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Do Red and Blue Make Green? 
An Analysis of the League of Conservation Voters Congressional Scorecards

Patrick Fisher & Michael Taylor
Seton Hall University

Vote scores, given annually to the members of Congress by the League of Conservation Voters (LCV), measure the degree to which legislators support environmental policies. Higher LCV vote scores represent a relatively pro-environmental stance. We find that (i) Democratic representatives are seen by the LCV as far better advocates of the environment than Republican representatives, (ii) the LCV vote score of representatives, regardless of party affiliation, improved as the support for Democratic presidential candidates in their constituency increased, (iii) the LCV vote score of representatives increased with the median per capita income of their constituency, and (iv) regional differences are found in LCV vote scores, with representatives from the Northeast having higher LCV scores and representatives from the South having lower LCV scores. Finally, these variables have consistently become more explanatory in determining LCV vote scores over time.

Environmental policy describes a broad set of public policies with goals that range from the protection of human health and safety from air and water pollution to the preservation of culturally important natural landmarks. The responsibility for and authority of environmental policy is most commonly shared among federal, state, and local governments. The majority of federal statutes considered to be the foundation of United States environmental policy were first enacted in the 1970s. Prior to this time, the issues associated with the natural
environment were considered to be the exclusive domain of state and local governments. A growing understanding of the impact of pollution and environmental quality on human health, combined with the tendency of these impacts to affect individuals across state borders led Congress to take a more critical role in shaping a comprehensive and centralized body of environmental policy through legislative and budgetary control.

Vote scores, annually given to members of Congress by the League of Conservation Voters (LCV), measure the degree to which legislators support environmental policy. Higher LCV scores reflect a greater pro-environmental commitment. We examine how various legislator and constituency characteristics (party affiliation, presidential candidate support, per capita income, and region) affect LCV vote scores in the House of Representatives.

**Interest Group Vote Ratings and the LCV Scorecard**

In order to influence the political process, interest groups publish ratings of members of Congress. A problematic aspect of interest groups is that they may have a polarizing effect on legislators. The leaders of interest groups tend to have more ideologically extreme opinions than the mass public (Kirkpatrick, 1976). Attempts by legislators to take moderate positions may invoke criticism from interest groups at both ends of the ideological spectrum. The influence of interest groups will tend to encourage legislators to move away from moderate positions (Poole and Rosenthal, 1997).

Interest groups that issue vote ratings can focus on relatively narrowly defined issues, such as environmental policy (e.g., League of Conservation Voters) or gun rights (e.g., National Rifle Association). They can also encompass a broad spectrum of public policy issues (e.g., Americans for Democratic Action). Labor unions (e.g., United Auto Workers), business and industry
associations (e.g., Chamber of Commerce), and farm organizations (e.g., National Farmers Union) all rate members of Congress according to votes that are considered important to them (Poole and Rosenthal, 1997).

The LCV scores are an index of environmental support constructed from a subset of the roll call votes of Congressional members. Each year the LCV chooses the particular bills that it views as most significant in terms of environmental protection. Vote scores reflect the frequency with which the roll call votes of Congressional members correspond to the pro-environment position endorsed by the LCV. Scores range from 0 to 100, where a score of zero indicates the member of Congress voted in opposition to all of the LCV endorsed positions, and a score of 100 indicates full support of LCV positions.

Before moving on to our analysis of the LCV vote scores, it is important to note that interest group ratings should not be viewed as an irreproachable indicator of a representative's intentions. A basic weakness of using interest group rating scores is that they are based on a relatively small number of roll calls (Kiewiet and McCubbins, 1991). Thus, individual votes can be given more weight as a determinant of overall legislative behavior than is appropriate. Also, the choice of the roll call votes selected for constructing the score can lead to legislators being portrayed as more extreme than is actually the case (Snyder, 1992). Furthermore, many important decisions that legislators make, such as votes during committee sessions, are not calculated into interest group vote ratings. For all of these reasons, LCV vote scores should not be used as a cardinal measure of legislator behavior. However, they can be used effectively as an ordinal measure of environmental support relative to other legislators.
Potential Influences on LCV Vote Score

What accounts for the differences among members of Congress for support of pro-environmental legislation? What are the characteristics of legislators who are more likely to support legislation conducive toward protecting the environment, as measured by the League of Conservation Voters?

The role of ideology in explaining the voting behavior of members of Congress has been the focus of a great deal of research (Peltzman, 1984; Kalt and Zupan, 1984; 1990; Poole and Rosenthal, 1991; 1997; Jackson and Kingdon, 1992; Bender and Lott, 1996; Heckman and Snyder, 1997; Nelson, 2002). Ideology has been conceptualized as both a useful signal of future voting patterns, and as a summary of the personal beliefs and preferences of the representative. The former conception conceives ideology as a means of reducing electorate uncertainty regarding a representative’s stance on future issues. The latter conception models ideology as a potential source of conflict with the pursuit of constituency preferences.

While these two conceptions of ideology are not necessarily mutually exclusive, empirically distinguishing between them is difficult, and this complicates the measurement of ideology in practice (Nelson, 2002). Heckman and Snyder (1997), utilizing a data-intensive analysis of roll call votes finds that ideology, in general, is determined predominately by party affiliation and regional loyalty of the representative. In terms of environmental voting, Nelson (2002) agreed that “while pure ideology plays a role in Senate voting on the environment, a sizeable portion is explained by party and regional loyalty.”

Constituency interests undeniably play an important role in congressional decision-making. Since members of Congress would like to be reelected, constituency pressures impose meaningful constraints on voting behavior (Fisher, 2005; Fiorina, 1996; Kingdon, 1989; Fenno, 1978). Representatives who desire
to win reelection can be expected to act in concurrence with the preferences of their constituents (Downs, 1957). Members of Congress will thus be attentive to the people that they are elected to represent. Environmental policy, like all public policy, will impart unequal benefits and costs across citizens in different communities. Therefore, the demographics of a Congressional representative’s constituency can play an important role in how they vote on particular issues. Heterogeneity of electorates has been found to be an important factor in determining roll call votes (Bailey and Brady, 1998). Thus, the nature of congressional representation may encourage members of Congress to have parochial interests when it comes to environmental legislation. Potential influences on the LCV vote scores include partisanship, presidential vote in congressional district, constituency per capita income, and region.

This study does not attempt to measure ideology, but instead focuses on the direct effects of constituency variables on the environmental voting patterns of members of the U.S. House of Representatives as measured by relative LCV scores. However, we anticipate that our results will be similar to those found by Nelson (2002) for the U.S. Senate. In particular, we expect to find that party affiliation and regional loyalty explain the majority of the variation of voting patterns on environmental issues among members of the U.S. House from 1993 – 2004.

Partisanship

Officially, the LCV is a nonpartisan entity, but it is possible that there may be partisan patterns as to which legislators are rated highly by the organization. When an interest group such as the LCV takes a position on an issue, it can be interpreted as a liberal/conservative issue (Poole and Rosenthal, 1997). Members of Congress tend to have a bias toward certain groups and interests, which is in turn determined to some degree by their party
affiliation (Fisher, 2005; Fenno, 1978; Clausen, 1973). Candidates, therefore, respond to different portions of their constituencies (Fenno, 1978; Fiorina, 1974). Partisanship, however, is not an infallible predictor. Roll calls often split one or both of the parties. These splits are due at least in part to the fact that legislators have parochial interests (Fisher, 2005). Given the nature of a member’s support, it can be to the benefit of individual members of Congress to go out of their way to protect the interests and preferences of his or her partisan electoral coalition.

A strong partisan relationship is increasingly found to influence the direction of congressional roll call votes across the policy spectrum. This can be attributed to the ideological polarization of the major parties since the mid-1970s (Poole and Rosenthal, 1997). However, even though partisan elites have become more polarized on issues such as the environment, mass partisans have not necessarily followed suit (Lindaman and Haider-Markel, 2002). Despite evidence of substantial party divergence concerning support of environmental legislation among Congressional representatives (Shipan and Lowry, 2001), recent opinion polls reveal that the difference among partisan voters may not be as great. For example, 81% of registered voters supported either stronger environmental regulations or stricter enforcement of existing environmental laws, with 87% of Democrats, 86% of Independents, and 70% of Republicans holding this belief (Greenberg, Quinlan, Rosner Research/Tarrance Group Telephone Survey March 13-19, 2002).

The early history of Congressional environmental policy was marked by strong support from both Republicans and Democrats. Throughout the 1970s and into the 1980s the cornerstones of environmental policy such as the Clean Air Act, the Clean Water Act, and the Endangered Species Act, were enacted with strong bi-partisan support in Congress (Kraft, 1995; Kamieniecki, 1995). However, since the erosion of bi-partisan support

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in the early 1990s, Congress has struggled to find consensus to enact new legislation and to reauthorize or amend existing statutes (Kraft, 2000).

Comparing the mean Democratic and Republican LCV scores in the House from the 103rd Congress (1993-1994) to the 108th Congress (2003-04) displays the large partisan split that has developed on environmental issues in recent years (see Table 1). Democratic representatives had an average LCV vote score ranging from 68-81 while Republican representatives had an average LCV vote score ranging from 12-24. The partisan differences are large for every Congress from the 103rd – 108th. And, if anything, the partisan polarization on environmental issues has become even more significant with time: average Democratic LCV vote scores went up from 69 during the 103rd Congress to 83 in the 108th Congress while average Republican LCV vote scores trended in the opposite direction: from nearly 24 in 103rd Congress down to 13 during the 108th Congress.

<table>
<thead>
<tr>
<th>Table 1</th>
<th>Mean League of Conservation Voters Congressional Vote Scores by Party</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>House of Representatives</td>
</tr>
<tr>
<td>103rd Congress (1993-94)</td>
<td>69.17</td>
</tr>
<tr>
<td>104th Congress (1995-96)</td>
<td>74.20</td>
</tr>
<tr>
<td>105th Congress (1997-98)</td>
<td>70.63</td>
</tr>
<tr>
<td>106th Congress (1999-2000)</td>
<td>76.73</td>
</tr>
<tr>
<td>107th Congress (2001-02)</td>
<td>79.60</td>
</tr>
<tr>
<td>108th Congress (2003-04)</td>
<td>83.33</td>
</tr>
</tbody>
</table>

***p < .001; **p < .01; *p < .05

Presidential Vote in District

As the leader of his party the president represents a direct link to citizen and party preferences and policies and will seek to promote these preferences in Congress. As chief diplomat (i.e., defining national interests relative to other countries and the
world) and chief executive (i.e., oversight of staff and the complex activities of the federal bureaucracy responsible for the majority of domestic policy) the president can exert a great deal of influence over environmental policy (Soden, 1999). Since the president unquestionably affects congressional environmental decisions, the president’s popularity in one’s district may influence the direction of a legislator’s vote on environmental legislation.

To appraise constituency support for the president, our examination of the LCV vote scores will utilize the percentage of the vote each member’s district gave to the Democratic nominee for president in the previous presidential election for each Congress that we study. Presidential vote share in the district, therefore, will be used as a rough surrogate for constituency ideology on environmental issues. It would be expected, for example, that those districts that gave Democratic presidential nominees a higher percentage of the vote would more likely elect representatives who would support Democratic environmental actions.

**Constituency Per Capita Income**

Income can play a large role in determining whether an individual supports environmental policy. The environmental justice literature has confirmed that the citizens of poor and minority communities are disproportionately exposed to environmental hazards (Bullard, 1990; Been, 1993). This fact would make one believe that the poorest households would be the most supportive of environmental policy. However, the poorest households may also have the most to lose in supporting environmental protection policies. Budgetary spending allocated to environmental policy competes for the same federal dollars that assist the poor through social spending programs. The increased disposable income of wealthier households makes them more likely to support additional spending on environmental protection. However, they
are more capable of purchasing improvements on their own (i.e., country club memberships, changing residence), and are less likely to feel the same urgency for increased environmental protection (Kahn, 2002). In addition, wealthier households may pay a disproportionate amount of the tax revenue for improvements that accrue primarily in other communities.

While there are conflicting conjectures regarding the effect of changes in income at the household level on support for environmental policy, previous studies have shown that increases in the average income within a district increases district-wide support for environmental policy. Elliot, Regens, and Seldon (1995) show an increase in national per-capita GNP have been an important factor in increasing public support for environmental regulation. A comparison of House constituencies below and above the national mean per capita income attains an interesting and distinct result (see Table 2).

<table>
<thead>
<tr>
<th>Table 2</th>
<th>Mean League of Conservation Voters Congressional Vote Scores by Constituency Per Capita Income</th>
<th>House of Representatives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mean LCV Score</td>
<td>Mean LCV Score</td>
<td>T-Ratio</td>
</tr>
<tr>
<td>Constituency</td>
<td>Constituency</td>
<td></td>
</tr>
<tr>
<td>with Below</td>
<td>with Above</td>
<td></td>
</tr>
<tr>
<td>Average Per</td>
<td>Average Per</td>
<td></td>
</tr>
<tr>
<td>Capita Income</td>
<td>Capita Income</td>
<td></td>
</tr>
<tr>
<td><em>103rd Congress</em></td>
<td>48.58</td>
<td>53.16</td>
</tr>
<tr>
<td>(1993-94)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><em>104th Congress</em></td>
<td>41.26</td>
<td>48.83</td>
</tr>
<tr>
<td>(1995-96)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><em>105th Congress</em></td>
<td>39.12</td>
<td>55.31</td>
</tr>
<tr>
<td>(1997-98)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><em>106th Congress</em></td>
<td>40.65</td>
<td>52.93</td>
</tr>
<tr>
<td>(1999-2000)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><em>107th Congress</em></td>
<td>40.41</td>
<td>54.54</td>
</tr>
<tr>
<td>(2001-02)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><em>108th Congress</em></td>
<td>45.44</td>
<td>47.61</td>
</tr>
<tr>
<td>(2003-04)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

***p < .001; **p < .01; *p < .05

Representatives representing constituencies with per capita income above the national mean have higher LCV vote scores than representatives representing constituencies below the national mean. This difference was statistically significant for each
Congress from the 104th to the 107th. This suggests that members of Congress from relatively wealthier constituencies tend to be more supportive of environmental legislation endorsed by the LCV, corresponding with the research findings that these constituencies should favor greater environmental protection.

Region

Another potential influence on congressional support for environmental legislation is the region of the country that a member of Congress represents. Significant public policy variations among the states have been found to vary along cultural and regional lines (Elazar, 1984). Though research on the relationships between region and policies has produced mixed results (Kincaid, 1982), Erikson, Wright, and McIver (1993) find that state politics vary along regional lines. One explanation is based on the history of westward migration and its resultant distribution pattern of various cultural groups across the United States (Elazar, 1984).

Of particular importance are the Northeast and the South. These are the two regions of the country that have distinct policy preferences from the nation as a whole. For example, in a multivariate analysis of state usage of the death penalty, Nice (1992) finds that the addition of a dummy variable for the South affects the findings for the execution rates for the states, indicating that region is an influence on state’s implementation of the death penalty. Ideologically, the states of the Northeast are significantly more liberal than the United States as a whole, while southern states are substantially more conservative (Erikson, Wright, and McIver, 1993). These ideological leanings can be seen in how the Northeast and South vote as well: in the 2004 presidential election John Kerry won every state in the Northeast with the exception of West Virginia and George W. Bush won every state in the South. At the same time, northeastern states
(with the exception of West Virginia) tend to be among the wealthiest states in the country while the South, on a per capita income basis, is the poorest region of the country. Thus, the relationship between region and environmental policy may be informative because it combines some of the attributes of partisanship and wealth.

Figure 1
One-Way ANOVA of League of Conservation Congressional Vote Scores by Region
House of Representatives

Regions are defined as followed:
East: CT, DE, ME, MD, MA, NH, NJ, NY, PA, RI, WV, VT
South: AL, AR, FL, GA, KY, LA, MS, NC, OK, SC, TN, TX, VA
Midwest: IL, IN, IA, KS, MI, MN, MO, NB, ND, OH, SD, WI
West: AK, AZ, CA, CO, HI, ID, MT, NV, NM, OR, UT, WA, WY
Comparing the LCV vote scores of members of Congress by region reveals the same pattern. A one way ANOVA by region suggests important differences in the mean LCV scores of congressional representatives (see Figure 1). In each Congress from the 103rd to 108th, the mean LCV scores for representatives from the Northeast and South regions were significantly different than those of the West and Midwest, which did not significantly differ from one another or the national mean LCV scores. Members of Congress from the Northeast (ranging from 64-70) had substantially higher mean LCV scores, and southern representatives had substantially lower LCV vote scores (ranging from 28-41). The mean LCV vote scores of Congress members from the West (ranging from 43-53) and Midwest (ranging from 41-51), are representative of the national average (ranging from 46-51). This suggests that Northeastern representatives tend to be the most supportive of environmental protection legislation and Southern representatives the least supportive, with Western and Midwestern representatives in between the extremes of the Northeast and South.

Analysis and Results

Ordinary Least Squares models were utilized for the 103rd to 108th Congresses (1993-2004) in the House of Representatives to determine the relative importance of constituency characteristics on voting behavior of representatives. All of the independent variables tested were statistically significant at \(p<.001\) for every Congress (Table 3). The dependent variable of legislators' LCV vote scores were regressed on the independent variables of party affiliation, constituency presidential choice, constituency per capita income, and region. The qualitative variables of party affiliation, constituency presidential choice, and region were included in the regression as dummy variables. The Republican Party was the omitted variable for both party affiliation and con-
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constituency presidential choice. For region the omitted variable was the combination of the West and Midwest region. As shown previously, the one-way ANOVA analysis found no statistically significant difference between both of these regions and the overall mean of all regions. The coefficients are interpreted as the difference between the dummy variables and the omitted variable. For example, the coefficient on the Northeast region is interpreted as the effect on LCV score relative to being from the West or Midwest region.

The regression results indicate that Democratic legislators are more likely to support pro-environmental legislation than

\[
\text{Table 3}\]

Influences on League of Conservation Voters Congressional Vote Scores

<table>
<thead>
<tr>
<th>Variable</th>
<th>103rd (93-94)</th>
<th>104th (95-96)</th>
<th>105th (97-98)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Constant</td>
<td>-21.979</td>
<td>-35.128</td>
<td>-37.576</td>
</tr>
<tr>
<td></td>
<td>(-4.846)***</td>
<td>(-6.896)***</td>
<td>(-6.729)***</td>
</tr>
<tr>
<td>Democratic Party Affiliation</td>
<td>40.766</td>
<td>42.860</td>
<td>32.125</td>
</tr>
<tr>
<td></td>
<td>(21.169)***</td>
<td>(19.400)***</td>
<td>(14.129)***</td>
</tr>
<tr>
<td>Democratic Presidential Vote</td>
<td>.612</td>
<td>.810</td>
<td>.846</td>
</tr>
<tr>
<td></td>
<td>(7.972)***</td>
<td>(9.034)***</td>
<td>(9.145)***</td>
</tr>
<tr>
<td>Per Capita Income</td>
<td>1.559</td>
<td>1.722</td>
<td>1.901</td>
</tr>
<tr>
<td></td>
<td>(7.885)***</td>
<td>(7.914)***</td>
<td>(8.520)***</td>
</tr>
<tr>
<td>Northeast</td>
<td>7.404</td>
<td>11.120</td>
<td>7.902</td>
</tr>
<tr>
<td></td>
<td>(3.549)***</td>
<td>(4.842)***</td>
<td>(3.253)***</td>
</tr>
<tr>
<td>South</td>
<td>-7.858</td>
<td>-7.343</td>
<td>-8.717</td>
</tr>
<tr>
<td></td>
<td>(-4.221)***</td>
<td>(-3.575)***</td>
<td>(-4.077)***</td>
</tr>
<tr>
<td>R-squared</td>
<td>.709</td>
<td>.740</td>
<td>.684</td>
</tr>
<tr>
<td>Standard Error of Estimate</td>
<td>16.388</td>
<td>18.072</td>
<td>18.747</td>
</tr>
<tr>
<td>F</td>
<td>208.589***</td>
<td>243.966***</td>
<td>185.259***</td>
</tr>
<tr>
<td>N</td>
<td>533</td>
<td>532</td>
<td>533</td>
</tr>
</tbody>
</table>

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Republican legislators. This is consistent with a general trend in party polarization in the House of Representatives over the past three decades (Poole and Rosenthal, 1997). Congress has found it difficult to reach agreements on environmental policy because of the sharp ideological divisions between the parties. The partisan nature of environmental policy in recent years may be to some degree the result of the representational nature of Congress. Congressional districts represented by Democratic members of Congress tend to be significantly different demographically and politically than those districts represented by Republicans (Fisher, 2005; Clausen, 1973). This dynamic has the potential to dramatically influence the environmental policies that representatives will support because in the process of representing the views of their constituents, members of Congress are moving toward very different legislative priorities. Members of

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Congress, therefore, may be simply responding to different portions of their constituencies (Fiorina, 1974). The general trend in party polarization may also be exacerbated in terms of environmental policy by the realization that the “pollution control problem” is much more complex and costly than initially anticipated in the 1970s (Kraft, 2000).

Partisanship in Congress may be reinforced by the prevalence of divided government, in which one party controls at least one house of Congress and the other party controls the White House. Divided government creates incentives for Congress to use divisive public policy debates on so-called “wedge issues” in order to damage the opposing party in future elections (Rose, 2001). Separation of powers, therefore, should be viewed as an important influence on congressional roll call behavior (Fiorina, 1996). Our findings, however, suggest that the prevalence of divided government appears to have no affect on congressional LCV vote scores. The LCV vote scores for the 103rd Congress and 108th Congress (eras in which one party—the Democrats for the 103rd and the Republicans for the 108th—controlled both the White House and both chambers of Congress) do not vary substantially from the LCV vote scores of congresses with divided government.

Besides partisanship, a constituency’s political preferences as measured through its presidential vote, the per capita income of the constituency, and whether or not the constituency is in the Northeast or South are strongly related to a representative’s LCV vote scores. The higher the constituency’s Democratic vote for president, the higher the representative’s LCV vote scores. Thus, legislators with constituents that supported the Democratic presidential candidate (i.e., Clinton in 1992 and 1996, Gore in 2000) are more likely to support pro-environmental legislation. Similarly, the per capita income of a legislator’s constituency is positively related to the legislator’s support for pro-
environmental policy; members of Congress from wealthier districts tend to be more supportive of environmental legislation. Finally, in regards to region, representing a constituency from the Northeast region makes a legislator relatively more likely to support pro-environmental legislation while representing a constituency from the South region makes a legislator relatively less likely to support pro-environmental legislation.

The R-squares for all six models are quite high, but importantly there is a consistent upward trend for the R-squares from the 103rd Congress to 108th Congress. While the R-square for the 103rd Congress is .655, the R-square for the 108th Congress is .835. This implies that the variables tested have become even more important determinants of congressional LCV vote scores.

Conclusion

Using higher LCV scores to indicate a greater propensity to vote pro-environment, our results for the House of Representatives correspond with Nelson's (2002) findings in the Senate that the two most important predictors of a representative's environmental voting pattern are party affiliation and region. In regards to partisanship, Democrats are more likely than Republicans to cast pro-environment votes. As for region, representatives from the West and Midwest represent the national average in terms of environmental voting patterns, while Northeastern representatives are more likely to vote more pro-environment, and Southern representatives are less likely to vote pro-environment. We also find that periods of divided government do not play a role in environmental voting patterns in the House, which is consistent with Nelson's (2002) findings for the U.S. Senate. Finally, our results show that the independent variables used in our analysis continue to become more consistent predictors of House environmental voting patterns.
Our findings suggest some potentially interesting ideas for future research. Environmental policy includes legislative issues ranging from energy use, to atmospheric deposition, to the protection of endangered plants and animals. In addition, environmental policy regulates the actions of government, business, and private citizens. Nelson (2002) argues that the broader the set of environmental votes being analyzed, the larger the role of ideology in voting patterns. Future research may benefit by focusing on more narrowly defined categories of environmental policy, as it may change the significance of particular constituency variables. For example, while region is found to be an important factor in explaining the variation in LCV scores for members of Congress, there is no clear explanation as to why this is the case. Focusing on more narrowly defined sub-categories of environmental policy may shed light on some of the underlying reasons for strong regional effects. The same may be true for other constituency factors as well, which may lead to important findings regarding the creation of environmental policy in a representative democracy.

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