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## Article Title: Innovation in State Government: Origin and Development of the Nebraska Nonpartisan Unicameral Legislature

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Article Summary: In 1934, Nebraska established a one-house (unicameral) nonpartisan legislature. Knowledge of its origin and development aids understanding of the one-house legislature, its operation, and its contemporary role. The article provides an overview of the birth of unicameralism as an idea, the campaign to implement it in Nebraska, and subsequent challenges and controversies.

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Photographs / Images: Senator George W Norris campaigning for the reelection of President Franklin D Roosevelt; Nebraska's Unicameral Legislature in session, 1937

# INNOVATION IN STATE GOVERNMENT: ORIGIN AND DEVELOPMENT OF THE NEBRASKA NONPARTISAN UNICAMERAL LEGISLATURE

*By Adam C. Breckenridge*

One of the most obvious features of government in the United States is the separation of powers among the legislative, executive and judicial branches. Among them, the legislative branch represents a paradox in our political arrangement. It is the branch that presumably is the closest to the people—legislators generally represent fewer people and are more accessible to them than either executives or judges, and citizen influence of legislators is generally considered more legitimate. But it is the most continually criticized. Indeed, legislatures come under heavy attack for being inept, unresponsive to the needs of the people, and subject to partisan special interests. And, notwithstanding concerted efforts to do their business in public view, critics abound who are positive that decisions are made elsewhere.

These allegations, true or not, throughout our history have encouraged efforts to reform the legislative process. Occasionally, these endeavors come from the legislature itself; more often, however, they are generated by outside forces. One such reform—perhaps one of the more significant in the recent history of the United States—was the establishment in 1934 of a one-house (unicameral) nonpartisan legislature in Nebraska.<sup>1</sup> The origin and development of this change is important for understanding the one-house legislature, its operation, and its contemporary role.

The Constitution of Nebraska provides that "laws may be enacted and constitutional amendments adopted by the people independently of the Legislature. The power may be invoked by petition wherein the proposed measure shall be set forth at length. . .and if the petition be for the amendment of the Constitution, the petition therefore shall be signed by ten percent of the electors."<sup>2</sup>

Nebraska turned to the "power of the people" in using the initiative petition to amend the Constitution in 1934 to provide for a nonpartisan, one-house legislature. The 1934 amendment, in effect, merely eliminated the larger chamber, the house of representatives. The house at the time had a membership of 100 members and the upper chamber, the senate, was fixed at 33. Although the legislature was to have constitutional authority to determine the size of the one-chamber body, the amendment prescribed that it should not have fewer than 30 nor more than 50 members.

Until 1934 only four initiative petitions to amend the constitution had been presented to the voters. Only one, a 1916 petition to prohibit liquor traffic, was approved. Other attempts—to establish woman suffrage (1914), a state pure food department (1916), and a direct primary system (1924)—were defeated.<sup>3</sup>

The decision by the voters in November, 1934, not only surprised most political observers, but astounded critics of the plan. Not only did the voters endorse a single house for the legislature, they also directed that members be nominated and elected without reference to political party—in short, nonpartisanship.

Creating a one-house legislature was not a sudden or impulsive decision nor did it have its origins in Nebraska. Vermont had a unicameral legislature until 1836; and earlier Pennsylvania had a similar form until 1790. Perhaps only technically did Georgia have one under its short-lived constitution in 1777. No unicameral forms were provided in any other state until Nebraska adopted it in 1934 and except for Nebraska all states have a bicameral legislature today.<sup>4</sup>

During the last quarter of the 19th century and into the early part of the present century, advocates of state governmental reform urged consideration of a unicameral legislature. Interest was evidenced at various times in Alabama, Arizona, California, Colorado, Kansas, Minnesota, New York, Ohio, Oklahoma, Oregon, and South Dakota. Constitutional conventions in New York and Ohio considered it but nothing emerged from them. The voters had an opportunity to declare themselves in Oregon, Oklahoma, and Arizona, but the proposals were all defeated.<sup>5</sup>

In Nebraska the 1913 session of the Legislature created a joint committee to consider legislative reforms. In its report to the 1915 session there was included for possible future action a



*University of Nebraska Professor John P. Senning, long associated with the Unicameral movement. Right: Nebraska Governor Robert Leroy Cochran, during whose terms of office [1935-1941] the Unicameral Legislature was inaugurated.*

proposal for a legislature of one chamber of no fewer than 33 nor more than 100 members. This recommendation undoubtedly was prompted by the Progressive movement of the time.<sup>6</sup> The 1915 legislature took no action on the proposal.

Nebraska advocates of a unicameral legislature had the strong and continuing leadership of John N. Norton of Osceola as early as the 1913 session. He sponsored the resolution calling for the 1913 joint committee and served as its chairman. The report of the committee presented arguments for a one-house legislature and was used in succeeding years by advocates of the plan.

The report declared that one body can more directly represent the public will than two houses and the desirability of a smaller body was stated to be more representative and responsible. It denied the argument that two houses are required in order to check each other and prevent the enactment of bad legislation. In practice, the report observed, two houses result in trades and an absence of real responsibility. Nothing is more common, it stated, than for one house to pass a bill and have members who voted for it to urge the other house to defeat it, or for a small group in one house to hold up legislation from the other house until they extort from it what they demand. The report also noted

that deliberation and reflection do not necessarily characterize the two-house legislature, which completes most of its work in the final days of a session. It concluded that a smaller body would tend to greater deliberation and reflection.

Opponents were not favorably impressed and may have recalled the admonition by John Adams that "a single assembly is liable to all the vices, follies, and frailties of an individual; subject to fits of humor, starts of passion, flights of enthusiasm, partialities or prejudice, and consequently productive of hasty results and absurd judgments."

On January 10, 1917, however, Representative Norton introduced a resolution calling for a constitutional convention to revise the state's constitution. The measure passed the house by a vote of 88 to 12, received the endorsement of the senate by a vote of 29, with four not voting, and the voters approved it at the general election in 1918 by a vote of 121,830 to 44,491. No legislature since that time has taken similar action.

Representative Norton was elected to serve in the convention which met in 1919-1920. On January 16, 1920, he presented a resolution calling for the establishment of a one-house legislature.<sup>7</sup>

Proposal to submit as a separate and alternative proposition to the voters of Nebraska an article relating to the Legislative Department, amended so as to provide for a Legislative Assembly of but one House, to be known as the State Assembly of Nebraska, and to consist of 100 members until otherwise provided by law, but never to consist of less than 100 members nor more than 133 members.

The committee to which the resolution was referred reported on March 11, 1920, in favor of the alternative; but soon thereafter, on March 24, 1920, Norton sought to fix the number precisely. In so doing, he apparently abandoned his earlier desire to authorize a legislature of small size.<sup>8</sup>

Resolved, That it be expressed as the sense of this Convention that we would favor the submission by this Convention of Proposal No. 303, providing for a Legislature to consist of 100 members, as an alternative proposition.

But the convention did not choose to permit the voters to make this choice.<sup>9</sup>

Perhaps because of a very narrow defeat in the convention, advocates of the plan were determined to pursue it. A very influential ally joined in support. He was US Senator George W. Norris of Nebraska.

Norris had served earlier in the US House of Representatives and had been a Senator since 1912. Although he was a

recognized leader of the Progressive Republicans, he was favorably viewed by persons of all political persuasions in Nebraska and his positions on public questions carried great weight.

His most noted pursuit of the unicameral idea was through his article, "A Model State Legislature," which appeared in the *New York Times* of January 28, 1923. In the article he was highly critical of the bicameral system. Since both houses of a legislature must agree completely if legislation is to be adopted, Norris claimed that all too frequently when different versions of a proposed measure were approved in each chamber, the only route to find total agreement in many instances was through a conference committee. Norris argued that the committee was necessary, but often what emerged was a different product than the two houses had expected. Compromises made by a conference committee, he wrote, were usually done in secret; and this was enough to cast doubt on the motives of those who participated. Norris knew about these compromises first-hand since the same procedures were common in the Congress of the United States.

To Norris state legislatures were too big and this made them unwieldy. After all, he argued, the legislature was supposed to be close to the people and if the body was small in size it would be more responsive to the wants and needs of the people. Better people (presumably meaning individuals with higher qualifications) would be elected to a smaller body. His final argument rested on the need to have individuals elected without regard to the political party ballot. Partisan elements were needed nationally, but not in state legislatures. Partisan connections did not belong in the conduct of the state's business.

Two efforts at a constitutional amendment were made prior to the successful campaign of 1934. A proposal was introduced in 1925 by Representative J. D. Lee of Boyd County for a single chamber of not more than 100 members, but it was indefinitely postponed by the judiciary committee of the Legislature. Eight years later, Senator John G. Boelts of Merrick County sought legislative support for a legislature consisting of a "House of Representatives only." It reached final reading, but failed to receive the required majority.<sup>10</sup>

In little more than a decade after his *New York Times* article, Senator Norris was touring the state of Nebraska in support of a unicameral legislature. He gave it his unlimited endorsement. In

the month immediately preceding the election in 1934 he addressed audiences totaling at least 30,000 people. He also made numerous radio broadcasts in support of it. Since he was highly regarded, even though controversial in some political party circles, he appealed to the voters to accept his judgment that the unicameral legislature was best for their welfare. He gave his substantive arguments, referred to his long experience in the US Congress, and then generally concluded his remarks in this way:<sup>11</sup>

I know that those who live by politics are opposed to this amendment. . . [But] I have served you for more than 30 years with no other interest than that of the people of Nebraska and the people of our country. I have always been called the worst demagogue who ever walked down the pike until the things I wanted began to work. Do you think that on my declining years I would desert the cause of the people to which I have given my life? If you have ever believed me, believe me now when I say that I have no other interest in this amendment than to make Nebraska a better place in which to live.

Opponents of the amendment had been successful in turning the plan aside on all prior occasions and they were convinced that the nonpartisan feature would mean its certain defeat. That provision was, of course, most unpalatable to any orthodox party adherent. Party supporters denounced it openly. They claimed that not only would it damage the place of the political party in elections and in the governing system, it would also mean the possible election of less than responsible individuals since they would in reality be responsible to no one. The positive influences of the party would be destroyed or at least severely reduced in the legislative process. Not surprisingly, members of the Legislature then in office believed that their opportunity to be elected to a seat in the single chamber would be in jeopardy. One leading opponent of the proposal was Governor Robert L. Cochran, a Democrat. Agricultural leaders and some minority groups also opposed it, maintaining that the small size of the chamber would mean woefully inadequate representation.<sup>12</sup>

The 1933 session of the Legislature was an important catalyst which favored the adoption of the unicameral amendment. That session left a generally bad impression of the Legislature because of its handling of such issues as the liquor question, tax reform, and appropriations, and a feeling that earlier pronouncements by members that the legislature that year would pass only necessary legislation and adjourn had been violated. There was, however, a large turnover in the membership resulting from the 1932 Democratic landslide. Many candidates had their names placed before the electorate with little expectation of being

elected only to find after election day that they were a senator or a representative. Thus there were many inexperienced members and apparently much time was wasted on matters of little significance. Also, the 1933 Legislature met during a period of acute agricultural distress.

The most influential media at the time were the newspapers. Newspaper editorial positions were generally against the unicameral amendment. They often centered on the absence of the political party identification which, it was claimed, would result in ineffective leadership with special interests getting control of the legislative process. The only significant papers supporting the amendment were the *Lincoln Star* and the *Hastings Tribune*. Strong opposition was voiced by the *Omaha World-Herald*, which had not only the largest circulation of any urban-based newspaper, but also the largest urban circulation. The vote in Lancaster County (Lincoln) was 20,662 for and 13,961 against. In Adams County (Hastings) 5,453 favored the plan with 3,286 opposing. And notwithstanding the opposition by the *World-Herald*, Douglas County (Omaha) approved it by a vote of 42,962 for and 25,102 against. The total vote was 286,086 in favor and 193,152 against, and the proposal was approved in all but nine of the state's 93 counties.<sup>13</sup>

Apparently the voters were favorably impressed by the arguments so frequently espoused by Senator Norris and other spokesmen. It must be remembered that this action took place during the great economic depression and drouth period. Proponents pressed the argument that the one-house legislature would reduce the cost of government. The Legislature would have no more than 50 members compared to the bicameral Legislature with 133. The pay for the members whether as few as 30 or as many as 50 was fixed in the constitution (by the amendment) and regardless of the number the total pay for all would be \$37,500 annually. When the number for the first session was set at 43, the pay per member was \$872 each year.

The unicameral amendment was not the only constitutional change offered to the voters in November, 1934. Two other propositions were on the ballot. One would authorize pari-mutuel betting and the other would repeal prohibition. These were also approved. There has been speculation since that time that the popularity of the propositions for pari-mutuel betting and prohibition repeal helped carry the unicameral proposal. There is little evidence, however, that any of the three



*Liberal Republican Senator George W. Norris (with microphone), shown here campaigning for the reelection of President Franklin D. Roosevelt (second from right) in 1936, was an influential supporter of the Unicameral Legislature. At extreme left is Governor Robert L. Cochran.*

materially helped the others to victory. For example, of the nine counties disapproving the unicameral amendment, all three propositions were defeated in five of them: Clay, Dundy, Hayes, Keya Paha, and Merrick. Arthur, Banner, Rock, and York Counties opposed repeal of prohibition and the unicameral plan, but approved pari-mutuel betting. Since these counties are scattered throughout the state, there is no apparent explanation for the outcome.

Whether the voters were actually motivated by some deep feelings about the change in the composition of their Legislature or whether it was a result of circumstances of the time will long remain in dispute. Certainly there were thousands of voters influenced by a trusted counselor, Senator Norris. Others in those depression times must have been swayed by the claim of lower governmental costs. Still others must have given their support believing that one legislative chamber would in fact be more responsive to public needs. One house would not have a second house to blame or shift responsibility.

The burden of carrying out the intent of the constitutional amendment for a unicameral legislature fell to the last session of the bicameral legislature in 1935. It was empowered to choose a

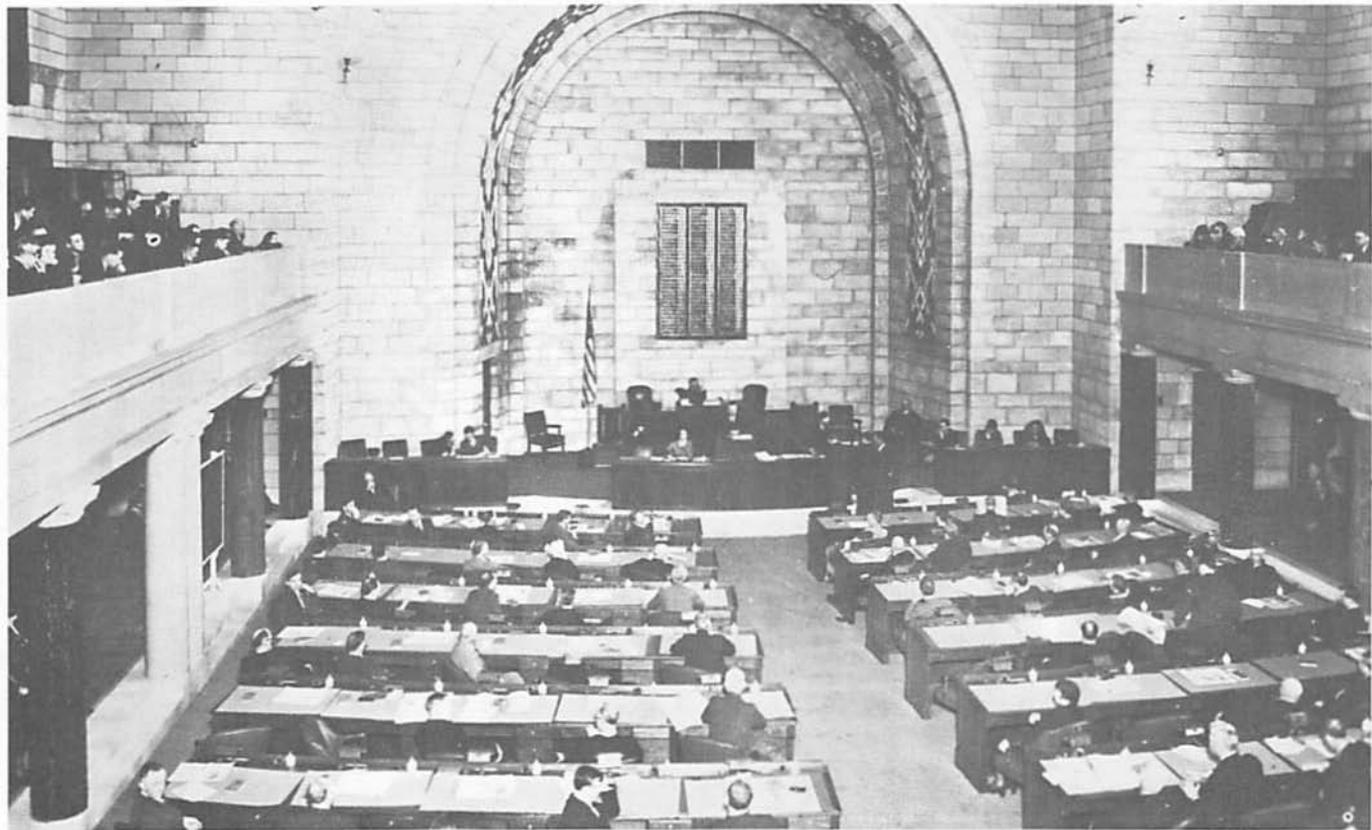
legislature of from 30 to 50 members. And these had to be from single-member districts. Additionally, the districts were to be "as nearly equal in population as may be and composed of contiguous and compact territory." This latter provision was a carryover of a similar requirement for the bicameral legislature, both for the Senate and the House. Another limitation was the prohibition against splitting off a part of a county to form a district unless it was entitled to two or more legislators. Numerous plans were presented during the 1935 session, but those which received the greatest support were prepared under the direction of Professor John P. Senning of the University of Nebraska-Lincoln department of political science. Professor Senning was associated for many years with the unicameral movement. One of his proposals for a membership of 43 was finally accepted and the districts were outlined. During the consideration of the plan to be adopted, it was maintained by its advocates that even though a larger legislature was authorized, the arrangement for 43 members would serve the diverse interests of the state and still provide adequately for the more sparsely populated western regions.

The first session of the unicameral legislature, elected in 1936, met in January, 1937. It went about its organization in the spirit of the change mandated. It introduced some innovations for Nebraska, including a full-time clerk, and established a legislative council with provision for a director of research.<sup>14</sup>

The nonpartisan feature was a bitter pill for party regulars. Republicans had dominated both houses of the legislature from 1919 to 1931. In 1932 when Franklin D. Roosevelt carried this presumably solid Republican state with a vote of 359,082 to 201,177, the people elected 31 Democrats and two Republicans to the state Senate and 80 of the 100 representatives were Democrats. At the same election Charles W. Bryan, a Democrat, was reelected governor.

Four years later in 1936 Roosevelt defeated Alfred M. Landon in the state by 347,454 to 248,731. In the race for governor, Democrat Robert L. Cochran won by 333,412 to 257,267 for his Republican opponent.

In the election for the first nonpartisan legislature the situation was dramatically changed from the 1932 election to the bicameral partisan legislature. Twenty-one legislators with known Republican affiliations were chosen and the remaining 22 were known Democrats. These results were hailed by supporters of the nonpartisan feature as solid proof that nonpartisanship



*Nebraska's Unicameral Legislature in session, 1937.*

could prevail. The voters, they maintained, were swayed in their choices, not by political party affiliations since the candidates were not so identified on the ballot, but by the issues and the candidates. It should be observed that of the 43 elected, 32 had served previously in the state's legislature, and of them, 19 had served two or more terms prior to the 1937 session.

As the years passed, the critics of the one-house feature were heard less and less frequently. Gradually, it appeared that the unicameral arrangement was not to be undone. It was considered to be an accomplished fact and a way of the state's political life. The younger generations did not recall any other legislative plan.

But two other features were destined for controversy. One was merely a continuation of an earlier debate: the nonpartisan feature. Neither major political party took a stand on the matter in their 1934 platforms. However, beginning with the 1952 Republican Party platform a return to a partisan legislature was advocated. "We favor amendment of the Constitution of Nebraska to provide for members of the Legislature of this state on a partisan basis." In one form or another a similar proposal was included in the party's platforms of 1954, 1956, 1960, and 1962. In 1964 the platform endorsed a petition drive which was underway at the time to place the question of a partisan legislature on the ballot. It urged party support to give the governor "an organized group of Senators of his own party who may aid him in carrying out the programs of the Governor, especially where new or different legislation is required." The platforms for 1968 and 1970 also contained provisions for a partisan legislature.

The 1972 platform, again supporting the partisan feature, advanced the argument that with the legislature operating in annual sessions, "we feel it is even more important that we have a partisan Legislature. Without party responsibility it is impossible for individuals of either party to develop issues in the Legislature and thoroughly discuss viable alternatives. Participation of the citizens of this state can be encouraged only if they have the organization of their efforts by their political party." In 1974, the platform stated that "after four decades of trial, the non-partisan legislature is an ideal which has not proved to be practical in its implementation. A noble experiment, it has proved to impede rather than promote the development of effective government and responsible leadership." The 1976 platform again urged adoption of a partisan legislature.

The Democratic Party platforms almost paralleled the Republican advocacy of a partisan legislature. The 1956 platform stated that although the party "recognizes in our unicameral legislature a bold and striking reform that has provided simplicity and economics in our legislative structure. . . organized political responsibility is needed to give the public an honest picture of our state's condition and the governmental responsibilities of meeting our public problems." Similar support was expressed in the 1960 and 1962 platforms. The 1964 platform contained these words: "For many years our party has advocated change in our constitution to establish greater political responsibility on the part of the Legislature—responsibility to the state as a whole, which is not possible under the present constitutional arrangement." From 1968 through 1976 the party's platforms continued to urge amending the constitution and providing for a partisan legislature. In the 1970 platform the provision also contained these words: ". . . while retaining its unique character as a unicameral body."<sup>15</sup>

Beginning with the second regular session of the legislature in its unicameral form several efforts, all of which failed, were made to restore the partisan feature and provide for the election of members with political party identification on the ballot. In 1939 a proposal reached general file reading in the legislature but was defeated. The next formal attempt in the legislature was in 1951 when the membership upheld a committee's decision to indefinitely postpone any such change. Six years later in 1957 a similar effort failed. In 1963 a measure with comparable features met the same fate as in 1957. Advocates of a partisan proposal were slightly more successful in 1967 in obtaining a favorable committee report, but this met rejection on a floor test. In 1972 a similar effort also went down to defeat. During the 1973 and 1974 sessions similar proposals were rejected.<sup>16</sup> Notwithstanding these defeats, it can be assumed that efforts will be continued for a legislature elected with political party identification.

The Nebraska Constitution provides that the districts from which legislators are elected will be of equal population and of compact and contiguous area. This stipulation prevailed for the bicameral legislature. It was not anticipated, therefore, that there would be an issue over this requirement, although opponents of the unicameral amendment maintained that the agricultural interests and the western regions of the state would suffer in not having adequate representation.

The districting for the first session of the unicameral legislature was arranged by the last bicameral session in 1935 and was based on the 1930 census of population. As in many other states, major population shifts were noted in succeeding counts. By 1950 the population range in the original 43 districts was from 21,579 to a high of 40,998, or perhaps higher for some of the districts in Douglas County (Omaha), since the census did not report legislative districts separately.<sup>17</sup> By 1960 the most populous district had a population of 100,826 and the smallest was reported to be 18,824. This made the ratio between the two ranges about 530 percent, or more than five times the population of the largest over the smallest district. Although the next population gain in the entire state between 1930 and 1960 was less than 33,500 individuals, dramatic internal shifts in population took place, much of it resulting from in-and-out migration. The major gains were in the two most populous areas: Douglas County (Omaha) and environs and Lancaster County (Lincoln). Population was lost in many small town and rural areas.

These population disparities had their impact on the 1961 legislature. Concern was expressed that if new districts were drawn in harmony with the constitutional requirement of equal population, the two metropolitan areas would gain substantially at the expense of the rural regions. The balance of power between the urban and largely eastern elements and the rest of the state would be shifted. This possibility greatly alarmed legislators from the western sections of the state. They maintained that if the trend continued the two metropolitan areas, Omaha and Lincoln, with less than 50 miles separating them would soon have a majority of the membership.

As a result of this prospect, and at the behest of rural and non-farm rural elements, a constitutional amendment was given legislative sanction to provide that in redistricting "primary emphasis shall be placed on population and not less than 20 percent nor more than 30 percent weight shall be given to area." The intent was to permit up to a 30 percent population disparity among districts. County lines were to be followed "whenever practicable" and "other established lines may be followed at the discretion of the legislature."

The amendment was scheduled for popular vote at the November, 1962, election. Meanwhile, growing national interest resulted from the 1962 decision of the US Supreme Court in *Baker v. Carr* which held that the US courts had jurisdiction to

hear complaints of voters who alleged they had been denied fair representation in state legislatures.<sup>18</sup> In almost every state voters who considered themselves under-represented initiated suits.

To prevent the placing of the "area" amendment on the November ballot a suit was filed in the Nebraska US District Court on July 20, 1962. This requested ban was denied, but the Court stated that it was "reserving and retaining jurisdiction of the case." The voters then proceeded to give their stamp of approval to the amendment by a vote of 218,019 to 175,613.<sup>19</sup>

Only five of the state's 93 counties voted against the proposal. It had been assumed that the two most populous counties, Douglas (Omaha) and Lancaster (Lincoln) would not support it, and although Douglas County defeated it and by a substantial margin, it was approved in Lancaster County. The other four counties voting against it were Cass, Colfax, Platte, and Sarpy.<sup>20</sup> All of these counties are in the eastern part of the state and in the Omaha metropolitan area or adjacent to it.

With voter sanction, the task of redistricting fell to the 1963 session of the Legislature. Several proposals were presented. The approved plan was to increase the size of the legislature from 43 to 49 and to recognize the area concept. As a result population disparities among districts continued. Not surprisingly, the issue of equal numbers was again before the US District Court. But before a decision was given, the US Supreme Court decided *Reynolds v. Sims* on June 15, 1964, mandating that legislative districts be based on equal numbers.<sup>21</sup>

On July 17, 1964, the District Court held that the election for the Legislature could follow the 1963 reapportionment act since it was too late to disturb the arrangement. It made it clear, however, that the 1965 legislative session would have to either correct the deficiencies noted by observing the "substantially equal" requirement or "the court will take appropriate action."<sup>22</sup>

In the closing days of the 1965 session the Legislature made changes to more nearly equalize the population in the several districts and the plan was accepted in proceedings before the Nebraska Supreme Court. The largest district had a population of 32,472 and the smallest 26,938.

Further population shifts were reflected in the 1970 census which increased the disparity between the smallest and the largest districts. The 1971 session proceeded to redistrict but retained the same number of districts at 49.

The population changes reflected by the 1950, 1960, and 1970 censuses and other post-census indicators may mean that the 1980 census may give the two metropolitan areas of Omaha and Lincoln a majority of the legislative membership. If the pattern of recent decades continues, this could intensify conflicts between eastern and western elements; and among urban, farm, and rural non-farm groups.

After more than four decades since its establishment, it can be assumed that there is strong public support in Nebraska for the unicameral Legislature. Whether or not the claimed positive benefits accrue from the equal protection requirements commonly known as the "one-man, one-vote" rule, it is unlikely that population disparities of consequence will hereafter prevail among the districts. Conversely, however, it is less clear that the nonpartisan feature will remain. Only the voters can decide, of course, with or without the endorsement of the legislature in the amending process.

Undoubtedly the Nebraska "experiment" was a fresh concept in state government and it remains unique among the 50 states, not only as a unicameral plan, but now also as the only legislature with the nonpartisan feature.<sup>23</sup>

## NOTES

1. John P. Senning, "One-House Legislature in Nebraska," *Nebraska Law Bulletin* 13, no. 3 (February, 1935) 341-350. This was written shortly after the passage of the amendment and gives a good summary account of the 1934 campaign. For the current wording see the Nebraska Constitution, Art. II, Secs. 5, 6 and 7 in the *Nebraska Blue Book*, 1974-1975, 58-59.

2. *Ibid.*, Art. III, Secs. 2, 3 and 4, 57-58.

3. *Ibid.*, 103 ff.

4. For further reference see John P. Senning, *The One House Legislature* (New York: McGraw-Hill Book Co., Inc., 1937) Ch. IV. Dr. Senning included a detailed bibliography beginning on page 101.

5. *Ibid.*, Ch. II. It has been proposed by groups in many states since the end of World War II.

6. James C. Olson, *History of Nebraska* (Lincoln, Nebraska: University of Nebraska Press, 1935), 314. The report of the joint committee was published by the Nebraska Legislative Reference Bureau as *Bulletin* no. 4, May 15, 1914, entitled "Reform of Legislative Procedure and Budget in Nebraska." It is available in the Nebraska State Historical Society Collections.

7. *Journal of the Nebraska Constitutional Convention*, 1919-1920, v. I, 382.

8. *Ibid.*, v. II, 2788. Norton served in the first unicameral legislative session in 1937 when the membership was 43. He died in 1960.

9. The vote in the convention was equally divided, the presiding officer having joined the opponents of the proposals. See *Journal*, op. cit., v. II, 2792.

10. *Senate Journal*, 1933, 1048-49.

11. Franklin L. Burdette, "Nebraska, A Business Corporation," *American Mercury* 34 (March 1935), 363.

12. Olson, op. cit. 316 *Depth Report No. 1*, published in 1961 by the School of Journalism, University of Nebraska-Lincoln, is devoted entirely to the Unicameral Legislature. Included are articles on John N. Norton, George W. Norris, and John P. Senning.

13. *Official Report of the Nebraska State Canvassing Board, General Election*, November 6, 1934, 11.

14. Roger V. Shumate, "The Nebraska Unicameral Legislature," *The Western Political Quarterly* 5, no. 3 (September, 1952), 504-512. Dr. Shumate was the first director of research for the Legislative Council and served in that capacity for more than sixteen years until his untimely death. He was concurrently a member of the faculty of the department of political science at the University of Nebraska-Lincoln.

15. Political party platforms are printed in each appropriate issue of the *Nebraska Blue Book*. The 1976 Republican platform also recommended internal legislative rule changes which would permit the organization of the membership along party lines. In 1953-1954 there was a movement to return to bicameralism and a partisan legislature which was advanced by the chairmen of Republican and Democratic parties. They announced the formation of a committee to circulate petitions, but the movement collapsed. For further reference see Jack W. Rodgers, "One House for 20 Years," *National Municipal Review* 46, no. 7 (July, 1957), 339-40.

16. See these legislative bills for each year indicated: 1939, LB 463; 1951, LB 160; 1957, LB 11; 1963, LB 112; 1967, LB 299; 1972, LB 1431; 1973, LB 9; and 1974, LB 649.

17. For comparative data on population for each of the districts for 1930, 1940, and 1950 censuses, see my earlier work *One House For Two: Nebraska's Unicameral Legislature* (Washington, DC: Public Affairs Press, 1957), 55-56.

18. 369 US 183.

19. For the text of the Amendment see the *Nebraska Blue Book*, 1964, 59.

20. See the "Abstract of Votes," *Nebraska Blue Book*, 1962, proposition no. 7, 650.

21. 377 US 533.

22. 232 *F. Supp.* 411 (1964).

23. William Riley, "NonPartisan Unicameral—Benefits, Defects Re-examined," *Nebraska Law Review* 52, no. 3 (1973), 377. Minnesota began requiring partisan elections in 1973.