

Research Statement

I study bureaucratic policymaking, congressional oversight and representation, and environmental policy. My dissertation focuses on how civic engagement through public pressure campaigns affects agency rulemaking. I examine who participates in public pressure campaigns and why, whether they affect congressional oversight, and whether they affect policy. My work employs a range of quantitative and qualitative methods, with contributions mostly in the field of text analysis.

Agency rulemaking

My 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 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 fourth 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.

For a separate project on rulemaking, I built another novel dataset using internal rulemaking project status reports, offering the first systematic data on rulemaking activities before the publication of a Notice of Proposed Rulemaking (the starting point for all previous quantitative studies of timing, duration, and delay in rulemaking). These data allow us to study rulemaking across pre- and post-NPRM stages. Using multi-state duration models, we find that producing draft rules is a dynamic policy process and that the timing of NPRM publication is affected by many of the political variables known to affect the publication of final rules. This project is in collaboration with Susan Webb Yackee.

I work to make data on agency rulemaking and interest groups lobbying available to scholars. Cleaned datasets including the Unified Agenda, Office of Information of Regulatory Affairs reports, and rules and comments posted to regulations.gov are available on my GitHub. Opportunities and challenges for research using these data and others are described in a forthcoming article in *Interest Groups & Advocacy* with Dan Carpenter, Brian Libgober, and Steve Rashin.

Congressional oversight and representation

To uncover the drivers of congressional oversight and representation, I am building a large new dataset on interactions between Members of Congress and other parts of the federal government. Through hundreds of Freedom of Information Act Requests, web scraping, and data wrangling, we have assembled data on half a million letters, emails, and phone calls from Members of Congress to federal agencies. These data yield new insights into legislator behavior. For example, we find that as legislators gain institutional power and experience, they do more policy oversight and constituent service. We also find that legislators who receive campaign contributions from energy companies are more likely to advocate for those companies. This work is in collaboration with Eleanor Neff Powell and Justin Grimmer.

In another project on interbranch relations and oversight, I use text analysis to study the agenda-setting power of U.S. federal agency budget proposals and congressional appropriations sub-committee reports (see my PolMeth poster on modeling relationships among texts here). I collect and clean a corpus of texts and develop computational methods to detect influence across political texts that enable novel studies of influence in policymaking. I find that changes in party control substantially affect the text of budget documents, suggesting that the policy effects of budget documents go far beyond the numbers they contain.

Environmental policy

In addition to my dissertation's substantive focus on environmental policy, I have two collaborative projects examining the role of private actors in regulation through case studies of forestry policy. My article in *Organisation & The Environment* ("Do Private Regulations Ratchet Up?") with Ben Cashore and Constance McDermott clarifies debates in the private governance literature by offering methods to measure regulatory stringency. Using these methods, we compare the forest management practices required by the activist-backed Forest Stewardship Council and industry-backed Sustainable Forestry Initiative. Overall, we find the activist-backed requirements to be increasingly more prescriptive. More importantly, we show how various studies have come to different conclusions by focusing on different dimensions of regulatory stringency.

Another project on the role of private actors in shaping policy with Irene Scher and Ben Cashore assesses the role of U.S. advocacy groups in shaping Canada's forestry regulations. Tracing the history and policy process leading to the world's largest conservation initiative, the Canadian Boreal Forest Agreement, we argue that while "Big Green" NGOs claimed credit, local First Nations groups had laid the necessary groundwork. This work was published as a peer-reviewed book chapter, "Non-domestic Sources of Canadian Boreal Forest Policy."

Future research

I expect my dissertation research agenda to expand to include the policy impacts of organized public pressure, including social media campaigns and protests. I will continue to build research collaborations with organizers in environmental justice movements as groups organize for and against policies to address the climate crisis. Methodologically, I aim to improve the methods I developed to measure policy influence in budget texts and rulemaking and adapt them to help identify influence wherever policy texts change.