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Decentralization of Agriculture

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American agriculture has long been a bellwether policy arena. Although the farm sector has rarely been a "model" policymaking force, changes in its structure and performance have often indicated emerging trends in the general domestic arena. During the first half of the nineteenth century, agricultural interests played a front-line role in determining the issues and overall direction of American public policy. Land policies, monetary issues, tariffs, and internal improvements reflected the primary concerns of an increasingly commercialized rural society. But even during that era of agricultural policy preeminence, the politics of the farm sector provided a clear sign of future policy trends. Deep divisions between farmers of the North and the South grew increasingly violent, culminating in the battles over "bloody Kansas," which were but a precursor of the greater national division to come.

In post-Civil War America, farmers were the first to organize as a political force against corporate monopolies, railroads, and other "public utilities." Indeed, the agrarian reform movements predated the Populist and Progressive movements that swept the nation. Then, just as the Populist fever reached its height in the first decade of the twentieth century, the agricultural policy arena established the foundations for "interest group liberalism." Theodore J. Lowi wrote that "agriculture policy set the pattern of organizing the government along pluralist lines."¹ It was a pattern of subsystem policymaking that spread through the political system and reached its peak during the 1960s.

Even more recently, trends in the agricultural policy arena appear to have foreshadowed significant changes in the American policy system. Beginning in the early 1960s, the role of "outsiders" was felt in various farm policy subsystems. These intervenors drew public attention to a number of farm issues affecting the health and well-being of the general public. The surgeon general's report

¹ Theodore J. Lowi, *The End of Liberalism: The Second Republic of the United States*, 2d ed. (New York: W.W. Norton and Co., 1979), p. 67.

on cigarette smoking and lung cancer, Rachel Carson's *Silent Spring*, and the work of Ralph Nader and other consumerists provided a basis for what would become a "new agenda" in the agricultural policy arena.

Analysts of this new agenda and the "new politics of food," which accompanied it, have cautiously suggested that the agenda might herald the demise of the powerful agricultural policy subsystem. In 1976, one analyst observed that "the present constellation of macro-political and economic factors has, at least temporarily, displaced the traditional farm policy subsystem in farm policy-making."² Indeed, there is a consensus among analysts that the once unchallengeable agricultural policy subsystem has been significantly weakened over the past fifteen years. If, as in the past, what occurs in agriculture proves to be a harbinger of what happens in the larger domestic policy arena, then new agendas and new politics would be anticipated in commerce, labor, and other bastions of interest-group liberalism.

But by all indications this has not been the case. Agricultural policy subsystems seem to have survived the new politics and may have even expanded their influence into issue areas that had not been within their domain. They survived by responding to the stimulus provided by the intervenors and by taking advantage of their indifference to the details of program implementation. The crucial survival resource at the disposal of farm producers was the decentralized nature of their economic, political, and policy structures. This essay examines how those decentralized features facilitated a "successful" response to the challenge of the new politics movement. Special attention is given to the case of pesticide regulation, which offers a clear example of how the traditional subsystems have maintained their leverage despite significant challenges. However, it is first necessary to describe the decentralization factor in agriculture, for it plays a key role both in the decline of farm-sector influence and in the agricultural community's recent rejuvenation and response to the challenges of environmentalists, consumerists, the hunger lobby, and other intervenors.

The Decentralization Factor

In broad terms, *decentralization* is a condition of social interaction wherein there is a high participation by individuals and groups in the decision-making process relative to the total number of people involved.³ This definition describes the American agricultural community in three key areas — economics, politics, and policy implementation. Even more significant, the decentralized structure of these three areas of farm-sector activity are interrelated and form a

² Garth Youngberg, "U.S. Agriculture in the 1970s: Policy and Politics," in *Economic Regulatory Policies*, ed. James E. Anderson (Lexington, Mass.: Lexington Books, D.C. Heath and Co., 1976), p. 65.

³ Cf. Jerald Hage, *Theories of Organizations: Form, Process, and Transformation* (New York: John Wiley and Sons, 1980), p. 65.

strong foundation for the community's responses to new challenges and changing conditions.

The lack of a centralizing concentration in the marketplace is perhaps the fundamental characteristic of American agriculture. In spite of recent signs of increasing concentration, the market for farm products remains fragmented and relatively open. The differences among commodity markets remain strong enough to preclude any sustained attempt to coordinate or control a significant portion of farmers. For example, although wheat producers may have many goals and problems in common, they contend with conditions and pressures that differ considerably from those facing cattle ranchers. This fragmentation is exacerbated by the high level of competition among individual producers within many of those commodity markets.

Market fragmentation is reflected in the decentralized political structure of the farming community. Although there are several major general farm organizations, such as the American Farm Bureau Federation and the National Farmers Union, most analysts agree that commodity-based interest groups like the National Association of Wheat Growers and the National Cattleman's Association are the prevalent and most powerful representatives of agriculture within the policymaking system. This horizontal dispersion of farm-sector political power is complicated by the existence of geographic and other divisions that further dissipate their potential influence. Each state's farm producers, for example, tend to organize their own lobbying groups to promote their specific interests, while other organizations form in order to protect farmers' interests in government programs, such as soil conservation and rural electrification.

Given the structure of the political and economic orders of agriculture, it is not surprising that most public-sector farm programs have been designed to fit a decentralized pattern. Within the major price-support programs, policy implementation is organized around specific commodities. For instance, the federal government's Flue-Cured Tobacco Cooperative Stabilization Corporation is the major institutional mechanism for tobacco price supports. The U.S. Department of Agriculture's Commodity Credit Corporation (CCC) is used to support dairy and grain prices, but even within this organization the process varies from commodity to commodity. Thus, while it purchases milk and other dairy products at an announced price, the CCC provides low-interest "nonrecourse" loans as a means of supporting wheat and cotton prices.

Beyond these general commodity program divisions, however, is a policy implementation system that transcends commodity subsystems and reaches farmers directly. CCC programs are actually administered by the Agricultural Stabilization and Conservation Service (ASCS), which relies heavily on county, state, and regional offices. According to Bruce L. Gardner: "The county-level organizations, each of which is in charge of three to five committeemen elected by the farmers, are at the heart of the system. . . . The county ASCS committees have broad powers, within guidelines set at the national level, to determine compliance with respect to [specific commodity program decisions]. . . . These

determinations often make a great deal of financial difference to participating farmers, and the committees are sometimes inconsistent and not always well informed in making their judgements."⁴

This ASCS implementation structure typifies the producer-oriented programs throughout the USDA. The Soil Conservation Service, the Agricultural Conservation Program (part of the ASCS), the Farmers' Home Administration, the Rural Electrification Administration, and even the Forest Service reach almost every rural community. Each is built on a model that Theodore J. Lowi dated back to the establishment of Agriculture Extension Service "local committees" mandated under the Smith-Lever Act of 1914.⁵ Offshoots of this model include the American Farm Bureau Federation and, indirectly, interest group liberalism itself.

From the farming community's perspective, the policy system emerging from these decentralized economic and political implementation arrangements has generated substantial benefits. For many years farmers have been able to determine when and how the government intervened in their affairs. More important, the decentralized implementation of most USDA programs allowed farmers to adapt general national policy directives to their specific problems and needs. It has, therefore, been easy for the farm sector to accept—or, as some would argue, to control—USDA programs and to become increasingly attached to their policymaking subsystems.

Ironically, that strong attachment may have been a major cause of the farm sector's political problems during the 1960s and 1970s. The efforts of consumerists, environmentalists, hunger lobbyists, and other outside intervenors to create a new agenda for agriculture were facilitated by the closed, decentralized agricultural subsystem and by the farm sector's growing inability to respond to external intervenor challenges in the national political arena. The successful decentralization of agricultural politics and policy implementation had created an agricultural power vacuum in Washington that the intervenors easily filled. Farmers found that in many key policymaking arenas farm producers were unable to generate sufficient opposition to well-organized challenges. Having "specialized" their political resources to fit the needs of narrowly defined policy subsystems, farmers were not able effectively to counter the opposing efforts in the media, the White House, or in Congress. In addition, a certain degree of political complacency had set in among agricultural interests between the mid-1960s and the 1970s. The cumulative effect was a series of policy defeats for farmers that seemed to herald their political demise.

However, the decentralized agricultural subsystem has proven resilient. The benefits of decentralization may outweigh its costs in the long run for several reasons. First, it has facilitated the reestablishment of an effective opposition to

⁴ Bruce L. Gardner, *The Governing of Agriculture* (Lawrence, Kansas: The Regents Press of Kansas, 1981), pp. 22–23.

⁵ Lowi, pp. 72–73.

intervenor efforts. This has been especially true when intervenors directly challenged specific commodity subsystems. James L. Guth's study of the dairy subsystem revealed that consumerism may actually have revitalized the dairy subgovernment: "The cooperatives and their allies were jarred out of some well-worn but archaic strategies into recognition of political realities confronting farmers in an urban society. Consumer attacks also encouraged dairy and farm groups to close ranks, putting aside some long-standing fraternal feuds."⁶

A second though less well-documented response to the interventionist challenge that was aided by the decentralization of agriculture was the farm sector's ability to control policy implementation in a number of key areas. This ability was due in part to the tendency of many intervening groups to concentrate their efforts on the formulation and passage of legislation while paying less attention to policy details and the determination of implementation strategies. But this tactical error would not have mattered a great deal were it not for agriculture's ability to mobilize and to control the direction of policy implementation at the state and local levels within their decentralized domains. Pesticide regulation is a particularly clear case.

Intervention, Decentralization, and Pesticides

The extent of growth in both the manufacture and the utilization of pesticides after World War II is best illustrated with reference to the period's most popular pesticide—DDT. In 1945, some 33,000 pounds of DDT were produced in the United States. In 1963, about 179,000 pounds were produced and distributed.

Attempts to regulate the use and manufacture of pesticides were plagued with problems from the beginning. Pesticide regulatory authority was originally administered by the USDA under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) of 1947. FIFRA gave the USDA responsibility for promoting pesticides that would increase agricultural production while regulating the environmental effects of chemical pest control. The USDA was to regulate environmental effects by limiting registration to safe compounds and by enforcing labeling and applicator safety standards. Because the USDA operated within a tight agricultural policy subsystem—the "iron triangle"—that included the House Agriculture Committee, the land-grant universities with their extension services, and the Farm Bureau along with pesticide producers, the inherent conflict between promotion and regulation often worked to the detriment of regulation. In a rush to obtain benefits from the new pesticide technology, the USDA often subordinated health and environmental concerns. The absence of regulation was noted in a 1978 report to Congress by the General Accounting Office (GAO) that was extremely critical of the USDA's failure to implement FIFRA.

⁶ James L. Guth, "Consumer Organizations and Federal Dairy Policy," in *The New Politics of Food*, ed. Don F. Hadwiger and William P. Browne (Lexington, Mass.: Lexington Books, D.C. Heath and Co., 1978).

The report charged that the USDA: (1) failed to remove harmful pesticides from the market; (2) failed to develop procedures for reporting FIFRA violations to the Justice Department for prosecution; and (3) failed to report a single violation for the thirteen-year period 1955–67.⁷

For all practical purposes, therefore, pesticides were unregulated from 1947 through 1970. In the absence of meaningful regulation, pesticide proliferation from 1947 through 1972 was largely a function of producer demand as defined by farmers. Farmers' advisers were agricultural extension entomologists who were committed to chemical controls but uninformed concerning cumulative toxic effects and other safety considerations. The manufacturers' sales representatives often acted as diagnosticians, with a perfect, unregulated opportunity to prescribe their products, regardless of safety or efficacy considerations.

In the absence of USDA regulation during the postwar era, a few critics called for biological and other forms of nonchemical control. However, their calls were largely ignored. Nonchemical pest-control methods were not nearly as profitable as chemical controls, and the market incentives to develop nonchemical controls did not exist. Thus, pesticide safety was essentially unregulated.

DDT and Intervenors

As is often the case, intervention by forces outside the agricultural subsystem began when the publication of a widely read and highly critical exposé that focused public attention on the government's perceived failure to protect the public interest. Rachel Carson's *Silent Spring*, published in 1963, focused public attention on the dangers of pesticides and on the failure of the USDA to protect the public from these dangers.

The public attack on pesticide abuse focused on a single widely used pesticide—DDT, a synthetic chlorinated hydrocarbon. Compared to other insecticides available after World War II, it was cheaper, more effective, and much more persistent. But a burgeoning coalition of critics jumped on the *Silent Spring* bandwagon, arguing that this effectiveness and persistence had serious negative consequences for the environment and demanding stringent regulation.

Although this loose coalition of conservationists, bureaucrats, and elected officials was unable initially to penetrate agriculture's iron triangle, they were able to bypass agricultural committees in Congress and state legislatures by attaching pesticide amendments to nonagricultural legislation. This effort also gave antipesticide intervenors the opportunity to testify at public hearings and to attract media attention and public support for their objectives. For example, a well-publicized testimony before the Wisconsin Department of Natural Resources resulted in what pesticide manufacturers called a "flood of legislation

⁷ U.S., House, Subcommittee on Government Operations, *Deficiencies in the Administration of FIFRA: Hearings on the Implementation of Pesticide Regulations*, 95th Cong., 1st sess., 1978.

aimed at tightening controls over the sales and uses of chemical pesticides in general."⁸

A review of state responses suggests, however, that manufacturers tended to exaggerate the effects of state legislation. State responses were typified by Iowa's revision of its existing pesticide laws in 1963. This statute was formulated by an advisory committee made up of four research scientists with ties to the agricultural subsystem and only one representative of the Iowa Conservation Commission. The statute was aimed at controlling misuse rather than regulating use. Essentially, the statute required registration of pesticides with the secretary of agriculture, labeling of containers to identify the manufacturer and to direct proper use, and licensing of commercial applicators who could furnish proof of competence and responsibility. Although the licensing provision became a model for subsequent federal legislation, the Iowa statute as implemented was largely symbolic and had little effect on the proliferation of chemical pest control in the state. Indeed, the ineffectiveness of both the state and federal responses fueled the effort to remove authority for pesticide regulation from the USDA and the agricultural policy subsystem.

The intervenors' initial efforts to remove pesticides from the iron triangle took place in both the judicial and the legislative arenas. For example, the Environmental Defense Fund (EDF) used the courts to secure an order canceling all uses of DDT pending a determination by the USDA of whether the insecticide constituted an imminent hazard. But the most visible efforts were concentrated in the legislative arena, where these groups sought to attach the pesticide question to the larger movement to create a federal agency responsible for protecting the environment. In other words, they sought to make pesticides an environmental rather than an agricultural question.

In response to the intervenors, the agricultural subsystem was unified in its commitment to maintain pesticide regulation within the subsystem. Farm organizations, pesticide manufacturers, the USDA, and congressmen from agricultural states all defended the proliferation of pesticides, arguing that the benefits of chemical pest-control technologies far outweighed their risks. Moreover, key spokesmen engaged in a concerted effort to discredit the intervenors. For example, Representative Jamie L. Whitten, chairman of the House Appropriations Subcommittee on Agriculture, published *That We May Live*, a polemic defending pesticide use and castigating Rachel Carson and her followers.

Despite the efforts of the propesticide coalition, the intervenors succeeded in removing the pesticide question from the agricultural agenda and in placing it on the macroenvironmental agenda. Russell E. Train, then chairman of the Council on Environmental Quality, testified in 1970 before the House Committee on Governmental Operations that the proposed Environmental Protection Agency, by assuming the pesticide function, could restore public confidence in

⁸ Neil A. Martin, "Help Stamp Out DDT: Development and Use of Pesticides Show Flourishing," *Barrons*, September 15, 1969, p. 5.

government's ability to control pollution in this area by eliminating the USDA's promotional and regulatory conflict. Train argued that the EPA's primary mission under FIFRA should be to regulate the use of pesticides by limiting or prohibiting those found to cause "unreasonable adverse" effects on people and the environment.

The EPA was created through President Nixon's 1970 Reorganization Plan and assigned primary responsibility for pesticide regulation. The EPA's power and responsibilities for pesticide regulation were subsequently defined and expanded by the Federal Environmental Protection Control Act (FEPCA) of 1972, which amended the FIFRA of 1947. It was the responsibility of EPA under FEPCA to determine whether the pesticides would perform their intended function without "unreasonable adverse" effects on the environment and human health. Further, the burden of proving the safety of a pesticide was to be placed on the applicant for registration, reregistration, or tolerance granting.

Agriculture's Response

This transfer of regulatory power from the USDA to the EPA and the passage of the FEPCA amendments would seem to introduce an era of stringent regulation. The movement of pesticide regulation to the EPA would seem to elevate pesticide regulation from a micropolicy subsystem controlled by agriculture and agrichemical interests to the macropolicy arena dominated by environmentalist intervenors. Moreover, the 1972 FEPCA amendments appeared to give the new federal agency a mandate to regulate vigorously in the public interest. However, events since 1972 suggest that the success of the intervenors in shifting pesticide regulation from the agricultural subsystem to the national environmental agenda may be more apparent than real and that the decentralized agricultural subsystem has retained substantial influence over pesticide regulation.

Several statutory shortcomings have limited the impact of environmental intervenors on pesticide policy. First, most of the pesticide personnel, and therefore the regulatory approach, from the USDA was simply transferred to the EPA. Substantial congressional oversight of pesticide regulation remained with the agricultural committees, which have constantly pressured the EPA to relax its regulatory policies. But the intervenors' greatest shortcoming was their failure to secure adequate resources to support EPA implementation efforts.

The EPA's primary responsibility under FEPCA was to reregister 50,000 existing pesticides on the basis of a careful examination of safety data. To accomplish its reregistration mandate by the 1976 deadline, the EPA Office of Pesticide Programs (OPP) would have had to register more than thirty pesticides a day every day of the year. Yet, by late 1975, the EPA had not begun a systematic review and did not propose to do so until 1978. In 1981, the task remained incomplete. In response to this inactivity, the comptroller general submitted a report to Congress concerning pesticide registration. The following conditions were cited: (1) safety and efficacy data had not been submitted to support mar-

keting many pesticides; (2) pesticide residue tolerances were not being monitored or reviewed; and (3) the safety of pesticide residues in some foods has not been determined.⁹ A related report by the Senate Subcommittee on Administrative Practice concluded that the EPA review of safety data consisted of little more than looking for the presence of some data.

The failure of the EPA was the result both of inadequate data available for the task and of too few employees available to review it. Files of the former USDA administration were unorganized, dated, inaccurate, and incomplete. Review data frequently came from laboratories under contract with the pesticide manufacturer. Often these laboratories were technically incompetent and had withheld information or misrepresented findings at the manufacturer's requests.¹⁰ In sum, despite the intervenors' successful transfer of pesticide authority from agriculture's iron triangle to the macroenvironmental policy agenda, the agricultural coalition was able to limit the effect of this transfer and to maintain substantial influence over pesticide policy. After maintaining this foothold in 1972, the coalition was able to organize a drive to regain hegemony over the regulation of chemical pest controls.

Counterattack by the Agricultural Coalition

In July 1975 a bill to amend the pesticide law was introduced in the House Committee on Agriculture. Soon after the hearings began, proposals to divest the EPA of much of its pesticide regulatory authority began to materialize. The committee supported an amendment (which failed) that would have given the secretary of agriculture a veto over EPA pesticide decisions. In the statute as passed the secretary was given timely opportunity for comment, and the House and Senate agriculture committees were to receive copies of the EPA's proposed actions. The law required that the EPA take into account the impact of its pesticide decisions on the agricultural economy. The EPA was required to consult with the secretary of agriculture and the governors of affected states before invoking an emergency clause that would allow a state or a federal agency to be exempt from FIFRA requirements.

Pressure from the agriculture coalition was instrumental in effecting administrative changes within the EPA. The EPA Office of General Counsel (OGC), which conducted adversary hearings for registration, cancellation, and suspension of pesticides, was stripped of its authority in response to charges that the adversary process was responsible for public misconceptions and was inhibiting public involvement. Although three leading OGC attorneys resigned in protest,

⁹ U.S., Congress, House, Subcommittee of the Committee on Government Operation, *EPA's Implementation of the Pesticides Control Act, 94th Cong., 2d sess., 1976* (Comptroller General's Report to Congress, p. 119).

¹⁰ U.S., Congress, Senate, Judiciary Committee, Subcommittee on Administrative Practice and Procedure, 94th Cong., 2d sess., 1976 (testimony by John Quarles, deputy administrator of the EPA.)

the OGC adversary procedures were replaced by administrative procedures whereby dangerous pesticides were assigned a "rebuttable presumption against registration" (RPAR). Under the short-lived OGC adversary process, the use of aldrin and dieldrin had been canceled and the use of heptachlor and chlordane had been suspended—all of these having been standard agricultural pesticides. In contrast, while thirty substances were assigned a rebuttable presumption against registration after 1974, all of them remained on the market pending completion of the RPAR process.

The new internal procedures led to a logjam of pesticide registration applications and drew intensive criticism from congressional sources outside the agriculture subsystem. The House Interstate and Foreign Commerce Committee's Subcommittee on Oversight and Investigation concluded that the EPA's interpretation of risk-benefit criteria and its use of conditional registration contravened FIFRA by assuming safety and by shifting the burden of proof from the applicant to the government. The committee concluded that at least one-third of all registered pesticides exceeded risk criteria for chronic toxicity and that EPA's cancer policy had become progressively less oriented to public protection. But criticism from outside the agricultural subsystem seemed to have little effect. In 1974 the agriculture coalition intensified its efforts to recapture control of pesticide policy, and 1978 amendments to FIFRA further reduced intervenor control. The 1978 FIFRA amendments legitimized conditional registration if a substance was "substantially similar" (generic) to pesticides already in use. Conditional registration is allowed for a time "reasonably sufficient" to generate necessary data. Given EPA's registration record, one may predict that "reasonably sufficient" will prove to be synonymous with "deliberate speed" in desegregation.

The 1978 amendments were most notable, however, for their delegation of regulatory discretion to the states rather than to the EPA. Some delegation of authority had been authorized by the 1972 statute, which allowed states to certify applicators of restricted-use pesticides under plans subject to EPA approval and authorized the administrator to delegate authority to allocate resources for enforcing pesticide regulations to the states. The 1972 provisions granted states the right to register pesticides for new uses within that state if the state registration plan was approved by the EPA administrator within ninety days and if the use had not previously been prohibited by EPA. But the delegation of implementation authority to the states accelerated exponentially after 1978, with a commensurate shift in the locus of control over pesticide policy away from the environmentalist intervenors.

With very few exceptions, the EPA delegation of pesticide regulation has been to state departments of agriculture. The 1978 amendments enabled these departments to consolidate three important implementation powers. First, primary enforcement responsibility was placed with the states, with the EPA furnishing enforcement grants. Second, EPA supervision of applicator licensing programs was reduced. Based on the 1978 amendments, the EPA cannot force states to require private applicators to take competency examinations and can no longer

prohibit the sale of restricted pesticides to uncertified applicators for use by certified applicators. Third, the discretion of states to register pesticides for intrastate use was expanded. The EPA administrator may no longer require a state to demonstrate that a pesticide is essential, and if the state finds a pesticide efficacious, the EPA must waive other efficacy data requirements. The administrator may not prohibit state registration if the pesticide's composition and use patterns are similar to those of a federally registered pesticide. Although the administrator retains the power to veto in-state registrations, prior approval of state plans is no longer required and disapproval of state plans is subject to complex new procedural constraints. Thus the burden of approval has been lifted from the states and replaced by a burden of disapproval on the EPA.

In sum, under the 1978 amendments, state departments of agriculture have regained an important role for the traditional agriculture coalition in the implementation of pesticide regulations. This role is ironic when one remembers the original rationale for moving pesticide regulation from the USDA to the EPA. But the pattern is consistent with the resilience of the decentralized agricultural subsystem.

Conclusion

The case of pesticides illustrates the resiliency of the decentralized agricultural subsystem and its ability to recapture prerogatives and privileges lost to intervenors. The decentralization of commodity subsystems interfered with the ability of the larger subsystem and its geographically decentralized components to respond to the challenge of environmentalist intervenors. Of particular importance was the ability of the agricultural sector to maintain and expand the implementation authority of state agricultural departments. The responsibility of these state agencies should increase under President Reagan's "New Federalism" for two reasons. First, real and projected EPA budget cuts will reduce that agency's implementation resources and encourage the EPA to delegate more implementation authority to the states. Second, by shifting responsibility for a wide variety of programs to the states, this New Federalism will maximize the influence of decentralized subsystems, such as agriculture, which are organized down to the county and local levels.

To the extent that responsibility for implementing national policy outside the agricultural policy subsystem is exercised at the state level within the subsystem, the influence of agriculture over policy outcomes may be expected to increase. One may therefore expect to see other organized interests emulate the decentralization of agriculture.