The Pi Sigma Alpha Undergraduate Journal of Politics

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The Pi Sigma Alpha
Undergraduate Journal of Politics

Fall 2006

Volume VI   Number II
Twelfth Edition

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Editor's Preface to the Fall 2006 Edition

I am happy to present the Fall 2006 edition of *The Pi Sigma Alpha Undergraduate Journal of Politics*. As always, the support of Pi Sigma Alpha, the National Political Science Honor Society, has given the *Journal* the strength it needs to remain one of the nation's premier undergraduate journals.

Though this is my last edition as Editor-in-Chief, I long ago realized that were it not for the political science-minded undergraduates of this country and abroad, I would have no job. It has always been my view that the *Journal* is produced and published for the scholarship and enjoyment of undergraduates. Perhaps more importantly, without the continued efforts of undergrads, these would be blank pages. As I leave this post, I want to take a moment and thank everyone who has submitted a manuscript to the *Journal*. These papers are often theses, the culmination of an upper-level course, or the ambitious result of a personal research interest. Whatever the impetus may be, I am grateful to all of the authors who have been willing to share the fruits of their very intense labors. It has truly been a privilege to read these manuscripts.

There are several people I wish to acknowledge. First, I would like to thank the Pi Sigma Alpha Executive Council and the Executive Committee, particularly President Jon R. Bond, Executive Director James I. Lengle, and Administrator Nancy McManus. The *Journal* would not be possible without these dedicated individuals. Next, the guidance and expertise of the *Journal's* Faculty Advisor, Rosalee A. Clawson, is essential to its success. Furthermore, I appreciate the outstanding work done by the Advisory Board and the Editorial Board members. I am grateful for the support from Purdue University's Political Science Department and its head, Bert A. Rockman. Last, but certainly not least, I am truly indebted to the *Journal's* incoming Editor-in-Chief, Joy Nyenhuis-Rouch. Joy is tremendously talented and it has been exciting to work with her and be the first to hear about her vision for the *Journal*. The Spring 2007 edition promises to be successful.

It is my sincerest hope that you enjoy the following manuscripts and either consider submitting one of your own, or encouraging your students to do so.

Thank you.

Allison O. Rahrig
Editor-in-Chief

Submission of Manuscripts

The *Journal* welcomes submissions from undergraduates of any class or major; submissions from Pi Sigma Alpha members are especially encouraged. Our goal is to publish manuscripts of the highest quality. In general, papers selected for publication have been well-written with a well-developed thesis, comp elling argument, and original analysis. We typically publish papers 15-35 pages in length that have been written for an upper level course. Manuscripts should include an abstract of roughly 150 words. Citations and references should follow the American Political Science Association *Style Manual for Political Science*. Please be sure references are complete and accurate. Students may be asked to revise their manuscript before it is accepted for publication. Submissions must be in the form of a Microsoft Word document and should be e-mailed to **journal@polsci.purdue.edu**. Please include name, university, and contact details (i.e., mailing address, e-mail address, and phone number).

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Roe v. *Wade*: The Inherent Protections of the Thirteenth Amendment

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This research is a wide-ranging analysis of selected "right to choose" court cases spanning 1965 to present, including Griswold *v.* Connecticut *and* Eisenstadt *v.* Baird, *both of which laid the foundation for* Roe *v.* Wade *and other subsequent "right to choose" cases. The question I will ask in this thesis is, were* Roe *to be overturned, could any resulting prohibition by state statute, of non-therapeutic abortions, be argued under the protections guaranteed by the Thirteenth Amendment, as a violation of the same? My research suggests the argument could be made, as the Amendment prohibits not only slavery, but also involuntary servitude. For if* Roe *is overturned, the Supreme Court will effectively allow state legislators the opportunity to force women, who do not want to carry their nonviable fetuses to term, to involuntarily serve the fetus, which is a violation of Thirteenth Amendment guarantees.*

Introduction

Seldom, if ever, has a single U.S. Supreme Court decision so decisively transformed American constitutional history or altered the relationship between law and morals, both public and private, than the decision in *Roe* v. *Wade* (1973). The Supreme Court, by a seven-to-two vote, struck down all state laws restricting a woman's right to an abortion during the first trimester of pregnancy and granted to the states only very limited regulatory rights concerning maternal health during the second trimester. The Court held that a fetus is not a "person" under the Fourteenth Amendment and is thereby not protected; thus, the Texas statute was unconstitutional on the grounds that it did not strike the proper balance between the mothers's protected right to privacy and the state's interest in potential life.

Essentially, the Court determined that the "constitution does not explicitly mention any right of privacy…[b]ut the Court has recognized that a right of personal privacy, or a guarantee of certain areas or zones of privacy, does exist under the Constitution. . . . These decisions make it clear that only personal

rights that can be deemed 'fundamental' or 'implicit in the concept of ordered liberty' are included in the guaranty of personal privacy" (*Roe* v. *Wade* 1973). The Court held the underpinnings of the right to privacy were anchored in the Constitution and based their decision on the Due Process Clause of the Fourteenth Amendment.

Thirteenth Amendment Case Law

Unbeknownst to the masses of society, a constitutional amendment ensconcing abortion has existed since the days of abolition. Contrary to historical jurisprudence, there is no evidence suggesting abortion is necessarily provided shelter solely under the "right to privacy" as contained within the Fourteenth Amendment: "The Fourteenth Amendment had one overriding purpose: to prevent states from replicating through law the distinctive forms of dominion and subjugation exercised over this nation's slaves" (Balkin 2005, 112). However, the protections of the Thirteenth Amendment concerned with women's privacy, liberty and the right to choose, have not been illuminated for more than 140 years.

> But there can be no doubt about the core meaning of this freedom. It is the right not to have an occupation forcibly or legally imposed on one. It is the right not to be forced into labor against one's will, for it is that right which chiefly distinguishes the free from the slave. And no law could more plainly violate this right than a law forcing a woman to bear a child (Balkin 2005, 111).

It is important to acknowledge that the Supreme Court has never before heard a case wherein the "right to choose" argument was framed under the protections of the Thirteenth Amendment. That being said, I will take this opportunity to discuss a case the Court did hear concerning the Thirteenth Amendment, and the implications of the Court's ruling as it relates to the abortion argument.

In *Bailey* v. *Alabama* (1911) Alonzo Bailey, a black man, entered into a contract to perform labor for the Riverside Company as a farm hand from December 30, 1907 to December 30, 1908 for the sum of $12.00 a month. Bailey was given a $15.00 advance on his wages upon the execution of the contract, and his monthly wage was to be accordingly reduced to $10.75 for the

duration of the twelve month contract. Bailey labored from the December 30 signing of the contract until the beginning of February 1908, but quit and failed to repay the balance of the $15.00 advance. Bailey was found guilty in criminal court of intending to "injure or defraud his employer," assessed damages of $15.00, fined $30.00 and ordered to pay court costs. In lieu of payment, he was sentenced "in default thereof to hard labor for twenty days in lieu of said fine, and one hundred and sixteen days on the account of said costs" (*Bailey* v. *Alabama* 1911).

Upon hearing the case, the Supreme Court found there was no evidence Bailey "received the money with any intent to injure or defraud his employer" (*Bailey* v. *Alabama* 1911). Compounded with this, the Alabama's statute did not allow him to testify on his own behalf that he did not intend to injure or defraud the Riverside Company. In the opinion of the Court, Justice Hughes held the statute's "natural and inevitable effect is to expose to conviction for crime those who simply fail or refuse to perform contracts for personal service in liquidation of debt" (*Bailey* v. *Alabama* 1911), and such statutes violate the Thirteenth Amendment.

The Court found the framers of the Thirteenth Amendment did not specifically intend for the amendment to solely prohibit slavery and involuntary servitude, and it was instead intended to protect "civil freedoms for all persons…under the flag" (*Bailey* v. *Alabama* 1911). The Thirteenth Amendment by its plain language prohibits involuntary servitude and slavery "to be established or maintained through the operation of the criminal law by making it a crime to refuse to submit to the one or to render the service which would constitute the other" (*Bailey* v. *Alabama* 1911).

The *Bailey* Court ruled the state of Alabama could not constitutionally force the labor of a man to fulfill a contract, as it impinged upon the liberty of the man as guaranteed by the Thirteenth Amendment. I contend the collective governing bodies of this nation cannot force a woman, through the prohibition of non-therapeutic abortions by state statute, to carry to term a non-viable fetus she did not intend to beget. Even so, some may argue by engaging in intercourse a woman accepts the myriad of possible outcomes and by doing so waives her right to possible recourse. This argument is dubious at best as it ignores the possibility of rape in addition to a myriad of other factors central to the abortion debate, including but not limited to, maternal health.

Right to Privacy

In 1965, the undertone of American jurisprudence shifted substantially with the delivery of the Court's opinion in *Griswold* v. *Connecticut* (1965). Appellants Estelle T. Griswold and Dr. C. Lee Buxton operated the New Haven, Connecticut, Planned Parenthood Center which "gave information, instruction, and medical advice to married persons as to the means of preventing conception. They examined the wife and prescribed the best contraceptive device or material for her use" (*Griswold* v. *Connecticut* 1965) Under Connecticut general statutes prohibiting such conduct, the appellants "were found guilty as accessories" in the Sixth Circuit Court and "fined $100 each" (*Griswold* v. *Connecticut* 1965). Following the judgment of the Circuit Court, the appellants filed an appeal with the Appellate Division of the Circuit Court and subsequently with the Connecticut Supreme Court of Errors, wherein both courts upheld the decision of the Circuit Court. The appellants filed an appeal with the United States Supreme Court under the claim the charge of accessory was in direct violation of the Fourteenth Amendment and certiorari was granted.

The Court found "specific guarantees in the Bill of Rights have penumbras" and these "various guarantees…create zones of privacy" (*Griswold* v. *Connecticut* 1965). Furthermore, the *Griswold* decision found the sections of the general statutes at issue "[sought] to achieve its goal by means having a maximum destructive impact upon [the] relationship lying within the zone of privacy created by several fundamental constitutional guarantees" (*Griswold* v. *Connecticut* 1965) and as such, were overruled.

It is important to note the Court did not specifically provide that only the Fourteenth Amendment contains an individual's expectation of privacy and protection, but this was simply the specific Amendment the appellants centered their claim under. In fact, the Court listed the First, Third, Fourth, Fifth and Ninth Amendments as examples where a guarantee of privacy can be found. The Court was not implying, by not listing the Thirteenth Amendment, that it does not contain protection. Keeping in mind that the Thirteenth Amendment was written primarily as a vehicle for the continued abolition of slavery, what other Amendment provides that greatest of protections, i.e. the inherent right, by virtue of being a human being, to be free in not only your person, but also free in whom you choose, if anyone, to work for or with. For was it not the government of this nation that condoned and even promoted slavery in its early stages? As such, it

would be quite pertinent for an individual, while reading the Amendment, to be cognizant of the fact that this Amendment reached fruition because a portion of the United States government wanted to keep African Americans enslaved, and this Amendment essentially freed those persons from governmental intrusion.

As *Griswold* settled the national question of contraceptive use by married persons, *Eisenstadt* v. *Baird* (1972) accomplished the same for unmarried persons. Perhaps the most convincing part of Justice Brennan's opinion comes while making reference to *Griswold*: "it is true that in *Griswold* the right of privacy in question inhered in the marital relationship…yet the marital couple is not an independent entity with a mind and heart of its own, but an association of two individuals each with a separate intellectual and emotional makeup. If the right of privacy means anything, it is the right of the individual, married or single, to be free from unwarranted governmental intrusion into matters so fundamentally affecting a person as the decision whether to bear or beget a child" (*Eisenstadt* v. *Baird* 1972). While *Roe* was argued on the basis of the Due Process Clause of the Fourteenth Amendment, one can easily see how Justice Brennan's opinion found that the meaning of the Thirteenth Amendment goes hand-in-hand with "unwarranted governmental intrusion" (*Eisenstadt* v. *Baird* 1972). If *Roe* is overturned, the government is, in essence, allowing states the statutory opportunity to trample the plain language rights as written in the Thirteenth Amendment. As a result, society will be forced to face a situation "that, as a real-life matter, not metaphorically but practically and concretely, can force on an individual who did not intend or want it what is tantamount to a full-time, years-long occupation" (Balkin 2005, 111).

"Right to Choose" Jurisprudence

Although illegal in the nineteenth century, the number of abortions increased dramatically by that century's end. However, unlike many present-day arguments, the nineteenth century debate on abortion was more about the health and safety of the mother than about morality. Supported by the American Medical Association (AMA) after the Civil War, nearly forty State legislatures passed anti-abortion laws, the majority of which remained "good law" until *Roe* in 1973.

In *Roe*, the appellant sought declaratory and injunctive relief, asserting the Texas abortion statutes were unconstitutionally vague and abridged her right

of personal privacy as protected under the First, Fourth, Fifth, Ninth, and Fourteenth Amendments. The District Court ruled declaratory, but not injunctive, relief was warranted and declared the abortion statutes void as vague and over-broadly infringing appellant's Ninth and Fourteenth Amendment rights. As such, appellant appealed to the Supreme Court on the injunctive rulings, while the State cross-appealed on the District Court's grant of declaratory relief to appellant.

On January 22, 1973, Justice Blackmun delivered the opinion of the court, holding:

> State criminal abortion laws, like those involved here, that except from criminality only a life-saving procedure on the mother's behalf without regard to the stage of her pregnancy and other interests involved violate the Due Process Clause of the Fourteenth Amendment, which protects against state action the right to privacy, including a woman's qualified right to terminate her pregnancy. Though the State cannot override that right, it has legitimate interests in protecting both the pregnant woman's health and the potentiality of human life, each of which interests grows and reaches a "compelling" point at various stages of the woman's approach to term:
> (a) for the stage prior to approximately the end of the first trimester, the abortion decision and its effectuation must be left to the medical judgment of the pregnant woman's attending physician;
> (b) for the stage subsequent to approximately the end of the first trimester, the State, in promoting its interest in the health of the mother, may, if it chooses, regulate the abortion procedure in ways that are reasonably related to maternal health; and,
> (c) for the stage subsequent to viability the State, in promoting its interest in the potentiality of human life, may, if it chooses, regulate, and even proscribe, abortion except where necessary, in appropriate medical judgment, for the preservation of the life or health of the mother (*Roe* v. *Wade* 1973).

Proponents of criminal abortion laws have historically argued that the state has an interest in protecting prenatal life. This argument relies, in part, on the supposition that life is apparent from the moment of conception, a theory upon which a medical consensus has not been established. The *Roe* Court found "the word 'person' as used in the Fourteenth Amendment, does not include the unborn" (*Roe* v. *Wade* 1973). In viewing the decision, the Court, in essence, implied that while a fetus is not a person and is not afforded the same rights as a person, the opposite could be true if *Roe* were to be overturned. If the aforementioned occurs, it could therefore be argued that because a fetus is a person, the woman carrying the fetus is, in some cases, involuntarily serving that person (the fetus), resulting in a violation of her Thirteenth Amendment rights.

The Court's decision to strike down *Roe*'s Texas abortion statutes left:

> The state free to place increasing restrictions on abortion as the period of pregnancy lengthens, so long as those restrictions are tailored to the recognized state interests. The decision vindicates the right of the physician to administer medical treatment according to his professional judgment up to the points where important state interests provide compelling justifications for intervention. Up to those points, the abortion decision in all its aspects is inherently, and primarily, a medical decision, and basic responsibility for it must rest with the physician (*Roe* v. *Wade* 1973).

Millions of abortions have been performed since *Roe*, and undoubtedly the Court's decision has resulted in the prevention of many unwanted births and the legalization of abortion has also led to improvements in the medical techniques employed. Some pro-choice advocates fear if *Roe* is overturned, U.S. society will revert to the period when "back-alley abortions" were performed.

There are a number of additional factors whose effects are difficult to measure and in all likelihood are far less significant than those discussed above. Factors such as parental consent, informed consent, counseling requirements and mandatory waiting periods have been contentious abortion issues and have come before the Court since *Roe* was promulgated in 1973 and our next case.

Abolishment of the Trimester Framework

In *Planned Parenthood* v. *Casey* (1992), a bare majority reaffirmed *Roe* as it applied to the interests concerning maternal health, the potential new life, and the interests of third parties. However, rather than rule on the aforementioned issues by using the "trimester framework" as established in *Roe*, the *Casey* plurality adopted the "undue burden" standard as first suggested by Justice O'Connor in her *City of Akron* v. *Akron Center for Reproductive Health, Inc.* (1983) dissent. In anticipation of the disagreement that was sure to come regarding the "undue burden" standard, the Court set forth the following summary:

> (a) To protect the central right recognized by *Roe* while at the same time accommodating the State's profound interest in potential life, the undue burden standard should be employed. An undue burden exists, and therefore a provision of law is invalid, if its purpose or effect is to place substantial obstacles in the path of a woman seeking an abortion before the fetus attains viability;
> (b) *Roe's* rigid trimester framework is rejected. To promote the State's interest in potential life throughout pregnancy, the State may take measures to ensure that the woman's choice is informed. Measures designed to advance this interest should not be invalidated if their purpose is to persuade the woman to choose childbirth over abortion. These measures must not be an undue burden on the right;
> (c) as with any medical procedure, the State may enact regulations to further the health or safety of a woman seeking an abortion, but may not impose unnecessary health regulations that present a substantial obstacle to a woman seeking an abortion;
> (d) adoption of the undue burden standard does not disturb *Roe's* holding that, regardless of whether exceptions are made for particular circumstances, a State may not prohibit any woman from making the ultimate

decision to terminate her pregnancy before viability; and,

(e) *Roe's* holding that 'subsequent to viability, the State, in promoting its interest in the potentiality of human life, may, if it chooses, regulate, and even proscribe, abortion except where it is necessary, in appropriate medical judgment, for the preservation of the life or health of the mother' is also reaffirmed (*Planned Parenthood* v. *Casey* 1992).

Planned Parenthood et al. filed suit in the United States District Court, challenging the constitutionality of amendments to the Pennsylvania Abortion Control Act of 1982, seeking declaratory and injunctive relief. The District Court held all of the provisions unconstitutional and enjoined their enforcement. Pennsylvania appealed to the U.S. Court of Appeals for the Third Circuit, wherein the District Court's ruling was affirmed in part and reversed in part. Both parties appealed to the U.S. Supreme Court and certiorari was granted.

At issue before the Court were five provisions of the Pennsylvania Act regarding definitions of a medical emergency, informed consent, mandatory waiting periods, parental consent, certain reporting requirements on facilities providing abortion services, and spousal consent. On June 29, 2005, in a plurality opinion, Justices O'Connor, Kennedy, and Souter held "the medical emergency definition in the Pennsylvania statute was sufficiently broad that it did not impose an undue burden" (*Planned Parenthood* v. *Casey* 1992). Furthermore, "the informed consent requirements, the 24-hour waiting period, parental consent provision, and the reporting and recordkeeping requirements of the Pennsylvania statute did not impose an undue burden" (*Planned Parenthood* v. *Casey* 1992). This was a departure from earlier Court rulings such as *Akron*, where the Court struck down an ordinance requiring the physician of a woman seeking an abortion to provide her with information "designed to influence the woman's informed choice between abortion or childbirth" (*Planned Parenthood* v. *Casey* 1992). The *Casey* Court, in overruling *Akron*, found the *Akron* jurists were erroneous in their decision, in that the ruling in the aforementioned case was "inconsistent with *Roe's* acknowledgment of an important interest in potential life, and [is] overruled" (*Planned Parenthood* v. *Casey* 1992).In distancing itself from *Akron*, the *Casey* Court stated "we permit a State to further its legitimate goal of protecting the life of the unborn by enacting legislation aimed at ensuring

a decision that is mature and informed, even when in so doing the State expresses a preference for childbirth over abortion" (*Planned Parenthood* v. *Casey* 1992).

The *Casey* decision concluded that the *Akron* ruling, regarding the 24-hour waiting period, was also incorrect and consequently must be overruled. As previously discussed, "under the undue burden standard, a State is permitted to enact persuasive measures which favor childbirth over abortion, even if those measures do not further a health interest" (*Planned Parenthood* v. *Casey* 1992). Accordingly, the Court ruled "in the context of this facial challenge, we are not convinced that the 24-hour waiting period constitutes an undue burden" (*Planned Parenthood* v. *Casey* 1992).

Under the Pennsylvania Act, "except in a medical emergency, an unemancipated young woman under 18 may not obtain an abortion unless she and one of her parents (or guardian) provides informed consent" (*Planned Parenthood* v. *Casey* 1992), though the Act did allow for judicial bypass in certain circumstances. The Court held "our cases establish, and we reaffirm today, that a State may require a minor seeking an abortion to obtain the consent of a parent or guardian, provided that there is an adequate judicial bypass procedure" (*Planned Parenthood* v. *Casey* 1992).

In addition to the "undue burden" standard as set forth above, the primary result of *Casey* was the Court's finding that "the spousal notification provision imposed an undue burden and was invalid" (*Planned Parenthood* v. *Casey* 1992). "Section 3209 of Pennsylvania's abortion law provides, except in cases of medical emergency, that no physician shall perform an abortion on a married woman without receiving a signed statement from the woman that she has notified her spouse that she is about to undergo an abortion" (*Planned Parenthood* v. *Casey* 1992). The Court held that millions of women suffer from physical and mental abuse at the hands of their spouses, and these women have "good reasons" (*Planned Parenthood* v. *Casey* 1992) for not informing these spouses of their decision to abort their fetus. "Many may fear devastating forms of psychological abuse from their husbands, including verbal harassment, threats of future violence, the destruction of possessions, physical confinement to the home, the withdrawal of financial support, or the disclosure of the abortion to family and friends" (*Planned Parenthood* v. *Casey* 1992). Consequently, §3209 of the Pennsylvania Act served as "a substantial obstacle to a woman's choice…is an undue burden, and therefore is invalid" (*Planned Parenthood* v. *Casey* 1992).

Similarly, as the Court found in *Planned Parenthood* v. *Danforth* (1976) "a spousal notice requirement enables the husband to wield an effective veto over his wife's decision" to procure an abortion (*Planned Parenthood* v. *Casey* 1992). The *Casey* Court concluded its decision by stating, "women do not lose their constitutionally protected liberty when they marry. The Constitution protects all individuals, male or female, married or unmarried, from the abuse of governmental power, even where that power is employed for the supposed benefit of a member of the individual's family. These considerations confirm our conclusion that [§] 3209 is invalid" (*Planned Parenthood* v. *Casey* 1992).

If *Roe* was the quintessential women's rights ruling issued by the Court, *Casey* was a step backwards. While *Roe* had a strict "trimester framework" designed to keep States from interfering in a woman's relationship with her doctor and the resulting decisions consequential of said relationship, *Casey* implemented the loosely defined and exponentially more subjective "undue burden" standard, wherein a state has the right to promote its interest in potential life so long as the state does not place a substantial obstacle in the path of a woman pursuing her desire to obtain an abortion, for to do so would constitute an "undue burden." The Court's decision to eradicate the "trimester framework" set forth in *Roe*, and implement the "undue burden" standard opened the floodgates in allowing states to create and implement increasingly restrictive law regulating abortion practices. In that there is now a subjective standard, each new law regulating abortion has the potentiality of being challenged by women's rights and right to privacy proponents. Conceivably these cases would reach the U.S. Supreme Court, where the Court would again weigh the merits of the abortion argument and hold forth whether said law embodies an "undue burden," in that it detrimentally and inexcusably encroaches upon a woman's right to choose.

It seems fitting to end this analysis of *Casey* with a quotation. In 1989, the author of *Roe*, Justice Blackmun, dissented in *Webster* v. *Reproductive Health Services* (1989), where the majority's holding allowed a superfluity of abortion restrictions to stand. He wrote, in allowing said abortion restrictions to stand, the Court "casts into darkness the hopes and visions of every woman in this country who had come to believe that the Constitution guaranteed her the right to exercise some control over her unique ability to bear children" (*Webster* v. *Reproductive Health Services* 1989).

Post-*Casey* Legislation and Jurisprudence

Post-*Casey* legislation and subsequent Court decisions have posed the essential question of whether a woman's decision to abort her non-viable fetus was overshadowed by the state imposing an "undue burden" on the same. While the *Casey* plurality allowed the central premise of *Roe* to stand, the decision was damaged. As we have seen with recent cases, namely *Stenberg* v. *Carhart* (2000) and *Carhart* v. *Gonzales* (2005), *Casey's* weakening of a woman's protections safeguarding her from unwarranted governmental intrusion has allowed for increasing encroachment upon that most sacred right guaranteed by the Thirteenth Amendment, i.e. the right to be free from slavery and involuntary servitude, both publicly and privately sponsored.

In *Stenberg*, Dr. Leroy Carhart brought suit in Federal District Court challenging the constitutionality of a Nebraska statute which prohibited the abortion procedure D&X, more commonly referred to as "partial birth" abortion. Nebraska Revised Statute 28-326(9) defined "partial birth abortion" as "an abortion procedure in which the person performing the abortion partially delivers vaginally a living unborn child before killing the unborn child and completing the delivery" (*Stenberg* v. *Carhart* 2000). The statute further determined the phrase "partially delivers vaginally a living unborn child before killing the unborn child" to mean "deliberately and intentionally delivering into the vagina a living unborn child, or a substantial portion thereof, for the purpose of performing a procedure that the person performing such procedure knows will kill the unborn child and does kill the unborn child." Both the District Court and the Eight Circuit Court held the Nebraska law as unconstitutional. Nebraska Attorney General Leroy Stenberg appealed to the Supreme Court and certiorari was granted.

On June 28, 2000 Justice Breyer delivered the opinion of the Court, holding:

> (1) [the] statute was unconstitutional because it lacked any exception for preservation of health of the mother; and,
>
> (2) statute was unconstitutional because it applied to dilation and evacuation (D&E) procedure as well as to dilation and extraction (D&X) procedure, and thus imposed undue burden on woman's ability to choose

D&E abortion, thereby unduly burdening the right to choose abortion itself (*Stenberg* v. *Carhart* 2000).

In deciding the Nebraska law was unconstitutional, the Court made note of the fact the Nebraska law did "not directly further an interest in the potentiality of human life by saving the fetus in question from destruction, as it regulates only a *method* of performing abortion" (*Stenberg* v. *Carhart* 2000, original emphasis). In its opinion, the *Casey* Court found "a State may promote but not endanger a woman's health when it regulates the methods of abortion" (*Planned Parenthood* v. *Casey* 1992). The State argued there was no need for such a health exception because "safe alternatives remain available [and] a ban on partial birth abortion/D&X would create no risk to the health of women" (*Stenberg* v. *Carhart* 2000). The Court disagreed, citing the "State fails to demonstrate that banning D&X without a health exception may not create significant health risks for women, because the record shows that significant medical authority supports the proposition that in some circumstances, D&X would be the safest procedure" (*Stenberg* v. *Carhart* 2000).

In regard to the Court's ruling, the D&X prohibition imposed an "undue burden" and a criminalization of that procedure would result in a violation of a woman's Thirteenth Amendment rights. Coming back to the crux of the argument that the carrying of a fetus and the subsequent childbirth is an occupation, the Thirteenth Amendment, as I have noted, specifically prohibits an individual from toiling at an occupation not of their choosing. Until the point of fetal viability, it is not the right of the state, as ruled by the Supreme Court, to force a woman to endure such an occupation. Had the Court ruled the Nebraska prohibition of the D&X procedure survived constitutional scrutiny, and was constitutionally acceptable, it would have resulted in the direct contradiction to their holdings in both *Roe* and *Casey*. For in both, the Court found a state may not ultimately, at least until the point of fetal viability, stand in the path of a woman's decision to undergo an abortion procedure.

A "carbon copy" of the Nebraska "partial-birth" abortion ban ruled unconstitutional in *Stenberg*, was passed at the Federal level with President Bush's signing of the Partial-Birth Abortion Ban Act of 2003. Consequently, in *Carhart*, Dr. Carhart et al. brought suit in the United States District Court for the District of Nebraska immediately following the signing of the Act, seeking an injunction. The District Court held the Act unconstitutional on the grounds that it did not contain an adequate health exception and, more importantly, imposed an

undue burden as a result of its coverage of the D&E abortion procedure, by virtue of its wording.

The Eighth Circuit Court of Appeals agreed with, and accordingly upheld, the District Court's decision holding the Act unconstitutional. As such, the Appeals Court announced "we believe when a lack of consensus exists in the medical community, the Constitution requires legislatures to err on the side of protecting women's health by including a health exception" (*Stenberg* v. *Carhart* 2000). Since the government did not evidence a medical consensus that D&X is never medically necessary, the Partial-Birth Abortion Act of 2003 must remain unconstitutional, as declared by the District Court. In addition to the Eighth Circuit, both the Second Circuit Court in New York and the Ninth Circuit Court in California have held the Act unconstitutional.

Having heard arguments in this case, should the Court, due to its new make-up, rule in favor of the Federal government, *Stenberg* and possibly *Casey* may be affected in the extreme. As the Circuit Court heard in oral arguments, in some cases it is safer for a women to undergo the D&X procedure as opposed to the D&E procedure. If partial-birth abortion is outlawed, specifically because of the visceral nature of D&X, but other forms of abortion remain, the federal government would violate the Thirteenth Amendment rights of women throughout the country for whom the procedure would be the medically safest alternative.

Conclusion

Abortion has been a critical issue for voters in state and national elections for more than thirty years. The election of pro-choice President Bill Clinton in 1992, and his subsequent appointments of Justice Ruth Bader Ginsberg and Justice Stephen G. Breyer to the Supreme Court, temporarily diminished the threat to *Roe*. However, the political and judicial climate of America has shifted with the confirmations of Chief Justice John Roberts and Justice Samuel A. Alito, Jr. I believe it prudent for citizens of this country to be cognizant of the agitated state of affairs consequential to the visceral debate concerning abortion. The religious right and a myriad of pro-life organizations throughout this country argue the rights set forth in *Roe* were a result of judicial activism, in that the Court created a "right to privacy" out of penumbras and thin air. I conclude, however, that while the "right to privacy" held in *Roe*

subsequently allowing abortion was not evident in the plain language reading of the Fourteenth Amendment, a similar reading of the Thirteenth Amendment reveals the same idea by explicitly prohibiting the government from forcing a person to toil at an occupation not of their choosing. Viewed within the confines of the Thirteenth Amendment, I do not think it erroneous for one to consider childbirth and the subsequent raising of said child as an occupation.

As I have argued above, to overturn *Roe*, the Supreme Court would, in essence, galvanize the supposition that a fetus is a "person" from the moment of conception, and is subsequently afforded all the rights and privileges of any other living citizen. However, this granting of constitutional rights for the fetus, and the potential prohibition of non-therapeutic abortions due to state statute, would leave the government at a crossroads. If the fetus is granted constitutional rights, what happens to the rights of the woman forced to carry it? A viewing of the Thirteenth Amendment, wherein as I have noted an individual is protected for enduring slavery and involuntary servitude, would certainly lead one to gather the rights of the fetus, having been granted "personhood" upon conception, are trampling a woman's right to not involuntarily serve another. So, shall the government simply allow these newfound rights of the fetus to eradicate the steadfast Thirteenth Amendment rights of the woman? I shall hope not, for as Justice Fortas wrote in *United States* v. *Price* (1966), "we think that history leaves no doubt that, if we are to give the law the scope that its origins dictate, we must accord it a sweep as broad as its language."

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Media *Meth*odology: A Study of the Media's Coverage of Methamphetamines

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Our research focused on media coverage of drug use, specifically the use of methamphetamines and crack cocaine. We examined whether the race associated with the drug affected the portrayal of its users. Using magazine and newspaper articles, we analyzed whether the media focused primarily on white methamphetamine users and whether the meth users were covered in a sympathetic manner. As a model for comparison, we relied on a previous study, Cracked Coverage by Reeves and Campbell, on the media's treatment of powder cocaine and crack users. Cracked Coverage found that the media showed predominantly black crack users in a harsh and unsympathetic light. Our research found that methamphetamine users, who were primarily depicted as white, were covered sympathetically. We believe that race is the reason for the difference in coverage styles.

Introduction

Americans read millions of magazines and newspapers every month, and many use these periodicals as their primary source of news information. Unfortunately, the type of coverage presented through these media is not always thoughtful, unbiased, or accurate. Thomas Jefferson said it this way, "The man who reads nothing at all is better educated than the man who reads nothing but newspapers." As bleak as this statement sounds, it may not be far from the truth sometimes.

The media in America help shape the feelings and ideas that are associated with race. Racial images in the media may be unintentionally constructed so that they are consistent with commonly established racial schema in the American culture. The coverage of drug use and its racial implications have received a great deal of attention from political scientists. Many times, a

single race can be associated with a certain drug; therefore we have decided to investigate whether or not the media's coverage of drug use differs based on the race with which a drug is associated.

Literature Review

In our research we study the way in which the media cover the issue of methamphetamine (meth) use. We specifically look at how, or if, race is associated with a drug. In this study, we compare our findings on meth to the research on racialized media coverage of crack cocaine (crack) and powder cocaine (cocaine) presented in the book *Cracked Coverage* (Reeves and Campbell 1994). Reeves and Campbell find that the media often relate African Americans to crack in an unsympathetic way. Our study is ground-breaking because scholars have not yet examined the relationship among race, media, and methamphetamine use.

A 1998 National Household Survey on Drug Abuse reported that the pattern of illegal drug use among blacks and whites is roughly proportional to their actual percentage in the United States population. In other words, blacks are no more likely than whites to use illegal drugs (Milovanovic and Russell 2001). When drug users are observed, crack use is highly concentrated in urban areas and among blacks. Research shows that crack users are more likely than other types of illegal drug users to live on the streets or in shelters and to use public assistance as their primary source of income (Riley 1997), while cocaine users are more likely to be affluent and middle-class whites (Reeves and Campbell 1994).

The disparity between these drugs and their apparent class niches may arise from the differences in socioeconomic status between races in America. A previous study found that people of lower socioeconomic status are three to four times more likely to use crack than are those of higher socioeconomic status (Goode 1999). Another study indicated that black men are twice as likely to be of lower socioeconomic status as whites and four times as likely to live in impoverished neighborhoods (Wallace 1999).

Researchers Sheila Murphy and Marsha Rosenbaum conducted a case study with two women, one a middle class white woman using cocaine, and the other a lower class black woman using crack. The results of this study yield possible answers to the question of why crack users are predominantly lower

class and cocaine users are more often higher class. The authors of the study concluded that crack usage is more rampant in lower class areas like the inner-city because of simple logistics. Many crack sellers belong to the lower class, and they sell their product nearest to where they live. On the other hand, cocaine, which is more expensive in small amounts than crack, is more easily marketed and accessible in middle-to-higher class areas. Crack becomes a problem in the inner-city simply because it is more easily found in lower class areas. Correspondingly, cocaine is more available than crack in higher class areas (Murphy and Rosenbaum 1997, 98-112).

The research also suggests that a higher class drug user's monetary resources give him or her an advantage over a lower class user. Middle class cocaine addicts have more resources available to them than lower class users, thereby preventing them from resorting to extreme measures such as theft or prostitution to obtain drugs. Also, upper class users would have easier access to appropriate health services when they were ready to quit using a drug. Lower class users may not have access to any kind of health care, let alone any type of rehabilitation program (Murphy and Rosenbaum 1997). It would be harder for a lower class user to stop using than for a higher class user, effectively maintaining the social, economic, and racial division between crack users and cocaine users.

The racial connections associated with crack and cocaine are furthered by the inconsistent sentencing of drug offenders. Laws in several states provide much harsher punishments for offenses involving crack than for those involving cocaine. Research shows that a vast majority of those with cocaine charges are white, while an even larger majority of those with crack charges are black (McNeir 2005). Thus, black crack users typically end up in prison for much longer time periods than white cocaine users (Reeves and Campbell 1994).

Throughout our study of the existing research on racialized drugs, we found that racism exists not only in the criminal justice system, but is also prominent in media coverage of illegal drug use. News coverage of mostly black, urban areas is overwhelmingly negative. Many stories related to urban areas focus on crime, resulting in a distortion of the public perception of the magnitude of and the race most often associated with crime-related problems in inner cities (Dreier 2005). These negative images of urban areas leads many viewers to form a "get tough on crime" attitude, which can make them more likely to support harsher policies on criminals, especially if those affected are likely to be black. These policies result in more arrests of black urban dwellers

who, in turn, receive more media coverage, creating more opportunities to reinforce the existing stereotype of black criminality (Peffley and Hurwitz 2002).

Previous research shows that when media cover drugs, racism is as prevalent as it is in coverage of crime, specifically in the coverage of cocaine versus crack. We reviewed Jimmie L. Reeves and Richard Campbell's *Cracked Coverage* (1994), a compilation of research that examined the media's coverage of crack and powder cocaine in the 1980s. Reeves and Campbell (1994) examined 270 television news reports from *ABC*, *NBC*, and *CBS* during the period of 1981 to 1988. Their research focused on the difference in coverage during three phases of cocaine news coverage. Reeves and Campbell referred to their phase theory as a trickle-down paradigm – the idea that what was once a drug belonging solely to the elite upper class had made its way down to the reaches of the lower classes. Reeves and Campbell used the term "transgressor" to describe any drug user. The transgressor group was further broken into "offenders" and "delinquents."

Phase one, according to Reeves and Campbell (1994), is the initial phase from January 1981 to November 1985. This coverage focused on the cocaine use of the glamorous upper class. These transgressors, who were most often white, were portrayed as offenders. Offenders were typically presented as affluent, white-collar workers who were in some kind of treatment program. They were shown to be in need of therapy but could eventually re-enter society. Many reports also centered on athletes and Hollywood stars. Stories in this phase were described by Reeves and Campbell as therapeutic narratives which often focused on drug treatment centers and drug hotlines.

The second phase of news coverage was called the crisis phase which spanned from December 1985 until November 1986. According to Reeves and Campbell's research (1994), this phase was characterized by images of crime running rampant in the inner-cities, sinister crack houses, and an emphasis on disciplinary operations. Reeves and Campbell found that stories encouraged the audience to identify with police officers and justified their use of extreme force against drug users. During this phase, the transgressor was identified as a black delinquent: an enemy beyond redemption. They described phase three as the aftermath phase. During this period, November 1986 to December 1988, the war on drugs emerged as a major political issue.

According to Reeves and Campbell (1994), the percentage of white males portrayed as cocaine users in news reports steeply declined at the start of

phase two, from 41% to 15% of the total transgressors, while the percentage of non-white male users increased sharply during each phase, from 13% in the first phase to 24% in the second to 40% in the third. Reeves and Campbell attribute this discrepancy to the network news' increased association of cocaine use with people of color. They found that the shift of phases of news coverage from the initial phase to the crisis phase was a shift from tales of cautionary warning of drug abuse to that of black inner-city criminals whose drug use was threatening white America (Reeves and Campbell 1994).

In light of existing research, one can see that there is a tendency to demonize crack users more than cocaine users, and the media have played a large role in the development of this trend. We feel that the reason for this difference is, at its core, racism. Our goal in this study is to find out to what degree, if any, the media differentiate between coverage of methamphetamines and crack and whether or not this differentiation is racially motivated.

Research Design

For the purposes of this study, we reviewed and coded a number of articles from various magazines and newspapers. We chose articles from four widely-read news magazines – *Time, Newsweek, The New York Times Magazine,* and *U.S. News & World Report* – to use as a basis for our research. We selected these four magazines because they are among the top-selling magazines in the country, and therefore would reach the highest number of people with their portrayals of methamphetamine use.

We selected our articles through a search of all articles that were under the Library of Congress subject heading "methamphetamine." Using the reputable, comprehensive online search engine, Academic Search Elite, we found all articles published between 1997 and 2005 in the previously listed magazines that were filed under this heading. We chose this period because methamphetamine use in the United States increased significantly during this time. Our search yielded nine articles.

We then expanded our analysis to include other magazines that are also widely read, but are not considered news magazines. The purpose of this expansion was to get a more comprehensive view of all of the media's portrayal of methamphetamine use, rather than from just the news media. Using the same method and time period as mentioned above, we collected six articles from

popular culture and entertainment magazines *People, Rolling Stone*, and *New York*. The inclusion of these magazines in our study allowed us to more accurately gauge the portrayals of meth users given by media as a whole.

In addition to pop culture and news magazines, our study included nine newspaper articles from *The Washington Post* and *The New York Times* to supplement the magazine articles. To find these articles, we used the newspaper search engine Lexis-Nexis. We conducted a search for all methamphetamine-related articles in these newspapers in the same 1997-2005 time period. To make sure the articles were truly about methamphetamines, the articles had to mention the word "methamphetamine" or its variant "meth" at least twice. We then chose every fourth article that turned up from each newspaper to be coded for our study. See Appendix A for a list of magazine and newspaper articles used in this study.

After collecting a total of 24 magazine and newspaper articles, we began our coding process. Our unit of analysis was single paragraphs. We coded every paragraph in each article and then recorded mentions of individual topics (a topic referred to more than once in a single paragraph was only recorded as one mention). The race of persons mentioned, and the paragraph's setting were also recorded using a standard coding sheet. Notes were made about special observations in individual articles, as well as about trends that were observed during research. In total, 503 paragraphs were coded in our study.

We coded the topic of a paragraph as one or more of the following: meth use prevention; meth user rehabilitation; any type of crime associated with meth; facts and statistics relating to meth; injuries caused by, and health effects related to, meth; children affected in any way by meth or its use; sentencing in meth cases; meth-related arrests or raids; and government drug policy. If more than one topic was mentioned in a single paragraph, each topic was recorded. We coded for the race, if it could be identified, of any person mentioned in an article as white, black, or other. Finally, a paragraph's setting, if it could be identified, was coded as rural, urban, or suburban. All of the above factors were coded in each paragraph.

In addition, all pictures that accompanied the chosen articles were coded using a separate coding sheet. We used the same coding procedure to record the race of persons featured, setting, and overall topic. Finally, each topic was grouped into one of three categories. We attempted to model some aspects of our research after Reeves and Campbell's work. We developed a system of

categorizing topic mentions based on their transgressor terminology. We designated each topic as being sympathetic, unsympathetic, or neutral. The sympathetic category was based on the "offender" description given by Reeves and Campbell, and the unsympathetic category was based on the "delinquent" description.

After all coding was completed, we compiled the data. We used these figures to analyze the media's coverage of methamphetamines and to compare it with the coverage of other drugs. The following sections present our research findings.

Race

In the articles selected from the magazines and newspapers, race was coded for in categories of white, black, or other. Our results show that of those people mentioned whose race could be determined, the media associate methamphetamine use with whites more so than with any other race (see Figure 1 below).

Figure 1: Race without Unknowns
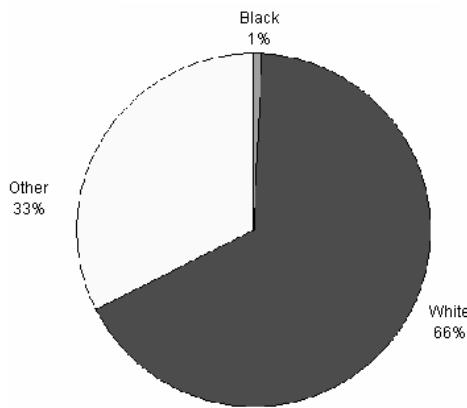
Out of the 245 people mentioned in the articles, 33% were white, 16% were of another race, and only 1% were black. Unfortunately, we could not clearly determine the race of 51% of people mentioned. As seen in Figure 1, the race breakdown was quite lopsided when unknowns were excluded. We believed

that many of these unknowns were white, but since this could not be explicitly proven, it was not coded for. Interestingly, only a solitary African American was mentioned in all the methamphetamine articles reviewed.

When gathering our articles, we found that a number of them dealt specifically with methamphetamine use in foreign countries. These articles were still coded, but we eliminated these articles from our racial statistics because our goal was to research domestic media coverage of meth users. After controlling for articles about foreign meth use and persons whose race was unknown, our data showed an even higher percentage of white meth users, as Figure 2 (below) shows.

Figure 2: Race (Excluding Foreign Users and Unknowns)
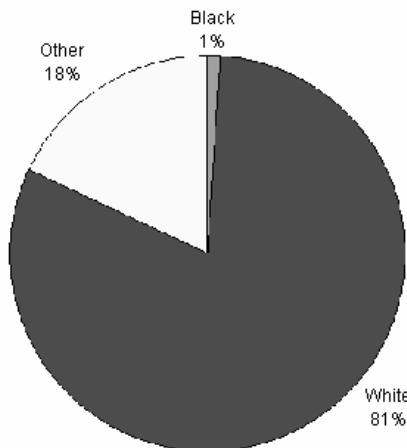
Eighty-one percent of the persons mentioned were white, while only 19% were Asian, Latino, or Native American, and just 1% were black. These data illustrate that the media portray U.S. meth users as predominantly white, and very rarely as black.

In addition to coding paragraphs we also coded pictures that appeared with the articles. After coding the pictures found in the articles, we noticed some disquieting trends. Persons featured in the pictures were separated into four different categories: users; suppliers or dealers; victims of meth-related incidents; and heroes, such as police officers and rehabilitation counselors. The majority of the users coded were white. As seen in Figure 3 (below), thirty-six of the total

users (72%) in the pictures were white, only one was black (2%), and nine were of another race (18%). This reinforces the previously noticed trend of the media to identify meth users as white. Of the ten victims we coded, 100% were white. Similarly, for the heroes whose race was distinguishable, all were white. There was only one dealer or supplier pictured with any of the articles. This person was Latin American.

Figure 3: Classification of People in Pictures
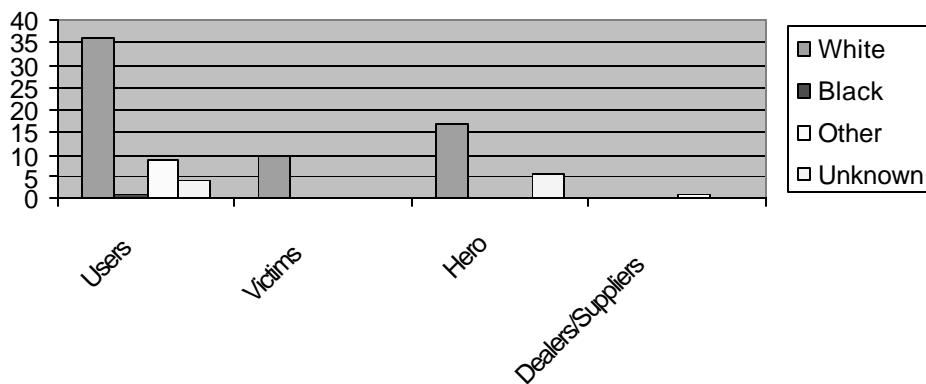
The majority of suppliers of methamphetamines who were mentioned in articles were Mexican. In fact, several articles suggested that meth had its origins in Mexico. A *Newsweek* article titled, "White Storm Warning," stated "[meth] is said to have come primarily from Mexican migrant workers" (Bai 1997, 66-67). The connection, through text and pictures, of Latin Americans, specifically Mexicans, and the supply of this drug implies that methamphetamine use is a foreign problem that has "corrupted" American communities.

Setting

When analyzing the physical setting data, we found that many articles dealt with methamphetamine use in rural areas. A number of these articles were set in the rural areas of Jackson County, Missouri, which is referred to as the "methamphetamine capital of America" (Wilkinson 1998), and the Shenandoah Valley area of Virginia. Figure 4 (below) shows that of the 503 paragraphs

coded in this study, 39% of them were set in rural areas, 44% were urban, and 17% were suburban.

Figure 4: Article Settings
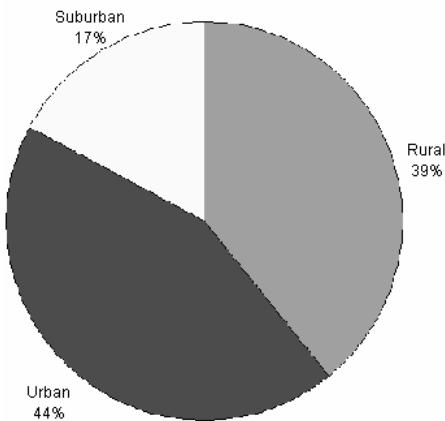
Our study included three lengthy articles that focused on homosexual meth users. We noticed that these articles discussed urban settings at a disproportionate rate compared to other articles. In fact, when an urban setting was mentioned, it was almost always in these articles focusing on homosexual meth users. One article stated that "crystal meth use in the city is confined to gay white men" (Jacobs 2004, B1-B5). For this reason, we felt it was necessary to analyze the data as a whole, as well as to look at the results with homosexuals set aside. We once again excluded foreign articles from our data set in order to focus on domestic coverage of methamphetamines.

In our analysis of the setting, we found a sharp contrast when the articles that focused on gays were excluded: 50% of the paragraphs coded were rural, 28% were urban, and 22% were suburban. As one can see, the difference between Figure 4 and Figure 5 (below) is dramatic.

Figure 5: Setting (Excluding Homosexual and Foreign Articles)
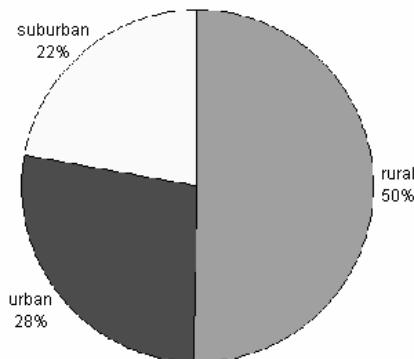
These results demonstrate that the media portray U.S. meth users as living mostly in rural areas. It also appears to hold the homosexual population responsible for most urban use.

Classification as Sympathetic v. Unsympathetic

During our coding, we categorized each topic as sympathetic, unsympathetic, or neutral. Prevention, treatment, children affected, and rehabilitation topics were coded as sympathetic; crime, sentencing, arrest, and raid topics were coded as unsympathetic; government policy, facts and statistics, and injury and health-effect topics were coded as neutral. We categorized each article as sympathetic, unsympathetic, or neutral overall based on which category received the most total mentions.

As seen in Figure 6 (below), we found that 54% of the 24 articles were sympathetic and 42% were unsympathetic. One article, 4% of the total surveyed, was coded as neutral because the number of sympathetic mentions was equal to the number of unsympathetic mentions.

Figure 6: Classification of Articles

Unsympathetic
42%

Sympathetic
54%

Neutral
4%
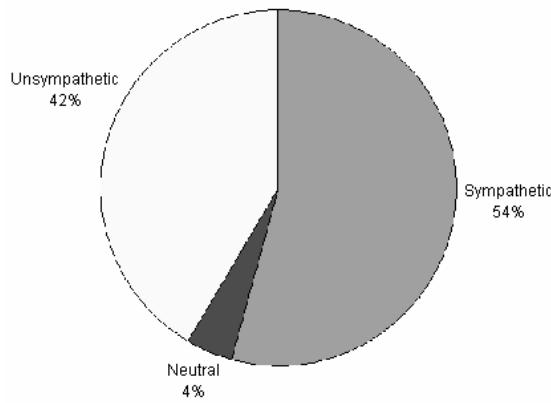
Thus, our results showed that the majority of the articles discussed meth use and users with more sympathy than condemnation.

Along with categorizing the articles as a whole, we also tallied the results of the individual topics in each paragraph. Figure 7 (below) shows that of the total 633 topic mentions that were coded, 49% were neutral, 30% were sympathetic, and 21% were unsympathetic. This indicates that the media deal with neutral topics more than with sympathetic or unsympathetic topics.

Figure 7: Classification of Units of Analysis

Unsympathetic
21%

Sympathetic
30%
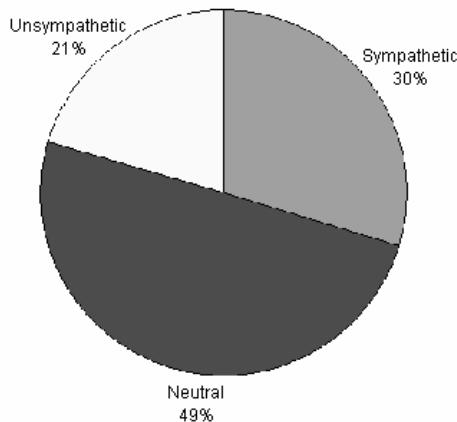
Neutral
49%

It should be noted that the neutral category included injuries, which was the most prevalent topic in the entire study. We determined that injuries would include any mention of mental, emotional, or physical health effects caused by meth use as well as physical injuries that occurred during or as a result of use. Although we decided these topics would be coded as neutral, it was our personal observation that, given the context of many of the articles, the mentions of these injuries were portrayed as more sympathetic than neutral. Methamphetamine users were typically portrayed as victims of the drug, and their injuries resulted from or were evidence of this victimization.

After mentions of these injuries, the next most prevalent topic – having been mentioned only three fewer times – was facts and statistics, most of which were about methamphetamine use and the drug's spread. Acknowledging the fact that methamphetamine in its current form is still a relatively new drug, it is to be expected that journalists would need to include factual information in order to bring their readers up to speed. Together, injuries and factual and statistical information made up 88% of the neutral category while government policy, the third topic in the neutral category, accounted for only 12%.

Figure 8 shows the obvious difference that designating injuries as sympathetic would make:

Figure 8: Classification with Injuries as Sympathetic
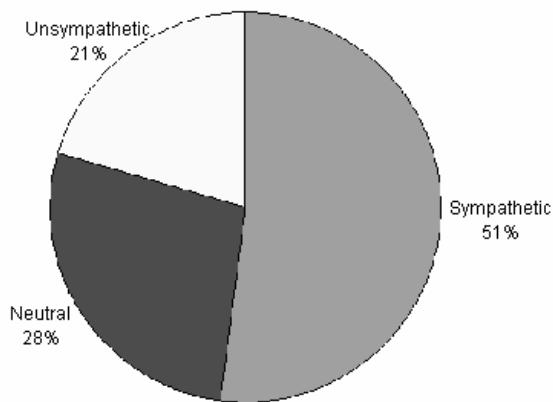
If injuries are included in the sympathetic category instead, the percentage of neutral topics falls to 28% and sympathetic topics increase to 51% of all topics. This leaves only 21% of the topics coded as unsympathetic.

We feel that these adjusted figures represent the trends in the media's portrayal of methamphetamine use and users more accurately. They indicate that the media's coverage is sympathetic towards meth users. Although we did not find the articles to be sympathetic by an overwhelming margin, we conclude from our data and qualitative observations that the media's coverage of methamphetamines is tilted more towards sympathetic than unsympathetic coverage.

In our research, we found parallels between the media's methamphetamine coverage and the coverage of cocaine as discussed in Reeves and Campbell's research. Like coverage of cocaine, many of the meth topics we coded for involved redemptive topics like treatment and rehabilitation. Crack users, however, were more likely to be associated with negative topics like crime. Thus, the media's coverage of meth and cocaine users is fundamentally different than its coverage of crack users (Reeves and Campbell 1994). When considering Reeves and Campbell's research along with our study, we observed a noticeable bias against crack users and sympathy for meth and cocaine users.

Strengths and Limitations

There were both strengths and limitations in the way this study was conducted. The complete lack of existing research on the relationship among methamphetamine, race, and the media indicates that our study was ground-breaking in that it was the first of its kind.

Another strength in our research was that we chose to analyze a very large cross section of genres, as well as different types of media to obtain the most representative sample possible. Entertainment, news, and pop culture magazines along with widely-read newspapers were included in our study to give the best overview of print media that we could analyze.

Despite these strengths some limitations also came to light in the process of conducting our study. We would have liked to code for more articles because we feel that 24 articles was not a large enough sample to provide results that we can generalize to the media as a whole. Our selection of newspapers was also somewhat narrow. Articles from only the *Washington Post* and the *New York*

Times were used, and although these are two of the leading newspapers in the country, they do not represent the entirety of the nation's newspapers by any means. Our research would have been more comprehensive if we had used a larger cross section of newspapers in the country.

Another weakness in our research was that our coding topics were developed before coding actually began. The problem with this is that our coding topics were based on preconceived notions and expectations of the types of topics we would find in our articles. Therefore, it is possible that our results may have been slightly biased, and there may have been aspects of the media coverage that we failed to take into account. As with any experiment, it is possible that there are confounds that could have affected the end results of our research. There may have been systematic differences between meth and crack users that could have caused the disparity in coverage. For example, it is possible that one drug may be more related to gangs, violent crime or other unknowable differences than another which could have affected coverage independent from race. In addition, an improvement to our research project would entail an extensive study of the coverage of crack as well as that of meth. We were only able to code for articles about meth, and we relied on Jimmie L. Reeves and Richard Campbell's data in *Cracked Coverage* regarding the coverage of cocaine and crack. An ideal project would include an equal analysis of the media's coverage of both crack and meth in order to better compare the results.

Further Research

In light of these limitations, we acknowledge that further research is needed on this topic. Even though our study analyzed different types of media, much more extensive research could be performed. Also, a study of gender conducted to analyze the differences in media content involving male versus female drug users would likely produce very intriguing results. A version of our study could also be done on different drugs. Since marijuana is a drug that is widely used by many different races, a study of the media's treatment of white marijuana users as compared to black marijuana users would be a very interesting subject to pursue. Also, a study comparing types of crime – and the degree of violence – that are committed in association with different drugs would yield fascinating results.

Conclusion

In answer to our research question, we conclude that the media does treat the drugs discussed in this study differently. We feel that the difference may be racially motivated though further research is required to prove this. Our research suggests that users of illegal drugs that are depicted as "white" drugs are treated more sympathetically than users of illegal drugs that are depicted as being "black" drugs. The users of white drugs are more often treated as victims who are to be sympathized with and given another chance. The users of black drugs are treated as criminals who are drains on society and deserve punishment. Though we find this conclusion troubling, it cannot be said that we find it surprising. Our findings help illustrate that, even with the progress made in the last century, today's culture, whether we notice or not, is still sadly affected by racism.

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The Neoconservative Persuasion:
How the Synthesis of Political Realism and Kantian Liberalism has Shaped American Foreign Policy

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There have been many attempts to unravel the motivations of President George W. Bush's foreign policy, especially in the aftermath of the September 11, 2001, terrorist attacks. One plausible influence on the country's commander-in-chief that has largely been overlooked is that of the neoconservatism movement. After all, many key players in the administration subscribe to the ideology's tenets. First, this paper will elaborate on the origins of neoconservative ideas, especially the fusion of realist and liberal thought. Then, I will show how this influence has affected the president's foreign policy, especially in the decision to engage in war with Iraq.

Introduction

The strategies and goals advocated by influential neoconservative policy makers and journalists are distinct from the traditional methods of international relations scholars. While most foreign policy students associate themselves with one of the two dominant theoretical paradigms, realism or liberalism, neoconservatives instead draw from both. Specifically, neoconservatives fuse aspects of realist power politics with Kantian liberalism, such as the universal spread of liberal democracy. Irving Kristol, widely credited as the founder of neoconservatism, described the transience of their ideas: "What we call neoconservatism has been one of those intellectual undercurrents that surfaces only intermittently...(It is) a 'persuasion' that manifests itself over time...and one whose meaning we clearly glimpse in retrospect" (2003).

This article is divided into two sections. The first half focuses on the origin and evolution of neoconservative thought over the past fifty years, while the second section examines the influence of neoconservative policy makers in the planning and implementation of Operation Iraqi Freedom. I examine the extent to which neoconservatives incorporate and apply elements of both the realist and liberal paradigms to their views on foreign policy and how this

synthesis influenced George W. Bush to go to war in Iraq. The invasion of Iraq was a natural extension of the War on Terror for neoconservatives. It was an attempt by American leaders to influence regional politics by planting the seeds of democracy to ensure the future security of the United States.

Origins of Neoconservatism

Neoconservative philosophy traces its American roots to the tumultuous 1930s. Immigrants, many fleeing from the grips of Hitler and Stalin, began settling along the East Coast in large numbers and eagerly joined the party of Roosevelt. Like others, Irving Kristol, Daniel Patrick Moynihan, and Nathan Glazier were all ideologically liberal (many had been socialists) and therefore embraced the New Deal initiatives. Having been far removed from the American tradition of minimal government, it was only natural that they supported a more proactive social welfare policy. Kristol even argued that conservatism and welfare state policies were not inherently contradictory. After all, it was Conservative Chancellor Otto Von Bismarck who first enacted these changes in Germany. By the 1950s, these immigrants, along with a substantial number of northeast intellectuals, strongly supported President Truman's militant anti-Communist policies (Havers and Wexler 2001).

Events during the 1960s had a critical impact on the ideology of this group. Many had become disillusioned with the new slant of the Democratic Party. President Johnson, they believed, had taken his Great Society concept of the welfare state too far. Their defection to the right was not only a response to that administration, but a reactionary response to the counter-culture movement and the Democratic Party's support for anti-Vietnam War candidates. The neoconservative movement held qualities of morality and patriotism in high regard, and the Democrats' perceived rejection of these principles played an integral role in neoconservatives sliding to the right on the political spectrum (Gerson 1996, 103-130).

By the early 1980s, many members of the neoconservative community had cemented their membership in the Republican ranks and were serving in the Reagan administration or in prominent conservative think tanks. For instance, Jeane Kirkpatrick served as ambassador to the United Nations and Paul Wolfowitz was a member of an influential lobbying group that was promoting an anti-ballistic missile (ABM) defense system (Winik 1996, 52). Many of the

anticommunism qualities that neoconservatives had embraced in Truman they also found in Reagan. Later, neoconservatives believed that Reagan had endorsed their view of taking a hard-line approach to the Soviet Union by rejecting mutual cooperation and pursuing an arms build-up to isolate the East (*Christian Science Monitor* 2004). In their collective memory they had played a critical role in defeating the Soviet Union and its collapse seemed to be a bittersweet victory for the neoconservatives.

Indeed, the dissolution of the Soviet Union ushered in a new era of unrivaled American power. President George H.W. Bush's decision to seek a United Nations mandate before expelling Iraqi forces from Kuwait in 1991 appeared to show that the country was not necessarily going to pursue the policies of unilateralism. President Bill Clinton continued to embrace multilateralism in a bid to strengthen and spread liberal democracies and to provide justification for military endeavors, such as air strikes against Serbian forces in 1998.

Neoconservatives, however, were sharply critical of Bush, and especially of Clinton. They believed that the presidents had failed to establish a global strategy to direct the military and instead chose to commit troops on a case-by-case basis. This lack of a coherent policy over-committed American forces to activities that were not in the country's best interest. Neoconservatives were especially disturbed by Clinton's perceived weakness in Somalia. The notion that American troops would exit a country at the first sign of trouble sent the wrong message to future adversaries. Neoconservatives urged a steadfast approach to major security threats in order to highlight American strength to the world (Kagan and Kristol 1996).

Realist and Liberal Theory

Realists promote the idea that the United States must strive to maintain its unrivaled hegemonic status in order to ensure international stability. Even in an international system dominated by the United States, power politics, such as preemption and unilateralism, are still necessary to ensure the country's position. These tactics, according to realists, are critical to the survival of the state and the present international system (Mearsheimer 2001).

Realists also believe that supranational organizations are not important elements to the conduct of a state's foreign policies. Instead, states are the

principal actors in the international realm and they hold the ultimate check over their own security. Generally, states are reluctant to concede part of their sovereignty in the hopes of universal cooperation. John Mearsheimer argues that "great powers do not work together to promote world order for its own sake. Instead, each seeks to maximize its own share of world power. The particular international order that obtains at any time is mainly a by-product of the self-interested behavior of the system's great powers" (2001, 49).

Realists reject the notion that a state's government affects how it interacts in the international system. Realists, such as Christopher Layne, dismiss the democratic peace theory (a view that democracies do not go to war with one another). The number of democracies in the world has historically been small and that most of these states were located in Western Europe. Layne argues that as more countries embrace democracy, war between these countries will ultimately occur. Since the number of democracies has been small, a correlation cannot yet be established. Realists disregard the idea that democracies share similar norms and act in a similar fashion in the international system. In fact, some realists argue that a state's internal institutions are more acutely affected by external factors. States in high-risk environments will likely be autocratic in order to respond to external threats (Layne 1994).

Meanwhile, liberals viewed the end of the Cold War as a chance for America to lead the world as a benevolent power. The United States had won the war of ideas and no longer faced a viable threat from the Soviet Union. Therefore, the focus on security issues and power politics ought to take a back seat to issues of trade and the advancement of human rights. Liberals, unlike realists, de-emphasize the role of a state's military in the international system (Nye 2003, 8). Military intervention was now viewed as a tool to end conflicts within states and not just to secure the international status quo.

Liberals view international organizations as vehicles for furthering interdependence among states in the international system: "International institutions provide information and a framework that shapes expectations and reduces the effect of anarchy" (Nye 2003, 45). Organizations such as the United Nations allow states to discuss security problems in an open format and encourage countries to seek collective action in dealing with a particular situation. Non-governmental organizations, such as multinational corporations, academic institutions, charities, and churches promote peace by making states interconnected.

In further contrast to realists, liberals are strong supporters of the systemic properties of the democratic peace theory. Liberals hypothesize that as the number of democracies increase, so too will the prospects for universal peace. These proponents of the democratic peace theory argue that democracies share an inherent respect for one another and are reluctant to fight a country with a similar popularly elected government. They also argue that internal mechanisms in a democracy prevent the government from hastily undertaking war. Should a dispute arise, governments in democratic countries will have time to solve the situation peacefully. It is the liberal view that domestic institutions and norms are critical determinants of a state's foreign policy (Oneal and Russett 2001).

In combining these two theories, neoconservatives have awkwardly grafted the Kantian notion that democracies are inherently more peaceful in an international system onto a realist framework. Neoconservative scholars idealistically promote democracy and fervently believe in the democratic peace theory; however, they justify the implementation of democracy through the policies of realpolitik. In essence, the idealistic result of neoconservative foreign policy is the cultivation of peaceful, stable democracies, which ultimately legitimizes the realist tactics that are utilized. The idea that democracy can and should be forcefully exported creates tension between the neoconservatives and the Kantian-liberals. While liberals agree that the spread of democracy ensures peace, they reject the neoconservative method of implementation. Democracy, they believe, should not be forced on one state by another (Page 2004). Philosophically, the liberal ideology encapsulates the belief that it is possible to transform the Hobbesian system into a Lockean one by acting like the former. Kant had argued that a state's internal problems would not justify a foreign government's intervention, since "interference by foreign powers would infringe on the rights of an independent people struggling with its internal disease; hence it would itself be an offense and would render the autonomy of all states insecure" (Kant 1795). States must be free to develop as they wish or they risk the potential for endless war.

Role of American Hegemony

Neoconservatives argued that America's role as global leader should not have been subverted in the 1990s simply because the United States lacked a visible enemy. Kagan and Kristol decried what they perceived as a slide towards

irrelevance: "The dominant strategic and ideological position the United States now enjoys is the product of foreign policies and defense strategies that are no longer being pursued. American hegemony is the only reliable defense against a breakdown of peace and international order" (1996). The authors' solution was a return to the strategies of Ronald Reagan. The U.S. needed to ensure that the country was militarily superior to any of its rivals and should not have been afraid to flex its muscles. Kagan and Kristol had as much trouble in spreading this message during the 1990s as they do today in the midst of the War on Terror and the invasion of Iraq. They scoffed at James Baker for selling the first Gulf War "in terms of jobs and not as the defense of a world order shaped to suit American interests and principles" (1996). They exhorted the American people to think abstractly, though it is much easier for people to recognize the tangible benefits and consequences for pursuing such actions.

At the end of the George H.W. Bush administration, Paul Wolfowitz, Undersecretary of Defense for Policy, constructed a mission statement to guide American foreign policy into the twenty-first century. The Defense Planning Guidance report urged the United States to protect its unrivaled status by discouraging potential competitors from challenging the country and persuading Western Europe to accept American leadership in economic and military affairs. Clearly, the primary countries of focus were China and a potentially resurgent Russia. Wolfowitz's ideas were, in traditional neoconservative fashion, bold and audacious. When word of the new policy was leaked to the press, reactions were impassioned. European and Asian powers quickly complained that the United States was attempting to subvert their regional hegemonic status (Martin 1992), while Americans were ultimately unwilling to accept such a proactive militant role during a time of peace. In fact, international and domestic outcry was so strong that Secretary of Defense Dick Cheney was forced to rewrite the policy ("Excerpts from the Defense Planning Guidance" 1992).

International Organizations

Irving Kristol is one of the more vociferous in condemning the United Nations and the future prospects of multilateralism. He argued that "international institutions that point to an ultimate world government should be regarded with the deepest suspicion" (2003). Neoconservative distrust of the UN can be traced back to 1974, when a resolution was introduced before the United Nations

General Assembly that essentially equated Zionism with racism. The measure, constructed by the Eastern Bloc countries and the Arab nations, blatantly targeted the existence of Israel, the primary ally of neoconservatives (Gerson 1996, 169-170).

The view that the state is the only important actor in the international system has been carried over to the War on Terror. After the attacks of September 11, 2001, neoconservatives applied a state-centric strategy to defeating terrorism. Douglas Feith, Undersecretary of Defense for Policy, made it clear that a focus on state-sponsors would be the "principal strategic thought underlying our strategy in the war on terrorism" (Marshall 2003). In a speech before Congress, President George W. Bush emphasized the strategy of targeting states that shelter members of al-Qaeda: "We will pursue nations that provide aid or safe haven to terrorism. From this day forward, any nation that continues to harbor or support terrorism will be regarded by the United States as a hostile regime" (Bush 2001).

Democracy and Peace

Neoconservatives have taken a proactive approach to the spread of democracy in Asia and in the Middle East. In 2000, the Project for a New American Century released an outline of its goals for the twenty-first century, which included "securing and expanding the zones of the Democratic Peace" in the Middle East and in East Asia (Donnely 2000). As early as 1998, neoconservatives at the Project for a New American Century advocated a plan to establish "a provisional, representative, and free government of Iraq in areas of Iraq not under Saddam's control," specifically for the Shiites in the south and the Kurds in the north (Abrams et al. 1998b). The cultivation and spread of democracy in Asia and the Middle East has always been a stated goal of the neoconservatives.

Neoconservatism and the War in Iraq

It is evident that the intellectual framework for Operation Iraqi Freedom was, to a great extent, created and driven by supporters of neoconservatism long before September 11, 2001. The attacks on the Pentagon and the World Trade Center simply provided the impetus for neoconservative followers to once again

exert their influence. The build-up to the war in Iraq contained the distinctive features of neoconservative ideology: a mixture of preemption, unilateralism, and staunch support for democracy.

This paper does not argue that President Bush readily accepted the neoconservative position on Iraq in the weeks immediately following September 11, 2001. In fact, there is a plethora of evidence to presume otherwise. The fact that President Bush waited 18 months to strike Iraq, against neoconservative wishes, shows that neoconservative dominance within the administration was not completely pervasive. Key members of the Bush administration, however, had embraced this ideology in the aftermath of 9/11, and were influential in persuading the president to launch a preemptive, unilateral attack against Iraq. The tenets of neoconservatism would define the contours of U.S. policy toward this country.

Pre-September 11 Views of Neoconservatives on Iraq

President George H.W. Bush's refusal to extend the first Persian Gulf War beyond Kuwait's liberation infuriated neoconservatives in Washington, many of whom urged a complete Iraqi invasion (Vest 2001). Throughout the 1990s, neoconservatives continually lambasted President Clinton for his failure to deal with the threat of Saddam Hussein. On January 26, 1998, a legion of neoconservatives, including Paul Wolfowitz, Robert Kagan and William Perle, sent a letter to Clinton urging him to form a new strategy to protect American interests. They wrote, "This strategy should aim, above all, at the removal of Saddam Hussein's regime from" (Abrams et als. 1998a). These neoconservatives were primarily concerned about Saddam's ability to make and use weapons of mass destruction (WMD), and they argued that the United States' attempt at containment was slowly eroding. With the departure of the UN inspectors, the United States lacked the ability to fully ensure that Saddam was complying with international law (Abrams et al. 1998a). William Kristol and Robert Kagan sent an open letter to the *New York Times* four days later, urging the necessity of "using air power and ground forces, and finishing the task left undone in 1991" (1998, A17). When President Clinton failed to include this new strategy into his State of the Union address, the neoconservatives attempted to persuade congressional leadership.

In a letter to Speaker of the House Newt Gingrich and Senate Majority Leader Trent Lott, the neoconservatives reiterated the threat that Saddam's WMD posed to friendly regimes in the Middle East and to the United States. They blamed President Clinton for the "significant defeat in our world-wide efforts to limit the spread of WMD. Other nations seeking to arm themselves with such weapons will have learned that the U.S. lacks the resolve to resist their efforts" (Abrams et al. 1998b). It is evident from the second letter that the neoconservatives were more concerned with limiting the spread of these chemical and biological weapons, than from Saddam actually launching an attack with such a device himself. The focus had moved from Saddam's ability to use such weapons to Saddam's ability to export chemical and biological technology to terrorist organizations, which is a significantly easier task. This belief would become the foundation for Bush's decision to invade Iraq in 2003. Besides infrequent bombing raids on Iraqi military institutions, Clinton refused to increase the scope of the Iraqi mission for the remainder of his second term.

Effect of September 11

When 19 stateless hijackers attacked the World Trade Center and the Pentagon, the Bush administration faced difficult questions in formulating a response. On the day after the attacks, the National Security Council convened to discuss the extent of this new war. Secretary Colin Powell advocated minimizing force to al-Qaeda only: "The goal is terrorism in its broadest sense, focusing first on the organization that acted yesterday" (Woodward 2002, 43). He had concerns that world opinion would oppose the United States if the country shifted its scope of retaliation away from al-Qaeda. On the other hand, Secretary Donald Rumsfeld and Vice President Dick Cheney raised the possibility of striking Iraq as well as Afghanistan. The Vice President argued that the reasoning for war ought to be kept vague in order to keep America's options open in the future. "To the extent that we define our task broadly, including those who support terrorism, then we get at states. And it's easier to find them than it is to find Bin-Laden. To strike a blow against terrorism inevitably meant targeting the countries that nurture and export it" (Woodward 2002, 43). Iraq was the principle state on his mind.

During the first Gulf War, Cheney had agreed with Powell that Saddam had been effectively contained and that further action would be fruitless

(Woodward 2002, 328). It is clear from this point that Rumsfeld and Cheney had only recently accepted the neoconservative position. While it is impossible to determine whether the two had arrived at this conclusion independently, or whether they were influenced, it is worth noting that both had neoconservatives in subordinate positions: Paul Wolfowitz was Deputy Secretary of Defense to Rumsfeld, and Lewis "Scooter" Libby was Cheney's Chief of Staff. Wolfowitz and Libby were named in a prominent *New York Times* article as opposing Powell in advocating an attack against Iraq in the first wave of the War on Terror (Woodward 2004, 50).

Thus, the internal debate had already shifted from al-Qaeda – the entity fundamentally responsible for organizing and implementing the events on September 11 – to the potential culpability of rogue states. There was minimal evidence to suggest that al-Qaeda had been dependent on the Iraqi state to achieve its goals ("September 11 Commission Report" 2004). It was also increasingly apparent that the neoconservative hawks were not only seeking justification for a war on al-Qaeda, but for a war against Iraq. Powell reported to the September 11 Commission that Wolfowitz was using the 2001 attacks as a pretext for war in Iraq: "Paul was always of the view that Iraq was a problem that had to be dealt with, and he saw this as one way of using this event as a way to deal with the Iraq problem" (2004). The reason neoconservatives focused on states in general, and more specifically Iraq, was simple: Iraq, unlike al-Qaeda, had sovereignty, a professional army, a conventional battlefield, and perhaps most importantly a staging area for greater American influence in the region. Nearly one week after 9/11, however, Bush had chosen to side with Powell and focused only on the network of Osama Bin-Laden (Woodward 2002, 49).

Strategy for a War in Iraq Emerges

After the successful military campaign in Afghanistan, the neoconservatives in the administration once again turned to Iraq. By the spring of 2002, planning was already under way for the implementation of phase two of the War on Terror: a preemptive, and if necessary, unilateral attack against the Middle Eastern country.

Neoconservatives had long sought a reason to link Saddam and his stockpile of weapons of mass destruction to the need for regime change. As early as 1998, Kristol, Kagan, Wolfowitz, and others had unsuccessfully urged the

Clinton administration to oust Hussein. They now argued that in the post-9/11 world, the stateless threat posed by al-Qaeda justified the removal of potential weapons suppliers. More specifically this meant the removal of rogue regimes, especially those with WMD stockpiles. In his 2002 State of the Union Address, President Bush officially made the connection between rogue state regime change and the War on Terror: "States like these (Iraq, Iran, and North Korea)…pose a grave and growing danger. They could provide these arms to terrorists, giving them the means to match their hatred" (Bush 2002). According to the administration, the threat of rogue states that possessed WMD technology now posed a threat equal to that of al-Qaeda. Many in the government, most notably Powell, now urged President Bush to take his case before the United Nations.

Critics argued that the situation was quite unlike that of October 2001. In that case, al-Qaeda's guilt had been undoubtedly established and an immediate invasion seemed critical to national security. Iraq also appeared to be sufficiently contained by both sanctions and frequent American and British bombing raids. Some prominent administration figures urged President Bush to undertake an international coalition similar to what had occurred during the first Gulf War.

The neoconservative position on unilateralism was outlined in the aforementioned Defense Planning Guidance statement, developed by Wolfowitz in 1992. Wolfowitz wrote that the United States, as a hegemonic power, "should expect future coalitions to be ad hoc assemblies" when dealing with a particular strategic threat ("Excerpts from Defense Planning Guidance" 1992). Cheney had stated in 2001 that future coalitions would fit the mission, an argument that mirrors Wolfowitz's controversial report (Woodward 2002, 48). Many European allies were reluctant to give immediate approval to a UN resolution against Saddam. France and Germany expressed legitimate concerns over how this war would affect Western relations in the Arab world (*The Economist* 2003). German Chancellor Gerhard Schroder became angry when he was not consulted to create a unified policy towards Iraq. "It just isn't good enough to learn from the American press about a speech, which clearly states: 'we are going to do it, no matter what the world or our allies think.' That is no way to treat others" (*The Economist* 2002). Vice President Cheney rejected their concerns, telling Tim Russert just days before the invasion, "the fact of the matter is, for most of the others who are engaged in this debate, they don't have the capacity to do anything about it anyway" (Russert 2003).

Democracy in Iraq

The fundamental motive driving President Bush's policies in the Middle East is the belief that democracy will ultimately stabilize this volatile region. In speeches about Iraq, President Bush frequently elaborates on the need for democracy and freedom: "I renewed this nation's commitment to promoting liberty abroad. Because our own freedom is enhanced by the expansion of freedom in other nations, I set out the long-term goal of ending tyranny in the world" (Bush 2002). President Bush chose a neoconservative think tank, the American Enterprise Institute, to describe how democracy in Iraq would influence the formation of democracy and lead to stability in the Palestinian territories: "Success in Iraq could also begin a new stage for Middle Eastern Peace. Without this outside support for terrorism, Palestinians who are working for reform and long for democracy will be in a better position to choose new leaders" (Bush 2003).

Even though a majority of the American public is leery about the prospects of democracy in Iraq, President Bush refuses to deviate from the democratic line (Harris and Muste 2004). Communication director Dan Bartlett explained that "every time we'd had a speech and attempt to scale back the liberty section, he would get mad at us...he would write the word freedom between two paragraphs to prompt himself to go into extended arguments for America's efforts to plant the seeds of liberty in Iraq and the rest of the Middle East" (Dickerson and Gibbs 2004, 33).

While recent presidents have actively pushed for democracy in the region, Bush has taken this a step further by turning his rhetoric into action. Bush's strong avocation for the spread of democracy changed in the midst of September 11. Hitherto, the foreign policies of the Bush administration had been cautious and were marked by avoidance of international obligations and treaties, such as the International Criminal Court, Kyoto, and the ABM treaty. During the 2000 presidential debates, the Texas governor made it clear that he would not pursue military commitments for peace-keeping and nation-building exercises (Bush and Gore 2000). Now President Bush sees the cultivation and spread of democracy as a personal calling. While discussing a draft of a speech he was to give in the days following the attacks, President Bush told his longtime aide Karen Hughes that "this is a defining moment. We have an opportunity to

restructure the world toward freedom, and we have to get it right" (Bruni 2001, A22).

Critics of Neoconservative Foreign Policy

Traditional realists and liberals have become strange bedfellows in opposing the Iraq invasion. Realists, such as John Mearsheimer and Stephen Walt, argue that an invasion of Iraq was unnecessary as a means to end the threat of WMD proliferation (2003). By examining Iraq's 1980-88 war with Iran and its 1990 invasion of Kuwait, the authors conclude that Saddam was acting rationally, and therefore could be deterred. Saddam had invaded Iran to counter the country's pursuance of regional hegemony. The reasons for his 1990 invasion are complex, but the authors write that the United States' ambassador to the country said "we have no opinion on the Iraqi Arab-Arab conflicts, like your border disagreement with Kuwait," thus failing to give Saddam the red light on a future invasion. They also cite an instance in 1994, when Iraq mobilized troops on the Kuwaiti border. This time their goal was to influence the work of UN weapons inspectors operating in the country. Saddam backed down once the United States began mobilizing forces inside Kuwait. There was no reason to believe that Saddam would act differently with such a large contingent of American troops stationed throughout the Middle East (2003).

Realists claim that neoconservatives were overly optimistic that neighboring rogue states would bandwagon with the United States' position in the face of an overwhelming geo-strategic military presence. Instead, realists believe that these states will inevitably balance against the Americans. The balance verse bandwagon debate is certainly not a new phenomenon for foreign policy makers, especially concerning those states in the Middle East. In *The Origins of Alliances*, Stephen Walt argued that Middle Eastern states are more likely to balance than bandwagon when threatened by an aggressive regional power. Bandwagoning typically occurs among weaker states that are unable to form alliances and ultimately feel that they must appease the threatening country (1987, 158-178). Neoconservatives have pointed to Libya and its decision to end its WMD program and embrace the West as a victory for their cause; however, Iran's decision to pursue nuclear weapon development is a better predictor of what will happen when a Middle Eastern state feels threatened. There was initial optimism among many administration officials that our dissenting allies would

also bandwagon with the American foreign policy. On the eve of the Iraqi war, Dick Cheney told Tim Russert that "a good part of the world, especially our allies, will come around to our way of thinking" (Russert 2003).

The former Senate Minority leader, Tom Daschle, and current House Minority leader, Nancy Pelosi, have both been vocal in their condemnation. Pelosi presented the traditional liberal argument by criticizing the president for not sufficiently presenting the case for war to "the American people…to the world community" and lastly, "to the Security Council." Daschle echoed these sentiments when he stated that the executive branch was "rushing to war without adequate concern for the ramifications of doing so unilaterally or with a very small coalition of nations" (Dewar and Vandehei 2003).

Conclusion

The greatest weakness of the neoconservative strategy is not that it is unrealistic, but that it is short sighted overall. The United States does have substantial resources in which to unilaterally initiate democratic revolutions across the Middle East. It cannot hope to sustain them, however. While it is true that historical evidence substantiates the peaceful nature of mature democracies, many democratic peace theorists also believe that rapidly democratizing countries are much more likely to be war prone. Jack Snyder wrote that "democratization in the developing world, as in other settings, is most likely to stimulate national conflict when elites are threatened by rapid political change and when the expansion of political participation precedes the formation of strong civic institutions" (2000, 266). Sunni elites have ultimately been reluctant to cede the reins of power to the Kurds or Shiites and have manifested their disaffection by refusing to participate in the political process or by taking part in the insurgency. Instead of causing regional stability, as President Bush hopes, a democratizing Iraq is likely to unleash a wave of turmoil among its neighbors.

The number of high-level neoconservative policy-makers that served in the White House and Pentagon during the second Gulf War raises troubling questions concerning the foreign policy agenda being followed. It is unlikely that an Iraqi invasion would have occurred had the neoconservatives in the Bush administration not been so prominent. In other words, neoconservatives are primarily responsible for the recent shift towards power politics and democracy building; Operation Iraqi Freedom was not just a natural progression in the War

on Terror. As I have already shown, the neoconservative ranks exerted significant influence over the course of events after the invasion of Afghanistan. Many in the administration were quick to extend the war to Iraq, even before the Taliban had been overwhelmingly defeated.

Interestingly, it appears that Kristol's "persuasion" has already passed, at least for the moment. Recently, Dick Cheney and Donald Rumsfeld have both been quiet on foreign policy matters. Their subordinates, Scooter Libby and Paul Wolfowitz, no longer serve in their once powerful positions. It has become increasingly evident that the State Department has consolidated the foreign policy apparatus under Secretary Condoleezza Rice. With fewer neoconservatives in power, the U.S. seems more likely to pursue the path of diplomacy. While the United States should strive to maintain its unrivaled hegemonic position, it must wield its power carefully. Unilateralism, preemption, and democracy exportation will not end the threat of an international terrorist organization that is both elusive and stateless in the twenty-first century.

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Religion and Environmentalism in America: An Analysis of Green Consciousness among the Christian Right

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There are many factors that affect a person's awareness of or interest in the environment. Using research from a bevy of political scientists, I explore the connection between religion and environmentalism. Earlier research suggests that Christian beliefs influence attitudes toward the environment. Using data from the American National Election Study 2004 Panel Study, I analyzed this relationship. Traditionally, it has been found that factors such as interpreting the Bible literally tend to correlate with low levels of concern for the environment. In my findings, however, I conclude that this relationship is a weak one and the Christian Right serves no serious threat to the environmental movement.

To explain the rise of environmental consciousness and the emergence of the environmental movement, Ronald Inglehart points to empirical evidence of changing value systems following World War II (1990). In particular, this shift in values is one from a materialist value system defined by concerns with physical sustenance and general safety to a post-materialist value system with greater emphasis on quality of life and individual expression. Such a shift in the public's value system allows for an explanation of heightened concern with the natural world and environmental policy. Inglehart attempts to explain what specific characteristics are likely to lead an individual to become involved with social movements that have emerged in this shift from a materialist to a post-materialist value system. In terms of involvement in the environmental movement, Inglehart finds that Christian groups are not as likely as secular groups to support the Green movement and consider themselves environmentalists. Additionally, Inglehart presents evidence that individual age, income, and strong identification with post-materialist values share positive relationships with one's level of support for the environmental movement (1990).

In addition to Inglehart's findings that are based on data collected mostly in Europe, research conducted in the 1980s by Carl M. Hand and Kent D. Van Liere indicates that Christian fundamentalism and political conservatism are

strong predictors of low levels of concern with the environment among the American public (1984). Other researchers, such as James L. Guth et al. found in the 1990s that in addition to religious identity, demographic factors correlate with environmental attitudes with varying degrees of strength (1995). These demographic variables include age, education level, and political ideology. Despite these findings, in the past several years conservative Christians have begun forming environmental organizations, like the Evangelical Environmental Network. Works such as *The Greening of Protestant Thought* by Robert Booth Fowler have noted the rise of pro-environmental attitudes among Protestants (1995). This phenomenon invites an examination of more recent survey data in order to determine if we can identify the emergence of conservative Christian environmentalists and if so, does this represent a heightened Green consciousness among conservative Christians as a whole? One hypothesis is that factors such as Christian fundamentalism and support for a literal interpretation of the Bible are weakly correlated with environmental concern, as found by Hand and Van Liere or Guth et al. The alternative hypothesis is that Christian conservative identity and belief in a literal interpretation of the Bible correlate with pro-environment orientation or predict support for pro-environmental positions.

With the highly polarized nature of politics in present-day America, empirical evidence of rising concern for the environment among conservative Christians as a group would present a challenge to both the Republican Party and the environmental movement. Conservative Christians, or the Christian Right, serve as a reliable base of support for the Republican Party while environmental concern has been traditionally associated with liberal political ideology and the Democratic Party (Inglehart 1990; Wilcox, 2000). Through successful lobbying and mobilization across the United States in all levels of government, the Christian Right has proven to be a highly influential political force. If concern with the environment becomes an aspect of conservative Christian identification, the Republican Party will certainly undergo pressure to appeal to their new attitudes (Wilcox 2000). Clearly, findings on the relationship between religion and environmentalism could have broad-sweeping implications for American politics and the environmental movement.

Previous Findings on Religion's Influence on Environmentalism

In 1984, Carl M. Hand and Kent D. Van Liere published the article "Religion, Master-Over-Nature, and Environmental Concern" in response to the lack of empirical research conducted in exploration of the presumably negative relationship between environmental attitudes and the "mastery-over-nature orientation in Western culture" reinforced by religious institutions (Hand and Van Liere 1984, 555). Using a model set forth by L. White in 1967, along with a "denominational diversity model" and a "no-difference" model, Hand and Van Liere examined the connections between religion, "mastery-over-nature orientation," and environmental attitudes based on data gathered in a 1976 survey of residents of Washington State (Hand and Van Liere 1984, 558). The results of their analysis reveal that environmental commitment varies between religious denominations and, in general, Judeo-Christians demonstrate greater adherence to the "mastery-over-nature-orientation" than do non-Judeo-Christians.

To preface their findings, Hand and Van Liere include a discussion of White's argument that Judeo-Christian faith emphasizes mastery over the world. In White's view, people's attitudes toward the natural environment are strongly rooted in their religion. Although White discusses people generally, Hand and Van Liere argue that the notion of religion determining environmental attitudes exists on an individual level From here, the researchers hypothesize that Judeo-Christians will exhibit lower levels of environmental concern because of their stronger acceptance of the "mastery-over-nature" doctrine in comparison to non-Judeo-Christians (Hand and Van Liere 1984, 556). Due to acceptable criticisms of White's view, Hand and Van Liere's analysis includes denominational differences and a "no-difference" model that includes those not linked to religious institutions (Hand and Van Liere 1984, 558).

In analyzing the data, the researchers used measures of church attendance to determine a respondent's degree of commitment to a Judeo-Christian denomination in addition to dividing respondents based on their stated religious preference. To measure a respondent's acceptance of a "mastery-over-nature" doctrine, the researchers use the New Environmental Paradigm Scale developed by Dunlap and Van Liere (Hand and Van Liere 1984, 558). A high score indicates an acceptance of the "mastery-over-nature" doctrine on this four-point scale. The Pollution Control Scale, the Population Control Scale, the

Resource Conservation Scale, the Environmental Spending Scale, and the Environmental Regulation Scale are multi-item measures that determine level of environmental concern.

The results of Hand and Van Liere's research reveals that dividing respondents as Judeo-Christian or non-Judeo-Christian allows for predictions about environmental concern as they hypothesized. When level of religious commitment is considered, greater frequency of church attendance correlates with greater concern for the environment among Episcopalians and Lutherans. For Baptists, Mormons, and Sect groups, there is a strong, negative relationship between church attendance and environmental concern. In addition, the variance in commitment to the "mastery-over-nature" doctrine among these denominations explains the variance in environmental concern (Hand and Van Liere 1984, 565). By controlling for demographic variables such as age, education, and income, the researchers demonstrate that "both the religion variables and the mastery-over-nature orientation provide at least some contribution to explaining environmental concern beyond the effects of age, education, and income" (Hand and Van Liere 1984, 566-567).

In conclusion, Hand and Van Liere state that those who identify themselves as non-Judeo-Christian possess a greater tendency toward supporting the environment. However, a challenge to White's model arises since it does not account for the varying degrees of environmental support demonstrated by different Judeo-Christian denominations. Furthermore, the researchers conclude that the fundamentalist Christians' growing influence on politics may serve as an impediment to "the progress of environmental reform" (Hand and Van Liere 1984, 568). Much of the research following this publication seeks to address this possible impediment and uses many of the methods set forth by Hand and Van Liere to examine the relationship between different religious and environmental variables.

A few years later, Andrew Greeley examined the relationship between religion and environmentalism by using information from the 1988 General Social Survey for his article "Religion and Attitudes toward the Environment" (1993). In his study, one dependent variable, willingness to spend money on the environment, serves as a measure of environmental concern. Christian identification, Biblical literalism, and confidence in the existence of God correlate with low levels of concern with the environment. In contrast,

Catholicism and a gracious image of God correlate with support for the environment.

To complement his findings, Greeley presents an explanatory model that suggests the relationship between world view, Protestantism, doctrine, political conservatism, moral rigidity and environmental attitude. Greeley raises several questions about fundamentalists' low levels of concern with the environment and considers through his explanatory model that political conservatism precedes fundamentalists' attitudes towards the environment, and their political conservatism is preceded by their world view (Greeley 1993, 20). Underlying Greeley's model is the understanding that, for individuals, religion is a symbol system that explains reality and determines world view. Furthermore, Greeley argues that by proving a relationship between Biblical literalism and measures of political conservatism, moral rigidity, and religious imagery the model is supported (Greeley 1993, 21). Likewise, if Catholics, who are less concerned with fundamentalist orthodoxy, demonstrate support for the environment, then his model would include a direct line between world view and environmental attitude.

According to Greeley's findings, non-Christians and Catholics are the most supportive of spending more money on the environment. Protestants and fundamentalists are less supportive, and there is little variance between the two groups (Greeley 1993). When age and education are taken into account, the correlation between environmental concern and Christianity weakens. Similarly, holding a gracious image of God further reduces the correlation as do liberal political views and moral rigidity. However, for Catholics, the data confirms the connection between their worldview or story of God and their support for the environment. Greeley concludes by describing the correlations between religion and environmental attitudes as seemingly spurious in America. Consideration of factors like religious imagery and political and moral rigidity leads to such a conclusion. Furthermore, image of God and worldview influence Catholic support for the environment (Greeley 1993).

In "Theological Perspectives and Environmentalism among Religious Activists," James L. Guth et al. use data from 1990 to 1991 accumulated by surveying activists in religious interest groups to establish connections between theological orientation and environmentalism (1993). Mentioned briefly are age, education, and political ideology as variables that have been determined by other scholars to influence environmental preferences. Although research concerning

the relationship between religion and environmentalism precedes this study, these scholars aim to consider how individuals' specific beliefs influence their environmental views. For the study, the researchers drew a stratified random sample of members from Bread for the World, Just Life, Evangelicals for Social Action, the National Association of Evangelicals, the Prison Fellowship, Focus on the Family, Americans for the Republic, and Concerned Women for America (Guth et al. 1993). In measuring support for environmentalism, respondents identified themselves by religious tradition, religious identity, frequency of church attendance, and answered questions about the priority of the environment and concern with environmental policy. Generally, the results indicate that those identifying with Mainline and Catholic religious traditions were more concerned with the environment than were those identifying with an Evangelical religious tradition. In terms of religious identity, Fundamentalist, Pentecostal, conservative, charismatic, and Evangelical Christians demonstrated low levels of concern with the environment while Mainline, Ecumenical, and liberal Christians demonstrated higher levels of concern (Guth et al. 1993).

The researchers then explored the comparative influence of religion, political ideology, and demographic factors on these results. By calculating bivariate correlations between support for the environment and each of the religious variables, demographic variables, and ideological variables, the researchers demonstrated that demographic variables are not as strong as religious variables in determining support for environmentalism. Although the data demonstrates that education strongly influences environmental concern, the researchers concluded that demographic factors do not explain religious differences in environmental concern. To further address ideological influences on environmentalism, respondents answered questions that allowed the researchers to place them in one of five issue groups: Christian Left, Pro-Life Liberals, Christian Center, Traditional Right, or Christian Right (Guth et al. 1993). With the Christian Left scoring high in environmental concern and the Christian Right demonstrating the least concern, the researchers concluded that "[e]nvironmentalism is part and parcel of a liberal religious/political world view" (Guth et al. 1993, 380). The article concludes by identifying conservative Protestants as roadblocks to raising environmental concern among Protestants generally.

In "Faith and the Environment: Religious Beliefs and Attitudes on Environmental Policy," Guth et al. hypothesize that conservative eschatology

(Biblical literalism, End Times thinking) and religious tradition are negatively related to support for environmental policy (1995). With data from national surveys from 1988, 1990, and 1992, the researchers analyzed the relationship between independent religious variables and attitudes towards environmental policy. The samples from these national surveys include clergy, religious activists, political-party contributors, and the mass public (Guth et al. 1995). Analysis of the data indicates that conservative eschatology is the strongest religious predictor of attitudes towards the environment while religious tradition and religious commitment have strong associations also.

The researchers described the difficulty in determining the origins of environmentalism since few variances exist to be explained. Nevertheless, the researchers pointed out that age, education, and political ideology are variables that demonstrate a measured degree of strength in predicting environmental attitudes. Despite rising discussion of environmentalism in religious contexts, little research had thoroughly examined the relationship between religion and environmentalism at the time of this study (Guth et al. 1995). Past studies by Hand and Van Liere, Eckberg and Blocker, and White enforce the notion that Biblical literalism and fundamentalism are consistently related to low levels of concern with the environment (Guth et al. 1995).

To measure levels of environmental concern among religious activists, the researchers analyze responses to questions about environmental spending, environmental protection, and priority of environmental issues. In order to measure religiosity, the survey data used in their research includes questions concerning religious identity, Biblical interpretation, and frequency of church attendance. The results of their analysis met their expectations: Mainline Protestants and Catholics demonstrated higher levels of environmental concern while conservative eschatology is negatively related to environmentalism (Guth et al. 1995). In addition to the predictive power of such religious variables, the results of this study also reveal the strength of political identity in determining environmentalism. In particular, liberal political ideology and Democratic identification correlate strongly with high levels of environmental concern. On the other hand, age and income along with other demographic variables are not as strongly related to environmentalism as political ideology and the religious variables. In conclusion, the researchers called for a more serious consideration of the impact of religious variables on public opinion in political science research (Guth et al. 1995, 378).

Using survey data from the 1993 General Social Survey, Heather Hartwig Boyd explores the influence of specific religious variables on support for the environment in "Christianity and the Environment in the American Public" (1999). These religious variables include belief in God, image of God, biblical literalism, fundamentalist tradition, church attendance, and prayer. Among these variables, Boyd finds that fundamentalist tradition is associated with weak support for the environment and that other variables yield insignificant results. Moreover, Boyd falsifies the assumption that greater frequency of prayer is associated with less support for the environment by proving the opposite even when controlling for demographic factors (Boyd 1999, 36).

Boyd measures the relationship between each of the aforementioned independent variables and individual willingness to spend money on the environment, attitude towards various environmental hazards, and frequency of environmental behaviors, like recycling. Before discussing the results, specific data concerning the strength of demographic variables and political ideology in predicting degree of support for the environment is emphasized. Strong correlations between fundamentalist tradition and the three measures of environmentalism are indicated by the data (Boyd 1999). In particular, fundamentalists, along with Biblical literalists and those who had no doubt in God, were less willing to spend money on the environment. Additionally, fundamentalists perceive pollutants as less dangerous to the environment and participate in activities associated with environmentalism less often (Boyd 1999). Demographic variables that include race, age, and education level are then introduced through a hierarchical linear regression, and the data indicate that belief in God, Biblical literalism, graceful image of God, and church attendance no longer have significant influence on the three measures of environmentalism. However, even with the introduction of political variables, fundamentalism remained a strong indicator of weak support for the environment. In conclusion, the data demonstrates that Christianity is a weak predictor of attitudes towards the environment. Although the results strongly question the validity of the notion that Christian beliefs influence Americans to degrade the environment, Boyd notes that these results do not negate findings concerning specific denominations of Christianity or activists (Boyd 1999, 43).

Research Design and Methodology

The American National Election Study 2004 Panel Study (2004) includes several questions concerning religion and environmentalism that allow for an updated examination of the relationship between religion and environmentalism. For example, a very useful question asks respondents to describe their interpretation of the Bible as: (1) Bible is the word of God and everything in it should be interpreted literally; (2) Bible is the word of God but not everything in it should be interpreted literally; or (3) the Bible is a book written by men and is not the word of God. In terms of environmental attitudes, survey respondents indicated their level of concern with the environment by placing themselves on an "Environment v. Jobs Tradeoff Scale." On this scale, a placement at or near 1 signifies that the respondent believes that the environment should be protected over jobs while a placement near 7 indicates a preference for the protection of jobs over the environment. Upon establishing that the majority of respondents identifying with conservative Christian denominations espouse a literal interpretation of the Bible and that frequent church attendance and daily prayer also correlate strongly with Biblical literalism, it can be concluded that respondents proclaiming that Bible is the word of God and everything in it should be interpreted literally are representative of conservative Christians and can be used as a proxy for them in the form of an independent variable.

Following the methodology employed by the researchers discussed previously, this data can first be analyzed by using responses to the Biblical interpretation question as independent variables and the measure of environmental concern as a dependent variable. Analysis of this data tests the hypothesis that factors such as Christian fundamentalism and support for a literal interpretation of the Bible correlate weakly with environmental concern, as found by Hand and Van Liere or Guth et al. This data also allows testing of the alternative hypothesis that Christian conservative identity and belief in a literal interpretation of the Bible correlate with pro-environment orientation or predict support for pro-environmental positions.

After observing the general relationship between Biblical interpretation and environmental attitudes, other variables identified in past research to influence environmental attitudes are included in a regression model as control variables. These variables include political ideology, party identification, education level, and age, which past researchers, like Boyd, used.

Important Findings

Table 1 depicts the relationship between Biblical interpretation and self-placement on the "Environment v. Jobs Scale." Of those respondents who identify with Biblical literalism, the largest percentage (61.9%) give themselves a score on the "Environment v. Jobs Scale" that indicates a moderate level of concern for the environment. Similarly, 67.4% of respondents who believe that the Bible is the word of God but do not believe that everything in it should be interpreted literally, placed themselves at level 3, 4, or 5. Nevertheless, 19.2% of those supporting a literal interpretation of the Bible give themselves a score that indicates a low level of environmental concern while less than 9% of respondents that interpret the Bible differently give themselves such a score.

Table 1: Biblical interpretation and placement on "Environment v. Jobs Scale"

Environment v. Jobs Self-Placement		Biblical Interpretation			Total
		Bible literal	Bible not literal but inspired	Bible not literal and uninspired	
High environmental concern (self-placement at 1 or 2)	Count	61	121	84	266

	% within Env v Jobs	22.9%	45.5%	31.6%	100.0%
	% within Bible	18.9%	24.6%	47.2%	26.8%
Moderate environmental concern (self-placement at 3, 4, or 5)	Count	200	331	79	610
	% within Env v Jobs	32.8%	54.3%	13.0%	100.0%
	% within Bible	61.9%	67.4%	44.4%	61.5%
Low environmental concern (self-placement at 6 or 7)	Count	62	39	15	116
	% within Env v Jobs	53.4%	33.6%	12.9%	100.0%
	% within Bible	19.2%	7.9%	8.4%	11.7%
Total	Count	323	491	178	992
	% within Env v Jobs	32.6%	49.5%	17.9%	100.0%
	% within Bible	100.0%	100.0%	100.0%	100.0%

The Chi-square of 122.355 for 18 degrees of freedom also indicates that this relationship is statistically significant, as seen in Table 2.

Table 2: Chi-Square Tests

	Value	df	Asymp. Sig. (2-sided)
Pearson Chi-Square	122.355(a)	18	.000
Likelihood Ratio	123.629	18	.000
Linear-by-Linear Association	43.036	1	.000
N of Valid Cases	1001		

In the first regression analysis, responses to the ANES survey question on Biblical interpretation serve as independent variables and placement on the "Environment v. Jobs Scale" is the dependent variable. The regression includes two dummy variables for respondents' answers to the ANES survey question on Biblical interpretation. Those responding that the Bible is the word of God and should be interpreted literally are identified by the variable "Bible literal" while those responding that the Bible is the word of God but not everything in it should be interpreted literally are identified by the variable "Bible not literal." The constant in this regression analysis represents those responding that the Bible is not the word of God (see Table 3 below). In this analysis, the coefficient for the constant is 2.916 while the coefficients for "Bible literal" and "Bible not literal" are 1.125 and .638, respectively. Therefore, moving from the belief that the Bible is not the word of God to support for a literal interpretation of the Bible causes a 1.125 unit change on the "Environment v. Jobs Scale." In other words, it can be predicted that those embracing a literal interpretation of the Bible will exhibit slightly lower levels of environmental concern in comparison to those who interpret the Bible differently. The R-square is .059 (see Table 4 below), indicating that consideration of other variables could strengthen the regression model.

Table 3: Regression of Biblical interpretation and self-placement on "Environment v. Jobs Scale"

Model		Unstandardized Coefficients		Standardized Coefficients		
		B	Std. Error	Beta	t	Sig.
1	(Constant)	2.916	.115		25.379	.000
	Bible literal	1.125	.143	.334	7.859	.000
	Bible not literal	.638	.134	.202	4.759	.000

Table 4: R-Square

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate
1	.244(a)	.059	.058	1.533

In the next regression analysis, control variables are included in measuring the impact of Biblical interpretation on environmental attitudes. These control variables are party identification, political ideology, age, and education level. The variable for party identification includes all respondents identifying with the Republican Party. In the ANES survey, political ideology is measured by self-placement on a 7 point scale in which 1 is extremely liberal and 7 is extremely conservative. Education level is measured on a 7 point scale in which 1 indicates that the respondent has acquired 8 grades of education or less and no diploma, 2 indicates no education beyond grades 9-11, 3 indicates a high school diploma or its equivalent, 4 indicates 12 or more years of schooling and no higher education, 5 indicates some exposure to higher education at a community or junior college, 6 indicates a bachelor's degree, and 7 represents an advanced degree.

Including all of these control variables in the regression analysis results in an R-Square of .21. In this analysis, the coefficient for "Bible literal" is .458 while the coefficient for "Bible not literal" is .183. In terms of political leanings, the coefficient for "Party ID Republican" is .375, and the coefficient for "Liberal/Conservative Self-Placement" is .278. The coefficient for age is -.001 while education level is -.137. In this regression, the most significant variables are party identification, political ideology, and education level. Table 5 illustrates the regression, while Table 6 demonstrates the R-Square value.

Table 5: Regression of Biblical literalism on environmental attitudes with control variables

Model	Unstandardized Coefficients		Standardized Coefficients	t	Sig.
	B	Std. Error	Beta		
1 (Constant)	2.745	.355		7.740	.000
Bible literal	.458	.203	.138	2.253	.025
Bible not literal	.183	.180	.059	1.020	.308
Party ID Republican	.375	.166	.120	2.257	.024
Liberal/conservative self-placement -7-point scale	.278	.056	.277	4.939	.000
Age	-.001	.004	-.011	-.282	.778
Education level	-.137	.040	-.143	-3.427	.001

Table 6: R-Square

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate
1	.454(a)	.207	.197	1.392

Interpretation and Discussion of Findings

Contrary to past findings, especially those by Hand and Van Liere as well as Guth et al, there no longer seems to be such a strong, negative relationship between Biblical literalism and levels of environmental concern. In reference to Table 1, 61.9% is a large portion of Biblical literalists placing themselves at a 3, 4, or 5 on the "Environment v. Jobs Placement Scale" which certainly undermines the notion that those adopting such a view of the Bible are a serious impediment to the environmental movement. However, Biblical literalism is still the strongest predictor of low levels of concern with the environment since less than 9% of individuals holding other views of the Bible place themselves at points 6 or 7 on the "Environment v. Jobs Scale."

In the first regression, it is interesting to compare the unstandardized coefficients for those identifying as Biblical literalists ("Biblical literal") and those with a more moderate interpretation of the Bible ("Biblical not literal"). Although the coefficient for "Biblical literal" is 1.125, higher than the coefficient of .638 for "Biblical not literal," the difference between the two coefficients is less than .5. While Biblical literalism indicates self-placement on the "Environment v. Jobs Scale" will be less pro-environmental than the other independent variables, the magnitude of the difference is not great. The R-Square of .06 also indicates that consideration of additional variables may help to explain environmentalism better than religious variables alone. Additionally, these independent variables all have a high level of statistical significance.

The second regression analysis reveals that consideration of political ideology is very helpful in understanding an individual's level of environmental concern. The R-Square for this regression is .21, which is significantly stronger than the R-Square of .06 for the first regression. According to this regression analysis, identification with the Republican Party is not as statistically significant as "Liberal/Conservative Self-Placement." Nevertheless, the regression does indicate that a higher score on the "Environment v. Jobs Scale" is related to a

higher score on the "Liberal/Conservative Self-Placement Scale" or a more conservative political ideology. Education level proves to have significance in the analysis while age does not. Overall, the findings in the second regression confirm Boyd's findings that religious variables lose some of their significance when demographic variables are introduced (Boyd 1999).

Conclusion

Overall, by analyzing the data from the 2004 ANES Panel Study, it is apparent that Biblical literalism is still a weak predictor of anti-environmental views. Nevertheless, the largest majority of respondents identifying as Biblical literalists are moderately concerned with the environment. The first regression analysis confirms that Biblical literalists are not extremely less concerned with the environment in comparison to those who adopt other interpretations of the Bible. Just as Hand and Van Liere and Guth et al. had found previously, religious variables and political variables can be stronger predictors of environmental attitudes than other variables, like age. Nevertheless, Boyd's more recent findings that religious variables lose strength when a regression analysis includes demographic variables are confirmed as are her findings that religious variables remain significant when political variables are included in a regression. Ultimately, the study reveals that the Christian Right is not a serious threat to the environmental movement and does not represent an anti-environmental force in society.

Further research could more closely examine political ideology and demographic traits of conservative Christians, fundamentalist Christians, and Evangelicals in particular. Apparently these groups are not as staunchly anti-environmental as they appeared to be in the past, specifically in Hand and Van Liere's findings. Additional research could ask why this change has occurred. Along with other factors, changing demographic characteristics of individuals identifying with these groups could explain a shift in environmental views.

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