

**Note to reader:** This dissertation chapter develops concepts and measures of public engagement in rulemaking that I apply in chapters 3 and 4. The methods are under construction, and the empirical claims are tentative.

This project aims to better understand the role of ordinary people in bureaucratic policymaking. I develop theories of why mass engagement occurs and how it may affect policy. To assess these theories, I tackle three related empirical questions: (1) Why does it occur?; (2) How does it affect the oversight behaviors of agencies' political principals?; and (3) Does mass engagement in bureaucratic policymaking affect policy?

**Chapter 1 situates agency rulemaking in the context of American politics.** I show that rulemaking is a major site of policymaking and political conflict.

**Chapter 2 explains why agencies (occasionally) get so much mail.** The literature suggests two possible explanations for variation in mass engagement; groups may leverage public support as a lobbying resource ("grassroots" mobilization) or groups with more resources may leverage those resources into an impression of public support (sometimes called "astroturf"). I find that public interest campaigns explain variation in mass engagement. Unlike other forms of lobbying, it is not primarily driven by interests with the largest financial stakes and resources. Because the vast majority of comments are inspired by interest-group campaigns, finding their cause requires a method to link comments to the lobbying coalitions that mobilized them. To link individual comments to the more sophisticated lobbying efforts they support, I use text reuse and clustering methods to capture formal and informal coalitions.

**Chapter 3 asks whether public pressure campaigns affect political oversight.** The political information signaled by mass engagement may serve as "fire alarms," altering principals to oversight opportunities or "warning signs" altering them to political risks. When a coalition mobilizes successfully, elected officials ought to be more likely to engage on their behalf and less likely to engage against them. To assess these hypotheses, I count the number of times Members of Congress engage the agency before, during, and after comment periods on rules where lobbying organizations did and did not go public. I then use text analysis to compare legislators' sentiments and rhetoric to that used by each coalition.

**Chapter 4 asks whether public pressure campaigns affect rulemaking and rules.** I theorize that the effects of political information on policy depend on the extent to which the strategic environment allows change and how political information is processed, both directly within agencies and indirectly through other actors (e.g., Members of Congress) whose appraisals matter to bureaucrats. The main dependent variable is change in the rule text. I systematically identify changes between draft and final rules, parse these differences to identify meaningful policy changes, and compare them to demands raised in comments to measure which coalition got their desired outcomes.

**Chapter 5 presents a case study of the environmental justice movement.** I identify all rules where "environmental justice" is raised in the comments to assess agency responses both quantitatively and qualitatively. In preliminary analysis, I find that responsiveness to environmental justice activist comments varies in predictable ways across agencies, but I find no evidence that the total number of comments affects rules.

**Chapter 6** concludes with remarks on the study of bureaucratic policymaking and policy recommendations to better account for the fact that public pressure campaigns and the bursts of civic engagement they mobilize will be an enduring feature of the policy process.