comments encouraged the staff to explore the issue and present the "pros" and "cons" in the text of their report.

Similarly, the advisory groups made substantive comments at the following two meetings, as well as by direct contact with the staff, which were reflected in the planning reports. For example, at their advice, the term "unwelcome" facilities became "key" facilities, a less perjorative term.[45] Further suggestions led to the staff's modifications of the outdoor recreational proposals. In their final meeting, the committees also discussed the recommendations for the proposed Northfield and Millers Rivers diversions with a representative from the Connecticut River Basin Program's advisory groups. This, too, prompted the staff to qualify their proposals and to emphasize the need for the convervation of water.[46] In general, a broad range of proposals

---

[45] Southeastern New England Study, "Minutes of Quarterly Meeting of CAC/RSTF," January 3, 1975, p. 6.

[46] Southeastern New England Study, "Minutes of Quarterly Meeting of CAC/RSTF," June 24, 1975; also see NERBC Memorandum of July 29, 1975, "SENE and Connecticut River Diversions."

incorporated in the SENE Study reflect the impact, in full or in part, of the advisory group members.

The impact of public meeting attenders and other participants. Other citizens participated in the SENE Study by attending public workshops and meetings or by other means such as writing or phoning the staff. These citizens, too, had an identifiable impact on the SENE plan, an impact often distinct from that of the advisory group members. Their influence on the plan became more specific and easier to identify as the study progressed. This examination focuses primarily on the impacts of the workshops and meetings, rather than on the less formal contacts.

It is difficult to discuss in concrete terms the impact of citizen comments at the first series of workshops which began in late 1973. These meetings centered on the broad subject areas to be addressed in the SENE Study, and the staff used a questionnaire to identify problems which concerned the public. The workshops did demonstrate broad public interest in concerns associated with growth and the public's desire for action. In general, however, these meetings served primarily to inform citizens about the study and to involve them in it.

The comments made and questionnaires completed by citizens at the series of workshops in the spring of 1974 had a more clear impact on the planning reports. For

example, citizens in the Ipswich-North Shore planning area of Massachusetts indicated their support for water conservation and for one large regional reservoir, rather than for three small reservoirs or the expansion of the Metropolitan District Commission water supply system. They also emphasized the need for greater protection of land in the upper portions of the Ipswich River. Subsequently, the staff incorporated these preferences in both the regional report and that particular planning area report.[47] In Rhode Island, public comments addressed to the fragile nature of Napatry Point led to the altering of proposed recommendations for that area. In general, the attenders of these workshops demonstrated support for increasing wetlands protection and expanding beach recreational facilities. Strong opposition was voiced against providing public recreational access across privately owned land. Citizens also opposed the creation of regional conservation commissions.[48] The SENE draft reports later reflected these public inputs.

The most specific comments from meeting attenders came at the eleven public meetings held in May and June of 1975 during the 90-day review period as the citizens reacted to specific recommendations in the draft reports which had

---

[47] Southeastern New England Study, "Citizen Preferences for Solutions," sent with Memorandum to SMT, May 24, 1974; also public announcement to Ipswich-North Shore residents, June 28, 1974.

[48] Ibid.

been released prior to this period. Their impact in this case can be assessed in part by comparing the draft and the final reports issued by the SENE Study.[49] In doing so, the impact of the citizens on a broad range of topics is apparent. Recreational, water supply, and water quality issues were among the most frequently discussed concerns.

Considerable attention centered on the study's recreational proposals, especially those calling for the development of present ocean-front parks, the acquisition of new beach areas, and the expansion of boating facilities. In general, the participating citizens shared the concern for the problem of insufficient beach access for recreation expressed in the study and broadly endorsed the recommendations. Specific projects proposed for the North-Shore area and the Boston Harbor Islands received support.

Local residents, however, objected to the study's recommendation for state acquisition of Duxbury Beach in the South Shore area and Quonochontaug Beach in the Pawcatuk area, favoring local and/or private management. The citizens in the latter meeting argued that state management would not necessarily protect the critical environmental areas along

---

[49] SENE Study, Draft Report of SENE Study (May 1975); New England River Basins Commission, Report of the Southeastern New England Study; Summary, Regional Report (with Environmental Statement), and Ten Planning Area Reports (Boston, December 1975).

these beaches more effectively than would local management. As a result of these comments, the final report endorsed local control in these areas, provided that these resources were responsibly managed. Otherwise, the study noted, the subject of state acquisition would be raised again.[50]

Citizens at several meetings disagreed with the staff's call for increased boating facilities in their areas, as well as accompanying recommendations for channel dredging. Subsequently, the SENE Study gave marina development a more cautious go-ahead. The study adopted a new slant on this subject, recommending the study of existing facilities and focusing on the expansion of these facilities rather than the construction of new marinas, as the way of accommodating boating demands.[51] The staff foresaw such studies being done in conjunction with the boating advisory committees, suggested initially by a SENE advisory committee member.

Likewise, the public supported SENE's water quality recommendation. One individual cautioned the staff on its proposal to treat industrial wastes in municipal sewerage systems (because of toxic materials), but this did not

---

[50]NERBC, Report of SENE Study, p. RR-7.

[51]Interview with SENE's Public Participation Coordinator, Priscilla Newberry, November 6, 1975; also see Southeastern New England Study, "Public Meeting Summary; Pawcatuck Planning Area," June 5, 1975, p. 3.

result in changes in the report. Opposition by officials from Coventry and West Warwick, Rhode Island, did lead to both the abandoning of the SENE draft recommendation for a regional sewerage plant in the latter community and the writing of substitute recommendations. One town official pointed out that the problem areas in Coventry stood furthest removed from West Warwick and that the study's information about existing lines appeared erroneous. Citizens also noted that the West Warwick plant had just been expanded and that residents would be unreceptive to additional efforts.[52]

Several of the meetings also addressed the water supply situations in local communities; most of the recommendations received favorable review. In a limited number of cases, citizens with local expertise corrected statements in the report and offered other considerations which the staff took into account. Arguments against a proposed joint Abington-Rockland-Brockton water supply system caused that recommendation to be dropped. A second major recommendation which was changed as a result of one of the meetings was the call for the diversion of the Weweantic River to supply water for the city of New Bedford, Massachusetts. Public comments by the head of a local laboratory, which monitored

---

[52]Southeastern New England Study, "Public Meeting Summary; Pawtuxet Planning Area, June 4, 1975, pp. 1-2.

the river as a matter of practice, emphasized its high level of pesticides and, hence, its unsuitability for water supply purposes. The staff replaced this recommendation in the final report.[53]

While it would be possible to continue this identification process further, the above serve to exemplify the impact on the study made by citizens at the public meetings. It is true that citizen responses in the SENE Study, as in the LISS Study, were not uniform, but discernible preferences did at times emerge. In many instances, although certainly not in all, these preferences resulted in changes in the SENE planning reports.

Probably the most dramatic impact by citizens on the SENE Study actually occurred after the final series of public meetings, but within the review period. At the May 1975 meeting in the Buzzards Bay area some local residents had criticized the study's recommendations for the expansion of the major state park in the area, the acquisition of several river islands for recreational purposes, and the expansion of local boating facilities. This opposition solidified over the summer, as evidenced in the press, in the letters and phone calls to the SENE staff, and in the circulation of a petition (reportedly signed by over a thousand residents).

---

[53] NERBC, Report of SENE Study, pp. RR-4 to RR-5; also Southeastern New England Study, "Public Meeting Summary, Buzzards Bay Planning Area," May 22, 1975.

The residents also charged that little advanced notice of the meeting had been received, a claim supported by the local weekly newspaper which stated that it had received the notice too late for publication.[54]

In response, the SENE staff held another meeting in the area that August. The staff invited about ten community leaders to discuss the recommendations with them, a format which, while reflecting the desires of the staff for a working session, was criticized locally. Actually, over two dozen residents attended the session, which focused on the environmentally fragile nature of the islands, their use as a habitat by rare wildlife, the present adequacy of the state park and of the local management of the surrounding lands, and the crowded boating conditions in the area.[55] Subsequently, the staff announced basic changes in the recommendations, dropping entirely the plans for expansion. This case exemplifies the impact of citizens' comments on the SENE Study in its clearest form.

The Impact of Citizen Participants in the CRBP Study

Citizens also had a comparable effect on the planning activities and documents of the Connecticut River

---

[54] See related articles in The Chronical (weekly newspaper serving Dartmouth and Westport, Ma.) on July 31, 1975 and August 7 and 14, 1975.

[55] Interview with Priscilla Newberry, November 6, 1975.

Basin Program's Supplemental Flood Plain Management Study. However, in one important respect the latter differed from the LISS and SENE Studies. The CRBP Supplemental Study, itself, was in many ways a product of citizen participation. As discussed above, many citizens had reacted negatively to the 1970 Comprehensive Study of the Connecticut River, prepared by a coordinating committee under the leadership of the Corps, and The New England River Basins Commission had created the Citizens Review Committee to help it assess the plan. The criticisms raised in turn by this group, which called for a broader assessment of environmental concerns, led to NERBC's recommending the Supplemental Study in its 1980 Connecticut River Basin Plan.[56] The very initiation of the CRBP Supplemental Study by NERBC and much of its basic thrust reflected citizen input.

Cognizant of this influence, the following examines citizen inputs in the CRBP Study. In this study, too, the impacts of the advisory group members differed from those of the general public and are examined separately. Unlike the advisory committees in the LISS and SENE Studies, however, CRBP's Citizens Advisory Group and Science Advisory Group functioned autonomously early in the planning process and later merged their activities. Their impacts must be

---

[56] Report of the Citizen Review Committee, op. cit.; see also NERBC, The NERBC 1980 Basin Plan, op. cit.

assessed accordingly. Also, it should be noted that at this time the final report of the CRBP Study has yet to be published, so that comparisons between it and the draft report could not be made, as was done in the case of LISS and SENE.

The impact of the Advisory Group members. During their early meetings, starting in March 1973, the Citizens Advisory Group (CAG) members sought to organize themselves and to learn about the study and their role in it. In particular, discussion focused on the role of the CAG in publicizing the study to other citizens; the members established a Public Information Committee to work on this task. Citizen comments at these and later meetings also emphasized the need for social impact studies as a part of the planning process. These, coupled with similar concerns expressed by the science advisors, encouraged the staff to hire a consultant to undertake such investigations, even though this activity had not been included in the initial tasks of the study.[57]

During this period, the Science Advisory Group (SAG), which had begun meeting earlier than did the CAG, became more deeply involved in the substantive elements of the planning process. The SAG quickly adopted a subcommittee system, and, during early 1973, individual subcommittees and the SAG as a whole met with consultants and agency repre-

[57]See Connecticut River Basin Program, "Report on CAG Meeting of August 11, 1973." Staff members indicated that the original idea of an individual social impact study was presented at an earlier study team meeting by a citizen observer not affiliated with the study.

sentatives to discuss both the tasks to be undertaken by them and the appropriate methodologies to be used. As noted by several observers, SAG criticism, directed at the early report of a consulting firm, coupled with a negative reaction by the Study Management Team, led the CRBP staff to back away from the methodologies embraced in that report.[58] At their third meeting in April 1973, the SAG responded to a draft Plan of Study, the document intended to guide the planning process. The members also began to address six broad methodological concerns posed by the CRBP staff and reformulated into questions by the SAG Chairman. These were referred to appropriate subcommittees for study. While the SAG forwarded a preliminary report of their findings to the Study Management Team during the next month, work on this and related projects by the subcommittees continued.

Despite the importance of these activities, the impact of the Science Advisory Group on the study during this period appears quite limited.[59] As one staff member later wrote, most SAG responses were general in nature, reflecting the complexity of the assignments and the fact

---

[58] Connecticut River Basin Program, "Report on SAG Meeting of March 16, 1973."

[59] Connecticut River Basin Program, "Memorandum from SAG Chairman; SAG's Mission and Effectiveness," dated July 5, 1973.

that SAG members were volunteers with limited time to devote to the study.[60] In addition, as seen above in Professor Berger's comments, the imprecise role of the SAG at this stage of the study discouraged some participants. Consequently, the level of activity among the subcommittees proved uneven. The Soil Conservation Service did ask one subcommittee to assist in the selection of a third small watershed for an in-depth study. The subcommittee selected the Mill River, a choice endorsed by the SAG and accepted by the agency.[61]

One controversial issue which arose during this period centered on the role which the Science Advisory Group should play in the review of Requests for Proposals developed by the staff. Because of potential conflict-of-interest charges, the staff decided that the SAG members should not review the requests and that proposals would not be accepted from SAG members.[62]

In late 1973 and early 1974, comparable subcommittees of both the Citizens and Science Advisory Groups began their review of the study's "Phase 1" documents. The similarity

---

[60] Connecticut River Basin Program, "Memorandum," dated August 10, 1973, p. 2.

[61] Connecticut River Basin Program, "Report on SAG Meeting of July 12, 1973"; see also "Report on SAG Meeting of August 23, 1973."

[62] Connecticut River Basin Program, "Report on SAG Meeting of September 21, 1973," p. 3.

of their assignments led to interaction between the parallel subcommittees; this encouraged the holding of joint CAG/SAG meetings. These subcommittees and their parent bodies reviewed a variety of reports, offering in certain cases quite specific and detailed criticisms. The CRBP staff, in turn, forwarded these comments to the appropriate public agency or consultant firm, for their consideration.

These reviews underscored a broad variety of methodological and environmental concerns.[63] Members were quick to point out statements which they felt could not be empirically substantiated. They also identified instances where they felt environmental concerns and non-structural alternatives were not adequately assessed.[64] The impact of these reviews is, however, difficult to assess, for there existed no direct reporting mechanism by which the planners outside the CRBP staff responded to the citizens' comments. A number of subcommittee members worked closely with certain agencies, especially those dealing with environmental matters. Several SAG and CAG members, as well as the CRBP staff, indicated that they felt certain agencies and consulting firms had taken the comments of advisory group members into

---

[63] For example, see Connecticut River Basin Program, "Report on SAG Meeting of November 16, 1973," and "Report on SAG Meeting of February 25, 1974."

[64] Ibid.; also based on written comments submitted to CRBP staff and respective agencies.

account in subsequent reports.[65] Here, too, the record was an uneven one, varying from agency to agency and from one individual member to another. This was also true of the later review by citizens and scientists of the "Phase 2" reports.

While the review process continued, the joint CAG/SAG meetings addressed a number of concerns beyond the scope of the Supplemental Study. For example, the combined groups developed and sent to NERBC a list of implementation priorities for the Connecticut River.[66] At first, a joint subcommittee and, then, the groups as a whole also reacted to a draft environmental impact statement for the Northeast Water Supply (NEWS) Study, recently completed by the Army Corps of Engineers. The product of these sessions was a twenty-four-page subcommittee report, a compilation of positions rather than a consensus statement.[67] The groups forwarded this report to the CRBP staff and to the Corps' Board of Engineers for Rivers and Harbors. Finally, the groups also examined the need for fishladders at a power company dam at Turner's Falls, Massachusetts, in order to permit

---

[65] Statements based on interviews with several SAG members and with CRBP staff.

[66] Connecticut River Basin Program, "Report on Joint CAG and SAG Meeting of October 17, 1974."

[67] Connecticut River Basin Program, "Report on Joint CAG and SAG Meeting of December 13, 1974.

anadromous fish to return upstream to spawn. The members issued a strong statement calling upon the power company involved to build the fishladders and upon the Federal Power Commission, by means of its licensing powers, to ensure that this be accomplished.[68] With this resolution in hand, several members lobbied vigorously for the ladders.[69]

In general, because of the nature of these activities, their impact lay outside the Supplemental Study. CAG/SAG activity may have helped motivate the New England River Basins Commission to adopt a formal position on the fish ladders and licensing procedures similar to that of the advisory groups. But the impact, if any, of these resolutions and reports on the decision-making apparatus of NERBC, the Corps of Engineers, or the Federal Power Commission cannot yet be assessed.

After this, attention focused again on the Supplemental Study and one principal unresolved issue, a question of methodology. At a meeting in May 1975, the advisors discussed the difference between estimates, by the Corps of Engineers and by the CRBP staff, of the economic benefits and costs of building major dams or raising local protection

---

[68] Ibid.; also see CRBP, "Report on Joint CAG and SAG meeting of January 18, 1975."

[69] Ibid.; also based on conversations with CAG and SAG members.

works (dikes) at key locations along the river.[70] The CAG and SAG members discussed the issue only in very broad terms. The issue proved highly technical, and several members complained that they lacked the essential information to evaluate the assumptions underlying both sets of figures, but especially those of the Corps. The CRBP staff, while willing to discuss the matter, had not made available their own draft paper on the subject. In addition, no representative of the Corps, although invited, attended the meeting to answer questions. Therefore, the meeting resolved nothing.

This disparity between the Corps' and the staff's figures continued to be one of the major issues of the study from that point on. The members, without becoming immersed in the respective methodologies, generally favored the staff's figures, which offered a less optimistic view of the dam-building and dike-raising options. They later used the staff's figures to criticize the Corps, an activity which strained relations between that organization--a member of the planning team--and the CRBP office.[71] This matter surfaced again at the next joint meeting.

It was also at the May meeting that the SAG and CAG

---

[70] Connecticut River Basin Program, "Report on Joint CAG and SAG Meeting of May 29, 1975"; also based on interview with CRBP staff and attendance of this meeting.

[71] *Ibid.*

members reacted strongly, as discussed above, against the SENE Study's failure to qualify its recommendation for the Northfield Water Supply Project.[72] A letter to the SENE staff explained the objections; later, a SAG member met with the SENE staff and advisory groups. As already noted, changes in the SENE plan resulted. This proved to be a unique case of the citizen advisors to one study having an impact on another study.

Two months later, the SAG and CAG members met to react to the first draft of the CRBP report. In general, they endorsed the plan, spelling out a number of specific changes which they desired--mainly in the text of the summary. Several CAG and SAG members' comments sought to clarify the terminology of the report. The members also suggested that the staff should:

(1) encourage compatible land uses in the flood plain;

(2) emphasize local responsibility for plan implementation and state responsibility for preventing new development in the flood plain;

(3) recommend that the Corps of Engineers should use Fiscal Year 1976 funds to accelerate flood plain delineation;

(4) use their own methodology for calculating the costs and benefits of raising the dikes in major cities

---

[72] CRBP, "Report on May 1975 Meeting," op. cit.

and present the Corps' methodologies and an explanation in the report's appendix;

(5) include education as an element of an implementation strategy;

(6) display in the report minimum non-structural programs.[73]

Although the final report of the CRBP Study has yet to be published, subsequent drafts suggest that some of these comments will be acted upon and that others will not be. In the last series of public meetings, the CRBP staff particularly stressed the role of local government in implementation. However, the Study Management Team in later meetings did not seriously consider the option of relegating the Corps' cost/benefit figures for the dikes to an appendix.[74] A meeting of the two advisory groups in March 1976 added little in the way of subsequent comments, although the members continued to submit individual critiques. Their focus by this time was on implementing rather than modifying the plan.

The impact of public meeting attenders and other citizen participants. The comments of citizens who attended the CRBP's public meetings also had an effect on

---

[73] Connecticut River Basin Program, "Report on Joint CAG, SAG, SMT Meeting of July 30 and July 31, 1975.

[74] Ibid.; also based on author's attendance at this meeting.

the Supplemental Study. Numerous citizens, including some of those who attended the meetings, also contacted the staff directly. In most cases, their inputs to the study became increasingly more specific as the planning process progressed.

As in the other studies, the first series of public meetings provided an opportunity to inform local residents about the study. A major portion of the meetings was devoted to answering citizens' questions. The attenders also indicated preferences for considering both a broad range of flood management alternatives and various ways of compensating local governments for the cost of resulting actions.[75] At a few meetings, renewed opposition arose to major dams which had been earlier proposed for those areas by the Corps' Study in 1970.

The timing of the second series of public meetings permitted citizens to react to a broad range of flood-control options suitable for their area, as well as for the basin as a whole. They did so, although with some uneasiness and difficulty because the costs of the various options were not calculated at this point. Their inputs at these meetings had, however, an impact on the CRBP plan.

Probably the clearest message emanating from these meetings was the unacceptability of the Corps' seven-dam

---

[75] CRBP, Local Perspectives, op. cit., pp. 20-22.

proposal.[76] Citizens at all the meetings, including those held in the lower basin where support for the dams would logically be the strongest, voiced opposition to that option. Massachusetts and Connecticut citizens and their local officials demonstrated instead an acceptance of dike-raising, as a solution to problems in their area. In the draft report which followed at a much later date, the staff focused on dike-raising proposals for the urban areas in the lower portions of the basin.[77] Later, at the next and final series of meetings, they announced that the dams were "dead." Although modified in these cities by the dike-raising proposals, broad support emerged for non-structural alternatives. The draft report reflected these concerns, as will presumably the final version.

In addition, the attenders at several meetings reacted to specific alternative plans, especially in the northern part of the basin where the alternatives proved more numerous. Citizens at the Brattleboro, Vermont meeting, for example, spoke against several alternatives involving the construction of dams, especially on one site constituting prime farm land.[78] The later draft plan noted these comments and did not recommend any of those dams, objected to earlier

---

[76] Ibid., im passim.

[77] Ibid.

[78] Ibid., pp. 194-217.

by the area residents.[79] Similar impacts occurred in the Passumpsic watershed. The Study Management Team also later considered alternatives suggested at several local meetings by the citizens themselves. At the request of a local official, the Corps of Engineers considered a dredging project in one flood-prone area, but later termed it economically unfeasible.[80] Finally, some criticism, particularly in northern areas, arose about federal intervention in any form, regardless of the alternative recommended. This attitude seems to have influenced the staff to keep their recommendations in such areas to a minimum. This again is reflected in the draft report, where the staff did not recommend further local studies in the Passumpsic region.[81]

Citizens at the third round of public meetings endorsed the general regional recommendations of the draft CRBP report. Comments focused primarily on the local recommendations of the study. The plan, for example, recommended the further study of dike-raising in four major cities along the lower reaches of the river, but not in two others. Officials and citizens from one of these cities, Chicopee, Massachusetts, however, expressed a strong desire

---

[79] CRBP, The River's Reach; Draft, pp. 53-58.

[80] CRBP, Local Perspectives, p. 132.

[81] CRBP, The River's Reach; Draft, pp. 87-91; statement also based on interview with David Harrison, June 21, 1976.

--both at the meetings and in later letters to the staff and to state officials--for further such studies in their community.[82] It seems likely this and other less dramatic responses will have an impact on the final plan, when it is produced.

Citizen Impacts on the Studies: An Overview

In the Long Island Sound Study, the Southeastern New England Study, and the Connecticut River Basin Program's Supplemental Study, the public participants had an identifiable impact on the planning processes and the draft and final planning reports. For the public meeting attenders, these impacts occurred later in the studies, especially as they reacted to the draft planning reports. With regard to the advisory group members, these impacts were distributed throughout the course of the studies, but seemed greater when the members performed specific tasks such as formulating goals statements or reviewing planning documents.[83]

Moreover, the impacts of citizen participation were

---

[82] Connecticut River Basin Program, "The River's Reach: Report on Public Response," presented at the Quarterly Meeting of the New England River Basins Commission, Boston, March 31, 1976, pp. 2-3.

[83] For further discussion of these points in reference to the LISS Study, see Shanley, pp. 60-66.

similar in all three cases. Although certainly these effects varied from study to study, their resemblance is striking. This similarity makes it possible to examine collectively the nature of the citizen impacts on the LISS, SENE and CRBP Studies. When one does so, one finds a variety of ways in which the citizens affected the three studies.

First, one way in which the citizen participants had an impact on the studies was by supplementing the knowledge of the regional planners, particularly with regard to local affairs. Given the broad geographical scope of the studies and the other constraints placed upon the planners, the planning staffs could not be informed about particular conditions and problems in many local communities in their planning areas. In a variety of cases, local residents, more aware of such concerns, brought forth additional data which the staffs had not considered.

This new information on numerous occasions led the staffs to change their recommendations. For example, as discussed above, new information about pesticide levels in the Weweantic River caused the SENE staff to drop its recommendation for diverting that river for water supply purposes. This type of supplemental information also seemed particularly important in shaping the recreational proposals in the SENE and LISS Studies. Many citizens in the latter study specifically questioned the knowledge of the Sound possessed by the

members of the recreational work group.[84] Public participants in a limited number of cases also corrected erroneous factual statements about local conditions which appeared in various planning documents.

From the perspective of the staff members, however, several problems arose in their use of this supplemental information. The accuracy of the information had to be judged. In some cases, the "facts" presented by local residents appeared to be statements of preference with weak empirical referents. In addition, in some cases, the data appeared accurate, but not significant enough in the planners' estimation to warrant changing study recommendations. The degree, then, to which the staff utilized the supplemental information provided by citizens depended upon the planners' judgments concerning its accuracy and its importance. They discarded information which failed to meet these tests.

Second, public participants also had an impact on the studies by affecting the use of both particular methodologies and specific planning reports by the NERBC personnel in plan formulation. The science advisors, by nature of their training, were attuned to viewing methodologies and

---

[84] Based on discussions with several advisory committee members; they clearly viewed the recreational planners as "outsiders," who were unfamiliar with the Long Island Sound region.

their underlying assumptions with a critical eye. In many instances, such as with questions of growth, the citizen advisors and the public meeting attenders proved no less capable. The criticism by one CAC member of the techniques used in the LISS boating inventory is one example of this type of impact. In general, the methodological criticisms offered by the public participants caused the staff to reconsider certain assumptions, to modify information-gathering and evaluative techniques, and to use given agency or consultant reports in different ways than originally intended. However, this was a selective process and the impact of the citizens and scientists on these methodological concerns varied with the assessment of their arguments by the NERBC staffs, as well as by the other planners associated with the studies.

Third, the public participants had an impact on the studies in that they encouraged a broad consideration of both value questions and alternative solutions to given problems. On numerous occasions, the citizens raised additional value-laden considerations for the planners to take into account. The advisory group members of the CRBP Study, for example, urged the staff to consider all of the environmental consequences of their proposals. Here, too, the staff had to judge whether or not the values were appropriate and sufficiently broad-based to warrant inclusion in the studies.

With regard to growth, transportation, water supply, and other issues, for example, the advisory committees of the Long Island Sound Study consistently viewed the study in a broader scope than did the staff itself. This forced the staff not only to define better the boundaries of the study, but also to consider at least briefly the relationship of their plans to more general problems. Similarly, public participants pressed the staffs to explore a multitude of alternative solutions. The CRBP advisory groups sought to consider a broad range of non-structural alternatives. The staff and associate agencies, given limits of time and money, were forced to decide how far they could reasonably go in such pursuits.

Fourth, the public participants directed staff attention to current problems in the study areas. As in the case of the bridge over the Sound, the citizens, particularly the members of the citizens advisory groups, encouraged the staffs to take stances on issues of local importance. Such staff involvement did serve to root the studies in real problems, to give the staffs a sense of urgency, to improve relations with the advisory groups, and to generate publicity for the studies, hence, potentially increasing public awareness of the planning programs. In the extreme, however, such activities may potentially involve study personnel in fighting a series of "brush-fires" and detract from the planning effort.

They could also bring the studies into conflict with other planning organizations or other governmental units. Hence, a balance approach is required.

Finally, citizen involvement in the studies served to make the final plans more acceptable to those community leaders and other citizens who participated in the planning process. In many instances, the three staffs changed proposed recommendations to which the participating citizens had strenuously objected. This was true in LISS with regard to the salt-water fishing license and in SENE with regard to the proposals for the development of both recreational facilities in the Buzzards Bay area and an expanded sewerage treatment plant in West Warwick, Rhode Island. In other cases, where the staffs deemed it necessary, they stood firmly behind their recommendations, offering at times additional explanations. However, despite these latter occasions, it would seem that the overall plans, as revised to reflect public comments, were certainly more acceptable to those citizens with an active interest in water resources usage. Presumably, therefore, citizen participation made it more likely that the plans would later be implemented.

In summary, public participation in the three NERBC planning programs did fulfill many of the expectations expressed earlier in the studies and in the related literature. The public participants had an impact on the planning

process by supplementing the factual knowledge of the planners, by affecting their use of planning methodologies and reports, by promoting the addressing of value questions, by focusing the planner's attention on current problems, and by helping to evolve politically acceptable plans. The records of the LISS, SENE, and CRBP Studies suggest that public participants can have a variety of impacts on regional planning efforts. The principal controlling factor is the degree to which the administrators accept and incorporate citizen comments in the plans. The implications of this for the accountability of these administrators is examined in the next chapter.

CHAPTER V

THE EFFECTS OF PARTICIPATION ON BUREAUCRATIC ACCOUNTABILITY IN THE THREE REGIONAL STUDIES

What stands out in the above description is the extensive efforts made by the staffs of the Long Island Sound Study, the Southeastern New England Study, and the Connecticut River Basin Program to integrate citizens into their regional (Level B) planning investigations. While the participation mechanisms selected and their employment by the staffs proved less than ideal, the evidence supports the conclusion that the three New England River Basins Commission staffs made sincere efforts to involve citizens in their work. Most observers and the citizen participants themselves shared this assessment.[1] Moreover, a comparative examination reveals that the scope of the participation programs undertaken by the NERBC staffs in these studies generally exceeded those of similar programs, established by the other river basins commissions.[2] The shortcomings which may be

---

[1]For a similar comment see Geerdes, Chap. 1, especially pp. 33-34.

[2]For elaboration on this point see Madge O. Ertel and Stuart G. Koch, Citizen Participation in Comprehensive Water Resources Planning (Amherst, Ma.: Water Resources Research Center, University of Massachusetts, August 1976), Chapt. 4.

attributed to these efforts seem due in part both to the experimental nature of the mechanisms used and to the limited funds and personnel assigned to the NERBC component of the studies, rather than to any inherent limits. Did the public participation programs in the studies, then, result in citizen control of the NERBC staff members?

While many citizens took advantage of these participation programs and had an identifiable impact on the three planning processes and their resulting plans, the above findings indicate that citizen participation in these three studies has not proven a complete and totally satisfactory strategy, in-and-of-itself, for holding the LISS, SENE, and CRBP planners accountable. The rationale for citizen participation suggests that in order for it to be considered an ideal mechanism for providing bureaucratic accountability, such participation must result in control over the administrators by the members of the general public. Such control by citizens did not occur in these studies.

In this absolute sense, accountability could not be fully realized in the LISS, SENE, and CRBP Studies by means of public participation because the citizens performed only an advisory role. The citizens had no final controls (comparable to elections) over the planning personnel or the planning decisions, and the NERBC resisted any citizen efforts to assume such powers. For example, early in the

LISS Study, it dismissed the request of the CAC members to make their chairman a "voting member" (along with the agency representatives) of the study's Coordinating Committee.[3] The CAC members, their leaders, or other citizen participants in the three studies never enjoyed any such voting or decision-making privileges. Likewise, the Commission did not grant the citizen participants control over any given functional part of the planning process. Thus, the LISS, SENE, and CRBP planners were not, either in whole or in part, in any final sense answerable directly to the citizen participants for the manner in which they carried out their responsibilities. The citizens had influence--their complaints, along with other factors, nearly led to the replacement of one Study Manager--yet the administrators made all planning decisions.[4] They acted upon citizen requests at their discretion.

While public participation in these three studies did not insure or guarantee bureaucratic accountability, citizen involvement did have effects on the accountability of the LISS, SENE, and CRBP planners. In examining these studies, one may appropriately ask, therefore, to what

---

[3]This request was made soon after the CAC began meeting; for more information see the minutes of these early meetings.

[4]Long Island Sound Study, "Minutes of CAC Meetings, No. 12, 15, and 16."

extent, if at all, public participation enhanced (although not insured) the accountability of the planners and other administrators who were responsible for these regional planning investigations.

No simple answer to this question is possible. Although one can, as indicated above, examine the ways in which the citizen participants influenced the LISS, SENE, and CRBP plans, it remains difficult to assess the impact of their influence on the accountability of the planners, whom they advised. The influence which the citizens exerted over the NERBC planners and other administrators proved extremely complex, in some respects serving to enhance administrative accountability, in others, the opposite.

Characteristics Limiting Accountability in the Studies

An examination of the participation by citizens in the LISS, SENE, and CRBP Studies reveals that many characteristics of that involvement limited the degree to which it served as a mechanism for enhancing administrative accountability. Problems which impeded the efforts to hold the planners accountable to the public at-large included: (1) the limited representative qualities of the citizens involved; (2) structural impediments in the planning investigations and the participation programs; (3) the unclear roles assigned to the citizen participants; (4) the timing of citizen

involvement; and (5) the parochial attitudes and low informational levels of the citizens. The manner in which these problems adversely affected administrative accountability warrants further examination.

(1) The problem of representativeness. The rationale for public participation suggests that such involvement will increase the control of the general citizenry over administrative policy-makers. However, it seems quite doubtful in many respects that the citizens involved in the three studies --the advisory committee members, as well as those attending the meetings--genuinely represented the general public. This issue of representation aroused considerable debate through the course of the planning investigations themselves. In particular, it continually troubled the members of the citizens advisory committees and the NERBC staffs, neither of whom ever completely resolved the matter.[5] While important, such assessments about the representativeness of the participants prove hard to make, primarily because "representativeness" is an elusive concept. It can be evaluated by various standards, not all of which necessarily agree. As Pitkin states, the representativeness of a public official may be judged by the extent to which that person (1) possesses

---

[5]For further discussion see Ertel, pp. 40-46. In a survey of citizens advisers, Madge Ertel found that 50% from CRBP, 45% from LISS and 33% from SENE considered their groups to be representative. See also CRBP, "Report of the CAG Meeting of July 13, 1973," p. 4.

binding authority; (2) answers to the people being served; (3) mirrors the characteristics of the represented; (4) symbolically stands for the people; and (5) deliberately acts on behalf of the interests of the other citizens.[6] Any statement about the representativeness of the citizen participants must, then, take these different criteria into account.

In applying these criteria to the LISS, SENE, and CRBP Studies, one finds that in some ways the citizen participants did represent a larger public. First, numerous citizen participants held elected or appointed office at the local or regional level. According to the questionnaire, 31.6% of the people attending the final meetings fell into this group; this figure proved particularly high in the SENE Study--45.6%. Members of the advisory committees also, in some cases, held such positions. Presumably, then, the comments of these citizens/officials reflected the interests and preferences of their politically active constituents and were in that sense representative. Secondly, the fact that sixteen of the LISS and twenty-four of the CRBP citizens advisory committee members had been appointed by their respective governors led some of these participants to feel that they represented these governors and, in turn, the electorate of their states. Several members of the CRBP CAG

---

[6]Pitkin, Chaps. 3-6.

espoused this view.[7] With regard to the two-tiered advisory structure of the SENE Study, it can be also argued that those citizen advisory committee members selected at the public meetings (Basin Advisory Committee meetings) represented the people present at those sessions and, in general, the residents of those areas.

Even in these respects, however, the representative qualities of the citizen participants proved quite limited. First, there exists no real indication that the citizen participants, including the advisory group members, defined their roles in the studies in such ways and acted accordingly. For example, the survey research of Robert Shanley reveals that the members of the LISS CAC had many different views about whom or what they represented, be it local citizens and their interests, the members of some interest group and their concerns, a body of knowledge, a broader range of people and their viewpoint, or some combination of the above.[8]

Moreover, the NERBC personnel in guiding the process and the governors in making the LISS and CRBP appointments failed to emphasize and develop systematically the notion of representativeness by virtue of appointment. Only a very few LISS and CRBP advisory committee members reported seek-

---

[7]This was particularly true with regard to the second CAG Chairman, Mr. Harold Pulling, of Vermont.

[8]Shanley, pp. 46-47, 89.

ing guidance from their governors or from other public officials.[9] In the SENE Study, the advisory committee members did not retain direct links to the citizens who selected them because, as noted earlier, the Basin Advisory Committees never really functioned as cohesive groups. The representation provided by the local and regional officials participating in the studies may similarly be questioned, for many were not there in an official capacity, and for whom they were speaking remains uncertain.

Secondly, the majority of the overall citizens participating in the three studies and many of the advisory committee members were not public officials or gubernatorial appointees. Thus, these individuals were clearly not representative of a larger public by virtue of either their status as public officials or their appointment by an elected official, a governor.[10] Ron Nelson, the LISS Public Participation Coordinator, has noted specifically that public officials were not well integrated into the LISS Study.[11] Whom most participants represented, then, is more uncertain. Thus,

---

[9]The CAG Chairman, Mr. Pulling, was one individual who did report contacting appropriate Vermont officials.

[10]Amongst the advisory committee members this included those appointed by the NERBC Chairman, rather than by the respective governors.

[11]Ron Nelson, "Level B Water Resources Planning in an Urban Setting," Water Resources Bulletin, XI (June 1975), p. 611.

neither the formal process by which advisory members were selected nor the participation by local and regional officials as citizens necessarily enhanced the representative qualities of the citizen participants.

When one examines the demographic characteristics and substantive interests of the citizens involved in the LISS, SENE, and CRBP Studies, it becomes even more clear that they were not generally representative of the public at-large. As noted in the third chapter, the participants possessed various characteristics (such as higher income and educational levels) and interests (such as environmental concerns) which distinguished them from the other citizens in these regions. In the case of the advisory committee members these differences were accentuated by the self-selection process that occurred. Even initially, however, the elaborate appointment mechanisms presented problems to the staffs, as they sought to create balanced advisory groups. In the LISS and CRBP Studies, where the governors made a substantial number of appointments independently of each other and the NERBC, the staffs found it impossible to control the composition of these groups. One observer, Jerry Delli Priscoli, also argues that the careful screening of appointees to the citizen advisory committees led to the selection of members who were atypically low risks in terms of potentially

challenging the planners.[12]

In a variety of instances, these distinctive characteristics and interests colored the manner in which the participants defined problems and the recommendations which they offered. For example, one staff member stated that the LISS CAC displayed a disproportionate interest in boating problems, a tendency which he traced to the atypical number of boatowners in the group. Similarly, he observed that only individuals with above average wealth could afford to view the Sound primarily as an "ecological unit," a view shared by many CAC members and other participants at the public meetings.[13] Less affluent individuals, he predicted, would be less concerned with boats and the environment than with swimming and jobs.[14] Admittedly, such demographic characteristics and interests do not uniformly affect political behavior. It can, of course, be argued that highly educated people are quite capable of and, perhaps, inclined toward considering the needs of others in society. However, since no procedures or guidelines for encouraging this

---

[12]Jerry Delli Priscoli, Public Participation in Regional Level B Water Resources Planning: A Preliminary View (Washington, D.C.: Water Resources Council, Special Consulting Report, October 1974), p. 144.

[13]These statements were made bv the second LISS Study Manager, David Holmes, in an interview with the author on September 11, 1975.

[14]Ibid.

broader view existed in these studies, it is difficult to see how the participants were representative in this larger sense. Clearly, in terms of significant demographic characteristics, such as income, age, race, education, and the like, the citizen participants were not a microcosm of the entire population of the region.

Given the absence of procedural mechanisms to enhance the representativeness of the citizens involved in the three studies and the particular demographic characteristics and substantive interests of these participants, one cannot equate the perceptions and preferences of these participants with those of the public at-large. That the citizens did not come closer to meeting the above standards for representativeness reveals the limited suitability of public participation in these studies as a device for holding the planners accountable. Even when the LISS, SENE, and CRBP planners responded to the advice of the advisory committee members and the other participants, they were not necessarily responding to the preferences of the citizens of those regions.

(2) The problem of structure. The very decision-making structures of both the three planning investigations and the three participation programs also limited the extent to which public participation in the studies enhanced bureaucratic accountability. In assessing this limitation, two

points should be recalled. First, while the LISS, SENE, and CRBP staffs coordinated their respective studies, decision-making authority proved quite diffused in these Level B investigations. Various federal agencies with separate budgets produced given sections of each plan. In addition, the New England River Basins Commission, the parent organization of the staffs, had to approve the final planning documents. Second, the citizen participants formally served as advisors to the separate LISS, SENE, and CRBP planning staffs rather than to either the agencies associated with the studies or the Commission itself.

Because of the structure of the public participation programs, the citizens, in interacting primarily with one of the regional staffs, did not frequently become involved in any give-and-take with many of the principal actors in the investigations. As noted above, the LISS, SENE, and CRBP staffs did on occasion use the opinions expressed by citizen participants as levers in negotiating with the other planners, and a few members of other agencies did speak at various advisory committee meetings. However, regular and meaningful involvement in the public meetings by the non-NERBC planners associated with the studies occurred only in the CRBP Supplemental Study. In turn, citizen participation in the work groups, where the planners made many of the substantive planning decisions, proved very limited, as well as sporadic.

The citizen complaints referred to earlier testify to this. When advisory group members participated in these sessions, they did so at an informational disadvantage since they were not closely apprised of the agencies' activities. As noted by one LISS CAC member:

> There was unremitting frustration on the part of many of the CAC members who found the agencies unprepared to accept the citizens in a partnership on the work groups.[15]

Perhaps part of the reason for this unpreparedness was that these agencies retained their own traditional constituencies.

In addition, the citizen particpants and the Boston-based leadership and immediate staff of the Commission itself maintained only limited contact. This proved particularly true with regard to the CRBP Study; more, yet still limited, contact existed in the SENE Study, the office of which was in the same city as that of the NERBC. In general, the influence which the citizens exerted in these studies proved to be generally restricted to influence over only one of several groups of planners responsible for the completion of each project. Citizen participation, then, failed to enhance the accountability of the other associated federal administrators.

Furthermore, the decision-making structure of these Level B studies impeded the efforts of the citizen participants to influence the activities of even the LISS, SENE, and

---

[15] A comment made by Ms. Claire Stein at a LISS public meeting held on January 14, 1975, at C. W. Post College.

CRBP staffs. As noted by the NERBC Chairman, the three staffs were deprived of the "essential ingredient of good management--clear authority and a reasonable degree of control over study resources."[16] This situation posed two particular problems for enhancing accountability. It left the citizens uncertain as to the powers of the three staffs and, subsequently, what they could expect them to perform. Secondly, where the planners sought to be responsive to the citizen participants, structural and financial constraints limited their ability to act.

Finally, the very nature of the NERBC itself hampered bureaucratic accountability. As a recently established planning organization, with limited funds and a small staff, the Commission lacked recognition amongst the public at-large. This made it more difficult for the staff to attract news coverage and to attract citizens to its public events. This in turn worsened the problems of a lack of representativeness among the participants and meant that many of the citizen participants, especially those attending the public meetings, lacked a basic familiarity with the agency that they sought to influence. In summary, the ways in which both the studies themselves and their public participation programs were structured made it difficult for the citizens to influence the planning decisions made and to hold accountable the

---

[16] LISS Memo 75-27, April 11, 1975, from Frank Gregg, Chairman, NERBC.

various planners involved. Public unfamiliarity with the Commission added to these and related problems.

(3) The problem of the citizens' role. Inconsistencies in, and confusion over, the advisory role played by the citizens involved in the LISS, SENE, and CRBP Studies also restricted the efforts to enhance accountability through public participation. These inconsistencies stemmed from the fact that, in practice, the citizens played dual roles in the studies and operated under different sets of standards and expectations. Several specific problems in this regard may be identified.

First, the citizens played a dual role as both insiders and outsiders with regard to the studies. At times the participants functioned outside of the planning process, as seemingly neutral observers attempting to provide a critical review of the plans; at other times they operated inside the process, enmeshed in the studies.[17] Although many citizen participants remained somewhat aloof from the planning processes of the three studies, in part because of the structural detachment of the participation programs, others did not.

Some participants, especially the advisory committee members, became highly integrated into the planning process and, it would seem, quite closely identified with these

---

[17]The existence of this dual role was acknowledged by the NERBC Chairman, Frank Gregg, in a conversation with Madge O. Ertel on October 25, 1973.

efforts. For example, the CRBP study manager, as noted above, viewed the environmental groups in the Connecticut Basin as CRBP's main constituent group, and several of their members participated extensively in the Supplemental Study.[18] Given such ties, whether the citizens could still provide an objective review of the proceedings is an interesting, yet unresolved, question. Such involvement could alter citizen perceptions and behavior. To determine if this occurred in these studies is difficult. Certainly many of the advisors observed by this author appeared to retain their independence, but the possibility of subtle cooptation remains.

Second, the three staffs developed and used very formal devices for generating citizen advice and in this sense placed numerous demands upon the citizens, yet they did not obligate themselves in any way to follow that advice.[19] For example, the staffs asked the advisory committee members to follow extensive procedural guidelines regarding voting on committee business, attendance at meetings, and speaking about committee business. In particular, the procedures established called for the citizens and science advisory committees to submit advice to the staffs in the form of recommendations, adopted by majority vote on given resolutions.

---

[18]This view was acknowledged by the CRBP Study Manager, David Harrison, in an interview with the author in June 1976.

[19]Delli Priscoli (1974), pp. 79-80.

Such advice, as noted earlier, possessed no binding qualities. The staffs did not necessarily act on these recommendations when they received them.

At the staff level, there existed a few systematic procedures for evaluating the participants' advice and reporting the results back to the citizens. The CRBP staff made some achievements in this direction by organizing citizen comments into special publications, such as the Report on the Phase Two Meetings.[20] Rather than issuing simply minutes, or summaries, of the CAG meetings, the staff also circulated what it called "reports," which sought to interpret and at times respond to citizen comments.[21] The LISS and SENE staffs did not use such a systematic approach except at the very end of their studies, where they summarized the comments made at the final series of public meetings and stated their reaction to them.[22]

Viewing this formalism on one hand, yet this lack of commitment on the other, Jerry Delli Priscoli found it hard to see the benefits for certain groups in submitting to such

---

[20] CRBP, Report on Phase Two Meetings, op. cit.

[21] This importance of these reports was emphasized by the CRBP Study Manager in an interview with the author in June 1976. He saw these as a mechanism for responding systematically to the comments of citizen advisors.

[22] For example, see NERBC, People and the Sound, Section 5.3, pp. 216-221.

procedures.[23] Some incentive undoubtedly lay in greater access to the study information, yet this dualism probably discouraged some individuals or groups from using these mechanisms to participate.[24] Delli Priscoli also noted that these conditions made it likely that participants would become frustrated and that the potential for "capturing new and interesting views" would not be maximized.[25] Rather impressionistic evidence suggests that the former may have caused some of the advisory committee resignations.[26] In general, the staffs' lack of both systematic response to citizen comments and commitment to use the advice in itself reduced the impact of the participants on the studies. Coupled with the formality of the advisors' procedures these factors discouraged certain groups from participating, thereby reducing citizen input into the studies.

Third, the LISS, SENE, and CRBP staffs viewed the citizen participants alternately as leaders of key groups, as experts, and as members of the public at-large.[27] Indeed, different participants did seem to represent all three

---

[23] Delli Priscoli (1974), pp. 81, 91, and 120.

[24] *Ibid.*, p. 81.

[25] *Ibid.*, p. 91.

[26] Perhaps the most clear-cut example of such frustrations was a letter of resignation submitted to the CRBP staff from Mr. Charles Weaver, who was at the time the vice-chairman of the Citizens Advisory Group.

[27] Delli Priscoli (1974), pp. 156-157.

categories, although to varying degrees. However, given these varying perceptions of the participants, the staffs found it difficult to judge the legitimacy of the advice provided them. These uncertainties, therefore, also limited the impact of the citizen comments on the plans. In addition, they served to shroud the channels of citizen influence over the planners.

Together, these various inconsistencies and doubts with regard to the advisory role of the participants raised questions in the three staffs about the appropriateness of using the participants' recommendations and served to limit the impact of this advice on the studies. They also tended to discourage some citizens from participating in the planning processes, a tendency which further reduced citizen inputs and which diminished the representative qualities of the participants.

(4) The problems of timing. Problems associated with the timing of citizen participation in the studies similarly limited the accountability of the planners. In assessing these effects it is important to note both that participation occurred within a rather specific overall time-frame and that, within that period, it took place at rather well-defined stages. Both sets of conditions diminished bureaucratic accountability in the studies.

As to the general timing of their involvement in the

planning processes, the citizens participated in the three studies from very late in the writing of the plans of study until the staffs had produced the final drafts of the LISS, SENE, and CRBP plans.[28] This timing posed two particular problems for accountability.

First, the citizen advisors did not participate early in the pre-authorization planning processes when the administrators established the broad frameworks of the Level B investigations. Although in both the LISS and SENE Studies, interim CAC's counseled the staffs on the structure of the envisaged public participation programs, these citizens had little identifiable impact on the remainder of the two plans of study.[29] Furthermore, once all three studies formally began, delays in the appointment of the regular members of citizens advisory committees limited their involvement in the early planning activities. In the LISS and CRBP studies, such delays can be attributed to the very complexity of the appointment processes and the lack of prompt responses from various governors; in SENE, such delays stemmed from both the unique two-tiered advisory structure and the staffs' slowness in establishing the

---

[28] Citizens did participate in the formulation of the CRBP plan of study, more so than in the case of the other studies.

[29] Certain of the Interim CACs' recommendations were included in the portion of the plans of study dealing with the public participation programs.

Basin Advisory Committees, which were responsible for selecting many of the members of the regional CAC. This overall situation served to reduce citizen influence in the early planning stages of all three studies.

Second, public involvement in the three studies ended abruptly as the staffs produced the final plans. As the staffs finished the plans, NERBC closed the LISS and SENE offices and dissolved the staffs, the very ones which the citizens had been advising. Since these staffs had been responsible for coordinating citizen involvement in the studies, the advisory committees and the other aspects of the public participation programs ceased to function.[30] The advisory committee members, for example, lost the prerogatives associated with their formal status as advisors; the limited funding of their expenses incurred in advising the staffs ended. Given these changes, the citizens could not readily participate in subsequent decisions concerning the plans, including those related to implementation. Citizen influence with respect to the plans and the planners waned.

Moreover, as Ortolano indicates is true in most water resources planning efforts, citizen involvement in the LISS, SENE, and CRBP Studies occurred at well-defined

---

[30] Currently, the CRBP staff is becoming involved in further (Section 73) studies, the status of the advisory committees is uncertain.

stages.[31] Apart from the recommendations of the advisory group members, the staff received other public inputs primarily at or soon after each series of public meetings, sessions that were held, roughly speaking, at yearly intervals in each study. Participation at such fixed intervals is not ideally suited for water resources planning. Indeed, Joseph Sax observes that planning is continuous over years, "rarely having clearly definable points at which critical decisions are made."[32] To the extent, then, that many interested and involved citizens did not participate continuously in the studies, their influence over the decisions made by staff members proved limited.

That citizens actively participated in each study for a fixed period of time, which began too late and ended too early, and that their involvement within this period often occurred at well-defined stages, restricted the participants' influence over the NERBC and other planners. This, like the other factors mentioned above, limited the ability of the citizens to hold the planners responsible for their actions.

(5) The problems of information and attitudes. Finally, the survey responses provided some pertinent information about the participating citizens' knowledge of the

---

[31] Ortolano, pp. 3-9, 3-10.

[32] Joseph L. Sax, p. 102.

studies and their orientations to water resources planning. For example, of the citizens attending the last round of public meetings, approximately one-third had attended previous LISS, SENE, or CRBP public meetings. Just under a quarter (23.9%) had attended another group meeting at which the plans had been discussed. Over forty percent (42.5%) reported reading about the study in a newspaper; however, as noted earlier, coverage often proved both superficial and incomplete; this figure proved high among LISS respondents (61.3%), but particularly low among SENE respondents (20.8%). In any case, the majority of respondents in all three studies did not obtain information about the plans in this manner.

Many citizens did receive a summary of the plan for their region prior to attending the meetings; about one-third had read the summary in entirety. Another third had read part of it, although how much of it they examined is unknown. The remaining third had not reviewed the summary at all. Discussions between citizens and either advisory committee members or staff members proved a minority experience. Just over a fifth of the citizens had discussed the plan with an advisory committee member; 23.2% had discussed it with a staff member. In general, when the SENE and CRBP meeting goers were asked, "Do you feel that you know enough about the study to be able to offer comments at tonight's

meeting?" about half answered negatively (SENE 52.7% and CRBP 44.6%).[33]

In assessing these findings, one must keep in mind that these various figures were not mutually exclusive. Indeed, it seems likely that those citizens informed about the study at earlier meetings or by newspaper were those who communicated with the staffs and the advisory committee members. These figures suggest that a group--probably a minority--within the total number of meeting-attenders was comparatively active and informed, but that a significant number apparently possessed little knowledge of the substance of the plans. Compared to the planners, many citizens attending the public meetings stood at an informational disadvantage and this situation limited their ability to influence the plans and to hold the planners accountable. It also seems reasonable to infer that this informed group of meeting-attenders, like the generally well-informed members of the advisory committees, had an influence on the studies greater than their numbers would suggest.

In addition, many of the citizens who commented at the public meetings voiced primarily local, as opposed to regional, concerns. While numerous individuals certainly expressed an interest in broad environmental issues, others demonstrated particular interest in how the studies' recommendations would affect their community or their private

---

[33]This question was not asked of the LISS respondents but was subsequently added to the SENE and CRBP questionnaires.

property. The latter interest proved especially strong in the CRBP meetings, as citizens realized the potential impact of the flood control recommendations on their property and its value.[34] About a fifth of the citizens at the CRBP meetings (20.6%) stated that their primary concern was for private property. Similarly, the questionnaire responses reflected citizen preferences for a strong local role in water resources planning.[35]

This local orientation raised serious questions about the appropriateness of citizen involvement in these Level B planning efforts. A fundamental tension developed as the staffs, charged with taking a regional focus, found many citizens reluctant to think in such terms. In particular, many citizens balked at placing what the staffs deemed to be regionally needed facilities (such as for recreation, power generation, or waste disposal) in their communities. Innumerable debates outside of these studies have revealed a similar tension. Were the planners to follow such expressed local preferences, few regional facilities would be built.

---

[34]Many discussions at the meetings centered on the relocation of structures and possible prohibition of building new structures in flood-prone areas. Property-owners also expressed fears that the HUD mapping procedures would diminish the value of those properties identified as being in such areas.

[35]Most respondents indicated their preference that planning decisions concerning the use of land and water resources should be made either at the local level, the regional level, or at the local level with broad state guidelines, rather than at the state or federal level.

If the citizens' lack of adequate information about the studies limited their influence on the staffs, the extent to which the public meetings generated comments addressed to local concerns, at the expense of regional ones, revealed a basic problem in seeking to hold regional planners accountable to citizen participants. This posed an added dilemma for the LISS, SENE, and CRBP public participation coordinators who correctly perceived that one way to maximize turnout at the meetings was to stress the impact of the plans on the surrounding localities, yet who knew also that the citizens so attracted would be critical of the distinctly regional features of the studies.[36]

To summarize, a variety of characteristics of the LISS, SENE, and CRBP Studies and of citizen involvement in them limited the ability of public participation to serve as a mechanism for enhancing bureaucratic accountability. The citizens who actually participated did not represent the public at-large either demographically or in terms of their method of selection. The structure both of the participation programs, which facilitated citizen contact with only the core NERBC staffs and not the other associated planners, and of the planning processes, which circumscribed the powers of the LISS, SENE, and CRBP staffs, reduced citizen influence

---

[36]From an interview with Priscilla Newberry of the SENE staff, held November 6, 1975.

in these investigations. Inconsistencies in the role being played by the citizens did likewise, while compounding the problem of a lack of representativeness by discouraging some individuals from participating. The timing of public involvement, which occurred at well-defined stages within a period starting belatedly and ending abruptly, also restricted citizen influence. For various reasons, citizens found it difficult to influence the planning activities. Moreover, the unrepresentative nature of the citizens, their lack of information about the studies, and their local orientation lead one to question the value and legitimacy of their advice. These characteristics, then, reveal significant shortcomings in viewing citizen participation as a tool for increasing the accountability of administrators engaged in regional (Level B) water resources planning investigations.

The Enhancement of Accountability in the Studies

Citizen participation proved an imperfect means for holding the planners and other administrators involved in the LISS, SENE, and CRBP Studies answerable to the public at-large for their activities. This general finding is hardly surprising, for authors have also revealed flaws in other methods for providing accountability. Nevertheless, as evidenced in the previous chapter, the participating

citizens did have an identifiable impact on plan formulation in all three studies. In light of this influence, it is appropriate to assess the general effects of this involvement on the accountability of the NERBC and other associated planners responsible for these studies. Given the problems and imperfections just considered, did public participation enhance or degrade the accountability of these planners? In pursuing answers to these questions, the following discussion examines both the direct effects of participation on bureaucratic accountability and its effects on other methods for controlling administrators.

The direct effects on accountability. Generally speaking, the problem to be faced in assessing the direct effects of participation on bureaucratic accountability is the lack of accepted standards by which to evaluate such impacts. Hanchey and other authors, recognizing the problems of evaluating the general effects of public participation, have suggested that observers focus on certain critical questions. Is the information provided by citizens useful? Are critical issues raised by this process?[37] What these authors maintain is that public participation should be judged less on the basis of the number of citizens involved or, perhaps, their demographic characteristics and more on the basis of what it in fact achieves in terms of policy

---

[37]Hanchey, p. 27.

results.[38] As indicated above in the first chapter, this focus makes eminent sense in that it offers a more policy-oriented, less legalistic, approach to the subject of administrative accountability, one in keeping with the significant role that bureaucrats play in public policy-making.

When one adopts such a policy orientation, questions surface, which can appropriately be used to guide further inquiry. Did citizen involvement in the studies cause the planners to use their powers and their limited resources to serve the interests of the citizenry in the best way possible? Did more responsible planning documents result? A useful way of addressing these questions is by utilizing the three evaluative criteria discussed earlier: effectiveness, responsiveness, and lawfulness. In applying these criteria to the effects of citizen participation on the LISS, SENE, and CRBP Studies, the author has found citizen participation to have had a quite positive influence on the three planning processes and, in turn, on bureaucratic accountability.

First, in terms of effectiveness, citizen involvement had few negative impacts on the studies. The cost of such participation in dollars and time remained a relatively small portion of the total moneys spent and the time invested over

---

[38] Ibid.

the course of the three respective studies. The funds expended on the salaries of the public participation coordinators and the participation activities amounted to about two to three percent of the total costs of the projects.[39] Citizen-caused mental discomforts to the staff members reached appreciable levels only in the LISS Study, and even there such tensions abated over time. Moreover, in studies often beset by delays, very few such delays can be attributed primarily to citizen participation.

In turn, the public participants helped to produce more effective, in the sense of more technically-sound, final plans than would have resulted without such inputs. As is documented in the previous chapter, the citizens usefully supplemented the knowledge of the planners about local conditions. At times, they corrected errors of an informational nature, regarding, for example, the suitability of certain areas for particular kinds of recreational usage. The participants also assisted the staffs in addressing various methodological questions, redressing on occasion certain flaws in reasoning, as during the initial LISS boating

---

[39] NERBC did not systematically keep track of the participation expenses in and of themselves. These rough estimates were provided by Mr. Brian Johnson, NERBC's Administrative Officer, who explained that the small percentage of funds involved did not warrant the keeping of separate records. The expenditures represented about 7% of NERBC's own budget for each study.

inventories. They called the staffs' attention to particularly important local problems and, in general, aided in the vital process of problem identification and definition. The role of the LISS CAC's "Goals Report" in defining the problem of limited recreational access to the Long Island Sound is a case in point.[40] Finally, in numerous instances, the citizens suggested alternative means to solving water-related problems, which because of their means-end efficiency were adopted by the LISS, SENE, and CRBP planners. When the staffs acceded to citizen recommendation, it was usually because of the merits of their arguments rather than for reasons of political expediency.[41]

Secondly, despite the varied problems of representativeness, citizen participation in the studies also helped to produce plans more responsive to the needs and preferences of the general public than would have been the case without citizen involvement. The advisors, although middle and upper class in their lifestyles and values, expanded the value base underpinning the LISS, SENE, and CRBP Studies.[42] Values beyond the limited concerns important to professional

---

[40] Long Island Sound Study, Citizens Advisory Committee, "Goals for the Region," op. cit.

[41] This is, of course, a difficult distinction to make, but when one examines the instances where the staffs followed citizen advice, one can readily find a number of technical, non-political, reasons for their doing so.

[42] Delli Priscoli (1974), p. 179.

planners received attention.

As Delli Priscoli observes, "it is hard to ascertain precisely where and in what direction" citizen participation broadens the value-base of planning investigations.[43] Yet one can identify at least two distinct perspectives contributed by the citizens to the LISS, SENE, and CRBP Studies. Certainly, they broadened the value-base of the studies in the direction of environmental concerns. This stands as no mean achievement in water resources planning, where many observers have long deplored the relative lack of attention to such concerns. In large part, the CRBP Supplemental Study had been undertaken because the earlier comprehensive study of the Connecticut River had given scant attention to such matters. Citizens helped to correct this discrepancy in the second effort. In stressing environmental values, the participants expressed an important concern which otherwise might have been given little attention.

Localism was a second and broadly shared perspective added by citizens. City and town officials and other participants, for example, expressed a concern for local self-government, for local "home-rule." This concern tempered recommendations by the staffs for state or national management of water resources in the study areas. While this concern posed problems for the very concept of regional planning,

---

[43] Ibid.

their prerogative, chose not to follow such advice. Thus, in general, citizen participation expanded the value-base of the LISS, SENE, and CRBP Studies, and the addition of different perspectives served as a salutary influence on the studies, increasing both the responsiveness and the effectiveness of the planners.

Public participation had little overt impact on the lawfulness (the legal and "due process" aspects) of the final plans. That citizens were involved in the planning process, however, probably helped to insure that the individual rights of the citizens potentially affected by the plan received their just consideration. Thus, citizen participation in the studies aided in the formulation of responsible final plans. It increased both the capability of these plans for responding to water-related problems affecting the general public and the likelihood that they would do so, taking into account a broader range of values. In this sense, public participation increased the accountability of the planners charged with carrying out these studies.

The effects on alternate means of providing accountability. Citizen participation also enhanced administrative accountability by complementing several of the alternate methods for controlling administrators. Since the citizens performed an advisory role in the studies, they did not automatically detract from the accountability of the planners to

the President (who appointed the NERBC Chairman), his appointee (the Chairman), the Congress, the courts, or fellow professionals. Instead, the creation of a body of citizens, who in some cases were well-informed about the studies and in others were at least interested in them, served to strengthen these other channels of accountability.

First, when distressed about various aspects of the studies, the citizen participants contacted various Congressmen or state legislators. This occurred early in the LISS Study, for example, when progress proved slow. These citizen-initiated contacts between individual participants and their Congressional or state legislative representatives tended to increase the latter's knowledge of and interest in the LISS, SENE, and CRBP Studies. This, in turn, increased the oversight over these planning activities exercised by such elected officials.

Secondly, the LISS, SENE, and CRBP science advisors, as well as other professionals among the citizen advisors and the meeting attenders, also had an impact on three final plans. Singly and collectively, these individuals displayed a formidable range of professional qualifications and utilized them in advising the respective staffs. This influence which they exerted increased the accountability of the LISS, SENE, and CRBP planners to fellow professionals, thereby enhancing this method for providing control over these administrators.

Citizen participation in these cases did not lead to citizen appeals to the courts or the President. However, in one other way it did enhance accountability. In an admittedly limited fashion, public involvement in the studies augmented the coordinating powers of the three staffs with regard to the federal line agencies.[46] Citizen opinions became at times a lever used by the LISS, SENE, and CRBP staffs to move the members of the work groups in certain policy directions. By increasing the power of the LISS, SENE, and CRBP core staffs, citizen participation tended to bring order to very decentralized decision-making structures, resulting in the writing of more coherent and effective plans. This also increased the answerability of the planners to the public by making it easier to fix responsibility for given planning decisions.

Overall, citizen participation enhanced bureaucratic accountability in several ways. Local citizen input, despite the problems identified earlier, improved both the effectiveness and the responsiveness of the planning recommendations, leading to the development of responsible water resources plans. It did so in part by providing information about local problems and the suitability of staff proposals and by adding new perspectives to the undertakings. Furthermore,

---

[46] From an interview with David Holmes of the LISS staff on September 11, 1975. Delli Priscoli makes the same point; see Delli Priscoli (1974), p. 111.

citizen involvement complemented other means for enhancing accountability by interesting and involving both legislators at all levels and fellow professionals in the planning processes of the three studies. It also helped to increase the core staffs' leadership role in the studies, resulting in more coordinated planning efforts. To summarize, citizen participation, while an imperfect mechanism, increased administrative accountability in the LISS, SENE, and CRBP Studies.

Improving Accountability in Level B Studies

One question which remains is whether or not the level of accountability provided by citizen participation in these studies can be improved. An affirmative answer seems in order. Given the characteristics which limited and colored citizen involvement in these studies, one can identify numerout ways in which the LISS, SENE, and CRBP public participation programs could have been improved so as to enhance accountability. These methods may, with caution, be appropriately applied to participation programs in similar Level B investigations undertaken in the future by the New England River Basins Commission or its counterparts in other regions, in order to make their planners more answerable to the general public.

Increasing representativeness. In order to reduce the problem of a lack of representativeness, which limited

administrative accountability in the studies, several changes seem in order. First, there existed in the studies a need to improve turnout at the public meetings, so as to ensure a broader range of participating individuals. In a few instances during the third round of LISS and CRBP meetings, inclement weather and the staffs' reluctance to reschedule events contributed to the low turnout. A more fundamental problem lay in the basic inadequacy of the notice given to citizens about the meetings. Because of the uneven newspaper coverage witnessed in these studies, planning staffs should, in future efforts, press for greater free coverage of the meeting announcements prior to the sessions. The CRBP staff's aggressive approach to radio and television might well be emulated by others in this regard. On the other hand, the staffs should also utilize paid advertising to publicize the meetings, something not done in these cases but which in retrospect seems necessary. In particular, this approach would have helped to bolster SENE's low attendance in its Rhode Island meetings.

Other related changes also seem desirable. The absence of minority group involvement in all three studies indicates that Level B staffs should more systematically strive to involve such individuals in the planning processes. This necessitates more reliance on direct personal contact with minority group leaders than found in the studies.

Direct mailings will not suffice. Certain staff members tried to tailor news-releases to interest minority-group readers, but these efforts were not systematic. Pressures of time delimit such possibilities.[47] In addition, more meaningful and direct use of advisory committee members as links to their communities seems appropriate. The three staffs proved hesitant, probably overly so, in using the advisory committee members as speakers at, or as sponsors of, small group meetings.[48] Delli Priscoli also observes that such studies should seek to involve more social scientists in the public participation programs, since such individuals can help in collecting and interpreting data about the preferences and values of citizens.[49]

Second, in order to enhance the representative qualities of the participants and the accountability of the administrators, the staffs should seek to involve local and regional officials more thoroughly and systematically in the planning than was the case in the three studies

---

[47]Clearly all staff members with whom the author discussed this subject emphasized the inadequacy in terms of time to deal with such concerns.

[48]Reservations about using the CAC members in such a manner, as discussed by the staff members, centered on the uncertainty of what the citizens would say and the lack of staff control over such situations.

[49]Delli Priscoli (1974), p. 165.

examined, especially the LISS study.[50] Richard Tucker argues, for example, that urban and regional planners can provide numerous insights into local conditions and local attitudes.[51] If encouraged to think in broad terms, says Tucker, they "usually come a great deal closer to representing the public interest than any one special interest group."[52] While the staffs, especially in the CRBP Study, did meet at times with local officials, more such efforts are needed.[53] At a minimum, the inputs of such individuals may balance concrete interests with an abstract claim of the public interest.

Third, the three staffs failed to use one potential tool for providing broad-based information about citizen preferences and attitudes, a poll, or survey, again in part because of the cost involved. Planners have seldom used such instruments in conjunction with Level B planning. As the LISS CAC members recognized and as L. Douglas James advocates, polls constitute a possible means for enhancing

---

[50] Ron Nelson, the Public Participation Coordinator of the LISS Study, has noted this particular need; see Nelson, p. 611.

[51] Tucker, p. 261.

[52] Ibid., p. 262.

[53] One useful technique used in the CRBP Study was to meet with local and county officials in an afternoon session prior to the public hearing scheduled for that night in the ares.

the representativeness of the citizen opinions solicited in the course of such investigations.[54] In particular, they offer a means of ascertaining the interests and needs of low-income, minority-group, and working class individuals who usually do not participate in other ways.[55] At a minimum, a more careful consideration of the applicability of this approach to future studies is desirable.

Even given such changes, the possibility that citizen participants can be truly representative of the public at large seems unlikely. It remains necessary for staff members to seek to involve other interested or affected groups conspicuously absent from the planning activities. One LISS staff member reported that he did so by telephoning the leaders of such organizations to sample their opinions and obtain a more balanced view on given issues.[56] But again, the fact that the planners must themselves seek such balance demonstrates the weakness of public participation as a means for holding these same individuals accountable.

Modifying the structural aspects of the programs. Other problems, such as those of a structural nature, can be dealt with more successfully. Here two options exist. First,

---

[54] Long Island Sound Study, "Minutes of CAC Meeting No. 10," held April 10, 1973; James, op. cit.

[55] Shanley, p. 94.

[56] From the interview with David Holmes, September 11, 1975.

citizen participants can be better integrated into the total planning process, by having them advise the other non-NERBC planners. At a minimum this would require the staffs' facilitating the involvement of citizens in the work groups. A second option would be to centralize the planning structure by giving more control to the NERBC staffs. In this instance the present advisory structure and level of citizen involvement would suffice, for the citizens would be interacting with the planners clearly in charge of the studies, a position of power the LISS, SENE, and CRBP staff members did not enjoy. This latter option clearly seems the most meaningful of the two and is a strategy which is currently gaining favor at the federal level. NERBC's new Lake Champlain (Level B) Study exemplifies this approach.[57]

Improving the timing of participation. Many of the problems of timing reflected in these studies can also be attenuated. The early delays in involving citizens can be overcome in either of two ways. First, the NERBC Chairman could directly appoint all advisory committee members. Given the political reasons for involving the states in this selection, a more acceptable plan might be to provide that, if the governors did not make the appointments within a

---

[57] In this case, the Water Resources Council and NERBC are jointly handling the study's funds, although a few agencies, like the Soil Conservation Service, retain some autonomy.

period of 45 or, perhaps, 60 days, the NERBC Chairman would do so.[58] This second approach would also seem less likely than the first to result in the committees being a "mirror-image" of the river basin commission or its chairman.[59] Later delays might be avoided by selecting alternate members initially or by employing similar deadlines.

To avoid an abrupt end to citizen involvement after the formulation of the plan, an ongoing advisory structure to the Commission itself should be established. The Ohio River Basin Commission (ORBC), for example, created such a central CAC which in turn helped to organize specific CAC's for its Level B studies.[60] Membership in these two groups overlapped. If used in future NERBC Studies, this arrangement would provide for the continued involvement of skilled and informed citizens in the Commission's activities and, thus, for the ongoing supervision of the NERBC administrators.

Clarifying the participants' roles. Still other activities might also serve to alleviate the problems related to the roles played by citizens in the studies. In general,

---

[58] David A. Gregorka, The Citizen Participation Program of the Maumee River Basin Level B Study (Ann Arbor, Mich.: Water Resources Management Program, University of Michigan, 1974), p. 33.

[59] Melvin B. Mogulof, Citizen Participation: The Local Perspective (Washington, D.C.: The Urban Institute, March 1970), p. 13.

[60] Ertel and Koch, pp. 74-75.

while it is appropriate for citizens and staff members to strive to involve a broad range of interests in the public participation programs, both groups should acknowledge that neither advisory committee members nor the citizens who attend public meetings are likely to represent the public at-large and should define the participants' roles accordingly.[61]

In particular, the formalism enveloping citizen roles in such studies, as reflected in voting and other procedures used by the LISS, SENE, and CRBP advisory committees, might usefully be reduced.[62] Generally, the members adopted formal recommendations to the respective staffs which were acceptable to at least a majority of the individual advisors. However, this process frequently involved lengthy debate within the committees, which in the end resulted in statements constituting the lowest common denominator of the opinions expressed. Given the time spent in debating over phrasing and the generality of the statements produced, the value of these collective efforts seems quite questionable. Less emphasis should be placed on such formal recommendations and more on informal, more detailed advice.

Regardless of whether the comments be received formally or informally, planners would be well-advised to

---

[61] Delli Priscoli (1974), pp. 92-93.

[62] Ibid., p. 80.

develop a system for listing citizen recommendations and for reporting their staff's reaction to them.[63] This procedure would help to insure that citizen comments be properly examined, and also it would bolster the morale of those citizens participating in the studies.

Informing citizens about the studies. Finally, various means may be suggested for better informing citizens so as to increase their knowledge and awareness of these studies. The major need is for an information program of a more continuous and aggressive nature than found in the LISS, SENE, and CRBP Studies. While the LISS Study probably received better newspaper coverage than its two counterparts, mass media coverage in all three occurred largely at the times of the public meetings, leaving gaps during the intervening periods. More media coverage during these times is essential; this requires in part more rigorous staff efforts to secure free media coverage.

In LISS, the staff's publishing of the Urban Sea supplemented such media coverage, although it is difficult to assess the impact of this tool on the level of public information about the study. Clearly, it had its limits in this regard. The Urban Sea appeared only four times, usually at the time of the public meetings, and reached a relatively small audience. To be effective, this type of publication

[63]The efforts of the CRBP staff, as described above, are a step in this direction.

requires more frequent and broader distribution. A viable alternative to this approach would be for the staff of a given study, or its parent commission, to issue a newsletter, using an expanded mailing list.[64]

Still other approaches might be utilized. Hanchey, for example, advocates the use of traveling displays which might be located at public events likely to be attended by citizens interested in some aspect of water resources. Such displays might be used to distribute further information about studies of this type.[65]

These various suggestions would help to inform more citizens about such studies, about the regional nature of water-related problems, and about the agencies responsible for carrying out these planning tasks. However, it must be acknowledged that such piecemeal efforts by small staffs cannot reach and bear the burden of educating the masses of citizens in a given region on water resources issues.

In summary, by increasing the breadth of citizen involvement, by restructuring the planning programs, by improving the timing of public participation, by clarifying the roles of the participants, and by better informing

---

[64]The Great Lakes Basin Commission, for example, issues periodically a newsletter called "The Communicator." In fact, NERBC is the only river basin commission that does not employ this strategy.

[65]Hanchey, p. 25.

citizens about planning problems and activities, bureaucratic accountability could be improved in studies of this type. More meaningful citizen input into the studies would result and the problems of accountability discussed above would be reduced. In part, these improvements require that an increased percentage of the budget of Level B studies be spent in public participation activities. There is a need to develop a crude target figure (or range) for such expenditures.

It is also evident, however, that even at best such alterations in the public participation programs will not totally overcome these varied problems and that citizen participation will remain an imperfect means for making administrators answerable to the public at-large. Time and monetary constraints are likely to limit efforts to improve the quality of citizen participation. Nevertheless, the record of citizen participation in these studies indicates that, in conjunction with other methods, it did make important advances in enhancing administrative accountability. It resulted in more responsible, that is, more effective and responsive, plans for water resources utilization than would have been created, had the planners been left to their own devices.

CHAPTER VI

CITIZEN PARTICIPATION AND BUREAUCRATIC ACCOUNTABILITY

Public participation remains a concept enveloped in controversy. Those authors who are skeptical about the merits of the participation phenomenon suggest that the strategies to democratize policy-making by involving citizens do not and cannot work. Some critics offer the quite fatalistic view that citizens cannot genuinely influence or control administrators; in the process of attempting to do so, they are frequently coopted. Others go so far as to argue that, to the extent that citizens are integrated into the policy-making process, the rationality of that process is degraded by parochialism and emotionalism.

From another perspective, a different set of authors view public participation as the purest form of democracy. It offers solutions to the problems of "big government" and, more specifically, bureaucratic accountability. These latter ideas found their most optimistic expression in the Office of Economic Opportunity and the literature related to the War on Poverty. As evidenced above, neither such dismal fatalism nor such unbridled optimism regarding public participation seems warranted. The following analysis

rejects both these extremes, presenting a view of citizen participation tempered with moderate optimism.

What general lessons, then, about the relationship between public participation and bureaucratic accountability can be drawn from the above case-studies? Is citizen involvement likely to enhance accountability in other water resources planning efforts, in water resources policy-making, and in administrative policy-making in general? How can the probability of its doing so be increased? These questions form the central theme in this final chapter.

Citizen Participation and Accountability in Water Resources Planning

As is true in examining any case-study, one must proceed with caution when generalizing from the above findings. One particular danger is that the circumstances surrounding these three studies, performed by the New England River Basins Commission (NERBC), may have been so unique as to void their comparative value. When one reads accounts of other similar studies, this does not appear to be the case with the Long Island Sound (LISS) Study, the Southeastern New England (SENE) Study, or the Connecticut River Basin Program (CRBP) Supplemental Study. Nevertheless, it should be recalled that various factors, which inevitably vary from case to case, do affect citizen participation in water resources planning. These include the areal scope of the

planning effort, as well as the seriousness and the salience of water-related problems in the area.[1] Mogulof observes that other factors at the local level, including distinctly human factors, also shape the impact of citizen participation on a given planning process.[2]

In terms of such variables as these, certain characteristics of the three NERBC Studies set them apart from many other water-related planning efforts. It proves difficult to speak precisely about these differences, to substantiate their existence, or to assess their impact, yet certain distinctive characteristics warrant further discussion.

First, the LISS, SENE, and CRBP Studies were of broader scope than many water resources planning investigations. For example, they possessed a regional focus not shared by investigations which center on the problems of a particular community. This broad geographical setting affected the basic nature of the three studies and of citizen involvement in them. As befits regional (Level B) studies, their recommendations tended to be both general and long-term in nature. In addition, the task of integrating the diverse population distributed over the three respective regions into each planning process proved difficult and required a particularly complex and rigorous public

---

[1]Warner, p. 37.

[2]Mogulof, pp. 142, 149.

participation program.[3] One would expect citizens to be more likely to get involved in, and to express sharp differences of opinion over, projects of a more immediate (local) and more specific nature, such as a Level C study.[4] The fact that the LISS and SENE plans encompassed such a broad range of functional topics also necessitated an especially elaborate public information program.[5]

Second, the geographical setting of the LISS, SENE and CRBP Studies affected the salience of the water-related concerns being discussed, the general proclivity of citizens to participate in the programs, and the attention given by participants to local concerns. Water-related issues are less important in New England and adjacent areas than in many other regions, where water is in critically short supply or where flooding occurs more frequently. Construction-oriented agencies, therefore, play a diminished role in water resources problem-solving in New England and other areas in the Northeast.[6] Accordingly, the salience of water-related issues remains relatively low in the region, a condition

---

[3]Bishop, p. 108.

[4]A level C study is focused on a specific problem and performed prior to the start of construction.

[5]Hanchey, p. 34.

[6]Derthick, p. 147.

which tended to lessen participation in the studies.[7] The relative lack of overt problems, the reduced role of construction-oriented agencies, and the low salience of the issues likely caused those citizens who did participate in the studies to bring a less "constructionist" approach to water resources planning than do their counterparts in other regions. Also, the literature suggests that citizen involvement in governmental activities has traditionally been more pronounced and more organized in New England than in many other regions.[8] With regard to these studies, this served to compensate in terms of participation for the low salience of the issues and to bring the planners in contact with well-established groups. Furthermore, the role of local, as distinct from county, government is more pronounced in New England, than in the South or many other areas.[9] This made it particularly difficult, in these studies, to interest citizens in a regional project and to get them to consider solutions involving government beyond the boundaries of their particular communities.

Third, the New England River Basins Commission proves to be a rather unique organization. It lacks the "constructionist" attitude which authors frequently attribute to

---

[7]League, p. 3.

[8]See Sharkansky, Chap. 3.

[9]*Ibid.*

the more traditional water resources agencies.[10] In the course of these studies, the NERBC also embraced the concept of citizen participation more fully than have many other such organizations. Perhaps, this reflected the recency of its creation (a decade ago) and the absence of supportive clientele groups. Undoubtedly, NERBC's openness has contributed to its generally good public image and to the support which it has earned from civic groups like the League of Women Voters. In any case, one must suspect that public participation achieved what it did in these studies at least partially because the Commission's leadership displayed a genuine desire to work cooperatively with citizens.

In generalizing about the LISS, SENE, and CRBP Studies, one must keep in mind, then, the regional focus of these Level B investigations, their New England setting, and the unique aspects of the NERBC itself. Certain of these factors worked to increase the number of individuals participating; others had the opposite effect. Thus, it is difficult to predict what might happen elsewhere. Given the tradition of participation in New England and surrounding areas, many other regions may find it difficult to involve citizens within a regional setting to a comparable extent. A higher level of citizen involvement may well be possible, however, in locally-oriented water resources studies there

---

[10] Derthick, p. 147.

or elsewhere. It also seems likely that citizen participation in regions which are expanding or which lack adequate water supplies may involve both a less "conservationist" orientation and more sharp conflicts of opinions than found in the LISS, SENE, and CRBP Studies. Participation in other areas outside of New England and Long Island may also evoke less concern for the prerogatives of local governments and less involvement by organized interest groups.

Differences between these three studies and other water-related planning efforts exist, but are of degree rather than kind and do not prohibit generalizing from the above findings, providing reasonable cautions are taken. The examination of citizen involvement in the LISS, SENE, and CRBP Studies provides numerous insights into the effects of public participation on bureaucratic accountability in water resources planning and policy-making. The problems identified and the impacts documented above are likely to be replicated in other water resources planning and policy-making efforts. Similarly, the suggestions for improvement offered in the previous chapter apply to other water resources planning studies. When further differences are considered, as is done below, these case-studies also provide insights into the effects of public participation on the accountability of bureaucrats working in other substantive policy areas.

The effects of participation on the accountability of water resources planners. The precise impact of public participation on bureaucratic accountability varies somewhat from one water resources planning effort to another, depending upon numerous variables. In general, however, citizen participation serves as a limited and imperfect mechanism for sustaining accountable water resources bureaucracies. It is limited in effectiveness in the sense that the citizens are advisors only and lack real authority over the personnel in charge of such planning investigations. As policy to be prescribed, in water resources planning, as in the three NERBC Studies, several factors limit the suitability of citizen participation as a mechanism for holding planners accountable to the public at-large. In part, these problems reflect certain of the concerns voiced by authors critical of public participation, namely that such involvement is unrepresentative and parochial. Other problems have also surfaced in the course of this study.

The above case-studies support the generally accepted notion that citizen participants in water resources planning tend to be unrepresentative of the general public. Unless faced with serious water-related problems, the majority of citizens is not likely to become interested in, informed about, and involved in water resources planning. These tendencies reflect quite engrained public attitudes and

cannot easily be changed. Greater turnout at meetings or the establishment of more formal channels for selecting citizen representatives--while desirable--will not alter this basic situation. An additional imperfection, here, is that the burden of insuring as broad a sampling of public opinion as possible has come to rest primarily with the administrators themselves, the very people regulated by the participation mechanisms. Moreover, those individuals who do participate frequently voice local, self-interested concerns, at times at the expense of regional or more general issues. The literature of political culture suggests that these orientations to politics are in part culturally-rooted and of apparently long duration.[11]

The above case-studies also reveal various structural impediments, such as the elaborate division of responsibilities within investigations, which limit citizen participation in water resources planning. Because of the number of agencies involved in many planning projects and the way in which presently they are, at best, only loosely coordinated, these impediments are quite widespread. Significantly, even apart from their adverse effect on participation, these characteristics of water resources planning diminish administrative accountability by making it difficult to fix respon-

---

[11]See Daniel J. Elazer, American Federalism; A View From the States (New York: Thomas V. Crowell, 1972).

sibility for planning decisions and other activities. Barring a reorganization of these agencies or a fundamental change in the way in which they are coordinated, these impediments will continue to limit the ability of citizens to make themselves heard.

Problems of timing and of role-definition arise repeatedly whenever citizens are integrated into a planning effort. While they may be dealt with more successfully than the above difficulties, they are still not readily surmounted. With regard to the former, the use of complex selection formulae for advisers--with their attendant problems--seems likely to continue because of the various levels of government interested in water-related matters, even where relatively small amounts of territory are involved.[12] Moreover, with regard to the timing of citizen involvement, Hanchey has observed that public interest in planning studies typically is low at their start and matures over time.[13] Thus, it is and will continue to be difficult to get citizens involved early in a project, even beyond the inherent difficulties associated with the initial selection process. Citizen influence over planners will, therefore, be quite limited during this crucial period of formulation. Similarly, problems of role-definition are likely to be recurrent, although

---

[12]Mogulof, p. 161.

[13]Hanchey, p. 2.

more substantial guidelines from the Water Resources Council could assuage this problem somewhat.

Related to these, but less evident in the case-studies than in other water-related planning efforts, is the added complication that citizens, starting with different concerns, may be unable to agree on solutions to particular problems or on the nature of the problems themselves. Frequently, water-related problems are not self-evident, nor is agreement simply the product of better information or communication.[14] Where consensus among citizens is absent, the ability of participation mechanisms, such as public hearings, to resolve conflicts involving water resources issues seems quite limited. Such conflicts reduce both the influence of citizen participants in the making of certain crucial planning decisions and their ability to supervise administrators.[15]

In summary, this study gives additional substance to many of the general comments in the literature about the shortcomings of citizen participation as a mechanism for providing accountability in water resources planning or other administrative activities. Certain of these criticisms about the unrepresentative and parochial nature of citizen involvement appear well-grounded, although other concerns such as

---

[14] Delli Priscoli (1974), p. 135.

[15] Sax, p. 101.

that participation would hamper planning efficiency, find little support here. Other problems related to the planning structures, timing, and role definition also limit the potential of public participation as a mechanism for holding water resources planners answerable to the public at-large, so as to ensure the creation of responsible plans.

Despite these problems, citizen involvement does, in various ways, enhance administrative accountability in water resources planning. The findings of the case-studies regarding the accomplishments of public participation in increasing accountability reinforce many of the positive arguments raised by proponents of the concept. These appear readily applicable to water resources planning as a whole and serve to overcome some of the problems which have been identified above.

As Bernard Berger observes, there appears to be in every region:

> a reservoir of citizens concerned about their water resources, informed on major planning issues, and willing to work hard on plan formulation if given a proper opportunity to do so.[16]

This group includes individuals with environmental interests as found in the NERBC Studies, but may also include those with interests of a different nature, perhaps more business or property oriented. In general, participation programs

---

[16] Berger, p. 1.

offer individuals and groups who lack various political resources but are interested in water-related questions an opportunity to express their opinions directly to governmental decision-makers and to have at least a limited voice in the planning process. Public meetings prove particularly helpful in this regard, providing they are well publicized.

Problems of representativeness and parochialism notwithstanding, the citizens who participate bring to water resources planning investigations a particular knowledge of local conditions and a range of interests and values, which, while still limited, is likely to exceed that of the planners. Probably the most notable accomplishment to date of such citizen participants, in the three case-studies and other water-related investigations, has been the airing of environmental and social concerns. As assessments of water resources planning by the National Water Commission and other observers have shown and as one recent court decision involving off-shore oil drilling has demonstrated, environmental issues have frequently been ignored by water resources planners.[17] Citizen participation assists in correcting this

---

[17] National Water Commission, p. 366. In February of this year, a federal judge voided the Government's sale of drilling rights off the Atlantic shore because of deficiencies in the related public hearings and environmental impact statements. See The New York Times, February 18, 1977, pp. 1 and B-7.

imbalance. The same is true with regard to social concerns. In part, because of citizen pressure, water-related plans must take into consideration the objective of "social well-being."[18] Citizens continue to serve as watchdogs over such issues.

As exemplified in the NERBC Studies, citizen participation also aids in alleviating other widely recognized deficiencies in water resources planning, including the tendencies to (1) adhere rigidly to long-range forecasts; (2) over-emphasize the use of benefit-cost calculations; (3) avoid setting priorities; and (4) ignore related land-use implications.[19] Citizen inputs, then, result in more responsible water resources plans which are both more effective and responsive--more in accord with public needs and preferences--than would otherwise be the case.

Bureaucratic accountability is also enhanced in water resources planning by the extent to which citizen participation under this advisory rubric fosters other channels of control over administrators. Because the citizens function as advisors, they do not automatically detract from or impede alternate means of providing for accountability. Instead, these public participation programs supply those who choose

---

[18]Terance P. Curran, "Water Resources Management in the Public Interest," Water Resources Bulletin, VII (February 1971), pp. 33-34.

[19]National Water Commission, p. 366.

to become regularly involved with considerable information about planning issues and activities in this policy area. To that extent, they help to create more informed citizens. Citizens may use this newly-acquired knowledge to generate reviews of administrative undertakings by other political institutions.

For example, as seen in the three studies, complaints from informed citizens to their Congressmen or state legislators invited greater legislative scrutiny of these water resources planning efforts. Such a response is particularly likely to be forthcoming when the complainants are themselves officially associated with the studies. Although it did not occur in case-studies, citizens may also use their knowledge about the planning of studies to pursue legal action through the courts, thereby increasing the control of legal institutions over water-oriented bureaucracies. Checks of this type have become increasingly important in recent years, especially since the passage of NEPA. With this sort of recourse in mind, Joseph Sax observes that, at a minimum, what citizen involvement in planning might achieve is to inform people and to prepare them for future action.[20]

Should citizens address their comments to other executive officials, for example, in either the Water Resources Council or the White House, accountability through this

---

[20]Sax, p. 104.

channel would also be increased. In addition, as professionals with areas of expertise related to water resources serve as science or citizen advisors, accountability to fellow professionals is augmented. Finally, as seen above, citizen comments directed at those agencies responsible for loosely coordinating planning efforts may also help to increase their control over the planning efforts, thus streamlining the lines of accountability in such studies.

To summarize, citizen participation is not a panacea for the problems of bureaucratic accountability in water resources planning. Even under present arrangements, final planning decisions are made by administrators who enjoy considerable discretionary powers. They, too, are responsible for orchestrating the involvement in the studies of the very individuals who seek to influence and supervise them. Numerous imperfections mar the citizen participation strategy. Moreover, it does not in itself deal with certain basic characteristics of water resources planning, such as the very large number of agencies involved and the difficulties inherent in fixing responsibility, which both impede participation and cause additional problems of accountability. Yet despite all these limitations, public participation does serve to enhance rather than diminish bureaucratic accountability, by resulting in more responsive and effective plans and by complementing various other means of controlling

administrators, via the Congress, the courts, the President, or fellow professionals. Citizen participation is, then, a significant, but by no means complete or radical reform.

Having acknowledged these benefits, as well as the accompanying problems, it seems desirable to limit citizen participants to an advisory role in water resources planning. Tangible, though limited, benefits are likely to result. Because the problem of representativeness seems inherent in public participation in water resources planning, citizen participants should not be granted actual decision-making authority in planning decisions. Such an act would create tensions between this strategy and other modes of providing accountability, would make lines of accountability in an already diffuse decision-making structure all the more obscure, and would, perhaps, make water resources planning even more elitist than it is at present.

Enhancing the accountability of water resources planners. However, within such an advisory framework, various steps are needed in order to increase the utility of citizen participation as a mechanism for providing administrative accountability and in turn responsible water resources planning. Here again the comments made above with regard to the case-studies seem applicable. The representativeness of the participants needs to be improved by expanding both the numbers of citizens participating, especially minority-

group members, and the breadth of their focus; by involving more local officials, including planners; and by using surveys where applicable. There is also a need to integrate citizen advisors into the working sessions of the planning process. Where many agencies are involved, the citizens should be attached to one organization clearly in charge of the planning effort. In terms of timing, participation should be more continuous throughout the planning process, beginning early and extending into the implementation period. The role of the participants in the planning process ought to be better and more uniformly defined than is presently the case. Citizen comments should be handled and responded to systematically. Finally, more aggressive public participation programs must be used to inform citizens about water-related studies, in light of the complexity of the issues to be addressed and the frequently low salience of the issue area. These rather specific types of changes would further enhance the effectiveness and responsiveness of water resources plans.

In general, one is struck by the largely experimental nature of citizen participation in water resources planning. The guidance given to water resources planners by federal laws and administrative standards in setting up public participation programs is minimal.[21] This is reflected in the

---

[21]Sax, p. 104.

Water Resources Council's "Principles and Standards." Planning staffs lack a clear understanding of the goals and objectives to be pursued in involving citizens in the planning process.[22] As a result, participation programs have been established in a random rather than systematic manner. Staffs have exchanged little information about the structure of such programs; little conventional wisdom exists as to how participation can be improved in water resources planning programs.

Given this state-of-the-art, several specific needs may be identified. The first is the need to develop more systematic standards for citizen participation in water resources planning.[23] For example, guidelines should be established concerning the funding of the expenses incurred by advisory committees in participating in planning efforts. As Mogulof comments, federal policy in this area has been erratic.[24] Second, further evaluations should be undertaken to determine what participation has in practice achieved and which strategies have worked best, so that programs can be restructured accordingly.[25] Third, there exists a need for more training programs on citizen participation for

---

[22]Delli Priscoli (1974), p. 140.

[23]Warner, pp. 9-10; Mogulof, pp. 173-180.

[24]Mogulof, p. 61.

[25]For further discussion see Warner, p. 9.

planners, such as the seminars initiated by the Environmental Protection Agency for "208" planners.[26]

At present, then, citizen participation in water resources planning has in a limited fashion enhanced bureaucratic accountability and responsible water planning. Further changes will permit it to do an even better job in this regard, within an advisory framework. It is also clear, however, that there exist problems of accountability in water resources planning which citizen participation cannot itself resolve. Other reforms, such as reorganization and centralization, seem in order here. In the end, what citizen participation achieves in any given study is likely to be less than ideal and will depend upon how the individual planners use the information provided.[27] In short, citizen participation can encourage the development of responsible water plans, it cannot, in and of itself, create them.

Citizen Participation and the Accountability of Officials in the Water Policy Subsystem

The planners who perform water-related planning investigations form a vital part of the policy-making process for water resources. In particular, their plans serve as the basis for other policy-making activities; the quality

---

[26]These meetings were held in different regions by a private firm under contract to E.P.A.

[27]Ortolano, p. 1-6.

of these plans has a significant impact on the caliber of later policy decisions. However, it is also important to assess the effects of citizen involvement on the accountability of the other policy-makers, including high-level administrators, who are removed from the initial planning process and who are responsible for translating the completed plans into authorized, funded, and implemented federal projects. In general, what impact does citizen participation have on the authorization, funding, and implementation of responsible water resources policies?

The effects of participation on the accountability of officials in the water policy subsystem. As A. Lee Fritschler observes, there exist in different policy areas, political subsystems comprised of the individuals and groups who make or influence governmental decisions related to those concerns.[28] In the realm of water resources, the primary actors in the policy subsystem are the leaders of several Congressional committees and subcommittees, individual Congressmen from potentially affected areas, certain officials of water-related agencies, representatives of various clientele groups, and the members of the National Rivers and Harbors Congress, which includes many of the above.[29]

---

[28] A. Lee Fritschler, Smoking and Politics; Policy-making and the Federal Bureaucracy, 2nd Edition (Englewood Cliffs, N.J.: Prentice-Hall, Inc., 1975), p. 4.

[29] Among the key members of Congress are the leaders of the Senate and House Public Works Committees.

Collectively, they dominate the authorization and appropriation processes by which water projects are established.

As Fritschler finds typical of public policy-making, water resources policy has long been made "in a spirit of friendly and quiet cooperation between small segments of Congress, the bureaucracy, and the interest group community."[30] Environmental groups, the Office of Management and Budget, and, most recently, President Carter--in his attempt to stop the funding of some thirty water projects--have sought to end the exclusivity of this policy-making arrangement. However, the results of their challenge prove quite mixed at best. Carter's recent efforts to block many of these specific projects encountered vigorous opposition in Congress, and, at this writing, it appears that at least some of the projects will be funded.

For many observers, the way in which water-related decisions are made and the resultant policies exemplify much of what is wrong with American public policy-making. Several "blue-ribbon" panels, for example, the Second Hoover Commission's Task Force on Water Resources and Power, have called for changes in both the structure for making water policies and in the policies themselves, policy and process

---

[30] Fritschler, p. 4.

being inextricably linked.[31] More specifically, criticisms of the process have centered on the perceived lack of both objectivity and concern for the "public interest." The initiative for policies, the critics charge, typically comes from agencies with vested interests in completing the projects.

Moreover, Congressional involvement in water policy-making centers on individual Representatives or Senators, who are interested in securing projects for their constituencies, rather than on Congress as a collective body. This reflects the shared attitude among the members, in part based on concern for reelection, that a Congressman should represent the interests of the voters who elected him or her to office. Thus, mutual accommodation prevails.[32] Maass notes that a Congressman usually does not intervene in the decision-making process, unless it concerns a project in his or her district.[33] Congress's reliance on committees, its seniority system (despite some relaxation of these rules), and the specialization prevalent among its members reinforce

---

[31]For a discussion of the Hoover Commission Task Force see Ben Moreell, Our Nations Water Resources--Policies and Politics (Chicago: The Law School, University of Chicago, 1956).

[32]Helen Ingram, "Patterns of Politics in Water Resources Development," Natural Resources Journal, XI (January 1971), pp. 107-111.

[33]Maass, pp. 140-141.

these tendencies.[34] Generally, this situation allows the lobbyists for client groups to concentrate their forces on key members, the resultant policies being shaped by the logic of "pork-barrel" politics.[35]

This process, say the critics, leads to the adoption of policies of questionable rationality. According to Helen Ingram and other observers, water policies in the United States are too project-oriented; no broad discussions of goals and alternatives occur, a situation which leads to inconsistent, often contradictory policies.[36] Moreover, these policies do not respond to "economic and physical facts" or "social and environmental forces."[37] Too few individuals or groups ostensibly benefit. These problems carry over into the implementation stage which is dominated by these same interests.

Needless to say, many individuals, particularly the principals involved, dispute this assessment of water resources policy-making; however, for this author the above provides an accurate portrayal of the present situation. The question, then, becomes: "Does (or can) citizen

---

[34] Ingram, p. 109.

[35] In discussing the failure of the Teton Dam, one observer noted that the project must have involved an "inferior grade of pork"; see Gallagher, p. 108.

[36] Ingram, pp. 105, 116.

[37] Ibid., p. 117.

participation enhance the accountability of the high-level administrators and Congressmen who are part of the water resources subsystem?" Can participation increase the likelihood that more responsible water-related policies will result?

This proves difficult to answer. At present some citizens participate in the process by which water policies are formally enacted (authorized and funded), but their level and means of involvement vary considerably. It is even harder to track and assess the amount of influence which they have than was the case with the planning studies examined above.

Citizen involvement at these later stages of decision-making does not consist primarily of "public participation" in administrative activities, in the sense that the term has been used above. There is little direct contact between the policy-making leadership of the various water-related agencies and interested citizens. Instead, citizens become involved in policy-making through the more traditional means of participation: (1) contacting individual Congressmen; (2) testifying at formal hearings; (3) serving on special commissions or task forces; or (4) being members of such permanent advisory bodies as the Citizens' Advisory Committee on Environmental Quality. These latter two types of bodies differ, however, from committees like the LISS CAC in that

they are not as likely to become immersed in either the operations of given water-related agencies or the substance of particular projects. Finally, citizens also participate during the implementation stage of projects by filing suits to stop or in some other way affect them.[38]

In general, direct participation by citizens during the authorization and funding stages of water resources policy-making is much less systematic than it is at the earlier planning stages; neither are the requirements for participation as specific. Unless a particular task force should choose to hold hearings outside of Washington and in the affected region(s), participation will normally occur on a relatively small scale, involving few citizens from the areas in question. All of these conditions exacerbate the problems of representativeness, timing, and lack of information which were discussed above. Moreover, these contacts are likely to be of a formal nature, in contrast to the frequently informal relationships between citizens and planners. Because of such general characteristics, the influence of the general citizenry over the relevant administrators and Congressmen during these later policy-making stages does not appear very appreciable.

More specific limitations on the influence of those citizens who testify at hearings or who belong to advisory bodies can also be identified. First, while certain citizens

---

[38]For a more elaborate discussion of citizens pursuing court action see Sax, op. cit.

speaking at public hearings come in part from public interest groups and environmental organizations, the political resources and, hence, the influence of such group representatives or of other unaffiliated individuals seldom match those of client groups. Second, those citizens who serve on ad hoc commissions also have very limited influence over the officials creating project-oriented water policies. During their temporary existence, such panels focus on broad issues rather than on the merits of individual projects, yet these projects form the bulk of water-related legislation. Third, the influence of permanent advisory bodies is also circumscribed, that of the Citizens' Advisory Committee on Environmental Quality providing a case in point. The Committee met only three times in 1975 and, as reflected in its annual report for that year, did not address issues related to domestic water usage.[39] Thus, during this period the impact of this major advisory committee on the kinds of issues raised above seems minimal. These problems all retard the efforts of direct participation to enhance accountability and responsible public policy.

In addition, citizens continue to participate in an indirect manner in authorization and funding decisions. They do so through the written summaries of public reactions to

---

[39] Citizens' Advisory Committee on Environmental Quality, Report to the President and to the Council on Environmental Quality (Washington, D.C., December 1975), p. 30.

respective plans which many planning agencies submit to the Water Resources Council, the President, and, eventually, the Congress as part of, or along with, their final planning documents. For example, both the LISS and SENE plans contained a section summarizing the major comments about the plan received from both various public agencies and citizens.[40] Such summaries, which provide a written statement of citizen recommendations regarding individual planning documents, may influence the members of the policy-making subsystem. Yet although such citizen inputs seem of importance, it is impossible within the limits of this investigation to assess the impact which they have on the bureaucrats or Congressmen (or legislative aides) who read them. The assumption is that they do at least read them.

What is clear is that several problems beset the use of these summaries, as reflected in Katherine Warner's call for a "reviewable record" of public participation.[41] First, not all planning agencies produce such documentation. Second, no satisfactory standards have been established for what should be included in such summaries. For example, the LISS and SENE staffs made commendable efforts to summarize and respond directly to citizen recommendations, using

---

[40] See NERBC, People and the Sound--Supplement, pp. 216-221; NEREC, Report of the SENE Study, pp. RR-1 to RR-11.

[41] Warner, p. 10.

an outline format. However, their summaries could have been improved by separating the comments of the citizens from those of the reviewing agencies and by providing a more substantive discussion of the citizens' comments and the staffs' reactions to them. One danger is that such summaries may not supply later reviewers with enough information about citizens' views to make the information usable.

Such reviewable records of public involvement in these planning stages may permit citizens to influence indirectly subsequent decisions about these plans. Whether or not this occurs depends on the quality of the initial comments, the receptivity of the reviewers to the ideas expressed, and the basic adequacy of the written record provided. Further efforts are necessary to insure that the latter condition is met.

Thus, by both direct and indirect means citizens do at present participate in the formal enactment of water resources policies. The nature and the extent of this involvement, however, differs significantly from public participation in the earlier planning processes of given projects. In short, the participation phenomenon has not permeated the authorization and funding stages of policy-making to the extent that it has the initial planning ones. It may be in part responsible for some changes in current project-oriented water policies, such as their somewhat

greater concern for environmental and social costs. However, to date, genuine public involvement in these later stages of public policy-making has proven very limited and has not alleviated the basic deficiencies associated with the authorization and funding processes.

This is also true with regard to the impact of citizen participation during the implementation stage of policy-making. Citizen involvement at this point, often through the use of the courts, has proven to be a rather sporadic process, marked by uneven results. In some instances citizen suits have blocked what might reasonably be said to be projects of dubious value, yet the courts have tended both to defer to administrative expertise and to resolve cases along procedural lines.[42] These latter factors have limited citizen influence, as have the various technical restraints on judicial power, including the concepts of standing and stare decisis.[43]

Still other individuals become involved in the implementation stages of policy-making by staying in contact with either the agency performing the task or Congressmen with an interest in it. Although few authors have systematically studied the accomplishments of citizens who participate during the implementation process, it seems reasonable to

---

[42]Sax, p. 148.

[43]Murphy, pp. 353-355.

say that their involvement is also characterized by sporadic and uneven results.

Thus, citizen involvement in the authorization, funding, and implementation stages of policy-making has not, to date, significantly enhanced the accountability of the governmental members of the water policy subsystem or the quality of water resources policies. In this respect, the current beneficial effects of public participation in these later stages of policy-making, where it is more infrequent in timing and uneven in results, are not commensurate with those of citizen involvement in the earlier planning processes.

Enhancing the accountability of officials in the water policy subsystem. Increasing the opportunities for citizen participation offers one potential means for enhancing the accountability of the administrative and Congressional officials who control the authorization, funding, and implementation of water-related policies. Probably the most serious problem which has been mentioned above is the narrowness of the concerns which presently enter into and dominate these stages of the water resources policy-making process. Current policies are presently geared to the needs of certain agencies (organizational survival), constituent groups (money and jobs for the district), and particular clients (services at little cost). Just as it does in the

earlier planning processes, citizen participation provides a way of introducing a new and somewhat broader set of concerns, including long-neglected environmental and social ones, into these calculations. To fulfill this promise, however, the role of citizens during these later stages of policy-making must be enlarged. Given considerable public apathy, the centering of most high-level decision-making activities in Washington, and the closed, complex nature of the policy-making process, this cannot be readily achieved.

Citizen participation in these later stages of policy-making can and should be increased. Some expense, some inconvenience, and some dangers (since the citizens are not truly representative) will result, but not in any extreme degree.[44] The more serious obstacle is that public participation in these stages of policy-making seems likely to be highly limited, even at best, although it can be increased in several ways. These include (1) creating a Citizens Advisory Committee for Water Resources; (2) fostering contacts between citizens and Congressmen, such as by holding more public meetings outside of the nation's capital; (3) providing more general information to citizens about water policies and priorities; and (4) improving the documentation of citizen responses to earlier planning documents. The latter

---

[44]Ruth Ittner and Dorthee S. Pealy, "Citizen Participation; Search for Criteria," Washington Public Policy Notes, Institute of Governmental Research, University of Washington, Seattle, Wash., V (Spring 1977).

would require the creation of a more complete record of public comments than is now typically produced; more uniform guidelines for such summaries are needed. One possibility is that citizen advisors might themselves produce such a record. The citizens involved in the LISS, SENE, and CRBP programs made no such detailed, collective effort near the end of their respective studies, but then they were not asked to do so. The 1971 report by the Citizens Review Committee on the Connecticut River Comprehensive Study shows, given certain conditions, what is possible in this regard.[45] In general, such reforms would increase citizen influence in these later policy-making stages both by involving them more directly and attaching greater meaning and importance to their earlier inputs.

It also seems logical that as citizens participate more systematically in planning investigations, they will develop more interest in local and regional water resources programs. This heightened interest may spur their involvement in the subsequent authorization, funding, and implementation stages, making them more inclined to contact administrators and legislators about such concerns. Even given these developments, however, it is difficult to imagine increased participation overcoming many of the problems

---

[45] See the Report of the Citizen Review Committee, op. cit.

discussed above. It is more difficult to involve citizens here than it is in the earlier planning stages.

Significant improvement in this part of the water resources policy-making process and in the final policies themselves lies primarily in improving our traditional political institutions. This might be usefully pursued through a number of different ways, including (1) Congressional and election reform; (2) the establishment of a public advocacy agency; (3) a comprehensive, long-term approach to water policy-making; (4) emphasis upon environmental and social concerns in the training of water resources planners and engineers; (5) the reorganization and consolidation of the water-related executive agencies; and (6) more substantive involvement by the courts. In pursuing such reforms, care must be taken not to circumscribe unduly the powers of administrative decision-makers.

To summarize, citizen participation, despite its many limitations, offers a significant way of enhancing the accountability of water resources planners and of improving the quality of water-related plans. As participation has become more widespread in water resources planning in the 1970's, it has in turn had a generally positive effect on subsequent policy-making activities based upon these plans. It has brought forth additional information and additional perspectives for planners to consider and should, therefore,

be encouraged. However, citizen involvement in the later authorization, appropriation, and implementation stages of policy-making has not kept pace with the above developments. Further studies about public participation in these stages are needed, but it seems clear that it is highly restricted at present. Instead, these later stages are dominated by the senior administrators, key legislators, and other actors who comprise the water policy subsystem. All too often, these individuals fail to create policies which serve the interests of the public at-large. As seen above, many more specific problems can be identified.

Citizens play both direct and indirect roles in these later policy-making decisions, but highly limited ones. For example, their specific comments about given plans, made during the initial planning investigations, have less impact in these subsequent stages than is warranted. Insuring that an adequate reviewable record of such citizen inputs exists is one way of seeking to increase citizen influence here. Still other reforms, aimed at facilitating citizen involvement are required. In the end, however, public participation in authorization, funding, and implementation decisions is unlikely in and of itself to enhance significantly the accountability of the administrators and key legislators who comprise the water policy-making subsystem or to increase the quality of the final water resources policies. Other

types of political reforms, such as reorganization, are needed to achieve this end. Citizen participation, then, contributes to administrative accountability and responsible planning, but the full benefits of these developments are not likely to be realized unless accompanying reforms bring greater accountability to the later stages of water resources policy-making.

Citizen Participation and Bureaucratic Accountability: Conclusions

The above case-studies and discussions of citizen participation in water resources planning and decision-making encourage one to reflect at a more general level on bureaucratic power in public policy-making and the role that citizens can play in enhancing administrative accountability and responsible public policy. Again, however, certain cautions must be observed, for the roles played by administrators and citizen advisors may vary from one policy area to another. For example, the problems of administrative accountability seem especially severe in the realm of water resources because of (1) the power of the major agencies, (2) the low salience in some areas of the issues involved, (3) the highly fragmented nature of the decision-making structure, and (4) the technical nature of much of the enterprise. This suggests that water resources administrators enjoy greater autonomy than many of their counter-

parts in other policy areas. With regard to the role of citizens, similar differences occur. Citizen involvement appears more feasible in more compact, shorter-term, more locally-oriented programs, such as those dealing with Community Development, than in water resources policy-making. In contrast, it would seem far less practicable in the areas of foreign affairs and defense, where the need for secrecy has long been recognized by most observers, despite their disagreement over how much secrecy is desirable.[46]

Nevertheless, the above findings seem broadly applicable to most policy areas. The particular successes and failures of public participation have been, or may be, replicated in other fields. For example, citizen involvement in former War on Poverty programs and current Community Development programs has similarly suffered from problems of representativeness, role-definition, program structure, timing, lack of information, and parochialism.[47] The above examination, then, provides an appropriate basis for further discussion.

---

[46] Thomas Halper, Foreign Policy Crisis; Appearance and Reality in Decision Making (Columbus, Ohio: Charles E. Merrill Publishing Co., 1971), Chap. 1.

[47] Moynihan, op. cit.; little has been written about participation in the new Community Development programs, yet from this author's observations, many of these same problems still exist.

The impact of bureaucracy on policy formulation. The NERBC case-studies demonstrate the prominent, sometimes predominant, role that bureaucrats play in water resources planning and policy-making. Administrators are primarily responsible for determining what problems are studied and for conducting the planning investigations which form the foundation upon which water policies are built. Senior administrators are themselves important members of the political subsystem which controls the authorization and funding of water projects. Bureaucrats also dominate the implementation stage of policy-making. In general, these findings parallel the conclusions of most authors who have studied administrative involvement in policy formulation in other issue areas. Clearly, bureaucrats play a major role in public policy-making, regardless of substantive area.

Given the many pressures upon administrators to serve essentially private interests, this situation quite appropriately raises concerns among many observers. As Peter Woll argues, the growth of bureaucratic powers has fundamentally altered the American constitutional system by causing a breakdown in the primary mechanism--elections--which has traditionally limited the arbitrary power of government.[48] New or restored mechanisms are needed to enhance administrative accountability and to provide responsible public

---

[48]Peter Woll, American Bureaucracy, 2nd ed. (New York: W. W. Norton and Co., Inc., 1977), pp. 18-22.

policies which are responsive, effective, and lawful.

In seeking to design such mechanisms, however, one must consider the very indispensability of bureaucracy. As Woll states:

> Given the needs of modern government for economic regulation, specialization, continuity, and speed in the dispatch of business, to mention only a few, it is the bureaucracy that has stepped in to fill the gap created by the inability of other branches to fulfill all of these requirements.[49]

These developments have occurred concurrently in water resources, and other policy areas. Thus, in their pursuit of accountability and in their desires to limit bureaucratic discretion, observers must be careful not to destroy the vitality of these administrative organizations and with it that of American government itself. To be successful, proposed reforms must balance these two different sets of concerns. As demonstrated above, current efforts at increasing public participation in administrative decision-making offer one reasonable way of addressing these needs.

The effects of citizen participation on bureaucratic accountability. Within very real limits, the involvement of citizens in administrative policy-making activities in an advisory capacity increases bureaucratic accountability and the formulation of responsible public policies. Public participation is, however, certainly not a flawless mechanism

---

[49] Ibid., p. 248.

in this regard. Because of low turnout, the citizens who participate are usually not genuinely representative of the public at-large. Low-income, minority-group, and working-class individuals are often not adequately involved. Problems of role-definition, program structure, and limited information recur. The parochial interests of citizens may run contrary to the expertise of the administrators.[50] The timing of the citizen involvement usually proves sub-optimal. In addition, there exists the ever-present dangers that an influential group of citizens, in their quest for public services, may co-opt an agency into serving narrow interests or that an agency, in its quest for survival or aggrandizement, may manipulate a group of citizens. For example, Frauenglass maintains that a citizen advisory board is:

> often placed between the public and the agency and then used to promote management plans and proposals and to discharge public animosity toward the agency.[51]

The above case-studies, however, show that advisory groups are capable of serving more honorable purposes. In general, these various problems detract from, but do not destroy, the value of citizen participation as a means for enhancing accountability. In practice, no mechanisms for providing accountability function ideally; citizen participation is not atypical

---

[50] Wengert, p. 14.

[51] Frauenglass, pp. 492-493.

in this regard. In most aspects of government there is, in Curran's words, a "basic gap between political theory and political process."[52]

Despite its limitations, public participation serves in many ways to increase administrative accountability and the likelihood that public policies will be responsible ones. As discussed above, citizens contributed to the NERBC Studies by (1) supplying pertinent information about local conditions; (2) evaluating the methodological approaches, priorities, and assumptions of the planners; (3) raising broad, but related value questions; (4) calling the planners' attention to immediate problems; and (5) making the plans more politically acceptable. These inputs helped to increase the accountability of the administrators involved and to make the final LISS, SENE, and CRBP plans more responsive and effective. Other interested citizens have had, or can have, comparable impacts on planning or other administrative policy-making activities in water resources and other substantive areas. Moreover, as evidenced above, the involvement of citizen advisors in administrative policy-making activities complements other mechanisms for accountability.

Public policy-making, in its many stages, is a rather exclusive process. Virtually every policy area is dominated

---

[52]Curran, p. 37.

by a political subsystem with a limited membership, including bureaucratic actors. Unavoidably, the policies which result are limited by the perspectives, the desires, and the experiences of the administrators and other subsystem members. Citizen participation, while not truly representative, expands this process in a significant manner by encouraging the examination of additional important concerns which would otherwise not be considered. In the area of water resources, citizen participants have influenced planners and other policy-makers to pay greater attention to long-ignored environmental and social concerns. Similarly, citizens involved in various urban programs have urged planners and other policy-makers to take into account social concerns and the needs of minority groups, which received too little emphasis in the past.

In short, citizen participation provides an additional voice or group of voices, to a rather closed policy-making process. Thus, despite its many limitations, it increases the likelihood that administrative policy-makers will be motivated to serve the public at-large and that responsible public policies will result. This would be even more the case, if a broader range of people would participate, particularly during the later stages of policy-making. As Wengert observes, it is difficult to distinguish between the needs of clients or constituents and those of

the public at large.[53] Yet the distinction exists and must be recognized; citizen participation aids in insuring that the latter's needs are considered.

Enhancing accountability through participation and other means. Because of the varied problems associated with public participation, citizen involvement in administrative policy-making should be limited to an advisory role. The alternative, granting decision-making authority to citizens, would only replace other imperfect means of providing accountability with an equally flawed mechanism. An advisory and, hence, complementary role is more appropriate.

Within this framework some improvements in policy have been realized, although there is considerable room for improvement. Citizen participation is a rather uneven process within and among different policy areas. Some flexibility in the structure of public participation programs is appropriate to accommodate the demands of different fields, yet the present lack of uniform standards is unjustified. At present, as Doerksen and Pierce note, the situation "is one of change, jockeying for position, uncertainty, and conflict."[54] Overall, citizens have not been sufficiently integrated into the policy-making process, especially at the crucial authorization and funding stages.

---

[53] Wengert, p. 15.

[54] Doerksen and Pierce, op. cit.

A number of suggestions for improving this situation, thereby enhancing bureaucratic accountability and the quality of public policies, have been offered above. These include (1) expanding current public participation and public information programs; (2) setting more uniform standards for citizen involvement; (3) better defining the roles of citizen participants; (4) carefully and concisely documenting citizen comments; (5) training administrators to work cooperatively with citizens; and (6) establishing procedures to evaluate public participation strategies and techniques. A significant effort is needed to involve citizens in public policy-making in a more meaningful way.

The above has also shown, however, that there are various problems of administrative accountability, in water resources and in other policy areas, which citizen participation is incapable of rectifying. It cannot, for example, overcome the problems associated with a highly fragmented decision-making structure. For this reason, it seems appropriate to think of public participation as one of several interrelated means by which bureaucartic accountability and responsible public policy can be realized. It is generally compatible with the efforts to strengthen the accountability of administrators to the Congress, the President, the courts, and fellow professionals. Public participation should, therefore, be pursued along with, rather than instead of, these other means for providing bureaucratic accountability.

APPENDIX A

RESEARCH METHODOLOGY

In this examination of citizen participation in three major planning efforts undertaken by the New England River Basins Commission, the Long Island Sound Study, the Southeastern New England Study, and the Connecticut River Basin Program, a varied approach has been taken. It has included the following:

1. The examination of public participation materials and other publications of the New England River Basins Commission (NERBC) and its three studies. In particular, the author has focused on the draft and final plans of the three studies and the degree to which they reflect public comments. The respective staffs proved extremely cooperative in furnishing copies of all materials requested by the author.
2. The observation of numerous advisory group meetings and public meetings over a two-year period, as well as a review of minutes of earlier meetings which took place before the research began.
3. Interviews with NERBC staff members, members of the advisory groups associated with the studies, and other individuals involved in these projects.

Perhaps, even more importantly, the author spent a great deal of time conversing with these same individuals in an informal manner at the many different advisory and public meetings.

4. The administration of a survey to citizens attending the final series of public meetings to examine their background characteristics, their sources of information about the study, the degree of their involvement in the planning process, their evaluation of the public meetings, and their attitudes toward the draft plans produced by the three studies.

Since the latter survey proves the most unique of the research methods used in this study, a brief description of this research tool is in order. The questionnaire was designed and administered by a research team of which the author was a member. This research team, centered at the Institute for Man and Environment of the University of Massachusetts, was funded by a grant from the U.S. Department of the Interior, Office of Water Research and Technology, to Madge O. Ertel, the Principal Investigator. The questionnaire sought both demographic and attitudinal information from the citizens attending the final series of evening public hearings sponsored by the Long Island Sound Study (January 1975), the Southeastern New England Study (May and

June 1975), and the Connecticut River Basin Program (February and March 1976). They were held during the official 90-day review period for each study. A few additional items were added to the questionnaire following the LISS Study meetings.

The respondents, those who returned the questionnaire, completed it either before, during, or after that night's meeting. In the course of this survey, the members of the research team personally handed the questionnaires to the people attending, as they registered at the meeting entrance. Prearranged comments by the respective study managers at each meeting's beginning, the remarks made by the research team members at the time of distribution, and the instructions on the questionnaire itself all directed those citizens in attendance to complete the questionnaire and to return it to a research team member when leaving the auditorium.

The design for administering the survey was in itself experimental and contrasted with the use in similar studies of mailed questionnaires and responses. Dissatisfied with the typical return rates of these latter surveys, the author and the other researchers sought to achieve a higher rate of response by conducting the survey at the meetings, thereby broadening the data base of the study and including among the respondents people who would be unlikely to reply to a mailed questionnaire. By design, this process involved

an informational trade-off. The process called for a questionnaire shorter in length than those frequently used in mailed surveys, so as to allow ample opportunity for completion and not to detract from the presentations made at the meetings, yet one which could be expected to produce data more representative and more accurate than that compiled from mailed surveys. A sample of this questionnaire is included in Appendix B.

The number of respondents supports the above assumption that such a format will produce a high rate of response. Some 1118 people out of a combined audience of about 1400 attendees returned the questionnaire, for a response rate of 80%. It seems reasonable to infer from this figure that the information provided by this survey is more representative than that which would have been received by means of a mailing process. The fact remains, however, that one person in five did not return a questionnaire, despite the efforts of the research team mentioned above. This figure bears examination, although the explanations offered are quite impressionistic. Included in this number are most newsmen, many of whom told the researchers that they felt it inappropriate to answer the questionnaire. Confusion about the questionnaire or the process, the constraints of time, and even the use of the questionnaire for note-taking during the meeting account for other non-returns. One may also

speculate that some people identified the survey with the NERBC Studies themselves or with their own previous survey efforts and, because of dissatisfaction with the plans or because they had filled out a questionnaire in the past, chose not to respond. Finally, it appears that some people resist surveying because they resent the intrusion, fail to see merit in the venture, or have other reasons. In summary, however, there is no firm evidence to suggest that any particular groups of people have been excluded from the data base.

APPENDIX B

PUBLIC MEETING QUESTIONNAIRE

Southeastern New England Study

This questionnaire is part of a study being conducted by a research team from the University of Massachusetts. The purpose of the project is to evaluate the effectiveness of the Southeastern New England Study's public participation program. Your answers to these brief questions will be very helpful. All individual responses will be kept strictly confidential. You need not sign the questionnaire, but feel free to add any additional comments if you wish.

Please complete the questionnaire while you are at this meeting and return it to a member of the research team as you leave. Your cooperation is greatly appreciated.

1. How did you hear about tonight's public meeting (Check as many as apply)?

   _____I read about it in the newspaper
   _____I heard about it on radio or T.V.
   _____I received a copy of the newspaper "How to Guide Growth in Southeastern New England" in the mail
   _____Someone told me about the meeting
   _____I saw someone else's copy of "How to Guide Growth in Southeastern New England."

2. How many other public meetings or hearings on <u>any</u> public issues have you attended in the last year?

   _____0
   _____1-5
   _____5 or more

3. Before you heard about this meeting, did you already know something about the SENE Study?

   _____Yes _____No

If so, how did you hear about the Study in the past?

_____I attended a past public meeting held by the SENE Study
_____I attended a meeting sponsored by another group where I heard about the Study
_____I received a letter from the SENE staff
_____I read about the Study in the newspaper
_____I heard about the Study on radio or T.V.

4. Which of the statements below describe your reasons for coming to this meeting? Please rank them according to their importance to you (Most important = 1, Second Most Important = 2, etc. Leave blank those which do not apply.)

_____I am a member of a governmental body
_____I have public agency responsibility
_____I am a member of an interested private community organization
_____I have an industrial or commercial interest in the Study's recommendations
_____I have a personal interest, but am not affiliated with any of the above

5. Are you a member of the Citizen Advisory Committee or the Regional Scientific Task Force?

_____Yes _____No

6. Are you a member of a Basin Advisory Committee?

_____Yes _____No

7. Do you hold an elective or appointed office in government?

_____Yes _____No

If "yes," at what level?

_____Town
_____City
_____County/Regional
_____State
_____Federal

8. What is your educational background?

_____High school or less
_____Some college or college degree
_____Graduate work

9. What is your approximate family income?

_____Under $8,500
_____$8,500-$13,000
_____$13,000-$20,000
_____Over $20,000

10. Have you read the summary of the SENE Report "How to Guide Growth in Southeastern New England?"

_____All of it
_____Part of it
_____None of it
_____I never received or saw a copy

11. Have you seen and/or read a copy of the full Report of the Study?

_____Yes _____No

If "yes," where?

_____Town hall
_____Local library
_____I received one in the mail
_____Someone else showed it to me

12. Have you ever personally discussed the Southeastern New England Study with a member of its Citizen Advisory Committee?

_____Yes _____No

13. Have you ever personally discussed the Southeastern New England Study with a member of its staff?

_____Yes _____No

14. Which of the following has most influenced your opinions on the SENE Study? (Most Important = 1, Second Most Important = 2, etc.)

_____Newspaper, radio or T.V. coverage
_____Public meeting presentations
_____Personal contacts with SENE Study Advisory Committee members
_____Personal contacts with the Study's staff
_____Knowledge of the problems discussed in the Study

15. Do you feel that you know enough about the Study to be able to offer comments at tonight's meeting?

_____Yes _____No

16. Do you feel that you have had an adequate opportunity to express your opinions regarding the Southeastern New England Study's Report?

_____Yes _____No

17. Do you feel that the Southeastern New England Study has considered the opinions expressed at previous public meetings (if you attended any)?

_____Yes
_____No
_____To some extent

18. Does the SENE Report sufficiently reflect the needs and preferences of your community?

_____Yes
_____No
_____To some extent

19. Planning decisions concerning the use of land and water resources should be made primarily at the

_____Local level
_____Regional level
_____State level
_____Inter-state level
_____Local level with broad state guidelines
_____Federal level

20. What is your general opinion of the Report produced by the Southeastern New England Study?

_____Very much approve
_____Approve
_____Undecided
_____Disapprove
_____Very much disapprove

21. In which of the following concerns are you the <u>most</u> interested?

_____Environmental concerns
_____Industrial or commercial concerns
_____Concerns for private property
_____Concerns for community betterment
_____Recreational concerns

22. Do you feel that the Study's recommendations will be affected by the opinions expressed tonight?

_____Yes
_____No
_____To some extent

<u>Optional Comments</u>:

WORKS CITED

Books, Articles, and Reports

Allison, Graham T. The Essence of Decision: Explaining the Cuban Missile Crisis. Boston: Little, Brown and Company, 1971.

Almond, Gabriel A. and Sidney Verba. The Civic Culture. Princeton: Princeton University Press, 1963.

Appleby, Paul. Policy and Administration. University, Ala.: University of Alabama Press, 1949.

Arnstein, Sherry R. "A Ladder of Citizen Participation." Journal of the American Institute of Planners, XXXV (July 1969), pp. 216-224.

Bachrach, Peter. The Theory of Democratic Elitism: A Critique. Boston: Little, Brown and Company, 1967.

Berger, Bernard B. "Citizen Participation on Comprehensive River Basin Planning." Printed in the Federal Register, Tuesday, December 21, 1971, Vol. 36, No. 245, Part II. Presented at the Conservation Foundation's Environmental Forum, Washington, D.C., March 9, 1972.

Bishop, Bruce A. Structuring Communications Programs for Public Participation in Water Resources Planning. Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, May 1975.

Bolle, Arnold. "Public Participation and Environmental Quality." Natural Resources Journal, XI (July 1971), pp. 497-505.

Borton, Thomas E., Katherine P. Warner, and William J. Wenrich. The Susquehanna Communication-Participation Study. Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, IWR Report 70-6, December 1970.

Brown, David S. "The Management of Advisory Committees: An Assessment for the 1970's." Public Administration Review, XXXII (July/August 1972), pp. 334-342.

Bureau of Land Management. "Public Participation in the Environmental Assessment Process: Training Session Notebook." Washington, D.C., 1974.

Citizens' Advisory Committee on Environmental Quality. Report to the President and to the Council on Environmental Quality. Washington, D.C., December 1975.

Coates, R. "Why Public Participation is Essential in Technology Assessment." Public Administration Review, XXXV (January/February 1975), pp. 67-69.

Cole, Richard L. Citizen Participation and the Urban Policy Process. Lexington, Ma.: D. C. Heath and Co., 1974.

Connecticut River Basin Coordinating Committee. Connecticut River Basin Comprehensive Water and Related Land Resources Investigation. October 1970.

Curran, Terrence P. "Water Resources Management in the Public Interest." Water Resources Bulletin, VII (February 1971), pp. 33-39.

Dahlgren, Charles W. Public Participation in Water Resources Planning: A Multi-Media Course. Professional Development Paper 72-1. Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, April 1972.

Davidoff, Paul. "Working Toward Redistributive Justice." Journal of the American Institute of Planners, XLI (September 1975), pp. 317-318.

Davis, Adam, Jill Anderson, and Richard Gough. Alternative Information and Interaction Approaches to Public Participation in Water Resources Decision-making; A Statement of the Arts Report. Raleigh, N.C.: Water Resources Research Institute, University of North Carolina, Report No. 106, April 1975.

Delli Priscoli, Jerry. "Citizen Advisory Groups and Conflict Resolution in Regional Water Resources Planning." Water Resources Bulletin, XI (December 1975), pp. 1233-1243.

_____. Public Participation in Regional Level B Water Resources Planning; A Preliminary View. Washington, D.C.: Water Resources Council, Sepcial Consulting Report, October 1974.

Derthick, Martha. Between State and Nation: Regional Organizations of the United States. Washington, D.C.: the Brookings Institution, 1974.

Dixon, John. "How Can Public Participation Become Real?" Public Administration Review, XXXV (January/February 1975), pp. 69-70.

Doerksen, Harvey R. and John C. Pierce. "Citizen Influence in Water Policy Decisions: Context, Constraints, and Alternatives." Water Resources Bulletin, XI (October 1975), pp. 953-964.

Douglas, William O. "The Corps of Engineers: the Public Be Damned!" In Walt Anderson, ed., Politics and Environment. Pacific Palisades, Ca.: Goodyear Publishing Co., 1970, pp. 268-284.

Drew, Elizabeth B. "Dam Outrage: The Story of the Army Engineers." In Stephen E. Ambrose and James A. Barber, Jr., eds., The Military and American Society. New York: The Free Press, 1972, pp. 274-295.

Dye, Thomas R. Understanding Public Policy. 2nd ed. Englewood Cliffs, N.J.: Prentice Hall, Inc., 1975.

Dynes, Russell R. and Dennis Wenger. "Factors in the Community Perception of Water Resources Problems." Water Resources Bulletin, VII (August 1971), pp. 644-651.

Elazar, Daniel J. American Federalism: A View From the States. New York: Thomas Crowell Co., 1972.

Environmental Protection Agency. "Public Participation in EPA's Water Pollution Control Activities; EPA Guidelines." Managing the Environment, Washington, D.C., 1973.

Ertel, Madge O. The Role of Citizen Advisory Groups in Water Resources Planning. Amherst, Ma.: Water Resources Research Center, University of Massachusetts, August 1974.

_____, and Stuart G. Koch. Citizen Participation in Comprehensive Water Resources Planning. Amherst, Ma.: Water Resources Research Center, University of Massachusetts, August 1976.

"Executive Order 11514; Protection and Enhancement of Environmental Quality." March 5, 1970. In Environmental Quality; Third Annual Report of the Council on Environmental Quality. Washington, D.C., 1972, Appendix D.

Fantini, Mario, Marilyn Gittell, and Richard Magat. Community Control and the Urban School. New York: Praeger Publishers, Inc., 1970.

Flathman, Richard. The Public Interest. New York: John Wiley and Sons, Inc., 1966.

Frauenglass, Harvey. "Environmental Policy: Public Participation and the Open Information System." Natural Resources Journal, XI (July 1971), pp. 489-496.

Frederickson, H. George. "Organizational Theory and the New Public Administration." In Fred A. Kramer, Perspectives on Public Administration. Cambridge, Ma.: Winthrop Publishers, Inc., 1973, pp. 185-200.

Fredrich, Augustine J. "Public Participation--Poison, Placebo, or Panacea." Unpublished paper presented at the ASCE Specialty Conference on "A Better Life through Water Resources Planning and Management," Fort Collins, Colorado, July 9-11, 1975.

Fried, Robert C. Performance in American Bureaucracy. Boston: Little, Brown and Company, 1976.

Friedrich, Carl J. Man and his Government. New York: McGraw-Hill, 1963.

_____. "Public Policy and the Nature of Administrative Responsibility." Reprinted in Francis Rourke, ed., Bureaucratic Power in National Politics. 2nd ed. Boston: Little, Brown and Company, 1972, pp. 316-325.

Fritschler, A. Lee. Smoking and Politics: Policymaking and the Federal Bureaucracy. 2nd ed. Englewood Cliffs, N.J.: Prentice-Hall, Inc., 1975.

Gallagher, Dorothy. "The Collapse of the Great Teton Dam." The New York Times Magazine, September 19, 1976, pp. 16, 95-103, 108.

Geerdes, Jenene. "Communications Aspects of the Long Island Sound Study." Unpublished Master's Thesis, Graduate School of Corporate and Political Communication, Fairfield University, June 1975.

Gittell, Marilyn. Participants and Participation. New York: F. A. Praeger, 1967.

Goodman, Robert. After the Planners. New York: Simon and Schuster, 1973.

Green, Mark J., James M. Fallows, and David R. Zwick. Who Runs Congress? New York: Bantam Books, 1972.

Gregorka, David A. The Citizen Participation Program of the Maumee River Basin Level B Study. Ann Arbor, Mich.: Water Resources Management Program, University of Michigan, 1974.

Halper, Thomas. Foreign Policy Crisis: Appearance and Reality in Decision Making. Columbus, Ohio: Charles E. Merrill Publishing Company, 1971.

Hanchey, James R. Public Involvement in the Corps of Engineers Planning Process. Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, IWR Report 75-R4, October 1975.

Harris, Joseph P. Congressional Control of Administration. Washington, D.C.: The Brookings Institution, 1964.

Hart, David K. "Theories of Government Related to Decentralization and Citizen Participation." Public Administration Review, XXXII (September 1972), pp. 421-428.

Hoggan, David H., et al. A Study of the Effectiveness of Water Resources Planning Groups; A Final Report. Logan, Utah: Utah Water Research Laboratory, Utah State University, March 1974.

Ingram, Helen. "Patterns of Politics in Water Resources Development." Natural Resources Journal, XI (January 1971), pp. 102-118.

Ittner, Ruth and Dorothee S. Pealy. "Citizen Participation: Search for Criteria." Washington Public Policy Notes, Institute of Governmental Research , University of Washington: Seattle Wash. V (Spring 1977).

James, L. Douglas. "Formulation of Nonstructural Flood Control Programs." Water Resources Bulletin, XI (August 1975), pp. 688-705.

Kahle, R. and R. L. Lee. A Q-Methodological Study of Attitudes Toward Water Resources and Implications for Using Mass Media in Dissemination of Water Research Results. Columbia, Mo.: Water Resources Research Center, University of Missouri, 1974.

Katznelson, Ira and Mark Kesselman. The Politics of Power New York: Harcourt, Brace, Jovanovich, Inc., 1975.

Kaufman, Herbert. "Administrative Decentralization and Political Power." Public Administration Review, XXIX (January/February 1969), pp. 3-15.

Keene, John and Ann Louise Strong. "The Brandywine Plan." Journal of the American Institute of Planners, XXXV (January 1970), pp. 50-58.

Koelzer, Victor A. "A Proposed National Organizational Structure for Water Resources Planning." Water Resources Bulletin, IX (February 1973), pp. 167-180.

Kotler, Milton. Neighborhood Government: The Local Foundation of Political Life. Indianapolis: The Bobbs-Merrill Co., Inc., 1969.

Lambright, William H. Governing Science and Technology. New York: Oxford University Press, 1976.

Lane, Robert E. Political Ideology. New York: The Free Press, 1963.

The League of Women Voters Educational Fund. The Big Water Fight. Brattleboro, Vt.: The Stephen Greene Press, 1966.

Long, Norton. The Polity. Chicago: Rand McNally, and Co., 1962.

Maass, Arthur. "Congress and Water Resources." In Francis Rourke, Bureaucratic Power in National Politics. 2nd ed. Boston: Little, Brown and Co., 1972, pp. 139-152.

Mainzer, Lewis C. Political Bureaucracy. Glenview, Ill.: Scott, Foresman and Co., 1973.

Mazmanian, Daniel A. "Citizens and the Assessment of Technology: An Examination of the Participation Thesis." Paper prepared for delivery at the 1974 Annual Meeting

of the American Political Science Association, Palmer House, Chicago, Ill., August 29-September 2, 1974.

_____, and Mordecai Lee. "Tradition be Damned! The Army Corps of Engineers Is Changing." Public Administration Review, XXXV (March/April 1975), pp. 166-172.

Milbreath, Lester. An Extra Dimension of Representation in Water Resources Planning: A Survey Study of Erie and Niagara Counties. Buffalo: State University of New York, 1976.

Miller, S. M. and Martin Rein. "Participation, Poverty and Administration." Public Administration Review, XXIX (January/February 1969), pp. 15-25.

Mogulof, Melvin B. Citizen Participation: The Local Perspective. Washington, D.C.: The Urban Institute, March 1970.

Moreell, Ben. Our Nation's Water Resources--Policies and Politics. Chicago: The Law School, University of Chicago, 1956.

Morley, C. G. "Public Participation; A Right to Decide." In Agassiz Center for Water Studies, The Allocative Conflicts in Water-Resource Management. Winnipeg: University of Manitoba, 1974, pp. 513-524.

Mosher, Frederick. Democracy and the Public Service. New York: Oxford University Press, 1968.

Moynihan, Daniel P. Maximum Feasible Misunderstanding: Community Action in the War on Poverty. New York: The Free Press, 1969.

Murphy, Walter F. "The Framework of Judicial Power." In Alan Shank, American Politics, Policies, and Priorities. Boston: Holbrook Press, Inc., 1974, pp. 348-360.

National Water Commission. Water Policies for the Future; Final Report to the President and to the Congress of the United States by the National Water Commission. Washington, D.C.: U.S. Government Printing Office, June 1973.

Nelson, Ron. "Level B Water Resources Planning in an Urban Setting." Water Resources Bulletin, XI (June 1975), pp. 605-612.

Neustadt, Richard E. Presidential Power. New York: John Wiley and Sons, Inc., 1960.

Ortolano, Leonard. Water Resources Decision-making on the Basis of the Public Interest. Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, February 1975.

Pateman, Carole. Participation and Democratic Theory. Cambridge: Cambridge University, 1970.

Paulette, R. G. and W. R. Klatt. "Water Resource Management; Planning for Action." Water Resources Bulletin, X (April 1974), pp. 384-388.

Pitkin, Hanna. The Concept of Representation. Berkeley: University of California Press, 1967.

Powell, Norman J. Responsible Public Bureaucracy in the United States. Boston: Allyn and Bacon, Inc., 1967.

"Preserving the Future of Long Island Sound." Hearings before the Subcommittee on Executive Reorganization and Government Research of the Committee on Government Operations. U.S. Senate, on S.2472, U.S. Government Printing Office, Washington, D.C., 1970.

Ragan, James F. Public Participation in Water Resources Planning: An Evaluation of the Programs of 15 Corps of Engineers Districts. Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, IWR Report 75-6, November 1975.

Reagan, Michael D. "Policy Issues: The Interaction of Substance and Process." Polity, I (Fall 1968), pp. 35-51.

Report of the Citizens Review Committee of the Connecticut River Basin Comprehensive Water and Related Land Resources Investigation to the New England River Basins Commission. Boston, February 1, 1971.

Riedel, James A. "Citizen Participation: Myths and Realities." Public Administration Review, XXXII (May/June 1972), pp. 211-220.

Rourke, Francis E. Bureaucracy, Politics, and Public Policy. Boston: Little, Brown, and Company, 1969.

Sargent, Howard L. "Fishbowl Planning Immerses Pacific Northwest Citizens in Corps Projects." Civil Engineering, XLII (September 1972), pp. 54-57.

Sax, Joseph L. Defending the Environment: A Strategy for Citizen Action. New York: Alfred A. Knopf, 1971.

Schultz, Charles E. The Politics and Economics of Public Spending. Washington, D.C.: The Brookings Institution, 1968.

Schumpter, Joseph. Capitalism, Socialism and Democracy. New York: Harper and Row, 1962.

Selznick, Philip. TVA and the Grass Roots. Berkeley: University of California Press, 1949.

Shanley, Robert A. Attitudes and Interactions of Citizen Advisory Groups and Governmental Officials in the Water Resources Planning Process. Amherst, Ma.: Water Resources Research Center, University of Massachusetts, August 1976.

Sharkansky, Ira. Regionalism in American Politics. Indianapolis: Bobbs-Merrill and Co., 1970.

Strange, John H. "The Impact of Citizen Participation on Public Administration." Public Administration Review, XXXII (Special Issue, September 1972), pp. 457-470.

Thomas, Norman. Rule 9: Politics, Administration, and Civil Rights. New York: Random House, 1966.

Tinkham, Lester A. "The Public's Role in Decision-making for Federal Water Resources Development." Water Resources Bulletin, X (August 1974), pp. 691-696.

Tucker, Richard C. "Planners As A 'Public' in Water Resources Public Participation Programs." Water Resources Bulletin, VIII (April 1972), pp. 257-265.

United States Council on Environmental Quality. "Preparation of Environmental Impact Statements--Guidelines." Federal Register, Vol. 38, No. 147, Part II, August 1, 1973, pp. 20550-20561.

United States House Committee on Merchant Marine and Fisheries, Report on the Coastal Zone Management Act, 92nd Congress, 2nd Session, House Report 92-1544, May 5, 1972.

United States Senate Commerce Committee. Report on the Coastal Zone Management Act. Report 92-753, 92nd Congress, 2nd Session, April 19, 1972.

United States Senate Committee on Public Works. Report on the Federal Water Pollution Control Act Amendments of 1971. 92nd Congress, 1st Session, Senate Report No. 92-414, October 28, 1971.

United States Senate. Hearings of the Subcommittee on Air and Water Pollution of the Committee on Public Works, 92nd Congress, 1st Session, March 18, 1971, in Water Pollution Control Legislation--1971, Part 2.

United States Water Resources Council. "Principles and Standard for Planning Water and Related Land Resources." Federal Register, Vol. 38, No. 174, Part III, Washington, D.C., September 10, 1973.

Wagner, Thomas R., and Leonard Ortolano. "Analysis of New Techniques for Public Involvement in Water Planning." Water Resources Bulletin, XI (April 1975), pp. 329-344.

Warner, Katherine P. Public Participation in Water Resources Planning. Arlington, Va.: National Water Commission, July 1971.

Wengert, Norman. "Where Can We Go with Public Participation in the Planning Process." Social and Economic Aspects of Water Resources Development. Proceedings of the 1971 National Symposium of the American Water Resources Association, Ithaca, New York, June 21-23, 1971, pp. 9-17.

Widditsch, Ann. Public Workshops on the Puget Sound and Adjacent Waters Study: An Evaluation. Ft. Belvoir, Va.: U.S. Army Corps of Engineers, Institute for Water Resources, IWR Report 72-2, June 1972.

Wildavsky, Aaron. The Politics of the Budgetary Process. Boston: Little, Brown and Co., 1964.

Wilson, Raymond H. Toward a Philosophy of Planning: Attitudes of Federal Water Planners. EPA Report No. R5-73-015. Washington, D.C.: U.S. Government Printing Office, 1973.

Wolff, Robert D. Involving the Public and the Hierarchy in Corps of Engineers' Survey Investigations. Stanford, Ca.: Dept. of Civil Engineering, Stanford University, 1971.

Woll, Peter. American Bureaucracy. 2nd ed. New York: W. W. Norton and Co., Inc., 1977.

_____. "Bureaucrats as Policymaking Agents." In John M. Nickerson, Roy W. Shin, and Robert Teachout, eds., A Study of Policymaking. Berkeley: McCutchan Publishing Corp., 1971.

NERBC Publications and Study Documents

Connecticut River Basin Program, Local Perspectives on Flood Management Planning in the Connecticut River Basin: Report on Phase 2 Local Meetings. November 30, 1974.

_____. "Memorandum from the SAG Chairman: SAG's Mission and Effectiveness." July 5, 1973.

_____. "Reports on the CAG and SAG Meetings."

_____. The River's Reach: A Plan for Flood Damage Reduction and Flood Plain Management in the Connecticut River Basin--90 Day Public Review Draft, December 1975.

_____. "The River's Reach: Report on Public Response." Presented at the Quarterly Meeting of the New England River Basins Commission, Boston, March 31, 1976.

Dakin, Janet W. (Chairman, CRBP Public Information Committee) "Report to the CAG on the Phase One Forums," December 14, 1973.

Long Island Sound Study. "CAC Comments on the LISS Draft Plan." CAC Memorandum No. 75-15, February 25, 1975.

_____. Citizen Advisory Committee. "Goals for the Region" Report, CAC Memorandum No. 74-14, November 1973.

_____. Citizen Advisory Committee Memorandum, No. 74-16, November 27, 1973.

_____. Memorandum No. 75-27, from Frank Gregg, Chairman of NERBC, April 11, 1975.

_____. "Minutes of the CAC Meetings."

_____. "Minutes and Prepared Statements of Public Meetings," January 1975.

_____. "Minutes of the R/PAC Meetings."

_____. People and the Sound; Draft Main Report of the Long Island Sound Regional Study (November 1974).

_____. "Report of the Public Workships of May/June 1973." August 21, 1973 (draft), and October 19, 1973 (final).

_____. "Results of Opinion Poll conducted by the LIS Regional Study," July 9, 1974.

_____. "Selected Newsclips of the Spring 1974 Public Meetings," May 31, 1974.

_____. The Urban Sea, "People and the Sound; A Plan for Long Island Sound." Fall 1974; earlier issues appeared in Summer 1973, Fall 1973, and Spring 1974.

McHugh, J. L. and H. M. Austin. "Prospects for Managing the Fisheries of Long Island Sound." Unpublished paper presented at a December 1973 R/PAC Seminar, sponsored by the Long Island Sound Study.

New England River Basins Commission. 1975 Annual Report. Boston, 1975.

_____. The NERBC 1980 Connecticut River Basin Plan. Boston, January 1, 1972.

_____. People and the Sound: Land Use. Boston, 1975.

_____. People and the Sound: Marine Transportation. Boston, 1975.

_____. People and the Sound. A Plan for Long Island Sound: Summary, Supplement (Vol. 2), and Ten Planning Reports. Boston, July 1975.

_____. Plan of Study: Long Island Sound Regional Study. Boston, August 1, 1971.

_____. Report of the Southeastern New England Study: Summary, Regional Report (with Environmental Statement), and Ten Planning Area Reports. Boston, December 1975.

_____. "SENE and the Connecticut River Diversions." Memorandum, July 29, 1976.

_____. Southeastern New England Water and Related Land Resources Study: Plan of Study. Boston, April 1972.

_____. "A State-Federal Partnership." (undated pamphlet)

Southeastern New England Study. "Citizen Preferences for Solutions." Sent with a Memorandum to SMT, May 24, 1974.

_____. "Goals and Objectives for the Southeastern New England Study." Memorandum from the CAC and R/STF, May 1974.

_____. How to Guide Growth in Southeastern New England: The Draft Report of the Southeastern New England Water and Related Land Resources Study (May 1975).

_____. "How to Guide Growth in Southeastern New England: A Management Proposal for Public Discussion." May 1975.

_____. "Minutes of the Quarterly Meetings of CAC and R/STF."

_____. "Minutes of the Third Series of Public Workshops Commenting on the 90 Day Review Draft," May/June 1975.

_____. "Progress Report; September 1972 to September 1973" (1973).

_____. "Report of the Interim Citizens Advisory Committee," 1971.