

Political Information in Bureaucratic Policymaking

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This dissertation examines the effects of public pressure campaigns on agency rulemaking, a technocratic policy process where “public participation” is usually limited to sophisticated lobbying but occasionally includes millions of people mobilized by public pressure campaigns. Public comment periods on proposed policies purport to provide democratic accountability. Yet theories of bureaucratic policymaking largely ignore the occasional bursts of civic engagement that generate the vast majority of public comments on proposed rules. To fill this gap, I build and test theories about the role of public pressure in policymaking. I collect and analyze millions of public comments to develop the first systematic measures of civic engagement and influence in bureaucratic policymaking. Four substantive chapters address (1) how and why advocacy groups mobilize ordinary people to engage in rulemaking; (2) how public pressure draws the attention of elected officials; (3) how public pressure impacts policy outcomes; and (4) how the environmental justice movement has used opportunities to participate in rulemaking to affect policy.

The first chapter (*Why Do Agencies (Sometimes) Get So Much Mail?*), addresses who participates in public pressure campaigns and why. Are public pressure campaigns, like other lobbying tactics, primarily used by well-resourced groups to create an impression of public support? Or are they better understood as conflict expansion tactics used by less-resourced groups? To answer these questions, I collect and analyze millions of public comments on draft agency rules. Using text analysis methods underlying plagiarism detection, I match individual public comments to pressure-group campaigns. I find that most public comments are mobilized by a few public interest organizations. Over 80% of the 48 million comments on proposed rules posted to regulations.gov were mobilized by just 100 organizations, 87 of which lobby in coalitions with each other. Contrary to other forms of lobbying, I find that mass comment campaigns are almost always a conflict expansion tactic, rather than well-resourced groups creating an impression of public support. Contrary to other forms of political participation, I find no evidence of negativity bias in public comments. Indeed, from 2005 to 2017, most comments supported proposed rules. This is because public comments tend to support Democratic policies and oppose Republican policies, reflecting the asymmetry in mobilizing groups.

The second substantive chapter examines the effect of public pressure campaigns on congressional oversight. I assess whether legislators are more likely to engage in rulemaking when advocacy groups mobilize public pressure. This involves collecting and coding thousands of comments from Members of Congress on proposed rules with and without public pressure campaigns. These data also allow me to assess congressional oversight as a mediator in policy influence, i.e., the extent to which public pressure campaigns affect agency decisionmakers directly or indirectly through their effects on elected officials’ oversight behaviors.

In a third chapter, I use a mix of hand-coding and computational text analysis methods to assess whether public pressure campaigns increase lobbying success in agency rulemaking. To measure lobbying success, I develop computational methods to identify lobbying coalitions and estimate lobbying success for all rules posted for comment on regulations.gov. These

methods are validated against a random sample of 100 rules with a mass-comment campaign and 100 rules without a mass comment campaign that I hand-code for whether each coalition got the policy outcome they sought. I then assess potential mechanisms by which mass public engagement may affect policy. Each mechanism involves a distinct type of information revealed to decisionmakers.

A **final chapter** focuses on the impact of the environmental justice movement in agency rulemaking. I examine the discursive effects of environmental justice claims both qualitatively and quantitatively. I write about the role of Native activists and environmental groups in shaping federal environmental regulations. Looking across over 20,000 draft regulations that failed to address environmental justice issues, I find that agencies are more likely to add language addressing environmental justice in their final rules when public comments raise environmental justice concerns. However, I have yet to find evidence that mass comment campaigns make this more likely.