groups. Bodnar’s model should stimulate scholars to examine other late nineteenth-century mill towns, such as Gary, South Bethlehem, and Youngstown, to determine whether or not it was normative for ethnicity to deter class alliance and social mobility among “new” immigrant groups.

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During the recent strike of the United Mine Workers of America, there was some talk that President Jimmy Carter would end the crisis by seizing the nation’s coal mines. This was an unlikely prospect, especially if President Carter has read Maeva Marcus’s new volume. Rather than seizure, the president invoked the Taft-Hartley Act, to which few miners paid any attention while negotiations between the union and the operators finally resulted in a coal settlement.

In this timely book, Marcus describes President Truman’s attempt to seize the steel mills in 1952. On April 8, as the Korean War (1950-1953) continued to tax America’s human, natural, and even spiritual resources, the president announced that the federal government was taking over the steel mills. At the time, the steel companies were involved in a labor dispute with the United Steelworkers of America, and it appeared that the mills were about to be shut down by a strike. The president insisted that seizure was necessary because the country had to maintain an uninterrupted supply of steel in order to prosecute successfully the war effort. He justified his actions on the basis of inherent presidential power.

The steel industry immediately brought suit, and the litigation culminated in Youngstown Sheet and Tube v. Sawyer wherein the Supreme Court invalidated the president’s seizure order. The Court ruled that Truman should have requested that a Taft-Hartley injunction be served on the union, even though the latter had voluntarily eschewed a strike — for longer than the cooling-off period provided — while the Wage Stabilization Board was writing its recommendations for settling the dispute. The Court decreed that all presidential
power must issue from either the Constitution or from Congress, and, clearly, no act of Congress had authorized the steel seizure. Indeed, Congress, through Taft-Hartley, had intended to deny presidential seizure power. The Court also declared that the president's inherent constitutional power as military commander in chief was not enough to sustain his actions in this particular instance.

In her discussion of the Court's decision to decide the case on constitutional grounds — which the Court could have easily evaded — Marcus argues that the decision reaffirmed the principle that the president, too, is subject to law. She also contends that the constitutional significance of the Youngstown decision was that it "served as a prelude to a more activist period" (p. 228) for the Supreme Court. It is true that the Court began to discard its traditional reluctance to deal with great constitutional issues if such cases could be disposed of on other grounds. However, it should be pointed out that the historic decisions of the Warren Court dealing with racial segregation, congressional investigative authority, and legislative apportionment had little to do with presidential power. Even if one sees the connection between the Youngstown decision and subsequent decisions of a more "activist" Court, one notable exception, as Marcus points out, was the Court's refusal to consider the constitutionality of the Vietnam War.

Some readers might have a few minor complaints about the volume. For one thing, Truman is shown as being less patient with the steel companies than he might have been, as well as — like Nixon? — too quick to defend his unconstitutional behavior on the grounds of "national defense" and the "inherent powers" of the presidency. Further, there is little development into the motives of the steel companies in their steadfast refusal to come to terms with the union, both before and after the high court's ruling. The steel seizure enabled the steel companies to appear besieged by both big labor and big government, while defending traditional American rights of private property. Marcus does not seem to question seriously these posturings or the silly rhetoric which accompanied them.

Altogether, however, the book is a fair and judicious treatment of the crisis. For students of contemporary America it is a welcomed addition to the literature of the period.

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