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Rural Bashing

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RURAL BASHING

Kaceylee Klein *
Lisa R. Pruitt **

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INTRODUCTION

Bette Midler Tweet.¹



Negativity toward rural folks has proliferated in recent years. This December 2021 tweet by entertainer Bette Midler, which labeled West Virginia—and, by extension, West Virginians—“[p]oor, illiterate and strung out,”² is but one high-profile exemplar of the phenomenon. The rise of Trump and the attribution of that rise to “rural” or “red state” voters has fueled the practice.

The lingering wound of Trump’s presidency—and to progressives, often characterized as coastal and urban elites, it is a wound—has also prompted harsh comments on social media when bad things happen in states commonly thought of as “red.” We saw this, for example, with the 2021 tornado in western Kentucky and the 2022 floods in the eastern part of the state.³ In the wake of these disasters, our social media feeds were awash with harsh crit-

1. Bette Midler (@BetteMidler), TWITTER (Dec. 20, 2021, 10:41 AM), <https://twitter.com/BetteMidler/status/1472955243935711236> [<https://perma.cc/4W8R-NPJV>].

2. *Id.* Midler subsequently walked back the remarks to the extent they insulted West Virginians and not only Joe Manchin. Christie D’Zurilla, *Bette Midler Walks Back W.Va. Remarks Amid Anti-Manchin Rant*, L.A. TIMES (Dec. 21, 2021, 5:48 PM), <https://www.latimes.com/entertainment-arts/music/story/2021-12-21/bette-midler-joe-manchin-west-virginia> [<https://perma.cc/AJ7H-DG8G>].

3. See *infra* notes 129–35 and accompanying text.

icism—even disdain—for those suffering amidst them.⁴ The criticism often suggested that these folks deserved their fates because they lived in red states and had (presumptively) voted for Republicans.⁵

We label this phenomenon “rural bashing,” in part because states like West Virginia and Kentucky are virtually synonymous with rurality in the national imaginary, though they are home to significant cities, too. The practice might be more precisely labeled red state bashing. Indeed, we take up below the complications that arise from progressives thinking about these issues in terms of entire states being “rural” and “the problem.”

We recognize the limits of making too much of what gets posted on social media. After all, it is easy to cherry pick the worst behavior to illustrate a point. Further, the people who participate on social media—like those who comment on mainstream media opinion pieces as we document below—are self-selecting.

But the rural bashing that alarms us is not just a creature of social media. It plays out in other coastal and urban contexts, too. A few years ago, one of us (Pruitt) was presenting a paper at UC Davis School of Law when an episode of rural bashing erupted in that academic setting. The paper was about an environmental injustice in the rural South, specifically an industrial hog farm that was sited with no local notice in a deeply impoverished community, next to a school.⁶

The audience appeared sympathetic until Pruitt revealed that the community was White. Perhaps, until that point, the audience had presumed that Black folks were the victims, and this was an instance of environmental racism. But when Pruitt mentioned the community was White, one of her colleagues blurted out, “Why

4. *Id.*

5. See *infra* note 130 and accompanying text. See also Ann Eisenberg, *Deconstructing Dangerous “Hurricane Karma” Rhetoric about the South*, THE ENVIRONMENTAL NARRATIVES PROJECT (Nov. 1, 2018), <https://envnarratives.com/2018/11/01/deconstructing-dangerous-hurricane-karma-rhetoric-about-the-south/> [<https://perma.cc/LGA6-6SXP>] (tracking the trend by commentators to “suggest that southern, ‘red’ states ‘deserve’ natural disasters because of conservative voting patterns and a culture of climate denialism”).

6. Lisa R. Pruitt & Linda T. Sobczynski, *Protecting People, Protecting Places: What Environmental Litigation Conceals and Reveals about Rurality*, 47 J. OF RURAL STUDS. 326, 327 (2016).

should I care about these people who put Trump in the White House? They're exercising power over California and me!"⁷

Given that this exchange happened a few days after Trump became the forty-fifth President of the United States, Pruitt could appreciate her colleague's frustration. Indeed, Pruitt shared it. After all, this was the fourth time since the Civil War when someone who had not won the popular vote had become President.⁸ But Pruitt was not on board with the colleague's next step: leaving disempowered and poor White folks in the rural South at the mercy of polluters—even *if* those poor White folks had voted for Trump.

In fact, the rural bashing of the Trump era is just the latest iteration of a phenomenon that dates back to the early days of our country, as documented by historian Nancy Isenberg, sociologist Matt Wray, and legal scholar Jill Fraley, among others.⁹ These attitudes surged to the fore in the 2008 Presidential election when Sarah Palin claimed the rural mantle of Main Street and cast Barack Obama as a Wall Street cosmopolite.¹⁰ These associations led left-leaning media to pillory rural America,¹¹ which became collateral damage of their harsh critiques of Palin. While criticism of candidates is fair game, the leap from critiquing candidates to lambasting entire regions associated with the candidate is unhelpful.

A serious flare up of the denigration of rural folks was evident in the 2016 presidential election cycle.¹² Indeed, it exploded in the

7. This suggests that, even a rural community is sympathetic if populated by people of color, in part because progressives tend to be sympathetic to all people of color, who are presumed not to vote Republican, especially if they are economically precarious. See *infra* notes 337–48 and accompanying text (discussing Mary Peltola); Lisa R. Pruitt, *The Women Feminism Forgot: Rural and Working-Class White Women in the Era of Trump*, 49 U. TOL. L. REV. 537, 553–54 (2018) (discussing both the interruption by the colleague and a subsequent email in which the colleague apologized for the “aggressive question” and acknowledged that “power is complicated, and the situations are complicated”).

8. Editorial Opinion, *Flunking the Electoral College*, N.Y. TIMES (Nov. 19, 2008), <https://www.nytimes.com/2008/11/20/opinion/20thu1.html?searchResultPosition=5> [https://perma.cc/3LWS-HCE3].

9. NANCY ISENBERG, *WHITE TRASH: THE 400-YEAR UNTOLD HISTORY OF CLASS IN AMERICA* (2016); MATT WRAY, *NOT QUITE WHITE: WHITE TRASH AND THE BOUNDARIES OF WHITENESS* (2006); see generally Jill M. Fraley, *Missionaries to the Wilderness: A History of Land, Identity, and Moral Geography in Appalachia*, 17 J. OF APPALACHIAN STUDS. 28 (2011) [hereinafter Fraley, *Missionaries to the Wilderness*]; Jill M. Fraley, *Appalachian Stereotypes and Mountain Top Removal*, 19 PEACE R. 365 (2007) [hereinafter Fraley, *Appalachian Stereotypes*]; Debra Lyn Bassett, *Ruralism*, 88 IOWA L. REV. 273 (2003) (documenting negative rural stereotypes in popular culture well before the 2008 election).

10. See *infra* notes 28–35 and accompanying text.

11. See discussion *infra* Section II.A.

12. See *infra* Section III.B.

robust social media landscape of the Trump era. Two years after the Trump presidency ended, this most recent wave of rural bashing has not subsided and may even have accelerated in our increasingly polarized nation.¹³

Anti-rural sentiment is expressed in the United States in three major threads. The first is a narrative about the political structure of our representative democracy—an assertion that rural people are over-represented thanks to the structural features of the U.S. Senate and the Electoral College.¹⁴ Because rural residents are less than a fifth of the U.S. population, complaints about this situation are often framed as “minority rule.”¹⁵

The second thread is related to the first: rural people and their communities get more than their fair share from federal government coffers.¹⁶ The argument, often expressed in terms of “subsidies,” is that rural places enjoy disproportionate government investments, especially from the federal government, in forms such as social safety net payments, infrastructure investments, and payments associated with the Farm Bill. These investments are said not to be justified by the relatively low amount of taxes rural folks pay and their small populations. Some see these investments as a function of earmarks and pork-barrel politics attributable to outsized small-state power in the U.S. Senate.¹⁷ Implicit in this

13. *Id.*

14. See discussion *infra* Sections II.B, II.D.

15. See Michel Martin, *What it Takes for a Representative Democracy to Address Political Minority Rule*, NPR (Sept. 25, 2022, 5:15 PM), <https://www.npr.org/2022/09/25/1125024826/what-it-takes-for-a-representative-democracy-to-address-political-minority-rule> [<https://perma.cc/MMF9-YQ7F>]; Seth Masket, *It's Dangerous When the Minority Party Rules Everyone Else*, WASH. POST: OUTLOOK, (Sept. 25, 2020; 10:10 AM) https://www.washingtonpost.com/outlook/minority-party-electoral-college-court-trump/2020/09/25/1163b954-fdfc-11ea-8d05-9beaaa91c71f_story.html [<https://perma.cc/J8RB-MP SP>]; Adam Jentleson, *How to Stop the Minority-Rule Doom Loop*, THE ATLANTIC (Apr. 12, 2021), <https://www.theatlantic.com/ideas/archive/2021/04/how-stop-minority-rule-doom-loop/618536/> [<https://perma.cc/7B 2H-GLZN>]; Steven Levitsky and Daniel Ziblatt, *End Minority Rule*, N.Y. TIMES (Oct. 23, 2020), <https://www.nytimes.com/2020/10/23/opinion/sunday/disenfranchisement-democracy-minority-rule.html> [<https://perma.cc/T3VE-7N5Y>]; see generally ANN EISENBERG, REVIVING RURAL AMERICA: TOWARD POLICIES FOR RESILIENCE (forthcoming Cambridge University Press 2023) (discussing the problem of the Electoral College and noting the framing as “minority rule”).

16. See *infra* Sections II.C.

17. Earmark spending is when funds are directed to specific projects; pork barrel spending is the more negative version of ear marks, in which funding is reserved and directed specifically to win over voters. See, e.g., Frank Rich, Opinion, *She Broke the G.O.P and Now She Owns It*, N.Y. TIMES (July 11, 2009), <https://www.nytimes.com/2009/07/12/opinion/12rich.html> [<https://perma.cc/H2UL-36Q7>] (complaining that the state of Alaska is number one in federal pork spending). Senator Jon Tester, in his biography, defends the use of earmarks.

line of thinking is that urban America does not get enough return on its investment in rural America. It may even evince a lack of awareness that rural and urban are interdependent and that urban folks do enjoy—even rely upon—the fruits of rural labor.¹⁸

The third thread, which emerges from the other two, is a culture of annoyance, even disdain, directed by metropolitan dwellers at rural people, their cultural trappings, and their intelligence. This contempt for rural people seems to envision and target an imagined caricature of working-class and illiberal White Americans; it tends to merge negative associations of working-class Whites with rurality in a “hillbilly” or “redneck” stereotype.¹⁹ Such contempt effectively “other[s]” rural folks, marginalizing them from mainstream society as manifested in urban norms.²⁰

All three of these phenomena fuel an impulse to dismiss rural needs and penalize rural residents. This unfortunate framing necessarily overlooks the complex realities of rural life, as well as the nuances of rural power and powerlessness.²¹ Among other goals, we seek in this Article to re-complicate the situation of rural people as a step toward rural-urban détente, even collaboration. Our task is not to rebut every criticism of rural populations and lifestyles. It is, rather, to document the extreme animus and call attention to how it undermines the wellbeing of communities along the rural-urban continuum. We are deeply concerned that rural bashing hin-

See Lisa R. Pruitt, *Book Review: Grounded by Jon Tester*, DAILY YONDER (January 12, 2021), <https://dailyyonder.com/book-review-grounded-by-jon-tester/2021/01/12/> [<https://perma.cc/S8WM-WPEF>].

18. See Ann M. Eisenberg, *Rural America as a Commons*, 57 U. RICH. L. REV. 769 (2023) (arguing that rural America as a whole, not just its natural resources, should be understood as a commons that fosters both urban and rural life); EISENBERG, *supra* note 15; GREGORY M. FULKERSON & ALEXANDER R. THOMAS, URBAN DEPENDENCY: THE IN-ESCAPABLE REALITY OF THE ENERGY ECONOMY 1–2 (2021); see generally Daniel Lichter & David Brown, *Rural America in an Urban Society: Changing Spatial and Social Boundaries*, 37 ANN. REV. SOCIO. 565 (2011) (emphasizing the theme of rural-urban interdependence).

19. See generally Lisa R. Pruitt, *The Geography of the Class Culture Wars*, 34 SEATTLE U.L. REV. 767 (2011); see also Geoffrey James, *7 Reasons to Avoid Going Rural to Work from Home*, INC (Feb. 27, 2022), <https://www.inc.com/geoffrey-james/7-reasons-to-avoid-going-rural-to-work-from-home.html> [<https://perma.cc/S9SH-DL93>].

20. See *infra* Section I.A; see also Michael Carolan, *The Rural Problem: Justice in the Countryside*, 85 RURAL SOCIO. 22, 25 (2020) (discussing the injustices experienced by rural populations in relation to three axes: distribution, recognition, and representation).

21. See generally Ann M. Eisenberg, *Power and Powerlessness in Local Government: A Response to Professor Swan*, 135 HARV. L. REV. 173 (2022); Carolan, *supra* note 20 (arguing that disproportionality as it relates to justice takes many forms, complicating the question of rural power, and arguing that rural people should count as a subject of justice).

ders coalition building that could solve problems afflicting both urban and rural places.

Part I of this Article summarizes the analysis that Pruitt did more than a decade ago, in “The Geography of the Class Culture Wars”. There, Pruitt summarized some of the negativity about rural people and places that spun out of the 2008 campaign for the U.S. presidency, a campaign in which Sarah Palin came to personify rural America. This led major media outlets like *The New York Times*—especially on its editorial page—to engage in some bare-knuckled rural bashing.

In Part II, we describe the resurgence of political resentment towards rural people in the run up to the 2016 election of Donald Trump to the U.S. presidency. We also show how this resentment still rages several years after his administration ended. We further illustrate how anger has found new outlets in a robust and vitriolic social media landscape, as well as in comments on opinion journalism in mainstream newspapers and magazines.

Importantly, in this Part, we also take on several rural myths that are frequently articulated to support complaints of rural folks’ disproportionate power. None of the myths discussed there are new. Regarding the argument that rural people are skewing presidential election outcomes because of the structures of the Electoral College and the U.S. Senate, we show that rural power is often grossly overstated. In fact, the winner-take-all practice, followed by the vast majority of states, has a greater impact on who becomes President. Regarding so-called rural subsidies, we show how determining who gets what from the federal government can be calculated in any number of ways—some of them leaving rural residents with the short end of the funding stick. We also insist that talking about rural subsidies at the level of the state—an increasingly common occurrence given left-leaning anger at “red states”—is desperately imprecise and certainly unhelpful.

Finally, in Part III we ponder the consequences of this increasingly common practice of pitting rural against urban. Rural bashing does not just hurt rural people; it sows discord among populations that are interdependent on one another.²² Urban America

22. See FULKERSON & THOMAS, *supra* note 18, at 2. Fullerson and Thomas detail the risks that a shrinking rural population poses to urban areas that are dependent on rural-produced goods and energy. They argue that all work traces back to rural work: “We define rural work as that which begins with harvesting energy in some form from the natural

remains dependent on the energy—whether food, fuel, or both—produced in rural areas.²³ As Professor Ann Eisenberg argues in this Volume of the *University of Richmond Law Review*, rural America is a commons, and rural areas and people are productive and vital parts of our larger union.²⁴ Urban folks should thus care about rural folks—and vice versa.

Rural bashing is concerning for many reasons, not least that it undermines the sort of coalition building necessary to solve cross-cutting problems like poverty and climate change. These problems afflict communities regardless of their size and population density. Everyone has a stake, then, in mending the urban-rural rift.

I. RURAL BASHING IN THE 2008 PRESIDENTIAL ELECTION CYCLE

Though it had long simmered beneath the surface of American life,²⁵ urban-rural hostility came to the fore in the 2008 presidential campaign. This was due in large part to Republican presidential nominee John McCain's selection of Sarah Palin as his running mate. Palin, then Governor of Alaska, played up her small town bona fides as a former Mayor of Wasilla, an Anchorage exurb.²⁶ In her speech at the Republican National Convention that year, Palin got in a dig about Obama's early career work as a community organizer in Chicago when she quipped, "I guess a small-town mayor is sort of like a community organizer, except that you have actual responsibilities."²⁷

In the run up to the election, Palin proclaimed that she and McCain were on the side of "normal Joe Six-Pack American,"²⁸ leading David Brooks to opine in his *New York Times* column that Palin "relentlessly divides the world between the 'normal Joe

environment. Urban work, in contrast, begins with a rural product.... As college professors and authors, we are urban workers, entirely dependent on rural workers to survive and thrive." *Id.*

23. *Id.*

24. Eisenberg, *supra* note 18, at 772–74.

25. See Pruitt, *supra* note 19; sources cited *supra* note 9.

26. *Seriously? Sarah Palin is a "Joe-Six-Pack American": Palin Explains What Kind of American She Represents*, U.S. NEWS (Oct. 1, 2008, 5:08 PM), <https://www.usnews.com/opinion/articles/2008/10/01/seriously-sarah-palin-is-a-joe-six-pack-american> [https://perma.cc/4ZJ-BCPS].

27. Rich, *supra* note 17.

28. See *Seriously? Sarah Palin is a "Joe-Six-Pack American"*, *supra* note 26.

Sixpack American’ and the coastal elite.”²⁹ A few weeks later, Palin announced that she and McCain “believe that the best of America is in these small towns that we get to visit,” and she praised the “hardworking, very patriotic . . . pro-America areas of this great nation.”³⁰ A few days before the election, Palin danced to the song “Redneck Woman” and embraced that moniker at a campaign stop in Ohio.³¹

While Palin never shrank from her sometimes-provocative advocacy on behalf of “ordinary” or “normal” folks—terms that got coded rural and white—some would argue that it was Obama who had picked the fight with rural America. In April 2008, candidate Obama commented on rural Pennsylvanians “cling[ing] to [their] guns or religion,” remarks that blew up in what became known as “Bittergate.”³² The optics were especially bad for Obama because he was speaking at a posh San Francisco fundraiser when he made his remarks about “bitter” residents of “small-town” Pennsylvania and the Midwest.³³ Obama later explained:

I was actually making the reverse point, clumsily, which is that these voters have a right to be frustrated because they’ve been ignored. And because Democrats haven’t met them halfway on cultural issues, we’ve not been able to communicate to them effectively an economic agenda that would help broaden our coalition.

I mean, part of what I was trying to say to that group in San Francisco was, “You guys need to stop thinking that issues like religion or guns are somehow wrong . . . Because, in fact, if you’ve grown up and your dad went out and took you hunting, and that is part of your self-identity and provides you a sense of continuity and stability that is unavailable in your economic life, then that’s going to be pretty important, and rightfully so. And if you’re watching your community lose population and collapse but your church is still strong and the life of the

29. David Brooks, Opinion, *The Class War Before Palin*, N.Y. TIMES (Oct. 9, 2008), <https://www.nytimes.com/2008/10/10/opinion/10brooks.html?ref=davidbrooks> [<https://perma.cc/3KN2-R2LN>].

30. Rosa Brooks, *The “Real” America, Really*, L.A. TIMES (Oct. 23, 2008, 3:00 AM), <https://www.latimes.com/archives/la-xpm-2008-oct-23-oe-brooks23-story.html> [<https://perma.cc/EQ37-U6UW>].

31. *Palin Dances to ‘Redneck Woman’ at Campaign Rally*, HILL (Oct. 28, 2008, 2:10 PM), <https://thehill.com/blogs/blog-briefing-room/news/campaigns/37579-palin-dances-to-redneck-woman-at-campaign-rally/> [<https://perma.cc/F2V9-PX2Y>].

32. Matt Bai, *Working for the Working-Class Vote*, N.Y. TIMES MAG. (Oct. 15, 2008), <https://www.nytimes.com/2008/10/19/magazine/19obama-t.html?smid=url-share> [<https://perma.cc/6BWT-9N86>].

33. *Id.*

community is centered around that, well then, you know, we'd better be paying attention to that.”³⁴

Liberal “condescension” about people who want firearms, Obama concluded, “has to be purged from our vocabulary.”³⁵ Though Obama spoke with insight and compassion about what these communities had lost in recent decades—most notably good jobs—suspicion persisted in some quarters that Obama thought himself superior to rural and working-class Whites.

A. *Distancing the Rural Other*

Whether it was Obama or Palin who fired the opening salvo across the urban-rural divide, journalists and commentators soon jumped into the fray. Some took the opportunity of Palin’s prominence on the national stage—a presence that persisted several years into Obama’s presidency—to criticize various aspects of rural life. Commentators mocked Palin’s hunting and fishing, for example, practices coded as rural and working-class.³⁶ Maureen Dowd referred to Palin’s hunting as “eviscerating animals for fun,”³⁷ while Gail Collins gave Palin tongue-in-cheek “credit for giving us a real understanding of the difference between a moose and a

34. *Id.* This is consistent with what Obama wrote in a manuscript he co-authored during his years at Harvard Law School, which was only revealed well after his presidency. Timothy Shenk, Opinion, *A Lost Manuscript Shows the Fire Obama Couldn't Reveal on the Campaign Trail*, N.Y. TIMES (Oct. 7, 2022), <https://www.nytimes.com/2022/10/07/opinion/obama-lost-book-manuscript.html> [<https://perma.cc/J7VP-MKX6>] (“Convinced that liberals had lost their way, Mr. Obama and Mr. Fisher argued for a renewed commitment to democracy, starting with the difficult and often messy work of coalition building.”).

35. Bai, *supra* note 32.

36. It is interesting to see the contrasting media reaction to Mary Peltola when, in 2022, she was the first Democrat elected to represent Alaska in Congress in more than five decades. Lisa R. Pruitt, *On What Makes Mary Peltola and Her Campaign Distinctive*, LEGAL RURALISM (Sept. 13, 2022), <https://legalruralism.blogspot.com/2022/09/on-what-makes-mary-peltola-and-her.html> [<https://perma.cc/KL5Y-67GF>]. Indeed, Peltola beat Palin in the race to complete Republican Don Young’s term and then again for a full two-year term. *Id.* Peltola ran on a campaign on “Freedom, Family and Fish.” *Id.* We did not see her ridiculed for her embrace of the importance of fishing to Alaska’s culture and economy. *Id.*; see also *infra* text accompanying notes 337–46 (discussing Peltola’s campaign, including frequent mentions of “regular Alaskans”).

37. Maureen Dowd, Opinion, *Pass the Caribou Stew*, N.Y. TIMES (Dec. 7, 2010), <http://www.nytimes.com/2010/12/08/opinion/08dowd.html> [<https://perma.cc/VF6Q-C24L>]; see also Timothy Egan, *Ms. Alaska*, N.Y. TIMES (Aug. 29, 2008, 2:36 PM), <https://archive.nytimes.com/opinionator.blogs.nytimes.com/2008/08/29/ms-alaska/?searchResultPosition=7> [<https://perma.cc/63P6-EHSS>] (writing of Palin, “She hunts! She fishes! She eats moose burgers! She can gut a salmon as well as dispatch an incumbent governor! She’s a rural mother of five who clings to guns and religion—exuberantly!”).

caribou.”³⁸ But that was just the wind up to Collins’ punchline: “O.K., there is nothing positive to say about Sarah Palin.”³⁹ Both *New York Times* columnists appeared oblivious to the reality that many rural and working-class folks hunt for sport, and also rely on the game they kill to feed their families. In ridiculing Palin, then, they were also ridiculing many who not only supported her, but who strongly identified with her on a very personal level.⁴⁰ Much like other identity categories, living in a rural place is a characteristic that people internalize; it can become an aspect of identity.⁴¹ As such, mocking rural things and rural ways of life is tantamount to mocking rural people.

Dowd also poked fun at Palin’s vernacular, asserting that her “pompom patois and sing-songy jingoism...bridg[ed] contradictory ideas that lead nowhere.”⁴² The famously acerbic columnist suggested that Palin had a “tumultuous” relationship with the English language, so much so that an interpreter was needed.⁴³ The tone and implication of commentary like Dowd’s is that rural people like Palin are outsiders who do not belong; in the terminology of

38. Gail Collins, Opinion, *Thinking of Good Vibrations*, N.Y. TIMES (Nov. 5, 2008), <https://www.nytimes.com/2008/11/06/opinion/06collins.html?scp=34&sq=election+op-ed&st=nyt> [<https://perma.cc/K7Q5-J3N6>].

39. *Id.*

40. See generally JEREMY W. PETERS, *INSURGENCY: HOW REPUBLICANS LOST THEIR PARTY AND GOT EVERYTHING THEY EVER WANTED* (2022). We believe the same is true of Trump and that when pundits poke fun at his body and what he eats, e.g., Kentucky Fried Chicken, many working-class supporters feel they, too, are being ridiculed.

41. Paige Kelly and Linda Lobao quantitatively support this by finding that there are “distinct socio-cultural attributes among rural voters that are not entirely reducible to voters’ respective social statuses or even their religion. These findings follow qualitative research that suggests that place of residence particularly matters in shaping perceptions of the role of government in alleviating social, economic, and environmental disparities.” Paige Kelly & Linda Lobao, *The Social Bases of Rural-Urban Political Divides: Social Status, Work, and Sociocultural Beliefs*, 84 RURAL SOCIO., 669, 698 (2019); see also Nicholas Jacobs & B. Kal Munis, *Place-Based Resentment in Contemporary U.S. Elections: The Individual Sources of America’s Urban-Rural Divide*, POL. RSCH. Q. at 1 (Sept. 7, 2022), <https://journals.sagepub.com/doi/abs/10.1177/10659129221124864> [<https://perma.cc/UU4H-G4XN>].

42. Maureen Dowd, Opinion, *Sarah’s Pompom Palaver*, N.Y. TIMES (Oct. 4, 2008), <https://www.nytimes.com/2008/10/05/opinion/05dowd.html> [<https://perma.cc/ZHN6-ZW69>]. At the same time that Dowd implies Palin is not proficient at English, she also implies Palin is performing “folksy” for votes—perhaps she “picked it up” from her church that speaks in tongues; she had a “strenuously folksy debate performance”; she “brandish[es]” her small town reality; and she “uses a heck of a lot of language to praise herself as a fresh face with new ideas.” *Id.*

43. *Id.*

sociology, they are “other” or “othered.”⁴⁴ Their derision is justified because they do not speak the same language or enjoy the same activities as metropolitan folks, which represent an implicit norm.⁴⁵

As Palin lingered on the national stage well beyond McCain’s failed presidential bid,⁴⁶ Frank Rich, writing in *The New York Times* in 2009, took perhaps the boldest, most direct hit at rural America.⁴⁷ Rich referred to the Republican party base as a “rump backwater minority” that had been ruralized.⁴⁸ He opined that Palin stood for “a genuine movement: a dwindling white nonurban America that is aflame with grievances and awash in self-pity as the country hurtles into the twenty-first century and leaves it behind.”⁴⁹ Rich also disputed Palin’s assertion that she stood for “real America . . . as if white rural America actually still was the nation’s baseline.”⁵⁰ He continued:

That resentment is in part about race, of course. When Palin referred to Alaska as “a microcosm of America” during the 2008 campaign, it was in defiance of the statistical reality that her state’s tiny black and Hispanic populations are unrepresentative of her nation. She stood for

44. The othering of rural folks is not new. See Ardis Cameron, *When Strangers Bring Cameras: The Poetics and Politics of Othered Places*, 54 AM. Q. 411, 411–12 (2002) (“Rural, poor, and historically dominated by outside interests, [northern New England and Appalachia] have been shaped less by their geographical location in America’s hinterlands than by the weight of visual excess that has historically bounded them as separate and apart from stories of ‘America.’ Topographies of strangeness overstuffed with desire and dread, othered places like these have long defined a particular kind of rupture in American narratives of modernity and progress.”); see also Aimee A. Howley & Craig B. Howley, *The Transformative Challenge of Rural Context*, 14 EDUC. FOUNDS. 73, 80–81 (2000) (discussing the cultural signals that show the relationship of the dominant urban and subordinate rural). Howley and Howley note that “various post-modern critics . . . understand social positioning in terms of power relations, particularly as these become embedded in discourse and symbols. . . . Thus, through literature and various other cultural practices, dominant groups bestow restricted (often negative) identities upon subordinated groups” or “[t]he rural life-world may be so situated as always to present an antithesis to cosmopolitan culture”). *Id.*

45. Piya Sinha-Roy, *Meryl Streep Tears into Trump in Golden Globes Speech*, REUTERS <https://www.reuters.com/article/us-awards-goldenglobes-merylstreep/meryl-streep-tears-in-to-trump-in-golden-globes-speech-idUSKBN14T0BT> [<https://perma.cc/QCK4-GGE4>] (Jan. 8, 2017, 11:57 PM). Streep, in her speech, seemingly ridiculed Trump voters for liking football and mixed martial arts, which she declared are not “art.” *Id.*

46. Dowd, *supra* note 37.

47. Rich, *supra* note 17.

48. *Id.*

49. *Id.*; cf. Lise Nelson, Barbara E. Smith & Jamie Winders, *Between Aggrieved Whiteness and Class Precarity: A Feminist Politics of Interpretation*, 29 GENDER, PLACE & CULTURE 961 (2022) (complicating the notion of White grievance).

50. Rich, *supra* note 17.

the ‘real America,’ she insisted, and the identity of the unreal America didn’t have to be stated explicitly for audiences to catch her drift.⁵¹

Interestingly, Rich did not acknowledge that Alaska Natives comprise a robust 15.7% of that state’s population,⁵² a matter we return to in Part III. There we also take up more fully this counter-productive and recurring dispute over who is a “real” or “ordinary” or “regular” American.

B. *Disproportionate Political Power*

The sparse and dwindling populations associated with rural areas generated urban resentment in another sphere of politics: representative government. This was a common complaint by Gail Collins in her *New York Times* columns from the Palin era.⁵³ Collins commented, for example, that Montana’s then-Senator Max Baucus had organized a bipartisan committee on healthcare that included members from Montana, North Dakota, New Mexico, Iowa, Maine, and Wyoming.⁵⁴ She called it “quite a coup ... since you have to work really hard to put together six states that represent only [2.77%] of the population.”⁵⁵ Collins observed in another column that only about 106,000 people vote in Alaska, fewer than “in [her] immediate neighborhood!” adding, “What kind of state is this, anyway?”⁵⁶

In another column, Collins and David Brooks mixed the issue of representation in government with per capita spending.⁵⁷ They did so in the service of dismissing what they called Montana residents’ anti-Washington sentiment, in part because “Montana gets \$1.47 back for every dollar it sends to Washington.”⁵⁸ They added that while Montanans may feel powerless, “each [has] 36 times the rep-

51. *Id.*

52. STATE AND COUNTY QUICK FACTS, ALASKA, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/AK> [<https://perma.cc/2WWQ-SYYX>].

53. See Collins, *supra* note 38; Gail Collins, Opinion, *August is the Cruellest Month*, N.Y. TIMES: OPINIONATOR (Aug. 7, 2009, 12:36 PM), <http://www.nytimes.com/2009/08/08/opinion/08collins.html?ref=gailcollin> [<https://perma.cc/9KRS-PNQ8>] [hereinafter Collins, *August*].

54. Collins, *August*, *supra* note 53.

55. *Id.*

56. Collins, *supra* note 38.

57. See David Brooks & Gail Collins, *This Just in from Montana*, N.Y. TIMES (Aug. 25, 2010, 12:36 PM), <http://opinionator.blogs.nytimes.com/2010/08/25/this-just-in-from-montana> [<https://perma.cc/982F-YHLD>].

58. *Id.*

resentation in the U.S. Senate as a resident of California,”⁵⁹ a reference to the fact that each state has two senators, regardless of population—and California’s population is thirty-six times greater than that of Montana’s. We return in Part II.D to this narrative of the disproportionate power of low-population states. There we reveal a reality more complicated than pundits typically acknowledge.

C. (Over)Investment in Rural America

As the Collins and Brooks column suggests, this derision of rural folks and annoyance at their undue political power dovetailed with a sense among urban folks that rural America was getting more than its fair share of federal dollars. Pundits rarely grappled in any meaningful way, however, with how a “fair share” should be defined or measured, instead casually using the language of “subsidy” to suggest urban folks were effectively paying for rural folks’ bucolic lifestyle.⁶⁰ Pundits also rarely spoke (then or now) about what rural people and places contribute to the nation with the fruits of their labor.

In 2008, a great deal of metro and coastal complaining about subsidies to rural America got wrapped up in a so-called “bridge to nowhere.”⁶¹ The metaphor was based on a proposed bridge to connect residents of Ketchikan, Alaska with their airport on a sparsely populated island nearby.⁶² The project became a symbol of pork-barrel politics.

Meanwhile, the influential Brookings Institute launched a “miracle mets” campaign—“mets” being short for metropolitan areas—

59. *Id.*

60. This is reflected, for example, in what one reader, Perrocaliente, wrote in response to a *New York Times* essay about rural America. Perrocaliente wrote that “[t]he city dwellers could grind their own axe with you. After all they’re subsidizing your idyllic pastoral lifestyle.” Perrocaliente, Comment to *In the Land of Self Defeat*, N.Y. TIMES (Oct. 4, 2019), <https://www.nytimes.com/2019/10/04/opinion/sunday/trump-arkansas.html> [<https://perma.cc/FJPS-SDG9>]. For an argument that rural places subsidize urban ones, see JOHN W. DAY & CHARLES HALL, AMERICA’S MOST SUSTAINABLE CITIES AND REGIONS 29 (2016).

61. See Jennifer Bradley & Bruce Katz, *Village Idiocy*, NEW REPUBLIC (Oct. 8, 2008), <https://newrepublic.com/article/61563/village-idiocy> [<https://perma.cc/8XMF-XT7Y>]; see also William Yardley, *Alaskan Bridge Projects Resist Earmarks Purge*, N.Y. TIMES (Mar. 6, 2007), <https://www.nytimes.com/2007/03/06/us/06bridge.html?searchResultPosition=5> [<https://perma.cc/5HKQ-N2K3>].

62. Yardley, *supra* note 61; see also Egan, *supra* note 37.

that touted the benefits of urban investment.⁶³ Picking up the bridge metaphor, Brookings put forward a policy program that aimed to rethink American transportation and advocated for urban investment in order to “keep America competitive and sustainable.”⁶⁴ In a *New Republic* essay under the unfortunate headline, “Village Idiocy,” two Brookings officials similarly advocated for metropolitan investments. They argued that the small towns of yesteryear had become obsolete in the sense that these towns are increasingly economically enmeshed with—and physically embedded in—metropolitan areas.⁶⁵

Remarkably, The *New York Times* even applied the metaphor to broadband in 2009, suggesting that federal investment in rural broadband was a “cyberbridge to nowhere.”⁶⁶ That same year, a former Federal Communications Commission (“FCC”) commissioner, Michael Katz, was harsher still: “The notion that we should be helping people who live in rural areas avoid the costs that they impose on society. . . is misguided . . . from an efficiency point of view and an equity one.”⁶⁷ Katz even led with an acknowledgement that he was treading in sensitive territory, commenting that “[o]ther people don’t like to say bad things about rural areas. . . [s]o I will.”⁶⁸ All of this hostile rhetoric led Dee Davis of the Center for Rural Strategies to protest, “When people think of rural as ‘nowhere,’ [they’re] saying the people who live in those places aren’t worth working with, they’re not worth helping.”⁶⁹ Pruitt couldn’t

63. See Jennifer Bradley, Bruce Katz & Mark Muro, *Miracle Mets: How U.S. Metros Propel America’s Economy and Might Drive its Recovery*, BROOKINGS (Mar. 11, 2009), <https://www.brookings.edu/articles/miracle-mets-how-u-s-metros-propel-americas-economy-and-might-drive-its-recovery/> [<https://perma.cc/6XHG-9E4G>]; see also Bruce Katz & Jennifer Bradley, *Metro Connection*, BROOKINGS (Mar. 16, 2011), <https://www.brookings.edu/articles/metro-connection/> [<https://perma.cc/K7HJ-CZPW>].

64. METRO. POL’Y PROGRAM AT BROOKINGS, A BRIDGE TO SOMEWHERE: RETHINKING AMERICAN TRANSPORTATION FOR THE 21ST CENTURY 4–5 (2008), https://www.brookings.edu/wp-content/uploads/2016/06/06_transportation_puentes_report.pdf [<https://perma.cc/C6B9-NDL2>].

65. Bradley & Katz, *supra* note 61.

66. David M. Eisenhorn, *Internet Money in Fiscal Plan: Wise or Waste?*, N.Y. TIMES (Feb. 2, 2009), <https://www.nytimes.com/2009/02/03/us/politics/03broadband.html?smid=ur-l-share> [<https://perma.cc/6AZK-NL2T>].

67. Howard Berkes, *Stimulus Stirs Debate Over Rural Broadband Access*, NPR (Feb. 16, 2009, 12:37 AM), <http://www.npr.org/templates/story/story.php?storyId=100739283> [<https://perma.cc/YQ22-W7VM>].

68. *Id.*

69. *Id.*; see also Charles M. Blow, Opinion, *The Death of Compassion*, N.Y. TIMES (Feb. 23, 2017), <https://www.nytimes.com/2017/02/23/opinion/the-death-of-compassion.html> [<https://perma.cc/4XG4-GB55>].

help but think these comments could also be read as calling rural folks “nobodies.”

Ezra Klein joined the conversation in a 2011 *Washington Post* essay asserting that a “raft of subsidies” from the federal government are “devote[d] to sustaining rural living.”⁷⁰ Bill Bishop of the *Daily Yonder* responded by disputing the notion that rural folks get an unfair share of federal dollars; he asserted, based on U.S. Department of Agriculture (“USDA”) Economic Research Service data, that federal per capita spending is higher in urban places.⁷¹ Bishop’s 2001 data indicated that of all federal funds, \$6,131 per person went to metro areas, while non-metro residents lagged slightly behind at \$6,020 per person.⁷² Federal spending per capita was lower still in non-metro regions in 2010: \$10,293 in non-metro areas compared to \$10,976 in metro regions.⁷³ In fact, the disparity in funding that favored metro areas grew in that decade—from \$111 in 2001 to \$683 in 2010.⁷⁴

Bishop was not the only person to respond publicly to Klein’s column. Secretary of Agriculture Tom Vilsack replied too, marshaling facts about what rural America contributes to the nation.⁷⁵ Vilsack noted that though rural America represented only 16% of the United States population

70. Ezra Klein, *Why We Still Need Cities*, WASH. POST (Mar. 4, 2011), https://www.washingtonpost.com/blogs/wonkblog/post/why-we-still-need-cities/2011/03/04/ABnqZtN_blog.html [<https://perma.cc/QYF7-9E2R>] (featuring a short review and excerpt from Ed Glaeser’s *The Triumph of the City*, which Klein used to argue that cities create profit and smarter humans and therefore deserve investment and suggesting that investment is thwarted because the representational system of the U.S. Congress gives rural areas disproportionate power).

71. Bill Bishop, *The Myth of Rural ‘Subsidies’*, DAILY YONDER (Mar. 10, 2011), <https://dailyyonder.com/not-thinking-about-rural-subsidies/2011/03/10/> [<https://perma.cc/L2RH-Y35E>] [hereinafter Bishop, *The Myth of Rural Subsidies*] (asserting that federal per capita spending is higher in urban places than in rural ones); Bill Bishop, *Busting Rural-Subsidy Myth One Last Time*, DAILY YONDER (Jan. 7, 2014), <https://dailyyonder.com/busting-rural-subsidy-myth/2014/01/07/> [<https://perma.cc/6QXT-MCZS>] [hereinafter Bishop, *Busting Rural-Subsidy*] (detailing a follow up on this issue a few years later, with updated data).

72. W.K. KELLOGG FOUND., FEDERAL INVESTMENT IN RURAL AMERICA FALLS BEHIND 3 (2004), [https://www.wkkf.org/~media/BBDB12471BCA4802898B80658C283442.ashx](https://www.wkkf.org/~/media/BBDB12471BCA4802898B80658C283442.ashx) [<https://perma.cc/4W6X-WY96>].

73. Bishop, *Busting Rural-Subsidy*, *supra* note 71.

74. Data from these sets constructed by the Economic Research Service does not exist after 2014 because the underlying data are no longer available. See *Federal Funds*, U.S. DEPT. OF AGRIC. ECON. RSCH. SERV., <https://www.ers.usda.gov/data-products/federal-funds/> [<https://perma.cc/5G3C-Y2YE>] (Jan. 7, 2021).

75. Ezra Klein, *Vilsack: ‘I Took it as a Slam on Rural America’*, WASH. POST (Mar. 8, 2011), https://www.washingtonpost.com/blogs/wonkblog/post/vilsack-i-took-it-as-a-slam-on-rural-america/2011/03/08/ABF016O_blog.html [<https://perma.cc/L3JE-HRU2>].

[44%] of the military comes from rural America. It's the source of our food, fiber and feed, and [88%] of our renewable water resources. One of every 12 jobs in the American economy is connected in some way to what happens in rural America. It's one of the few parts of our economy that still has a trade surplus. And sometimes people don't realize that [90%] of the persistent poverty counties are located in rural America.⁷⁶

Vilsack also observed that we can thank farmers because we “spend [6 or 7%] of your paycheck for groceries and people in other countries spend [20%].”⁷⁷ This argument might be particularly resonant in 2023, in an era of high inflation.⁷⁸

Klein challenged some of Vilsack's points in yet another column.⁷⁹ Klein noted, for example, that the fact that rural folks disproportionately join the military might justify increasing pay to those individuals who serve, but that it was not a good argument for sending more funding to rural communities.⁸⁰ He also pointed out that 90% of persistent-poverty counties being in rural America does not mean 90% of people living in persistent poverty counties are rural.⁸¹ In sum, Klein essentially split hairs in what we think of as a “lies, damned lies, statistics” manner associated with his Wonkblog.

Ultimately, the exchange devolved into Vilsack defending rural communities by bolstering the character of their residents as “good, hardworking people.”⁸² Vilsack elaborated, “Those folks are good people, they populate rural communities and support good schools and serve important functions,”⁸³ and “[t]here's a value

76. *Id.* Vilsack made another key point in this conversation with Klein; he said that rural people “feel underappreciated.” *Id.* It is interesting that Vilsack offered this observation several years before scholarly documentation of this phenomenon. See KATHY CRAMER, *THE POLITICS OF RURAL RESENTMENT: RURAL CONSCIOUSNESS IN WISCONSIN AND THE RISE OF SCOTT WALKER* (2016); ARLIE HOCHSCHILD, *STRANGERS IN THEIR OWN LAND: ANGER AND MOURNING ON THE AMERICAN RIGHT* (2016).

77. Klein, *supra* note 75.

78. Isabella Simonetti & Julie Creswell, *Food Prices Soar, and So Do Companies' Profits*, N.Y. TIMES, <https://www.nytimes.com/2022/11/01/business/food-prices-profits.html> [https://perma.cc/3TWF-3NM4] (Nov. 8, 2022).

79. Klein, *supra* note 75.

80. *See id.*

81. *See id.*

82. *Id.*

83. Jonathan Chait, *The Idiocy of Rural Talking Points*, NEW REPUBLIC (Mar. 9, 2011), <https://newrepublic.com/article/84954/the-idiocy-rural-talking-points> [https://perma.cc/G4RS-RKZP].

system there. Service is important for rural folks. Country is important, patriotism is important.”⁸⁴

While Klein ridiculed Vilsack for this rhetorical move, it is worth noting that Vilsack did so in the service of making a key point: “[i]f there’s not economic opportunity [in rural America], we can’t utilize the resources of rural America.”⁸⁵ In other words, if rural communities are not healthy enough for people to want to live there, we will struggle to garner the products associated with them—products derived not only from farming, but from other extractive enterprises, such as, mining, forestry, and fishing. It is perverse that the nation would presumably also struggle to draw sufficient recruits into the armed services if we did not have communities—including rural ones—that are bereft of opportunities. Yet that may be a tragically accurate assessment.

More imperious and sarcastic than even Klein’s reply to Vilsack was a *New Republic* essay commenting on the Vilsack-Klein exchange. In a piece unhelpfully titled “The Idiocy of Rural Talking Points,”⁸⁶ Jonathan Chait ridiculed Vilsack in particular for his “most persistent rhetorical move [which] is to insist upon the moral superiority of rural people.”⁸⁷ Chait asserted that declarations of this moral superiority reflect a common trope in American politics.⁸⁸ He added: “Some city dwellers think of themselves as superior to everybody else, but they understand they can’t say so openly. . . .”⁸⁹ Chait, it seems, had not read the “Village Idiocy” essay in his own magazine because urban superiority is precisely what it communicated.

In any event, the conversation had devolved again—at least implicitly—into a squabble over who had picked this silly fight. Who had drawn the artificial line in the sand that pitted rural against urban? And given that the gauntlet had been thrown down, who

84. *Id.*

85. Klein, *supra* note 75.

86. Chait, *supra* note 83. Another of Chait’s assertions aged particularly poorly in light of the pandemic and its supply chain consequences, never mind the world hunger consequences of the Russian invasion of Ukraine. Chait wrote that Vilsack “argues for food subsidies because the U.S. needs to be self-sufficient in food, which is silly. (Who exactly is going to blockade our ports and starve us into wartime submission?).” *Id.*

87. *Id.*

88. *Id.*

89. *Id.* Chait declared, “Only rural Americans are deemed morally superior on the basis of their population density.” *Id.* That, of course, mischaracterized what Vilsack had said. See Klein, *supra* note 75.

had initially suggested that urban people were more important than rural ones or that rural folks were superior to their urban counterparts? Was it Sarah Palin? Barack Obama? Or did it predate their arrival on the national stage? Whenever or whoever did it, the two sides got racially coded,⁹⁰ and that coding has persisted, a phenomenon that has served not only to deepen the rift, but also to complicate any effort to resolve it. This is a matter we return to in Part II.

Regardless of who started the fight, suggestions that rural areas are wasteful and undeserving lingered well beyond the 2008 Presidential election. This was driven in part by debates over how best to use stimulus funds associated with the American Recovery and Reinvestment Act.⁹¹ But it was also driven by newfound belief among the chattering classes—folks like the Brookings Institute and Ezra Klein—that metropolitan areas are more productive, innovative, and important than rural ones. Sadly, as the exchanges above suggest, this led to more pitting of rural against urban, a phenomenon that obscured the interdependence of the sectors.

At the time, Pruitt was struck by the harshness of the anti-rural rhetoric, and she wrote “The Geography of the Class Culture Wars,” in part, to protest it. But Pruitt assumed relatively few rural folks read *The New York Times* and *The New Republic*, so she figured they would not see what was being said about them. Little did she know that social media’s ability to sow chaos—to amplify these harsh sentiments and deliver them directly to rural folks’ social media feeds—loomed just around the corner.⁹²

Donald Trump’s victory in the 2016 presidential election caused the disproportionate electoral power of rural voters—and, to a lesser extent, the supposed disproportionate investments they

90. See, e.g., Chait, *supra* note 83. Chait continued:

Why is it so common to praise the character of rural America? Part of it is doubtless that rural life represents the past, and we think of the past as a simpler and more honest time. But surely another element is simply that rural America is overwhelmingly white and Protestant. And completely aside from the policy ramifications, the deep-seated veneration of rural America reflects, at bottom, a prejudice few would be willing to openly spell out.

Id. But see Bradley & Katz, *supra* note 61.

91. American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, § 7002, 123 Stat. 521.

92. See generally MAX FISHER, *THE CHAOS MACHINE: THE INSIDE STORY OF HOW SOCIAL MEDIA REWIRED OUR MINDS AND OUR WORLD* (2022) (documenting the influence of social media and the polarizing algorithms that drive it).

enjoyed—to again take center stage. This was in part because “red state” voters were credited with putting Trump in the White House. Amid coast-al and urban progressives’ shock at Trump’s win, many turned with renewed vigor to rural bashing.

II. A RESURGENCE OF RURAL BASHING IN THE ERA OF TRUMP

A. Crediting (or Blaming) Rural Voters for Trump’s Election

In the wake of Donald Trump’s 2016 victory over Hillary Clinton, journalists and academics latched onto the idea that rural areas “decided” the 2016 election.⁹³ Repeatedly, the media declared the rural voter “key to [Trump’s] victory”⁹⁴ or “vital to Donald Trump’s surprise win.”⁹⁵ One proclaimed that Trump “rode a wave of anger and enthusiasm in rural counties . . . enroute to victory.”⁹⁶ Danielle Kurtzleben, of National Public Radio (“NPR”), went as far as to declare, “it’s possible that living in a rural area *caused* people to vote more Republican this election.”⁹⁷

This line of thinking often overlooked Trump’s strong performance among suburban voters,⁹⁸ but it was true that Trump fared well with rural voters. Trump won 62% of the vote in small and

93. This made for an interesting shift from 2008, after which the mainstream media suggested the rural vote mattered little anymore. Adam Nossiter, *For South, A Waning Hold on National Politics*, N.Y. TIMES (Nov. 10, 2008), <https://www.nytimes.com/2008/11/11/us/politics/11south.html> [<https://perma.cc/6SDM-CN75>] (arguing that, by voting for John McCain, “voters from Texas to South Carolina and Kentucky may have marginalized their region for some time to come”). This is an interesting quote given how the region has become increasingly marginalized in political rhetoric—like people shouldn’t live in Kentucky, or should move away from Kentucky if they don’t like the floods.

94. Jason Lemon, *Rural Voters Helped Trump Win in 2016—How Do The Polls Say They’ll Vote in 2020?*, NEWSWEEK (Aug. 26, 2020, 10:45 AM), <https://www.newsweek.com/rural-voters-helped-trump-win-2016how-do-polls-say-theyll-vote-2020-1527772> [<https://perma.cc/T3MY-9Q5V>].

95. Don E. Albrecht, *The Nonmetro Vote and the Election of Donald Trump*. 34 J. RURAL SOC. SCI., 1, 1–32 (2019).

96. Mike Wilkinson, *Rural Michigan Thumbs Nose at Clinton, Backs Trump*, BRIDGE MICH. (Nov. 9, 2016), <https://www.bridgemi.com/michigan-government/rural-michigan-thumbs-nose-clinton-backs-trump> [<https://perma.cc/ET27-TP26>].

97. Danielle Kurtzleben, *Rural Voters Played a Big Part in Helping Trump Defeat Clinton*, NPR (Nov. 14, 2016, 10:32 AM), <https://www.npr.org/2016/11/14/501737150/rural-voters-played-a-big-part-in-helping-trump-defeat-clinton> [<https://perma.cc/B85S-FRKQ>]. *But see* Andrew Van Dam, *Trump Wasn’t Just A Rural Phenomenon. Most of His Supporters Come from Cities and Suburbs*, WASH. POST (Nov. 18, 2020), <https://www.washingtonpost.com/business/2020/11/18/rural-city-trump-voters/> [<https://perma.cc/JDL6-GRPE>].

98. *See, e.g.*, Thomas B. Edsall, *The 2016 Exit Polls Led Us to Misinterpret the 2016 Election*, N.Y. TIMES (Mar. 29, 2018), <https://www.nytimes.com/2018/03/29/opinion/2016-exit-polls-election.html> [<https://perma.cc/ZVU3-NMMX>].

rural towns, and Hillary Clinton carried urban areas 59% to Trump's 35%.⁹⁹ While younger voters tend to choose Democratic candidates, rural young people also leaned toward Trump in 2016, 50% to 47%.¹⁰⁰ Among rural white women, 62% supported Trump.¹⁰¹

In fact, however, rural voters' support for Republican candidates is nothing new. Demographers Dante Scala and Ken Johnson have observed, "[P]olitical commentators routinely treat rural America as an undifferen[t]iated bastion of strength for Republicans,"¹⁰² though they seek to complicate that narrative. Republican President George W. Bush carried rural areas by 16% in 2000, and then 19% in 2004.¹⁰³ Bush won "the nation's 2,049 rural counties by 4.1 million voters and exurban counties by 2.56 million" in 2004, while John Kerry won urban counties by 3.75 million.¹⁰⁴ Exit polls showed that rural voters preferred Republican candidates 53% to 45% in 2008 and 62% to 34% in 2016.¹⁰⁵ Urban voters, on the other hand, consistently prefer Democratic candidates: 63% to 35% in 2008 and 59% to 35% in 2016.¹⁰⁶ Trump's success with rural voters

99. Rich Morin, *Behind Trump's Win in Rural White America: Women Joined Men in Backing Him*, PEW RSCH. CTR. (Nov. 17, 2016), <https://www.pewresearch.org/fact-tank/2016/11/17/behind-trumps-win-in-rural-white-america-women-joined-men-in-backing-him/> [https://perma.cc/VMN5-DCGY].

100. *How Rural Youth Voted in the 2020 Presidential Election*, TUFTS TISCH COLL.: CTR. INFO. & RSCH. CIVIC LEARNING & ENGAGEMENT (Feb. 26, 2021), <https://circle.tufts.edu/latest-research/how-rural-youth-voted-2020-presidential-election> [https://perma.cc/STK4-H3YE].

101. Morin, *supra* note 99; see also Pruitt, *supra* note 7.

102. Dante J. Scala & Kenneth M. Johnson, *Red Rural, Blue Rural: The Geography of Presidential Voting in Rural America*, 13 GEOGRAPHY TCHR., 118, 118–23 (2016) (arguing that while pundits might treat rural America as a monolith, there are actually complicated and salient voting trends that might affect national elections); see also Kai A. Schafft, *Rurality and Crises of Democracy: What Rural Sociology Can Offer this Political Moment?*, 86 RURAL SOCIO. 393, 399 (2021) (discussing trends of partisan segregation that occur not only in rural or metro areas, but also at micro levels within "purple" areas); see generally Shannon Monnat & David Brown, *More than a Rural Revolt: Landscapes of Despair and the 2016 Presidential Election*, 55 J. RURAL STUD. 227 (2017); Sheila Foster & Clayton P. Gillette, *Can Micropolitan Areas Bridge the Urban/Rural Divide?*, THEORETICAL INQUIRES IN L. (forthcoming) (discussing rural and urban voting trends).

103. Howard Berkes, *Poll: Rural Voters Not Reliably Republican in 2008*, NPR (May 18, 2008, 12:00 AM), <https://www.npr.org/2008/05/18/90555893/poll-rural-voters-not-reliably-r-republican-in-2008> [https://perma.cc/6JUQ-H3VJ].

104. Tim Murphy & Bill Bishop, *Is the Past Prologue? Looking at the 2004 Rural, Urban and Exurban Vote*, DAILY YONDER (Oct. 17, 2008), <https://dailyonder.com/past-prologue-looking-2004-rural-urban-and-exurban-vote/2008/10/17/> [https://perma.cc/A8SS-6VPY].

105. Kurtzleben, *supra* note 97.

106. *Id.*; see also Schafft, *supra* note 102, at 395–96 (discussing other demographic slices that supported Trump in 2016, such as suburban voters who preferred Trump by 5%).

was thus an extension of the trends of recent decades,¹⁰⁷ and many scholars have explored various aspects of what drove rural voters attraction to Trump.¹⁰⁸

B. *Rural Bashing in the Trump Era*

Widespread attribution of Trump's victory to red-state voters elicited a new wave of rural bashing following the 2016 election cycle, a wave that has yet to subside. This more recent negativity toward rural voters has been more likely to appear on social media than in mainstream media, as it did during the 2008 election and after-math. While we acknowledge the limits of social media as an indicator of public sentiment due to the self-selecting nature of the enterprise, social media does influence what people think and believe. Indeed, social media may have a greater impact than mainstream outlets, which is no doubt why foreign governments have used it sow discord.¹⁰⁹

Recent rural bashing also shows up in response to essays in legacy media outlets. Former Montana Governor Steve Bullock, for example, was met with derision when he advocated in a December 2021 *New York Times* essay that Democrats should reach out to rural voters.¹¹⁰ Many readers essentially “shot the messenger,” in this case a Democrat who had been elected to state wide office several times in a red state. One reader, Patrick—elevated as a “Times Pick” comment—wrote:

Can I play devil's advocate here? Maybe the rural voter needs to live in the city for a year or two. Maybe the “ordinary voter” is a[n] urban dweller. I have personally gotten pretty tired of the “real” America narrative—it's as if the rest of us are fake Americans. Rural voters are over-represented in Congress and State Legislatures, they receive a disproportionate amount of Federal dollars, they have a disproportionate impact in the Senate and in Presidential elections.

107. Suzanne Mettler & Trevor Brown, *The Growing Rural-Urban Political Divide and Democratic Vulnerability*, 699 ANNALS AM. ACAD. POL. & SOC. SCI. 130, 131 (2022).

108. Kelley & Lobao, *supra* note 41, at 671–72; *see generally* Schafft, *supra* note 102; Jessica D. Ulrich-Shad & Cynthia M. Duncan, *People and Places Left Behind: Work, Culture and Politics in the Rural United States*, in *AUTHORITARIAN POPULISM AND THE RURAL WORLD* 89 (Ian Scoones et. al. eds., 2021).

109. *See generally* FISHER, *supra* note 92 (discussing the reach of social media and its capacity to sow discord and chaos).

110. Steve Bullock, *I Was the Governor of Montana. My Fellow Democrats, You Need to Get Out of the City More*, N.Y. TIMES (Dec. 3, 2021), <https://www.nytimes.com/2021/12/03/opinion/democrats-rural-america-midterms.html> [<https://perma.cc/GC65-PMFJ>].

The issue is not that Dems are not listening to the rural voter, it's that the rural voter is insular: when everyone you know looks and sounds like you, you start fearing "outsiders". In a nutshell, this is why Republicans win this voter - because they've convinced him or her that those city dwellers are evil, condescending and that they want to change rural lifestyles.¹¹¹

In short, the themes taken up by many commenters were familiar ones, including resentment about disproportionate political power and federal investments, along with assertions of insularity.

We could not help but think that Patrick (along with many others) was living up to the urban stereotype he attributed to Republicans: condescending and suggesting rural folks change their lifestyle, by moving to the city. Meanwhile, another commenter, Frank from Boston, made an important counterpoint when he queried where these rural folks would live if they followed Patrick's exhortation to move to the city, given the shortage of urban housing.¹¹² Other "Times Pick" comments on the Bullock essay echoed the complaint of Patrick about Bullock's "ordinary Americans" language, and several accused rural folks of simply being motivated by racism and misogyny.¹¹³

111. Patrick, Comment to *I Was the Governor of Montana. My Fellow Democrats, You Need to Get Out of the City More*, N.Y. TIMES (Dec. 3, 2021), <https://nyti.ms/3opr5xb#permid=115752769> [<https://perma.cc/7FGT-UWDRJ>].

112. Frank, Comment to *I Was the Governor of Montana. My Fellow Democrats, You Need to Get Out of the City More*, N.Y. TIMES (Dec. 3, 2021), <https://nyti.ms/2ZP3z52#permid=115752423> [<https://perma.cc/XK95-W2CU>]. Frank wrote: "Where would they live? In tents on the streets? In RVs or trailers under elevated highways? Metro areas zone out multi-family apartments. And then urban dwellers during COVID relocate to rural areas and bid the prices of houses there out of sight." *Id.*

113. See generally comments to *I Was the Governor of Montana. My Fellow Democrats, You Need to Get Out of the City More*, N.Y. TIMES (Dec. 3, 2021), <https://www.nytimes.com/2021/12/03/opinion/democrats-rural-america-midterms.html#commentsContainer> [<https://perma.cc/QEX6-HVER>]. One comment, from Kelly in PA, took a different tack:

With the exception of Obama, democrats do have a tendency to not acknowledge that there are white working class or white poor people. I sometimes wonder if they actually forgot that they exist. To hear them talk you would think our country is full of white rich people and poor non-white people. They conveniently forget that there are also races in this country with higher average income than whites. Rural people also have their own interests and needs that are different from urban people. School closures have hit this group very hard as well.

Kelly, Comment to *I Was the Governor of Montana. My Fellow Democrats, You Need to Get Out of the City More*, N.Y. TIMES (Dec. 3, 2021), <https://www.nytimes.com/2021/12/03/opinion/democrats-rural-america-midterms.html#commentsContainer> [<https://perma.cc/QEX6-HVER>]. Another harsh comment came from Joe:

Responses to another *New York Times* essay, “In the Land of Self-Defeat,” echoed similar negativity.¹¹⁴ Author Monica Potts used the occasion of a local government budgeting fight in Van Buren County, Arkansas, population approximately 16,000,¹¹⁵ to argue that rural folks are beyond appeals to their own economic interests because they have become so antagonistic to government spending generally. The spending at issue in Van Buren County was for the public library, and various community members opposed paying the librarian, who held a master’s degree, twenty-five dollars per hour.¹¹⁶ Potts observed that these rural folks “view anyone who is trying to increase government spending, especially to help other people, with disdain, even if it ultimately helps them, too.”¹¹⁷

And what, pray tell, are Dems supposed to tell these rural folks or learn from these rural folks. Many of the proposals Democrats make such as healthcare, hard infrastructure, soft infrastructure, immigration reform, prioritizing education would all benefit rural communities - often more than the cities and burbs. I'd love, for example, to know what books rural folks think we should read - in general, and about race in particular. Do Bullock and David Brooks who regularly makes the same argument have a reading list? I'd love to see it! Candidly, I think the problem is really the reverse. That the best thing Democrats could do is invite rural folks into the city and the suburbs to see all the wonderful things that are going on and to also see that we're all struggling just like they are.

Joe, Comment to *I Was the Governor of Montana. My Fellow Democrats, You Need to Get Out of the City More*, N.Y. TIMES (Dec. 3, 2021), <https://www.nytimes.com/2021/12/03/opinion/democrats-rural-america-midterms.html#commentsContainer> [https://perma.cc/QEX6-HVER].

114. Monica Potts, Opinion, *In the Land of Self Defeat*, N.Y. TIMES (Oct. 4, 2019), <https://www.nytimes.com/2019/10/04/opinion/sunday/trump-arkansas.html> [https://perma.cc/FJ P8-SDG9].

115. STATE AND COUNTY QUICK FACTS, VAN BUREN COUNTY, ARKANSAS, U.S. CENSUS BUREAU, (July 1, 2021), <https://www.census.gov/quickfacts/vanburencountyarkansas> [https://perma.cc/36U2-KRS8].

116. Potts, *supra* note 114.

117. *Id.* It is interesting that while Potts references the economic realities of life in rural areas, where previously monopolistic industries are gone and shortfalls hit viscerally, she phrases her understanding of rural voters as a hypothetical: “[i]t is as if there will be a nationwide scramble to cover the shortfall just as there was here with the library”, rather than understanding that shortfalls in the national budget affect low-income people the most and low-income rural people have specific vulnerabilities. *Id.* For example, rural communities did not show the same gross domestic product growth in the post-Great Recession era as urban areas (14.7% growth in rural areas and 19.2% in urban areas). See Raksha Koppam, *Gaps in U.S. Rural and Urban Economic Growth Widened In The Post-Great Recession Economy, With Implications Amid The Coronavirus Recession*, EQUITABLE GROWTH (Aug. 6, 2020), <https://equitablegrowth.org/gaps-in-u-s-rural-and-urban-economic-growth-widened-in-the-post-great-recession-economy-with-implications-amid-the-coronavirus-recession/> [https://perma.cc/HH8J-DP8L]. Nor had nonmetro employment rates recovered to pre-Great Recession rates as of 2019, and in fact the gap between employment rates in metro and nonmetro areas has continued to widen. See Olugbenga Ajilore, *The Path to*

Many commented harshly on the people about whom Potts wrote. One said it is “impossible to forgive these people, let alone sympathize with them,”¹¹⁸ and others asserted that they are “country bumpkins,”¹¹⁹ “angry illiterates . . . deplorable,”¹²⁰ and “not capable of logic.”¹²¹ Another insisted “these rural leftovers are dying out anyway.”¹²² Such comments illustrate how rural bashing can be so vitriolic as to anticipate, without reservation, the death of swaths of rural America.¹²³

More recently, readers commented harshly on Robert Leonard’s 2022 *New York Times* essay, “Biden Has Already Done More for Rural America Than Trump Ever Did.”¹²⁴ ElleJ wrote that “un-educated and home schooled rurals will happily and consistently vote against their own interests and go hungry as long as no minority or democrat succeeds.”¹²⁵ Another user, Victorious Yankee, commented: “Fox state tv has left the rural losers in my own family little more than catatonic temper tantrums with diabetes, bad teeth and swollen ankles. And I agree, they are beyond hope. There

Rural Resilience in America, CNTR. FOR AM. PROGRESS (Sept. 21, 2020), <https://www.americanprogress.org/article/path-rural-resilience-america/> [<https://perma.cc/Z2MD-4NHB>].

118. mls, Comment to *In the Land of Self Defeat*, N.Y. TIMES (Oct. 6, 2019), <https://www.nytimes.com/2019/10/04/opinion/sunday/trump-arkansas.html#commentsContainer> [<https://perma.cc/86GH-UYEG>].

119. JRM, Comment to *In the Land of Self Defeat*, N.Y. TIMES (Oct. 6, 2019), <https://www.nytimes.com/2019/10/04/opinion/sunday/trump-arkansas.html#commentsContainer> [<https://perma.cc/86GH-UYEG>].

120. No name, Comment to *In the Land of Self Defeat*, N.Y. TIMES (Oct. 6, 2019), <https://www.nytimes.com/2019/10/04/opinion/sunday/trump-arkansas.html#commentsContainer> [<http://perma.cc/86GH-UYEG>].

121. Mary Rivkatot, Comment to *In the Land of Self Defeat*, N.Y. TIMES (Oct. 6, 2019), <https://nyti.ms/3IGYH5X#permid=102929753> [<https://perma.cc/B8T2-JG6D>].

122. David G., Comment to *In the Land of Self Defeat*, N.Y. TIMES (Oct. 6, 2019), <https://nyti.ms/3kkLiqa#permid=102926141> [<https://perma.cc/323V-26WP>].

123. Joan Williams writes of a similar attitude toward working class whites:

“Why not just wait for the white working class to die off?” asked an audience member at last year’s Berkeley Festival of Ideas. I get this question a lot, and I always reply: “Do you understand now why they voted for Trump? Your attitude is offensive, and Trump is their middle finger.”

Joan C. Williams, *The Democrats’ White-People Problem*, ATLANTIC (Dec. 2018), <https://www.theatlantic.com/magazine/archive/2018/12/the-democrats-white-people-problem/573901/> [<https://perma.cc/V2AL-C5QL>].

124. See Robert Leonard, *Biden Has Already Done More for Rural America Than Trump Ever Did*, N.Y. TIMES (Apr. 26, 2022), <https://www.nytimes.com/2022/04/26/opinion/biden-trump-democrats-rural-america.html> [<https://perma.cc/5U8B-5NXP>].

125. ElleJ, Comment to *Biden Has Already Done More for Rural America Than Trump Ever Did*, N.Y. TIMES (Apr. 27, 2022), <https://nyti.ms/3XlCHBR#permid=118034044> [<https://perma.cc/SW4D-QTVZ>].

isn't an inkling of reason behind their dead rural eyes."¹²⁶ Both users denigrated the intelligence and humanity of people who live in rural areas. ElleJ did so by referring to rural residents as just "rurals," defined *only* by their geography, and Victorious Yankee did so by labeling them with the non-human noun "tantrums."¹²⁷

In a similar vein, consider replies to Skylar Baker-Jordan's December 2021 essay, "Liberals Sneer at Rural America—Then Expect Our Votes,"¹²⁸ in *Newsweek*. Writing about the tornados that left a 250-mile path of ruin through western Kentucky, Baker-Jordan lamented that "for too many," the tornados "presented an opportunity to gloat, chide and reprimand us for 'voting against our interests' on things like climate change."¹²⁹ Baker-Jordan observed that social media users responded to the disaster with derision for the people of Kentucky, but then readers responded to his essay with still more derision. Twitter account @Binary_Daoist, for example, replied, "I don't believe for a second that these tornados have changed Kentucky. You people will still vote against yourself and still vote against helping others in need. That's truly callous."¹³⁰

It is interesting to note that @Binary_Daoist had only a handful of followers, and the account has since been removed. Both facts suggest that it was a bot account. If that is the case, it supports our hunch that those seeking to sow discord among the U.S. electorate, be they Russian or otherwise, know that the urban-rural axis is a cleavage fraught with considerable sensitivity.¹³¹

126. Victorious Yankee, Comment to *Biden Has Already Done More for Rural America Than Trump Ever Did*, N.Y. TIMES (Apr. 27, 2022), <https://nyti.ms/3H0oo0l#permid=118035064> [<https://perma.cc/4RLT-LEJR>].

127. ElleJ, *supra* note 125; Victorious Yankee, *supra* note 126.

128. See Skylar Baker-Jordan, *Liberals Sneer at Rural America—Then Expect Our Votes*, NEWSWEEK (Dec. 21, 2021, 10:00 AM), <https://www.newsweek.com/liberals-sneer-rural-americathen-expect-our-votes-opinion-1661609> [<https://perma.cc/KSN8-ZPVK>].

129. *Id.*

130. @Binary_Daoist, TWITTER (Dec. 14, 2021, 6:11 AM), https://web.archive.org/web/202126195528/https://twitter.com/Binary_Daoist/status/1470758305387921408 [<https://perma.cc/5Y8X-8983>] (the link provided is an archived version hosted on the WayBack Machine because the account has since been deleted).

131. See Natalia V. Osipova & Aaron Byrd, *Inside Russia's Network of Bots and Trolls*, N.Y. TIMES (Oct. 31, 2017), <https://www.nytimes.com/video/us/politics/100000005414346/how-russian-bots-and-trolls-invade-our-lives-and-elections.html?searchResultPosition=4> [<https://perma.cc/7AAY-JNNL>]; see Sheera Frenkel, *What Are Spam Bots and Why They're an Issue in Elon Musk's Twitter Deal*, N.Y. TIMES (July 11, 2022), <https://www.nytimes.com/2022/07/09/technology/elon-musk-twitter-spam-bots.html?searchResultPosition=7> [<https://perma.cc/277P-WT7Y>].

Other Twitter users with enough followers to appear not to be bot accounts also spew ugliness across the urban-rural divide. Indeed, similar antipathy was expressed in social media during the national focus on a disaster at the other end of the Commonwealth, eastern Kentucky's July 2022 floods. Twitter user @SammyGolden5, for example, tweeted: "Has anyone noticed that Mitch McConnell hasn't showed his face in the flood area of Kentucky? He doesn't give a damn about his constituents ! Kentuckian hope you're watching no sewers no water reclamation plant you live in a fish bowl, but you kept voting for McConnell smfh ! [sic]."¹³²

One of the most vitriolic comments was from user @SgmSteven, Steven Wright, who replied to CNN's forecast of more rain on its way to flooded eastern Kentucky.¹³³ Wright tweeted that "[y]ears of ignorance and incest created a subhuman race that ignored the climate crisis in Kentucky and now they are paying for it."¹³⁴ Such social media activity—at least that which shows up in our admittedly liberal media silos—often communicates that if rural residents do not like the climate disaster afflicting them or how their state government is responding, they can and should move. That stance is not only harsh, it is—as Frank told Patrick in response to the Bullock essay—impractical.¹³⁵

Sadly, examples of rural bashing in social media are easily found. Sometimes those doing the bashing are high profile, as when former *Saturday Night Live* cast member Taran Killam tweeted shortly after Trump's election, "Rural = so stupid"¹³⁶ or

132. SammyG (@SammyGolden5), TWITTER (July 31, 2022, 6:51 PM), <https://twitter.com/SammyGolden5/status/1553876069668851713?s=20&t=wSvKtIbEVTwquycqpm4Q> [<https://perma.cc/XTB9-32TV>]. The acronym "smfh" means "shaking my [fucking] head" and is used to show disappointment, disapproval, or frustration. *SMFH Meaning: What Does SMFH Mean?*, 7ESL, <https://7esl.com/smfh/#:~:text=What%20Does%20SMFH%20Mean%3F,Origin%20of%20SMFH> [<https://perma.cc/26YJ-U8PJ>].

133. Aya Elamroussi & Dakin Andone, *Death Toll in Kentucky Floods Rises to 28 as Area Braces For More Rain*, CNN, <https://www.cnn.com/2022/07/31/weather/kentucky-appalachi-a-flooding-sunday/index.html> [<https://perma.cc/XTP7-ZHHE>] (July 31, 2022, 6:19 PM).

134. Steven Wright (@SgmSteven), TWITTER (July 31, 2022, 6:35 PM), <https://twitter.com/SgmSteven/status/1553872059129815040?s=20&t=wSvKtIbEVTwquycqpm4Q> [<https://perma.cc/44BX-MRDM>].

135. It is impractical, among other reasons, because of the nation's housing crisis, but also because of the cost of moving and attachment to kith and kin where they live. See Janet Adamy & Paul Overberg, *Struggling Americans Once Sought Greener Pastures—Now They're Stuck*, WALL ST. J. (Apr. 2, 2017, 11:13 AM), <https://www.wsj.com/articles/struggling-americans-once-sought-greener-pasturesnow-theyre-stuck-1501686801> [<https://perma.cc/5E6T-EXUF>].

136. Taran Killam (@TaranKillam), TWITTER (Nov. 8, 2016, 10:32 PM), https://twitter.com/TaranKillam/status/796193714834210816?s=20&t=3RyUOPkNuFnVfqv_kbInEw [<https://perma.cc/5E6T-EXUF>].

when Bette Midler denigrated West Virginians in the tweet we featured in the introduction to this Article.¹³⁷

A lower-profile Twitter user, UC Berkeley graduate student instructor Jackson Kernion, attracted attention in late 2019 with a Twitter thread about healthcare costs.¹³⁸ He wrote, “Rural Healthcare Should be expensive! And that expense should be borne by those who choose rural America!”¹³⁹ But it was a subsequent entry in the thread that caught national attention and drew some pushback: “I unironically embrace the bashing of rural Americans. They, as a group, are bad people who have made bad life decisions . . . and we should shame people who aren’t pro-city.”¹⁴⁰

Kernion’s underlying assumption was that city folks might have to bear some of the higher costs associated with rural healthcare delivery—presumably because rural hospitals and other rural providers cannot achieve economies of scale.¹⁴¹ His own self-proclaimed bashing thus echoed former FCC commissioner Michael Katz’s 2009 comments about rural broadband funding, and it veered into Ezra Klein’s “raft of subsidies” complaints about rural folks.¹⁴² It is also in the same vein we saw in some responses to the eastern Kentucky flooding, like one blaming rural residents for environmental disasters and their costs because of their presumed voting record.¹⁴³

Social media shaming subsequently led Kernion to delete his tweet.¹⁴⁴ The UC Berkeley lecturer did not, however, apologize or

[//perma.cc/NLB6-G56V](https://perma.cc/NLB6-G56V)]. Killam did tweet an apology the next day, writing “In the light of day, I’m embarrassed for making thoughtless and mean statements. I was wrong. I’m sorry.” Taran Killam (@TaranKillam), TWITTER (Nov. 9, 2016, 4:14 AM), https://twitter.com/TaranKillam/status/796325086169010176?s=20&t=3RyUOPkNuFnVfqv_kbInEw [<https://perma.cc/T68Y-P9Q8>].

137. See *supra* note 1 and accompanying text.

138. Celine Ryan Ciccio, *Berkeley Instructor: ‘Rural Americans’ are ‘Bad People,’* CAMPUS REFORM (Nov. 8, 2019, 9:09 AM), <https://www.campusreform.org/article?id=13975> [<https://perma.cc/V2EP-V4TH>].

139. *Id.*

140. *Id.*

141. See Annelise Pierce, *Lack of Medical Specialists Increases Obstacles to Care and Worsens Patients’ Prognoses*, DAILY YONDER (Oct. 20, 2022), <https://dailyyonder.com/lack-of-medical-specialists-increases-obstacles-to-care-and-worsens-patients-prognoses/2022/10/20/> [<https://perma.cc/K7NJ-67LE>].

142. See Berkes, *supra* note 67; Klein, *supra* note 75.

143. See *supra* notes 133–35 and accompanying text.

144. Some called for UC Berkeley to terminate Kernion. See e.g., Kenna Ford (@_kennaford), TWITTER (Nov. 11, 2019, 9:21 PM), https://twitter.com/_kennaford/status/1194077615201640448 [<https://perma.cc/Z455-GTLA>]. Others took to denigrating the entire discipline

back off the substance of his assertion.¹⁴⁵ Kernion did acknowledge that the tone was harsher than intended: “Pretty sure I did a bad tweet here. Gonna delete it. I’ll want to reflect on it more later, but my tone is way crasser [sic] and meaner than I like to think I am.”¹⁴⁶

While reader responses to rural essays, including on social media, are harsh, it is sometimes the established media doing the bashing, just as we saw back in the Palin era. In fact, Kernion’s language arguably channeled Kevin Williamson’s 2016 essay, “The Father-Führer,”¹⁴⁷ in the conservative *National Review*. In that essay, Williamson faulted cultural decline for the problems he sees in rural areas.¹⁴⁸ He concluded that rural folks are not just bad people to be shamed, he went a step further to argue that rural communities deserve to die:

If you spend time in hardscrabble, white upstate New York, or eastern Kentucky, or my own native West Texas, and you take an honest look at the welfare dependency, the drug and alcohol addiction, the family anarchy—which is to say, the whelping of human children with all the respect and wisdom of a stray dog—you will come to an awful realization. . . .The truth about these dysfunctional, downscale communities is that they deserve to die. Economically, they are negative assets. Morally, they are indefensible.¹⁴⁹

of philosophy. See e.g., Dr. Mark Young (@MarkYoungTruth), TWITTER (Nov. 11, 2019, 7:54 PM), https://twitter.com/MarkYoungTruth/status/1194055736382414849?s=20&t=iywl_lx4KbrWbDOzYpCcxA [<https://perma.cc/MLN6-N8U6>]; Pete Johnson (@choplawyer), TWITTER (Nov. 12, 2019, 1:53 PM) https://twitter.com/choplawyer/status/1194327406074445825?s=20&t=iywl_lx4KbrWbDOzYpCcxA [<https://perma.cc/6PVE-8M9B>]. User @Whitey_83 noted that Kernion’s original tweet was “ratio’d back to the stone age” which is when the number of replies to a tweet greatly outnumber the retweets or likes and indicates that the community is arguing with the content of the original tweet. Since the original tweet was deleted, it is hard to know exactly the ratio of replies to likes and retweets—but screenshots show a ratio of 946 replies to 24 retweets and 32 likes. See Jisha Joseph, *UC Berkeley Instructor Says Rural Americans Are “Bad People” Who Deserve “Uncomfortable” Lives*. GOOD INC. & UPWORTHY (Nov. 18, 2019), <https://scoop.upworthy.com/uc-berkeley-instructor-rural-americans-bad-people-bad-decisions> [<https://perma.cc/4BP4-4MTX>].

145. See Jackson Kernion (@JacksonKernion), TWITTER (Nov. 6, 2019, 3:27 PM) <https://twitter.com/JacksonKernion/status/1192176586088255489?s=20> [<https://perma.cc/4BVC-B CYP>]; see also Joseph, *supra* note 144 (quoting a tweet by Kernion, “None of the replies I’m getting even *try* to address the central point I’m making . . . That’s how you know I’m right[.]”).

146. Kernion, *supra* note 145.

147. Kevin D. Williamson, *The Father-Führer*, NAT’L REV. (Mar. 28, 2016, 5:00 AM), <http://www.nationalreview.com/magazine/2016/03/28/father-f-hrer/> [<https://perma.cc/4H8A-T LLA>].

148. *Id.*

149. *Id.*

After Williamson's essay attracted negative attention, David French, another conservative pundit, came to Williamson's defense. French acknowledged that "[t]hese are strong words, but they are fundamentally true and important to say."¹⁵⁰ Like Kernion, French apologized for his unduly harsh tone but not for the underlying message.¹⁵¹

More remarkable still, the message of J.D. Vance's 2016 best-selling memoir, *Hillbilly Elegy*,¹⁵² was essentially a folksier, aw shucks version of the Williamson essay. Vance cast blame on those who, unlike him, had not been able to bootstrap themselves out of a place with diminished economic opportunities.¹⁵³ In doing so, he downplayed the structural barriers that keep people from rising. In spite of its harsh underlying message, Vance's memoir was initially lauded by pundits across the political spectrum,¹⁵⁴ though his widespread embrace by the left fell away once Vance embraced Trump.¹⁵⁵

Mainstream media outlets have occasionally taken to ridiculing rural people in the Trump era. During a 2020 CNN segment, Don Lemon interviewed contributor Wajahat Ali¹⁵⁶ and political strategist Rick Wilson¹⁵⁷ about a tense interview between Trump administration Secretary of State Mike Pompeo and NPR host Mary

150. David French, *Working-Class Whites Have Moral Responsibilities—In Defense of Kevin Williamson*, NAT'L REV. (Mar. 14, 2016, 10:09 PM), <https://www.nationalreview.com/corner/working-class-whites-have-moral-responsibilities-defense-kevin-williamson/> [<https://perma.cc/9FQQ-K69D>].

151. *Id.*

152. See generally J.D. VANCE, *HILLBILLY ELEGY: A MEMOIR OF A FAMILY AND CULTURE IN CRISIS* (1st ed. 2016).

153. *Id.* at 4–8.

154. See Lisa R. Pruitt, *What Hillbilly Elegy Reveals About Race in America*, in *APPALACHIAN RECKONING: A REGION RESPONDS TO HILLBILLY ELEGY* 105, 107 (Anthony Harkins & Meredith McCarroll eds., 2019).

155. Lisa R. Pruitt, *What Republicans Know (and Democrats Don't) About the White Working Class*, POLITICO (June 24, 2022, 4:30 AM), <https://www.politico.com/news/magazine/2022/06/24/democrats-white-working-class-00041807> [<https://perma.cc/J42X-6C95>] (noting Vance's shift from criticizing Trump to courting and winning Trump's endorsement).

156. Ali is a regular columnist with *The Daily Beast*. He has published two books. WAJAHAT ALI, <https://www.wajali.com/> [<https://perma.cc/7NUT-7LV7>]. His most recent book was published in 2022. WAJAHAT ALI, *GO BACK TO WHERE YOU CAME FROM: AND, OTHER HELPFUL RECOMMENDATIONS ON BECOMING AMERICAN* (2022).

157. Wilson is a political strategist and advertiser, as well as a contributor to a variety of outlets, including *The Daily Beast*, *CNN*, and *The New York Times*. His biography names him a "leading conservative critic of Donald Trump." RICK WILSON, <http://www.therickwilson.com/about/> [<https://perma.cc/722Z-P37D>]. His most recent book was published in 2020. RICK WILSON, *RUNNING AGAINST THE DEVIL: A PLOT TO SAVE AMERICA FROM TRUMP—AND DEMOCRATS FROM THEMSELVES* (2020).

Louise Kelly. In that CNN program, the guests took on “hick” accents as they commented derisively on rural voters. All three men ultimately lapsed into contemptuous laughter.¹⁵⁸ Wilson commented that Pompeo “knows that this is an administration defined by ignorance of the world,” an apparent reference to Ukraine, “so that’s partly him playing to their base and playing to their audience—you know, the credulous boomer rube demo.”¹⁵⁹

Lemon shook with laughter and wiped tears from his eyes as Wilson switched to a mock Southern accent: “Donald Trump’s the smart one—y’all elitists are dumb!” Ali joined in with “you elitists with your geography and your maps and your spelling.”¹⁶⁰ Thus both Wilson and Ali, and implicitly Lemon as he joined in their laughter, cast Trump supporters as “rube[s].”¹⁶¹

More disturbing still is a revealing story Harvard graduate student Adam Kirk Edgerton told in his 2018 essay in the *Chronicle of Higher Education*.¹⁶² Edgerton wrote of his exchange with a student who told him “she felt no sympathy at first for the victims” of the mass shooting at the 2017 Route Ninety-One Harvest Music Festival in Las Vegas, Nevada.¹⁶³ The student realized that her initial impulse stemmed from her assumption that these folks “attending a country music concert . . . must have voted for Trump, which meant they loved guns and thus deserved death.”¹⁶⁴

C. Complicating Rural Subsidy Talking Points

As the Kernion tweet discussed in the previous Section suggests, debates about what would be a fair share of federal investment in

158. Jordan Sandman, *Jokes at Rural Americans’ Expense Aren’t Worth the Chuckle*, NEW AM. WKLY. (Feb. 6, 2020), <https://www.newamerica.org/weekly/jokes-at-rural-americans-expense-arent-worth-the-chuckle/> [<https://perma.cc/3KPD-J34J>]; see also *GOP Strategist Roasts Pompeo’s Response to NPR Incident*, CNN (Jan. 26, 2020), <https://www.cnn.com/videos/politics/2020/01/26/pompeo-ukraine-bangladesh-npr-ctn-sot-vpx.cnn> [<https://perma.cc/FAA9-69L2>].

159. Sandman, *supra* note 158.

160. Lemon wrapped up this segment of disdainful commentary, during which he was laughing so hard that he could not speak before moving on to the next question. *GOP Strategist Roasts Pompeo’s Response to NPR Incident*, *supra* note 158.

161. *Id.*; see also Sandman, *supra* note 158.

162. Adam Kirk Edgerton, *What’s Wrong with Being from the South? Just Ask an Academic in the North*, CHRON. OF HIGHER EDUC. (May 25, 2018), <https://www.chronicle.com/article/whats-wrong-with-being-from-the-south-just-ask-an-academic-in-the-north/> [<https://perma.cc/4U8H-F954>].

163. *Id.*

164. *Id.*

rural America resurfaced in the Trump era, perhaps because of ongoing coastal and urban agitation about rural folks' association with Trump.¹⁶⁵ Specifically, Kernion talked in terms of urban residents having to subsidize rural residents' healthcare costs, just as Katz had been agitated in 2009 about the higher cost of broadband for an "inefficient" rural America.¹⁶⁶ Indeed, the idea that urban folks "subsidize" rural folks is an old one, in part because of the use of the term "farm subsidies," meaning payments that farmers receive in exchange for leaving their fields fallow as part of the USDA's food security strategy.¹⁶⁷

Recently, however, the word "subsidy" is used more broadly to refer to any benefits that rural people and communities receive from the federal government. The Rockefeller Institute is one source tracking such data at the level of the state, which is different from Bill Bishop's 2011 and 2014 tracking at the lower scale of the metro or non-metro region.¹⁶⁸ The Rockefeller data includes in its calculation the funding streams returned to states, defense spending, federal employment and social safety net programs, as well as four COVID-19 funding bills passed in 2020.¹⁶⁹ It does not include farm subsidies and infrastructure spending.

New York Times columnist and Nobel Prize-winning economist Paul Krugman cited Rockefeller data¹⁷⁰ in a 2022 column asserting that rural folks are "heavily subsidized by urban America."¹⁷¹

165. Ciccio, *supra* note 138.

166. See Berkes, *supra* note 67.

167. See Chait, *supra* note 83.

168. See *supra* note 71 and accompanying text.

169. LAURA SCHULTZ & LYNN HOLLAND, ROCKEFELLER INST. OF GOV'T, GIVING OR GETTING? NEW YORK'S BALANCE OF PAYMENTS WITH THE FEDERAL GOVERNMENT 9 (2022), <https://rockinst.org/wp-content/uploads/2022/03/Balance-of-Payments-Federal-2022.pdf> [<https://perma.cc/WA4F-42D7>]. These include the Coronavirus Preparedness & Response Supplemental Appropriations Act, the Families First Coronavirus Response Act, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and the Paycheck Protection Program and Health Care Enhancement Act. Laura Schultz & Lynn Holland, *New York's Balance of Payments with the Federal Government: Executive Summary*, ROCKEFELLER INST. OF GOV'T (Mar. 11, 2022), <https://rockinst.org/issue-area/balance-of-payments-2022/> [<https://perma.cc/4URZ-99AB>] [hereinafter Schultz & Holland, *Executive Summary*].

170. Paul Krugman, *Working Out: Facts, Feelings and Rural Politics*, N.Y. TIMES (Oct. 21, 2022), <https://www.nytimes.com/2022/10/21/opinion/rural-america-politics.html> [<https://perma.cc/F8K3-4W4K>] [hereinafter Krugman, *Working Out*]; see also Paul Krugman (@paulkrugman), TWITTER (Oct. 20, 2022, 8:12 AM), https://twitter.com/paulkrugman/status/1583069076208771072?s=20&t=AsK8gRSOUSjUjhHclbqD_A [<https://perma.cc/6SSJ-L9VY>].

171. Krugman, *Working Out*, *supra* note 170. Krugman seems to have a bee in his bonnet about rural people and places. He published another column three months later echoing

Krugman further noted that in 2020 “Trump sent \$46 billion in aid to farmers.”¹⁷²

As the Section I.C discussion of the Klein-Vilsack exchange on subsidies suggests, Krugman’s take is a very simplified one on a complex matter. First, Krugman references Rockefeller’s state-level data,¹⁷³ which obscures rural-urban disparities in spending within any given state. This is consistent with Krugman’s focus on whether a *state* is “red” or “blue,” and it therefore overlooks in-state distribution of government funds. A more nuanced approach would require agreement on several matters, including how to define “rural.”¹⁷⁴ It would also require agreement on which federal funding streams to include.

Regardless of the fact that people might disagree with the methodology associated with the Rockefeller data on which Krugman relies, these data are hardly the smoking gun of rural dependency that Krugman suggests. In fact, the states that benefit from the federal balance of payments—those that get back more than they pay in taxes—may or may not have significant rural populations. In Maine, for example, a robust 61% of residents lived in rural

similarly pessimistic themes but with a focus on what he called “rural rage.” Paul Krugman, *Can Anything Be Done to Assuage Rural Rage?*, N.Y. TIMES (Jan. 26, 2023), <https://www.nytimes.com/2023/01/26/opinion/rural-voters-economy.html> [https://perma.cc/HB5C-AA25]. Krugman had published yet another column about the decline of rural America in 2019. Paul Krugman, Opinion, *Getting Real About Rural America: Nobody Knows How to Reverse the Heartland’s Decline*, N.Y. TIMES (March 18, 2019), <https://www.nytimes.com/2019/03/18/opinion/rural-america-economic-decline.html> [https://perma.cc/XTY5-4EK6].

172. Krugman, *Working Out*, *supra* note 170. For perspective, Krugman noted that “there are only about two million farms in America, and annual net farm income is only about \$150 billion.” *Id.*

173. SCHULTZ & HOLLAND, *supra* note 169, at 4. The Rockefeller website uses the word “receipt” for funds flowing from the state to the federal government, and the word “expenditures” for federal monies flowing back to the states. See Schultz & Holland, *Executive Summary*, *supra* note 169. For an analysis of where federal funds go within a given state, see Carolan, *supra* note 20, at 42–43 (analyzing federal funds flowing into Colorado to show that nonmetro places fare less well than metro ones).

174. Two possibilities are the U.S. Census Bureau’s definition (a population cluster of fewer than 2500 people or living in open territory) or the Office of Management and Budget definition, which tracks rurality at the level of the county, either metropolitan (more than 50,000 residents) or nonmetro (fewer than 50,000 residents). UNDERSTANDING AND USING AMERICAN COMMUNITY SURVEY DATA: WHAT USERS OF DATA FOR RURAL AREAS NEED TO KNOW, U.S. CENSUS BUREAU 2, 4 (2020), <https://www.census.gov/programs-surveys/acs/library/handbooks/rural.html> [https://perma.cc/9Q8C-DLUU]. In early 2023, the U.S. Census Bureau announced a revision of its definition of “rural” to raise the population threshold from 2,500 to 5,000. Josh Zumbrun, *And Just Like That, America Becomes More Rural*, WALL ST. J. (Jan. 6, 2023), <https://www.wsj.com/articles/and-just-like-that-america-become-s-more-rural-11672963347> [https://perma.cc/4BAT-5MKS].

areas according to the 2010 census,¹⁷⁵ and the state benefitted from the balance of payments. Maine received \$21,092 per person from the federal government in 2020, but paid only \$7,702 per person in federal taxes, resulting in a net gain from the federal government of \$13,390 per Maine resident. Hawaii, on the other hand, where only 8% of people live in rural areas, benefitted from a \$13,210 per person net gain or “subsidy” from the federal government.¹⁷⁶ That is, Hawaii gained just \$99 per person less than Maine, though the latter is a much more rural state. Thus, the correlation between rurality (as measured by the percentage of a state’s residents living in a rural area) and robust support from the federal government is not as clear as Krugman suggests.

Indeed, the states that get the biggest “subsidies” fall into two categories: they are low-income or they are home to sizeable portions of the federal workforce.¹⁷⁷ Thus, Virginia and Maryland get a great deal back from the federal government because of their proximity to Washington, DC;¹⁷⁸ also, Virginia is home to world’s largest naval base, in Norfolk.¹⁷⁹ Virginia nearly doubles its money, with an average of \$10,000 per person in federal taxes paid but \$20,000 per person in federal monies flowing back.¹⁸⁰ Maryland residents also fare well, paying on average \$11,323 in federal taxes and getting back \$17,358.¹⁸¹ To a great extent, however, these monies are earned as income by residents who work for the federal government and so might be distinguished from social safety net payments and other funding streams.¹⁸²

Among the low-income states that fare well in terms of balance-of-payments are Kentucky, New Mexico, and West Virginia.¹⁸³

175. News Release, *Growth in Urban Population Outpaces Rest of Nation, Census Bureau Reports*, U.S. CENSUS BUREAU: NEWSROOM ARCHIVE (Mar. 26, 2012), https://www.census.gov/newsroom/releases/archives/2010_census/cb12-50.html [<https://perma.cc/7ATC-U3SX>].

176. \$21,896 in expenditures, \$8,776 in receipts. SCHULTZ & HOLLAND, *supra* note 169, at 17.

177. Dora Mekouar, *Which U.S. States Get More than They Give?*, VOICE OF AM. (Mar. 1, 2019, 8:07 AM), <https://www.voanews.com/a/which-us-states-get-more-than-they-give/4809228.html> [<https://perma.cc/EE8R-PDPG>].

178. *Id.*

179. Todd Corillo, *Naval Station Norfolk, Largest Navy Base in the World, Turns 100*, 3WTKR, (Jun. 28, 2017, 4:29 PM), <https://www.wtkr.com/2017/06/26/naval-station-norfolk-largest-navy-base-in-the-world-turns-100> [<https://perma.cc/XA9W-YB8N>].

180. Mekouar, *supra* note 177.

181. *Id.*

182. SCHULTZ & HOLLAND, *supra* note 169, at 35, 38.

183. *Id.* at 16.

These states do not pay much in federal income taxes because of low-earning populations.¹⁸⁴ At the same time, their residents are more likely to benefit from safety net programs like Social Security, Medicare, Medicaid, and SNAP.¹⁸⁵ This is because people who live in rural counties tend to be older and, on average, poorer than in cities.¹⁸⁶ It thus stands to reason that a rural resident is more likely than an urban one to benefit from a federal transfer that is part of the social safety net. Indeed, this is surely appropriate, as even rural skeptics like Ezra Klein acknowledge.¹⁸⁷

Krugman equates rurality with low population, but at the state level.¹⁸⁸ By his account, then, Wyoming is the most rural state, with 563,626 residents as of 2010, though some 365,000 of those residents (64.7%) live in urban areas as defined by the U.S. Census Bureau.¹⁸⁹ According to the Rockefeller Institute, Wyoming received \$10,293¹⁹⁰ per resident more than its residents paid to the federal government. That is a less lop-sided situation than either Maine or Hawaii, though Wyoming is “more rural” by Krugman’s assessment. But consider Pennsylvania, which had 12,702,379 residents as of 2010 and received \$10,181 per person more than it paid the federal government.¹⁹¹ Pennsylvania’s net gain is different from Wyoming’s by only \$112, despite Pennsylvania having a far larger population and therefore being less “rural” by Krugman’s definition.

Overall, the Rockefeller data reveal that states with greater numbers of high earners are the ones with balance-of-payment deficits, and those states often feature overwhelmingly urban populations. Connecticut, New Jersey, Massachusetts, and New York, for example, get an average of eighty-three cents in federal spending for every dollar they contribute, in part because many high earners live there.¹⁹² Indeed, together they contribute nearly 17% of all

184. *Id.*

185. *Id.*

186. Bishop, *Busting Rural-Subsidy*, *supra* note 71.

187. Klein, *supra* note 75.

188. Krugman, *Wonking Out*, *supra* note 170.

189. U.S. CENSUS BUREAU, 2010 CENSUS CONGRESSIONAL DISTRICT SUMMARY FILE (116TH CONGRESS): 2010 CENSUS OF POPULATION AND HOUSING A-31 (2019), https://www2.census.gov/census_2010/08-SF1_Congressional_Districts_116/0CD116_TechnicalDocumentation.pdf [<https://perma.cc/Z893-WLQR>].

190. \$21,594 in expenditures, \$11,301 in receipts. SCHULTZ & HOLLAND, *supra* note 169, at 17.

191. \$19,778 in expenditures, \$9,597 in receipts. *Id.*

192. Mekouar, *supra* note 177.

federal taxes, though they are home to less than 12% of the population.¹⁹³ None of this means, however, that rural people in any given state are necessarily benefitting from that state's balance of payments.

Anthony Pipa of the Brookings Institute's Center for Sustainable Development is among those who responded to Krugman's column by noting that rural communities would be better served by investments in rural economic development, which helps rural communities retain and grow their labor markets.¹⁹⁴ Pipa also noted that rural areas "lack capacity [because] of decades of disinvestment by states & [the federal government] in rural local [governments], and [because] of their own fiscal policies that have historically depended on industries that have declined or left . . . ," making it "tough to adapt."¹⁹⁵ Pipa pointed out that a great deal of federal investment in community and economic development is "decided by states & thus v[ery] hard to follow/analyze," such that it was missing from Paul Krugman's analysis. To this he added, "[t]alk to any local rural leader, and they'll tell you how much of that they get ... and it ain't much."¹⁹⁶ As for disproportionate social safety net spending going to rural areas, Pipa wrote, "That's exactly it! [Federal dollars] are going to rural folks to barely keep their heads above water, rather than offering investment to help their communities succeed."¹⁹⁷ Pipa closed, "[r]ural communities are having to adapt to significant transitions in the 21st [century]. We are doing a poor job of helping those communities make that transition successfully. In fact if you follow the [money], it seems we are hardly trying."¹⁹⁸

193. *Id.*

194. See Anthony F. Pipa & Natalie Geismar, *Reimagining Rural Policy: Organizing Federal Assistance to Maximize Rural Prosperity*, BROOKINGS INST. (Nov. 19, 2020), <https://www.brookings.edu/research/reimagining-rural-policy-organizing-federal-assistance-to-maximize-rural-prosperity/> [<https://perma.cc/NFV7-AFWQ>].

195. Anthony Pipa (@anthonypipa), TWITTER (Oct. 22, 2022, 10:40 AM), <https://twitter.com/anthonypipa/status/1583875871508922369> [<https://perma.cc/ARB5-FN7P>]. This tweet was in response to Paul Krugman's "Wonking Out" column. *Id.*

196. *Id.*

197. *Id.* This is a point Pipa amplifies elsewhere. See Anthony Pipa (@anthonypipa), TWITTER (Nov. 29, 2022, 7:42 PM), <https://twitter.com/anthonypipa/status/1597752928647151616> [<https://perma.cc/7UMJ-VW7V>] (commenting that both Democrats and Republicans talk in terms of policies to assist individuals, but that "places, [especially] rural places, need investment too").

198. Pipa, *supra* note 195.

Another issue is “farm subsidies,” which are popularly associated with rural places, as we discussed in Section I.C. While most agricultural activity takes place in rural areas, farming is not nearly as significant a component of rural economies as it once was.¹⁹⁹ On-farm employment now accounts for only 2.6 million of 60.8 million rural residents.²⁰⁰ Manufacturing²⁰¹ and healthcare are currently much larger sectors of the nation’s rural economies.²⁰² Further, with farmland and agricultural entities increasingly owned by urban individuals and institutions,²⁰³ even foreign ones,²⁰⁴ rural residents and communities rarely see or benefit from this money. These payments are thus not “devoted to sustaining rural life,” as Brian Depew of the Center for Rural Affairs has pointed out.²⁰⁵ “In fact,” Depew argues, the farm “subsidy system

199. Matt Hildreth (@mhildreth), TWITTER (Oct. 22, 2022, 8:53 AM), <https://twitter.com/mhildreth/status/1583849145638744064> [<https://perma.cc/U7JM-S98Q>] (responding to Paul Krugman and explaining “[w]hat explains small-town America’s sense of rage” in political and economic terms).

200. *Ag and Food Sectors of the Economy*, U.S. DEPT. OF AGRIC. ECON. RSCH. SERV., <https://www.ers.usda.gov/data-products/ag-and-food-statistics-charting-the-essentials/ag-and-food-sectors-and-the-economy.aspx> [<https://perma.cc/5APP-Y23B>].

201. See Sarah Low, *Manufacturing Is Relatively More Important to the Rural Economy than the Urban Economy*, U.S. DEPT. OF AGRIC. ECON. RSCH. SERV. (Aug. 4, 2021), <https://www.usda.gov/media/blog/2017/09/12/manufacturing-relatively-more-important-rural-economy-urban-economy> [<https://perma.cc/5WFZ-X3EJ>].

202. See Chris Tachibana, *Economic Impact of Rural Hospital Closures: Are Closures a Cause or Fallout of Community Economic Decline?*, UNIV. OF PENN. LEONARD DAVIS INST. HEALTH ECON. (June 28, 2022), <https://ldi.upenn.edu/our-work/research-updates/economic-impact-of-rural-hospital-closures/> [<https://perma.cc/77RN-UW7D>].

203. See generally Loka Ashwood, John Canfield, Madeleine Fairbairn & Kathryn De Master, *What Owns the Land: The Corporate Organization of Farmland Investment*, 49 J. PEASANT STUD., 233 (2020) (arguing that ownership of farmland has changed into something more like a corporation, in part to deal with liabilities). Many high-profit farms are actually limited liability corporations, which carry a single name, but are made up of many investors. For example, in McDonough and Fulton Counties in west central Illinois, 12% of farmland is owned by corporate entities. Further, absentee ownership of corporate owned land is high in these counties, “73% of corporations have corresponding addresses outside of the county, accounting for 70% of corporate-owned land.” *Id.* at 9–11.

204. See Johnathan Hladik, *What About Our Farmers*, CNTR. FOR RURAL AFFS. (Nov. 8, 2019), <https://www.cfra.org/blog/what-about-our-farmers> [<https://perma.cc/QN9Z-3RUC>] (noting that amid the 2019 agricultural “bailout,” Brazilian company JBS received one-quarter of all subsidies paid through the program, more than any other U.S. pork producer).

205. Brian Depew, *The Myth of Rural Subsidies*, HIGH COUNTRY NEWS (Mar. 15, 2011), <https://www.hcn.org/blogs/range/the-myth-of-rural-subsidies> [<https://perma.cc/Y52G-2HS4>]; see also Ezra Klein, *How Do You Define ‘Rural Subsidies?’*, WASH. POST VOICES (Mar. 9, 2011), http://voices.washingtonpost.com/ezra-klein/2011/03/how_do_you_define_rural_subsid.html [<https://perma.cc/SX7A-VDW9>] (quoting DePew’s letter to Klein in which he argues that “farm commodity subsidies should not be characterized as ‘rural subsidies’ [because] [t]heir benefit accrues to only a very small portion of the rural population”).

is literally undermining the economic and social foundation of rural communities.”²⁰⁶

In sum, both data and analysis indicate that the relationship between rurality and federal spending is much more nuanced than takes like Paul Krugman’s—or Ezra Klein’s a decade earlier—credit. A key challenge is the current tendency to conflate rurality with “red state,” a trend we also see in the representational government context.

While agreeing on what counts toward the balance of payments calculation is important to the conversation, it should not be the end of the analysis. We believe there are times when subsidies are necessary to create minimally acceptable conditions of living for rural areas. If we are interested in creating a more equitable society, programs that help to raise all people to a baseline of well-being are a public good, regardless of where they live. Beyond the social safety net, which does get more use in rural areas simply because of the high poverty rates associated with rural living,²⁰⁷ infrastructure projects help spur economic activity and reduce dependence on government transfers to individuals.²⁰⁸

Take the debate surrounding investment in rural broadband,²⁰⁹ which drew national attention and even some controversy at the beginning of Obama’s presidency. As policy makers debated how best to spend stimulus funds, the need for broadband often came

206. Depew, *supra* note 205.

207. See Ann Eisenberg, *Distributive Justice and Rural America*, 61 B.C. L. REV. 189, 226–28 (2020) (discussing the intersection of policy and morality when it comes to funding rural areas: “policy decisions concerning rural places are nonetheless infused with value judgments and choices as to which communities merit service and to what extent. In other words, it should not be presumed that rural communities are naturally fated to poverty and struggle”). Regarding rural poverty rates, see *infra* note 299.

208. *Id.* at 227–28; see also Pipa & Geismar, *supra* note 194 (arguing that funding in rural areas needs strong federal leadership to support communities and revise the current maze of funding that often supports individuals); CHITRA KUMAR & MIKKI SAGER, ASPEN INST.: CMTY. STRATEGIES GRP., STEWARDSHIP + EQUITY: ROOTING A NEW RURAL LEGACY 1 (2022), <https://www.aspeninstitute.org/publications/stewardship-equity-rooting-a-new-rural-legacy/> [<https://perma.cc/SDS6-52G4>] (arguing that it is important to invest in rural areas so that communities can fight against climate change and continue to be stewards of natural resources: “Rural and Native people and communities have been doing the work of stewardship for all of us for centuries—even as many of these rural resources and places have been steadily despoiled by negligent and extractive industries, underinvestment, and a lax policy environment”); Pipa, *supra* note 197 (commenting that both Democrats and Republicans talk in terms of policies to assist individuals, but that “places, [especially] rural places, need investment, too”).

209. See *supra* notes 66–74 and accompanying text.

to the fore.²¹⁰ That's when former FCC commissioner Michael Katz said he would not support the subsidies necessary to achieve broadband saturation in rural areas where private actors cannot achieve economies of scale that entice them to enter the market.²¹¹ This is what Katz meant when he said rural areas are inefficient.

Well, more than a decade on, 3.7 million rural Americans still do not have broadband, along with another 10.8 million non-rural folks.²¹² The percentages of coverage in rural areas compared to urban ones reveal persistent geographic disparities. While 45.7% of rural Americans had broadband in 2012, a figure that rose to 60.4% in 2014 and 69.3% in 2016,²¹³ only 82.7% had it by 2019.²¹⁴ Urban access to broadband, on the other hand, sat at around 90% in 2012, and it rose steadily to 97.9% by 2016.²¹⁵ Thus, while the urban-rural disparity in broadband availability is down since 2016,²¹⁶ too many rural Americans remain unserved. That situation proved especially detrimental during the period of remote schooling and work associated with the early pandemic.²¹⁷

These broadband data raise the question of what, if anything, government owes rural Americans—or any other American for that

210. See *supra* notes 66–74 and accompanying text.

211. See *supra* notes 66–67 and accompanying text.

212. “Broadband” here refers to fixed terrestrial 25/3 mbps services, the FCC’s current benchmark for advanced communications capabilities. FED. COMMC’NS COMM’N, FCC 21-18: FOURTEENTH BROADBAND DEPLOYMENT REPORT 2 (2021); see generally U.S. GOV’T ACCOUNTABILITY OFF., GAO-23-105265, USDA SHOULD SET PERFORMANCE GOALS AND IMPROVE FRAUD RISK MANAGEMENT FOR FUNDING PROGRAM 33 (2022) (detailing current issues facing the effort to increase access to broadband for rural areas).

213. FED. COMMC’NS COMM’N, *supra* note 212, at 22. However, only 76% of *students*, one of the groups most in need of internet access during the ongoing COVID-19 pandemic, had fixed broadband internet access at home. INST. OF EDUC. SCIS: NAT’L CTR. FOR EDUC. STATS., RURAL STUDENTS ACCESS TO THE INTERNET 1 (2022), <https://nces.ed.gov/programs/coe/indicator/lfc/internet-access-students-rural?tid=1000> [<https://perma.cc/LZ2D-7NJV>].

214. FED. COMMC’NS COMM’N, *supra* note 212, at 20.

215. *Id.* at 22. Despite the slow progress of broadband, many urban dwellers decided to move to rural areas as work shifted to remote practices during the COVID-19 pandemic. Willem Roper, *COVID-19 Is Pushing Americans Out of Cities and Into the County*, WORLD ECON. F. (Jan. 19, 2021), <https://www.weforum.org/agenda/2021/01/rural-life-cities-country-side-covid-coronavirus-united-states-us-usa-america> [<https://perma.cc/TJU3-QT5B>].

216. FED. COMMC’NS COMM’N, *supra* note 212, at 55.

217. Julie Jargon, *Schools Work to Speed Up Internet in Rural Homes for Remote Learning*, WALL ST. J. (Dec. 15, 2020), <https://www.wsj.com/articles/schools-work-to-speed-up-internet-in-rural-homes-for-remote-learning-11608037202> [<https://perma.cc/2HWK-LT29>] (discussing the technology barriers for rural students trying to connect to schooling amid the COVID-19 lockdowns); see also Reg Leichty, *Online Learning for Rural Students*, 21 STATE EDUC. STANDARD 13, 13–17 (2021) (again noting that the “Broadband Gap,” often referred to as the “homework gap” by policymakers is really a huge “learning gap,” on which rural students find themselves on the disadvantaged side).

matter. Should we be starting to think of broadband access as a sort of right necessary to human flourishing?²¹⁸ Or at least something that every person in the United States should have? Even Ezra Klein, who is famously and proudly a rural skeptic, suggested in 2011 a willingness for his tax dollars to subsidize broadband from “sea to shining sea” because it was the right thing to do.²¹⁹ Indeed, many would surely agree that broadband is the twenty-first century’s rural electrification.²²⁰ That is, it is an arena in which the government must provide what the market will not. We thus acknowledge that Katz was correct that rural people are inefficient in the sense that it is more costly to provide services to them, but that inefficiency should not be the end of the inquiry.

Professor Ann Eisenberg addresses these issues in her 2020 article “Distributive Justice in Rural America,” by initially acknowledging that rural communities benefit disproportionately from resources in some contexts.²²¹ She continues:

But those resources are almost overwhelmingly designed to benefit poor people; rural communities benefit disproportionately, for instance, from Social Security, Medicare, Medicaid, food stamps, and unemployment benefits. In contrast, the resources that rural residents are denied—such as infrastructure, broadband, and education—tend to be capacity-building resources that can spur economic growth and reduce regional dependency on direct aid. One must at least ask whether better distributional decisions for dependency-reducing measures might help reduce distributions of resources geared toward alleviating crises.²²²

Like Pipa then, Eisenberg would have us think carefully about the nature of the investments we make in rural people and places.

If we recognize the value of rural communities because of what they provide—and that recognition is a big “if”—we should be

218. See generally Lisa Pruitt, *Human Rights and Development for India’s Rural Remnant: A Capabilities-Based Assessment*, 44 U.C. DAVIS L. REV. 803 (2011) (highlighting how many things, like health capability, are essential aspects of humanity flourishing).

219. Ezra Klein, *What Do Values Have to Do with Rural Subsidies?*, WASH. POST (Mar. 8, 2011), https://www.washingtonpost.com/blogs/ezra-klein/post/what-do-values-have-to-do-with-rural-subsidies/2011/03/08/ABpQ3LP_blog.html [<https://perma.cc/6ZLM-R4ET>].

220. Rural Electrification and Telephone Service, 7 U.S.C. §§ 901–950cc-2; see also Brandon McBride, *Celebrating the 80th Anniversary of the Rural Electrification Administration*, U.S. DEPT. OF AGRIC. (Feb. 21, 2017), <https://www.usda.gov/media/blog/2016/05/20/celebrating-80th-anniversary-rural-electrification-administration> [<https://perma.cc/V98M-VC6BJ>] (briefly detailing the history of the Rural Electrification Administration).

221. Eisenberg, *supra* note 207, at 227.

222. *Id.* at 227–28; see also Carolan, *supra* note 20.

willing for government, including taxpayer dollars, to subsidize the market so that rural residents will enjoy some fundamental level of services like healthcare and schools.²²³ This, in turn, challenges urban folks to think about the ways in which they are interdependent with rural people and places—from the food, fuel,²²⁴ and fiber produced in rural places to the growing demand to consume the rural, as through ecotourism.²²⁵ It should also challenge urban folks to think about the history of rural exploitation that has left many rural communities so economically vulnerable.²²⁶

Another way of expressing this urban-rural interdependence is with philosopher Michael Sandel's concept of "contributive justice," which would have us focus on what each individual produces and contributes to society.²²⁷ This is also a long-standing theme of Wendell Berry's work, though he uses different terminology, and his express focus is agriculture.²²⁸ It is surely undeniable that the folks

223. See EISENBERG, *supra* note 15; N. Douthit, S. Kiv, T. Dwolatzky, & S. Biswas, *Exposing Some Important Barriers to Healthcare Access in the Rural USA*, 129 J. PUB. HEALTH 611, 611–18 (2015) (discussing problems with health care access in rural communities); see also Kai A. Schafft & Alecia Youngblood Jackson, *Introduction: Rural Education and Community in the Twenty-First Century*, in RURAL EDUCATION FOR THE TWENTY-FIRST CENTURY: IDENTITY, PLACE, AND COMMUNITY IN A GLOBALIZING WORLD 1, 1–11 (Kai A. Schafft & Alecia Youngblood Jackson eds., 2010) (introducing the challenges associated with schools and education in rural areas).

224. See Priya Baskaran, *Remaking Appalachia: Ecosocialism, Ecofeminism, and Law: A Conversation with Author Nicholas F. Stump and Professor Priya Baskaran*, 69 UCLA L. REV. DISCOURSE 106, 113 (2021) <https://www.uclalawreview.org/remaking-appalachia-a-conversation/> [<https://perma.cc/7BNZ-LBY2>] (asserting that Appalachia, "with its vast deposits of coal and oil and gas, has been absolutely central in the United States . . ." to economic growth and has "been pillaged as a 'national sacrifice zone' or an 'energy sacrifice zone' because both the land and the people have been exploited in order to keep energy prices low for the nation . . . to drive economic growth and ultimately . . . to facilitate capital accumulation among elite energy interests").

225. See Lisa Pruitt, *Mending the Rural-Urban Rift*, WESTMINSTER TOWN HALL F. ARCHIVES (Oct. 25, 2022) <https://westminsterforum.org/forum/mending-the-rural-urban-rift/> [<https://perma.cc/7WW3-F26P>].

226. See generally Olivia Weeks, *Q&A: How Rural America's Assets Have Been Systematically Stripped Away*, DAILY YONDER (Aug. 26, 2022), <https://dailyyonder.com/qa-how-rural-americas-assets-have-been-systematically-stripped-away/2022/08/26/> [<https://perma.cc/UY2K-2E2C>] (interviewing Professor of Anthropology Marc Edelman and discussing the historical and developing methods of capitalist extraction faced by both urban and rural areas); STEVEN STOLL, *RAMP HOLLOW: THE ORDEAL OF APPALACHIA*, at xiv–xviii (2017) (discussing the underdevelopment of Appalachia due to federal preference for extractive industries); Ann M. Eisenberg, *Economic Regulation and Rural America*, 98 WASH. U. L. REV. 737, 737–38 (2021) (arguing that economic regulation could address the decline in rural areas and refusing to do so is a failure on the part of industrial policy).

227. See MICHAEL SANDEL, *THE TYRANNY OF MERIT: WHAT'S BECOME OF THE COMMON GOOD?* 206 (1st ed. 2020).

228. See generally Wendell Berry, *The Agrarian Standard*, in ENVIRONMENT AND SOCIETY: A READER, 353, 353–60 (Christopher Schlotmann et al. eds., 2017). Berry

who grow our food and fish our waterways, along with those who mine other resources and harvest the timber used to make the myriad products we need—among other extractive enterprises associated with rural America—are contributing to what Sandel and Berry call the common good. We should recognize as much.

D. *Complicating the Electoral College Talking Points*

While rural bashing has flourished on social media in the Trump era, media pundits have mostly moved away from the sort of rural hostility associated with the Palin era. Commentators more recently have focused on rural voters' disproportionate political power because of the representational structure of the U.S. Senate and Electoral College.²²⁹ As with the “subsidies” discussion, however, the focus on the scale of the state—specifically on red-state power—overstates rural power.

Recall that Gail Collins and David Brooks, in their 2010 op-ed discussed above, mentioned briefly that twelve senators represented six states that were home to a mere 2.7% of the national population.²³⁰ More recently, David Leonhardt of *The New York Times* also did the math on senatorial representation. As of 2022

discusses the implications of a globalized and industrialized agricultural sector as at odds with the common good. *See id.* at 358.

229. *See infra* notes 230–75 and accompanying text. Interestingly, this is a flip from the discourse of the 1960s to the early 1980s. Lawrence Longley and James Dana argued through a quantitative analysis that the Electoral College *advantages* Spanish origin, Jewish, and foreign-born citizen-voters, along with central city, urban residents, and inhabitants of the Far West and the East. Populations *disadvantaged* by the present systems were found to be inhabitants of the mountain, southern, and midwestern states, as well as blue collar, rural, and Black citizen-voters, with the Black disadvantage, however, declining over three decades. *See* Lawrence D. Longley & James D. Dana, *New Empirical Estimates of the Biases of the Electoral College for the 1980s*, 37 POL. RSCH. Q. 173 (2016). Longley and Dana's view was not controversial at the time, though it would be now. *See, e.g.*, Douglas H. Blair, *Electoral College Reform and the Distribution of Voting Power*, 34 PUB. CHOICE 201 (1979) (arguing that the Electoral College advantages suburban, native-born Whites the most, and disadvantages nonmetropolitan native-born Whites the most); ALEXANDER M. BICKEL, *REFORM AND CONTINUITY: THE ELECTORAL COLLEGE, THE CONVENTION, AND THE PARTY SYSTEM* (1st ed. 1971); WALLACE STANLEY SAYRE & JUDITH H. PARRIS, *VOTING FOR PRESIDENT: THE ELECTORAL COLLEGE AND THE AMERICAN POLITICAL SYSTEM* (1st ed. 1971) (both arguing the metropolitan residents are advantaged by the Electoral College).

230. *See* Brooks & Collins, *supra* note 57. Some other comparisons could be made that show greater balance between rural and urban or even red state and blue. For example, California has 12 Republican representatives, the same number of Republican representatives as a cluster of low-population states spoken about as rural or red states: North Dakota (1), South Dakota (1) Wyoming (1), West Virginia (2), Montana (2), Idaho (2), and Nebraska (3). U.S. HOUSE OF REPRESENTATIVES, *Directory of Representatives*, <https://www.house.gov/representatives> [<https://perma.cc/98MD-EELQ>].

the 50 Democratic Senators represent about 186 million Americans, while the 50 Republican Senators represent some 145 million.²³¹ Leonhardt, like Seth Masket of *Washington Post* and many others, frames rural political power as perilous, a chronic threat²³² that is dangerously powerful.²³³

The Electoral College process, by which the U.S. President is elected, has similarly come under fire for giving rural voters a “disproportionate slice of power.”²³⁴ Each state has the same number of Electors as it has Representatives and Senators in the U.S. Congress.²³⁵ These Electors vote for the President based on the election outcomes in their respective states.²³⁶ As with the Senate, voters in small population states theoretically wind up with more electoral power, though the disparities are not as great as in the Senate because the number of members of the House of Representatives—who make up the great majority of electoral votes within most states and nationally—are pegged to population.²³⁷

231. David Leonhardt, “A Crisis Coming:” *The Twin Threats to American Democracy*, N.Y. TIMES (Sept. 17, 2022), <https://www.nytimes.com/2022/09/17/us/american-democracy-threats.html> [<https://perma.cc/8B5C-6BUV>].

232. Masket, *supra* note 15.

233. Leonhardt, *supra* at note 231; *see also* Eisenberg, *supra* note 21, at 173–74.

234. Emily Badger, *As American as Apple Pie? The Rural Vote’s Disproportionate Slice of Power*, N.Y. TIMES (Nov. 20, 2016), <https://www.nytimes.com/2016/11/21/upshot/as-american-as-apple-pie-the-rural-votes-disproportionate-slice-of-power.html> [<https://perma.cc/B79Z-HKXX>] [hereinafter Badger, *As American as Apple Pie?*]. *But see* Emily Badger, *How the Rural-Urban Divide Became America’s Political Fault Line*, N.Y. TIMES (May 21, 2019), <https://www.nytimes.com/2019/05/21/upshot/america-political-divide-urban-rural.html> [<https://perma.cc/CD8C-NZK2>] (reflecting a more nuanced view on the issue of rural-urban voting, recognizing the role of a “winner-take-all” majoritarian election system; nevertheless, still placing geography as a central “fault line”). The Electoral College was crafted as part of the three-fifths compromise, a bargain to get the South to buy-in to the Constitution’s congressional apportionment method by including their enslaved, nonvoting population as three-fifths of a person for purposes of representation in Congress and the Electoral College. Wilfred U. Codrington III, *The Electoral College’s Racist Origins*, ATLANTIC (Nov. 17, 2019), <https://www.theatlantic.com/ideas/archive/2019/11/electoral-college-racist-origins/601918/> [<https://perma.cc/WUQ7-N9JN>]; *see also* HEATHER MCGHEE, *THE SUM OF US: WHAT RACISM COSTS EVERYONE AND HOW WE CAN PROSPER TOGETHER* 140-41 (2021) (discussing the racial history of the Electoral College).

235. U.S. CONST. art. II, § 1. While the constant two is spoken about as increasing rural power, a significant minority of blue or urban states, including Rhode Island and Connecticut, also benefit from it.

236. U.S. CONST. art. II, § 1; *see also* *Electoral College, Distribution of Electoral Votes*, U.S. NAT’L. ARCHIVES & RECS. ADMIN., <https://www.archives.gov/electoral-college/allocation> [<https://perma.cc/H9B4-56YU>].

237. Katherine Florey, *Losing Bargain: Why Winner-Take-All Vote Assignment Is the Electoral College’s Least Defensible Feature*, 68 CASE W. RES. L. REV. 317, 321 (2017).

Concerns that the Electoral College gives rural voters outsized power far pre-date the rise of Trump. Those concerns rose with renewed vigor, for example, in 2000 when George W. Bush won the electoral vote but not the popular vote.²³⁸ The Electoral College was controversial again in 2004 when Bush sought re-election, raising fears of a “2000 [r]edux.”²³⁹

The *New York Times* headlined a 2008 editorial “Flunking the Electoral College,”²⁴⁰ though criticism of the institution generally tapered off after Obama prevailed twice in spite of it. Indeed, Obama initially worked hard at cultivating the rural vote in 2008, and he succeeded to a great degree, mostly overcoming his early “Bittergate” comments.²⁴¹

Still, it is true that the Electoral College enhances rural power, at least in certain pockets. Because of the combination of non-population (Senate) and population-based (House of Representatives) representation, people in lower-population states enjoy a vote that is “worth more” in the Electoral College than those in more

238. See *id.* at 324; Nate Silver, *Would Al Gore Have Won in 2000 Without the Electoral College?*, N.Y. TIMES (Sept. 20, 2011), <https://archive.nytimes.com/fivethirtyeight.blogs.nytimes.com/2011/09/20/would-al-gore-have-won-in-2000-without-the-electoral-college/?searchResultPosition=1> [<https://perma.cc/VEM9-X5N4>]; Editorial Opinion, *The Case for the Electoral College*, N.Y. TIMES (Dec. 19, 2000), <https://www.nytimes.com/2000/12/19/opinion/the-case-for-the-electoral-college.html?searchResultPosition=3> [<https://perma.cc/N3KQ-8FVQ>]; David Stout, *The 2000 Campaign: The Electoral College; How Winner of the Popular Vote Could Lose After All*, N.Y. TIMES (Nov. 3, 2000), <https://www.nytimes.com/2000/11/03/us/2000-campaign-electoral-college-winner-popular-vote-could-lose-after-all.html?searchResultPosition=29> [<https://perma.cc/5UVW-5CFD>].

239. John M. Broder, *Imagining the Danger of 2000 Redux*, N.Y. TIMES (Oct. 17, 2004), <https://www.nytimes.com/2004/10/17/weekinreview/imagining-the-danger-of-2000-redux.html?searchResultPosition=14> [<https://perma.cc/5FGH-XUSN>]; Christopher Caldwell, *Our Electors, Ourselves*, N.Y. TIMES (Oct. 17, 2004), <https://www.nytimes.com/2004/10/17/magazine/our-electors-ourselves.html?searchResultPosition=20> [<https://perma.cc/EG5R-6H79>] (arguing that suspicion of Electoral College-only wins has grown because the sovereignty of individual states has eroded over time).

240. *Flunking the Electoral College*, *supra* note 8.

241. See John Whitesides, *Obama Mixes Holiday Barbecue, Politics in Montana*, REUTERS (July 4, 2008, 3:43 PM), <https://www.reuters.com/article/usa-politics-obama/obama-mixes-holiday-barbecue-politics-in-montana-idUSN0440194020080704> [<https://perma.cc/Y2KK-4RVS>] (noting that Obama “threw a picnic for supporters in Butte—a Democratic bastion in a state that normally votes Republican in White House races”). The *New York Times* also commented on Obama’s visit to “the country.” Jeff Zeleny, *America Gets to Know Obama, and Vice Versa*, N.Y. TIMES (July 10, 2008), <https://www.nytimes.com/2008/07/10/us/politics/10obama.html> [<https://perma.cc/FYZ3-USEL>]; see also Bill Bishop, *One More Time: Rural Voters Didn’t Desert Dems in 2008*, DAILY YONDER (May 31, 2008), <https://dailyyonder.com/one-time-rural-voters-didnt-desert-dems-2008/2018/05/31/> [<https://perma.cc/RW7Z-9CU4>] (noting that “[i]n 2008, Barack Obama won 43[%] of the vote in the rural America. . . . By 2016, Democrat Hillary Clinton took a tad over 30[%] of the rural vote”).

populous states.²⁴² Each state thus has a “constant two” (the Senators) in addition to a variable number of representatives. This is best illustrated by comparing the most and least populated states, California and Wyoming. California, with nearly 40 million residents, has 55 electoral votes,²⁴³ that is, 2 Senators and 53 members of the House of Representatives, the latter determined by population.²⁴⁴ Wyoming, with about 600,000 residents, has the same 2 votes from its Senators, but just 1 additional vote for the state’s single member of the House of Representatives, for a total of 3.²⁴⁵

Thus, one of Wyoming’s electors represents 195,000 people. A single elector in California, on the other hand, represents 712,000 people.²⁴⁶ Phrased another way, California is underrepresented in this scheme by about 2%; they have 12% of the population but only 10% of the electoral votes. Meanwhile, Wyoming has 0.18% of the national population but 0.55% of the total number of electoral votes. This means Wyoming is overrepresented in the Electoral College by 0.37%.²⁴⁷

But the reality is more complicated than these calculations suggest. A state’s entire population is used to calculate the number of electoral votes, but mismatches exist between eligible voters, actual votes cast, and the population used to calculate the number of Congresspersons—and by extension the number of electors—a

242. *American Democracy’s Built-In Bias Towards Rural Republicans*, ECONOMIST (July 12, 2018), <https://www.economist.com/leaders/2018/07/12/american-democracys-built-in-bias-towards-rural-republicans> [https://perma.cc/NVG6-YYEM]; see also Jesse Wegman, *Abolish the Electoral College and Everyone Wins*, N.Y. TIMES (Oct. 7, 2020), <https://www.nytimes.com/video/opinion/100000007319217/electoral-college-abolish-eliminate.html?searchResultPosition=1> [https://perma.cc/B5QZ-D4XC]; Akhil Reed Amar, Opinion, *The Electoral College, Unfair From Day One*, N.Y. TIMES (Nov. 9, 2000), <https://www.nytimes.com/2000/11/09/opinion/the-electoral-college-unfair-from-day-one.html?searchResultPosition=7> [https://perma.cc/DP3J-WZQ4].

243. *Electoral College, Distribution of Electoral Votes*, *supra* note 236.

244. *Id.*

245. *Id.*

246. Denise Lu, *The Electoral College Misrepresents Every State, But Not as Much as You May Think*, WASH. POST (Dec. 6, 2016), <https://www.washingtonpost.com/graphics/politics/how-fair-is-the-electoral-college/> [https://perma.cc/RHL8-GXPF].

247. *Id.* Wyoming’s overrepresentation was calculated by dividing Wyoming’s 2010 population (564,531) by the U.S. population (308,745,538) to get 0.18%. Wyoming has 3 electoral votes of the 538 total nationally, or 0.55%. Because the share of the national electoral votes that Wyoming holds is a larger percentage than its share of the national population, it is overrepresented (by 0.37%). *U.S. Census Bureau Announces 2010 Census Population Counts Apportionment Counts Delivered to President*, U.S. CENSUS BUREAU (2010), https://www.census.gov/newsroom/releases/archives/2010_census/cb10-cn93.html [https://perma.cc/DE8R-VGMA].

state gets.²⁴⁸ Texas, for example, is like California in that its large population means its residents were underrepresented in 2016 by Texas's 38 electoral votes. When considering the actual number of popular votes cast, however, those Texans' votes are *overrepresented* in the state's electoral votes because Texas' voting-eligible population is only 64% of its total population.²⁴⁹ According to the 2010 census,²⁵⁰ Texas had a population of more than 25 million.²⁵¹ Of those, only about 19 million were of voting age in 2016, and even that number is greater than the number of eligible voters due to felony disenfranchisement.²⁵² The number of registered voters is fewer still, just over 15 million, and the number of people who actually voted is less than 9 million.²⁵³

Thus, Texas is getting representation that corresponds to 25 million people (38 electoral votes), but only about 15 million people can decide on that representation. In reality, fewer than 9 million do. Because of the disparity between population and votes cast, a Texas voter is actually overrepresented nationally. Any given state's calculation thus depends on a number of factors, including the relative youth of its population, the rate of felony disenfranchisement, and how easy it is to vote.

As already noted, the structure of the Electoral College means it is possible to win the popular vote but not become President. This happened in 2000 when Al Gore won the popular vote by about 550,000 votes, but George W. Bush garnered 270 electoral votes to claim the presidency.²⁵⁴ It happened again in 2016 when Donald Trump won a popular vote of just under 63 million—some 3 million votes fewer than Hillary Clinton—but nevertheless became president with 306 electoral votes.²⁵⁵

248. *Id.*

249. *Id.*

250. This is the census that determined Texas' electoral votes for the 2016 election. See *Quick Facts Texas*, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/TX> [<https://perma.cc/S95B-J589>].

251. *Id.*

252. *Turnout and Voter Registration Figures (1970-current)*, TEX. SEC'Y OF STATE, <https://www.sos.state.tx.us/elections/historical/70-92.shtml> [<https://perma.cc/4PHU-ZC7F>].

253. *Id.*

254. Maggie Astor, *The Electoral College Is Close. The Popular Vote Isn't.*, N.Y. TIMES (Nov. 13, 2020), <https://www.nytimes.com/article/popular-vote-electoral-college.html> [<https://perma.cc/5HFB-QM83>].

255. *2016 Statistics*, UC SANTA BARBARA: AM. PRESIDENCY PROJECT (Dec. 16, 2016, 10:15 PM), <https://www.presidency.ucsb.edu/statistics/elections/2016> [<https://perma.cc/H3WY-2877>].

There is debate, however, over whether this electoral mismatch is because of the misrepresentation inherent in the system of assigning electors by both population and non-population factors, or because of the “winner-take-all” system used by all states except Maine and Nebraska.²⁵⁶ That is, in 48 states, the candidate who wins the popular vote in the state gets all of the state’s electoral votes.²⁵⁷ This means that the preference of just under half of voters in any given state can, and often does, get nullified.²⁵⁸ Professor Katherine Florey points out many other effects of the Electoral College on democracy, such as the focusing of campaign resources on only close elections and the deprivation of political minorities’ representation in presidential elections.²⁵⁹

In the context of the 2008 election, *The New York Times* took up the winner-take-all problem:

The Electoral College also makes America seem more divided along blue-red lines than it actually is. If you look at an Electoral College map, California appears solidly blue and Alabama solidly red. But if you look at a map of the popular votes, you see a far more nuanced picture. More than 4.5 million Californians voted for McCain (roughly as many votes as he got in Texas), while about 40[%] of voters in Alabama backed Obama.”²⁶⁰

256. Editorial Opinion, *Fix the Electoral College—or Scrap It*, N.Y. TIMES (Aug. 30, 2019), <https://www.nytimes.com/2019/08/30/opinion/electoral-college.html?searchResultPosition=3> [<https://perma.cc/7LSL-NGNX>]. A State legislature can change the mechanism by which the electors vote, meaning they could decide to award electoral votes proportionately, as Maine and Nebraska do. U.S. CONST. art. II, § 1. However, the most popular alternative to our current system is the National Popular Vote Interstate Compact, which needs to be enacted by enough states to possess a majority of electoral votes (270 or more). Then those 270 (or more) electors would be bound to vote for the candidate that wins the national popular vote. This system is different than proportional assignment of electoral votes in a state-by-state manner. See *Agreement Among the States to Elect the President by National Popular Vote*, NAT’L POPULAR VOTE, <https://www.nationalpopularvote.com/written-explanation> [<https://perma.cc/LT4V-WDM8>]; Florey, *supra* note 237, at 317 for more discussion on the history and possible effects of different electoral systems than a winner-take-all system.

257. Florey, *supra* note 237, at 318–19, 383.

258. *Id.* at 325. This also can create pockets of ignored voters. If the total number of rural people in a state are a minority of voters, candidates might choose to campaign only to the population that would get them the “first past the post” majority, playing to metropolitan voters while doing little to attract the voters of nonmetro residents. A form of this plays out at state-level races, too. See *infra* notes 282–96.

259. *Id.* at 323; see also Henry L. Chambers, Jr., *Enhancing Rural Representation Through Electoral System Diversity*, 57 U. RICH. L. REV. 849 (2023).

260. Opinion, *America’s Outdated Electoral College*, N.Y. TIMES (Oct. 20, 2008), <https://www.nytimes.com/2008/11/20/opinion/20iht-edelect.1.17997223.html> [<https://perma.cc/PU6A-ELPT>].

But those 4.5 million voters in California or 40% of voters in Alabama are not reflected in the distribution of either state's electoral votes because each is less than 50% of the state's total vote. When voting behavior is viewed by county, the map appears much more purple, a variation not captured by the winner-take-all system.

In the 2016 Presidential election, Clinton's robust popular vote included higher margins in "traditionally blue" states with large populations, like California and New York.²⁶¹ But those votes were essentially "wasted"²⁶² because the winner-take-all system meant any votes above the plurality within a state do not influence the number of electoral votes a candidate receives.²⁶³ In contrast, Trump won by very slim margins in important battleground states: Florida, Wisconsin, Michigan, and Pennsylvania.²⁶⁴ Though these slim margins make the disparity between popular vote and electoral vote appear stark, the emphasized significance of small numbers is a reflection of the winner-take-all system.

Even under an electoral system that reflected exact population share but still maintained a winner-take-all system, Clinton would have fared about the same as under our current system.²⁶⁵ If electors were apportioned by just the number of U.S. Congresspersons to which a state is entitled, Clinton would have received 43.8% of the Electoral College vote.²⁶⁶ If electors were apportioned by exact population share, her share would have decreased to 43.7%, only 0.4% greater than her share under our current system (43.3%), and still not enough to win the presidency.²⁶⁷

Despite the complicated and nuanced realities of Electoral College representation and election outcomes, the media clung to the

261. FED. ELECTION COMM'N, FEDERAL ELECTIONS 2016: ELECTION RESULTS FOR THE U.S. PRESIDENT, THE U.S. SENATE AND THE U.S. HOUSE OF REPRESENTATIVES 26, 37 (2017).

262. Andrew Prokop, *Why the Electoral College Is the Absolute Worst, Explained*, VOX, <https://www.vox.com/policy-and-politics/2016/11/7/12315574/electoral-college-explained-presidential-elections-2016> [https://perma.cc/VG6W-G6ZS] (Dec. 19, 2016, 10:15 AM).

263. John W. York, Opinion, *No, the Electoral College Isn't "Electoral Affirmative Action" for Rural States*, L.A. TIMES (Oct. 9, 2019, 3:00 AM), <https://www.latimes.com/opinion/story/2019-10-09/electoral-college-affirmative-action-rural-states> [https://perma.cc/6BMZ-H8MZ].

264. See Prokop, *supra* note 262.

265. Nate Cohn, *Why Trump Had an Edge in the Electoral College*, N.Y. TIMES (Dec. 19, 2016), <https://www.nytimes.com/2016/12/19/upshot/why-trump-had-an-edge-in-the-electoral-college.html> [https://perma.cc/Z55V-KKEJ].

266. *Id.*

267. *Id.*

idea that sparsely populated states decided the 2016 election with the “magic of the Electoral College.”²⁶⁸ Emily Badger of *The New York Times* argued that the Electoral College “structurally disadvantages Democrats,” while “cushion[ing]” Republicans.²⁶⁹ Seth Masket characterized rural power as a minority party that is “rul[ing] everyone else.”²⁷⁰ *The Economist* amplified this rhetoric, suggesting a “tyranny of the minority” because “a red vote,” assumed to be rural, “is worth more than a blue one,” assumed to be urban.²⁷¹ As Joel Kotkin and Wendell Cox observed in *Forbes*: “Much of the New York and Washington press corps has concluded that Donald Trump’s surprising journey to the Oval Office was powered by country bumpkins expressing their inner racist misogyny.”²⁷²

And pundits are not the only ones attacking the electoral structure because of its consequences for rural voters versus urban ones. Congresswoman Alexandria Ocasio-Cortez tweeted that the Electoral College was “electoral affirmative action” and “about empowering some voters over others.”²⁷³ Lay people take up this rhetoric, too. Readers commenting on essays about rural topics gripe that rural voters are “over-represented in Congress and State Legislatures.”²⁷⁴ A commenter on the Potts’ *New York Times* essay discussed above wrote that only “the less educated, and lazier people”

268. Prokop, *supra* note 262.

269. Badger, *As American as Apple Pie?*, *supra* note 234.

270. Masket, *supra* note 15.

271. *American Democracy’s Built-In Bias Towards Rural Republicans*, *supra* note 242; see also Eric Black, Opinion, *U.S. Senate Representation Is Deeply Undemocratic—and Cannot Be Changed*, MINNPOST (Feb. 19, 2021), <https://www.minnpost.com/eric-black-ink/2021/02/u-s-senate-representation-is-deeply-undemocratic-and-cannot-be-changed/> [<https://perma.cc/J8BC-N9RR>] (arguing that the Senate representation method is a “a ‘quirk’ of the U.S. electoral system you might say, although ‘quirk’ is a bit too cute a word [for] such a powerful anti-democratic tendency in a country that likes to consider itself the leader of world democracy.” (emphasis added).

272. Joel Kotkin & Wendell Cox, *It Wasn’t Rural “Hicks” Who Elected Trump: The Suburbs Were—and Will Remain—the Real Battleground*, FORBES (Nov. 22, 2016, 12:58 PM), <https://www.forbes.com/sites/joelkotkin/2016/11/22/donald-trump-clinton-rural-suburbs/?sh=57d931da38b5> [<https://perma.cc/86YN-TKML>].

273. Alexandria Ocasio-Cortez (@AOC), TWITTER (Aug. 23, 2019, 3:57 PM), <https://twitter.com/AOC/status/1164990042416148481> [<https://perma.cc/BEQ8-4TFQ>].

274. Patrick, *supra* note 111. Many other comments to that essay also spoke in terms of rural folks voting against their own interests. See *supra* notes 109-13 and accompanying text.

remain in rural states after brain drain takes effect, yet that undesirable remainder still get their 2 Senate seats.²⁷⁵

We recognize the legitimacy of the complaint that some voters should not have more power than others, but we regret that it is expressed with less nuance than it merits. For one thing, it is articulated as a rural complaint, but it's more precisely a complaint about states with small populations, many of which are reliably "red." What troubles us more is how the complaint gets wrapped up in and merged with suggestions that rural people are ignorant, insular, racist, misogynists who vote against their own interests.²⁷⁶ This assumes, of course, that city folks know what is in the best interests of rural voters.²⁷⁷ It also gets merged with the sort of insulting rhetoric—like the rural bashing we described above—that can dehumanize rural residents as allegedly "uneducated and home schooled"²⁷⁸ people whose communities "deserve to die."²⁷⁹

In shifting the blame for political outcomes onto rural voters, urban and coastal folks rarely consider how little choice many rural voters have, especially in recent years. There is ample evidence that the Democratic Party has nearly ceded so-called red states, along with rural areas of all states, to the Republican Party.²⁸⁰ Ted

275. Lostinspacey, Comment to *In the Land of Self-Defeat*, N.Y. TIMES (Oct. 6, 2019), <https://www.nytimes.com/2019/10/04/opinion/sunday/trump-arkansas.html#commentsContainer> [<https://perma.cc/7YXN-6MFW>].

276. See Jeff Madrick, *Why the Working Class Votes Against Its Economic Interests*, N.Y. TIMES (July 31, 2020), <https://www.nytimes.com/2020/07/31/books/review/the-system-robert-reich-break-em-up-zephyr-teachout.html> [<https://perma.cc/3C2D-35HR>]; THOMAS FRANK, WHAT'S THE MATTER WITH KANSAS?: HOW CONSERVATIVES WON THE HEART OF AMERICA 1–2 (2006); Michelle Ruiz, *Why Do White Women Keep Voting for the GOP and Against Their Own Interests?*, VOGUE (Nov. 8, 2018), <https://www.vogue.com/article/white-women-voters-conservative-trump-gop-problem> [<https://perma.cc/6TG2-2BS4>]; see also *supra* notes 28–35 and accompanying text. A 2022 empirical study using implicit bias tests found that contempt for rural whites is an observable, distinct phenomenon that is slightly more prevalent in Democratic respondents. Republican respondents, on the other hand, are more likely to hold rural Whites more responsible for their own poverty, showing that rural Whites may have aligned with the Republican party, but that party's views of rural Whites has not changed. Molly Rain Kraus, *Voting Against Everyone's Interests: Interrogating the Politization of Rural Whites as a Latent Expression of Historical White Supremacy* (Apr. 1, 2022) (honors thesis, Columbia University) <https://academiccommons.columbia.edu/doi/10.7916/4dy5-3119> [<https://perma.cc/M7BC-MRBZ>].

277. Bullock, *supra* note 110.

278. ElleJ, *supra* note 125.

279. Williamson, *supra* note 147; see also *supra* notes 146–51 and accompanying text.

280. See Lisa R. Pruitt, Opinion, *John Fetterman is Running a Test Democrats Need to Watch*, POLITICO MAG. (Aug. 9, 2022, 4:30 AM), <https://www.politico.com/news/magazine/2022/08/09/john-fetterman-tries-to-lure-rural-voters-00050352> [<https://perma.cc/5LSN-AXG2>] [hereinafter Pruitt, *Fetterman*]; Lisa R. Pruitt, Commentary, *Fetterman Went Full-On Rural in the Pennsylvania Primary*, DAILY YONDER (Aug. 16, 2022), <https://dailyyonder.com>.

Genoways, for example, wrote about how the Democratic National Committee shifted “resources away from rural red states like Nebraska . . . in part because Mr. Obama had slashed the committee’s resources.”²⁸¹ Despite Obama’s campaign success in rural areas, he rarely visited rural places once in office. Of the 43 domestic trips he took during his first year as president, only one was to a rural county.²⁸² The same pattern of relative neglect held with regard to Obama’s policy priorities: despite hearings on large agricultural corporations by the U.S.D.A. and the Department of Justice, the Obama administration took no action to rein in those corporations’ dominance in rural regions.²⁸³

Meanwhile, local Democrats who organize in rural areas complain about being abandoned by the Democratic National Committee.²⁸⁴ In rural Wisconsin, for example, local Democratic Party chair Bill Hogseth believes the national Democratic Party has failed to offer “rural voters a clear vision that speaks to their lived experiences. The pain and struggle in my community is real, yet

com/commentary-john-fetterman-went-full-on-rural-in-the-pennsylvania-primary/2022/08/16/ [https://perma.cc/ZT28-ZJKZ] [hereinafter Pruitt, *Went Full On Rural*]; Christopher Cadelago, *Barbershop Confrontations, Profane Signs and Despair: Pro-Biden and Alone in Rural America*, POLITICO MAG. (Mar. 4, 2022, 4:30 AM), https://www.politico.com/news/magazine/2022/03/04/pennsylvania-rural-democrats-trump-neighbors-00008915 [https://perma.cc/MB3T-4S34]. Pruitt links to rural organizers, who often take to Twitter to express their anger and dismay at the Democratic Party’s abandonment of rural efforts and candidates. These include organizers in North Carolina, Arizona, and New York. See, e.g., Anderson Clayton (@abreezeclayton), TWITTER (June 30, 2022, 3:50 PM), https://twitter.com/abreezeclayton/status/1542596547032014851?s=20&t=pqpNIOMNAPcQE9U0Zvk3FA [https://perma.cc/L4U4-R298]; Yavapai Democrats (@YavapaiDemocrat), TWITTER (July 15, 2022, 5:06 PM), https://twitter.com/YavapaiDemocrat/status/1548051414001168384?s=20&t=Fyziut8XETAedjpK8OKWpA [https://perma.cc/EB64-EPKH]; Paolo Cremidis (@paoloredtoblue), TWITTER (Jul. 19, 2022, 5:51 PM) https://twitter.com/paoloredtoblue/status/1549512237391527936?s=20&t=abLWRUPYtFZ_WQ2VeKHueQ [https://perma.cc/4CNM-EWEE].

281. Ted Genoways, Opinion, *How Trump Helped Transform Nebraska Into a Toxic Political Wasteland*, N.Y. TIMES (May 9, 2022), https://www.nytimes.com/2022/05/09/opinion/trump-nebraska-politics.html?searchResultPosition=118 [https://perma.cc/FBB3-KNSE]. Obama’s shift of resources away from red states is somewhat ironic given how he campaigned there and won many of those states. See *supra* note 241 and accompanying text (detailing Obama’s success with rural voters).

282. Bishop, *supra* note 241.

283. See Richard Oswald, *Letter from Langdon: One Year Later*, DAILY YONDER (Mar. 21, 2012), https://dailyyonder.com/letter-langdon-one-year-later/2012/03/21/ [https://perma.cc/NF9F-5HLE].

284. See Pruitt, *Fetterman*, *supra* note 280; Robert Kuttner, *The Rural Turnaround*, AM. PROSPECT (Nov. 15, 2022), https://prospect.org/politics/the-rural-turnaround/ [https://perma.cc/KPS3-3C9N] (briefly summarizing the withdrawal of Democrats’ pocketbook from rural areas and outlining, as a model for the future, how Democratic candidates in the 2022 midterms, like John Fetterman, sought and garnered support in rural communities).

rural people do not feel it is taken seriously by the Democratic Party.”²⁸⁵

More recently, other rural Wisconsin Democrats, fed up with a lack of financial support from the Democratic National Committee, took matters into their own hands. The *Wisconsin Examiner* reports that Adams County resident, Jeff Spitzer-Resnick, began paying out of his own pocket for ads supporting Democratic candidates in the local weekly ad mailer.²⁸⁶ Meanwhile, Spitzer-Resnick’s requests for candidate signs from the state Democratic party went unaddressed.²⁸⁷ This trend of national Democratic Party disinvestment in rural areas is evident across the country.²⁸⁸

Rural residents’ political power is thus impacted by the fact that one party in a strict two-party system sees them as “out of play,”²⁸⁹ a phenomenon increasingly lamented by a variety of commentators. Lyz Lenz, for example, writing in *Politico* about the 2022 Iowa U.S. Senate race, opined that “funding from the Democratic Party has dried up, along with organizing infrastructure,” causing “all

285. See Bill Hogseth, Opinion, *Why Democrats Keep Losing Rural Counties Like Mine*, POLITICO MAG. (Dec. 1, 2020, 4:30 AM), <https://www.politico.com/news/magazine/2020/12/01/democrats-rural-vote-wisconsin-441458> [<https://perma.cc/HS7G-FU43>].

286. Henry Redman, *Ahead of Razor Thin Elections, are Democrats Overlooking Rural Wisconsin?*, WIS. EXAM’R. (Sept. 29, 2022, 7:00 AM), <https://wisconsinexaminer.com/2022/09/29/ahead-of-razor-thin-elections-are-democrats-overlooking-rural-wisconsin/> [<https://perma.cc/B5RN-C6PB>].

287. *Id.*; see also Robin A. Johnson, *How Democrats Can Win in White Working Class Districts: Let Them Control Their Own Messages—and Give Them the Resources They Need*, WASH. MONTHLY (Jan. 17, 2022), <https://washingtonmonthly.com/2022/01/17/how-democrats-can-win-in-white-working-class-districts/> [<https://perma.cc/ZJG7-8SMH>].

288. See Lyz Lenz, *The Franken Campaign Was Doomed Even Before an Assault Allegation Shook the Race*, POLITICO MAG., <https://www.politico.com/news/magazine/2022/10/06/franken-grassley-abortion-iowa-00057656> [<https://perma.cc/7WA6-9KJV>] (Oct. 6, 2022, 9:50 AM) (tracking the campaign of Iowan Democratic candidate Mike Franken for Senate; the Democratic Senatorial Campaign Committee was not involved in Franken’s race, despite committing millions to the previous Democratic candidate in the 2020 race); Dan Merica, *Trump’s Visit to Small Nevada Town Highlights Importance of Rural Voters to State Republicans*, CNN, <https://www.cnn.com/2022/10/08/politics/nevada-republicans-rural-voters-trump-laxalt> [<https://perma.cc/V54S-PV8V>] (Oct. 9, 2022, 11:34 AM) (noting that in Nevada Democrats have strategized to win the densely populated areas of Las Vegas, stay competitive in Reno, and “lose big in rural Nevada”); see also Pruitt, *Fetterman*, *supra* note 280; Pruitt, *Went Full-On Rural*, *supra* note 280.

289. Anton DiSclafani, *Pregnancy, Guns and Politics in Alabama*, N.Y. TIMES (June 20, 2022), <https://www.nytimes.com/2022/06/20/opinion/alabama-abortion-guns-politics.html> [<https://perma.cc/Y4ZN-CBFT>].

the big names in the Iowa Democratic Party . . . to sit this year out.”²⁹⁰

Sarah Vowell, writing about Montana’s political landscape in *The New York Times*, advocates alliances among moderate Republicans, Democrats and Independents, in order to defeat radical Republicans who perpetuated the idea that Biden did not legitimately win the 2020 election.²⁹¹ Vowell quips that Democrats have “alienated most of the continent . . .,” a reference to the vast rural territory of the U.S.²⁹² She further observes that this alienation “is also unrealistic in a republic if governing is the goal.”²⁹³

Anton DiSclafani, a registered Democrat in Alabama, wrote in a *New York Times* essay about her choice to vote in the Republican primary in order to influence the outcome there because she thinks Democrats have forsaken red states like hers.²⁹⁴ DiSclafani writes that she “understand[s] why Democratic presidential candidates wouldn’t want to waste time and money campaigning [there]” because “Alabama feels as if it belongs to Republicans.”²⁹⁵ DiSclafani

290. Lenz, *supra* note 288 (suggesting that a reason for Democrats’ disinvestment in Iowa is Biden’s poor performance there, failing to win the caucuses in 1988, 2008, and 2020).

291. Sarah Vowell, Opinion, *A Plan B for Responsible Americans Living in Red States*, N.Y. TIMES (Oct. 6, 2022), <https://www.nytimes.com/2022/10/06/opinion/democrats-independents-montana.html> [<https://perma.cc/K4TY-Z2RV>] (discussing the Democratic strategy in Montana of cross-party cooperation to root out extremist Republicans).

292. *Id.*

293. *Id.* The Pulitzer-Prize winning editor of Iowa’s *Storm Lake Times* made a similar point after the Democratic Party suggested it would no longer begin the presidential election season with the Iowa caucuses. He noted that “the Democratic brand has become virtually unmarketable” in rural America. Art Cullen, Opinion, *Want to Know Why Democrats Lose Rural America?*, N.Y. TIMES (Dec. 11, 2022), <https://www.nytimes.com/2022/12/11/opinion/democrats-iowa-caucus.html> [<https://perma.cc/2RCB-4GZV>]. A similar headline accompanied a 2023 report on the Democratic Party’s woes in several midwestern states. Katie Glueck, *Democratic Report Explores Blue-Collar Struggles: ‘Our Brand Is Pretty Damaged’*, N.Y. TIMES (Feb. 22, 2023), <https://www.nytimes.com/2023/02/22/us/politics/democrats-factory-towns-2024.html> [<https://perma.cc/ZR85-JGUT>].

294. DiSclafani, *supra* note 289.

295. *Id.* This may be a particular problem in the South. See Marianne Levine, *Dems Agonize Over N.C. Spending Debacle as Senate Race Tightens*, POLITICO (Oct. 4, 2022, 4:31 AM), <https://www.politico.com/news/2022/10/04/dems-north-carolina-senate-spending-00060109> [<https://perma.cc/4ZYJ-9PBj>]. The story quotes Doug Jones, former U.S. Senator from Alabama who replaced Jeff Sessions when he became Trump’s Attorney General, but then failed to garner a full six-year term when he was defeated by Republican Tommy Tuberville:

Democrats give up sometimes too easy and they give up on the South way too easy . . . I worry sometimes after my loss, after Jaime [Harrison’s] loss, after Cal Cunningham’s loss, and despite winning in Georgia, that they just sometimes overlook and say, “We know we can do better in Ohio and Pennsylvania and other places.

Id.

also poignantly acknowledges the paradox of supposed rural political power juxtaposed against rural economic devastation:

There's so much beauty in rural Alabama, and it often abuts terrible poverty. A brilliantly hued hydrangea next to a trailer with blacked-out windows. A row of abandoned old houses next to a field of unmown wildflowers. I do believe that Democratic policies are friendlier to the poor, but how would you know that if you live in a trailer without running water or internet²⁹⁶

Professor Ann Eisenberg has also written of this paradox, observing an important rural split: political versus economic.²⁹⁷ While political commentary casts the “rural as dangerously powerful,” a look at the economic situation “reveals the rural as the underdog,” in part because “[l]arger cities dominate the economy.”²⁹⁸ Indeed, the 2022 edition of the USDA’s *Rural America at a Glance* shows that rural economies had older workforces, with more than 20% of the rural population over the age of 65.²⁹⁹ This caused the working population to decline by 4.9% from 2010–2020, while the working population in metro areas grew.³⁰⁰ Meanwhile, rural poverty rates continue to exceed urban poverty rates, 16.1% compared to 12.6%.³⁰¹

In fact, rural economic devastation and the needs associated with it are not unlike the needs of urban and suburban areas that have experienced decline and where many live in poverty or with some less dramatic form of economic precarity.³⁰² Individuals, families, and communities—especially downtrodden and disadvantaged ones—often have the same needs, regardless of where they

296. DiSclafani, *supra* note 289; *see also* Dee Davis, *Giving Up On Rural Is Not a Winning Political Strategy*, DAILY YONDER (Dec. 21, 2016), <https://dailyyonder.com/analysis-giving-up-on-rural-is-not-a-winning-political-strategy/2016/12/21/> [<https://perma.cc/22YM-7EUF>]; Pruitt, *Went Full-On Rural*, *supra* note 280.

297. Eisenberg, *supra* note 21, at 174.

298. *Id.*

299. JAMES C. DAVIS, ANIL RUPASINGHA, JOHN CROMARTIE, & AUSTIN SANDERS, U.S. DEPT OF AGRIC., ECON. RSCH. SERV., ECON. INFO. BULL. NO.: RURAL AMERICA AT A GLANCE 3 (2022), <https://www.ers.usda.gov/webdocs/publications/105155/eib-246.pdf?v=6075.3> [<https://perma.cc/3NST-5S6A>].

300. *Id.*

301. JOHN CROMARTIE, ELIZABETH A. DOBIS, THOMAS P. KRUMEL, JR., DAVID MCGRANAHAN, & JOHN PENDER, U.S. DEPT OF AGRIC., ECON. RSCH. SERV., ECON. INFO. BULL. NO. 221: RURAL AMERICA AT A GLANCE 1 (2020), <https://www.ers.usda.gov/webdocs/publications/100089/eib-221.pdf?v=6575.3> [<https://perma.cc/5VN6-NLNR>].

302. *See* Foster & Gillette, *supra* note 102 (comparing the economic and demographic data on rural and urban places).

lie on the urban-rural continuum: good schools,³⁰³ access to health care,³⁰⁴ a grocery store where they can buy healthy food,³⁰⁵ habitable and affordable housing,³⁰⁶ and broadband.³⁰⁷ When we pit rural against urban, we run a great risk that none of these communities or their residents will get what they need.

303. See Bob Doucette, *Bob Doucette: Fears for Fate of Rural Schools Are Real*, TULSA WORLD, https://tulsa-world.com/opinion/columnists/bob-doucette-fears-for-fate-of-rural-schools-are-real/article_240a1914-548e-11ed-a42e-53bf8b7ea7be.html [https://perma.cc/Z8UU-2E9P] (Jan. 6, 2023) (discussing the lack of access to good education because of school closures and consolidations in the surrounding community).

304. See Douthit et al., *supra* note 223; Akilah Johnson, *In Rural America, the Crisis of Disappearing Reproductive Care Steals Lives*, WASH. POST (Nov. 18, 2022, 6:00 AM), <https://www.washingtonpost.com/health/2022/11/18/reproductive-care-access/> [https://perma.cc/EC47-SL2W].

305. “While rural counties make up 63% of all counties, they represent 78% of counties with the highest estimated rates of food insecurity in the country.” FEEDING AMERICA, MAP THE MEAL GAP 2019: A REPORT ON COUNTY AND CONGRESSIONAL DISTRICT FOOD INSECURITY AND COUNTY FOOD COST IN THE UNITED STATES IN 2017, at 16 (2019), <https://www.feedingamerica.org/sites/default/files/2019-05/2017-map-the-meal-gap-full.pdf> [https://perma.cc/P3VF-GUJN]; see also Lisa R. Pruitt, *A Week at a Rural Food Delivery Site*, LEGAL RURALISM (Aug. 29, 2022, 4:00 AM), <https://legalruralism.blogspot.com/2022/08/a-week-at-rural-food-delivery-site.html> [https://perma.cc/G8CD-SMKK].

306. See Mike Feinberg & Lance George, *Analysis: Rural America Loses Affordable Rental Housing at an Alarming Rate*, DAILY YONDER (Mar. 21, 2022), <https://dailyyonder.com/rural-america-is-losing-an-affordable-rental-housing-resource-at-an-alarming-rate/2022/03/21/> [https://perma.cc/KCX7-S5TT] (“In the last five years, more than 20,000 rental units have left the USDA’s affordable housing program—nearly three times the predicted number. Tenants of these properties can lose USDA rental support and see rent prices rise simultaneously.”); Joe Belden, *Senate Turns Its Attention to Rural Housing*, DAILY YONDER, (Sept. 28, 2022), <https://dailyyonder.com/senate-turns-its-attention-to-rural-housing/2022/09/28/> [https://perma.cc/UET3-RREA] (discussing how Senators Tina Smith (D–Minnesota) and Jean Shaheen (D–New Hampshire) introduced a bill “that would protect rural low-income tenants in USDA rental projects who are in danger of losing their government-provided rental assistance”); Jason Blevins, *Housing Lottery: Inside a Manufactured Neighborhood Fighting Colorado’s High Country Housing Crisis*, COLO. SUN (Oct. 16, 2022, 4:30 AM), https://coloradosun.com/2022/10/16/norwood-manufactured-housing-part-1/?mc_cid=62685e427d&mc_eid=0b0b2501d1 [https://perma.cc/YD84-FEW6] (discussing the issues of housing in areas popular for ecotourism, specifically Colorado’s Western Slope); Jennifer Sherman, *“Please Don’t Take This”: Rural Gentrification, Symbolic Capital, and Housing Insecurity*, SOC. PROBS. at 1 (2021).

307. See U.S. GOV’T ACCOUNTABILITY OFF., GAO-23-105265, BROADBAND: USDA SHOULD SET PERFORMANCE GOALS AND IMPROVE FRAUD RISK MANAGEMENT FOR FUNDING PROGRAM 1 (2022), <https://www.gao.gov/assets/gao-23-105265.pdf> [https://perma.cc/F9U2-Q2UM] (detailing current issues facing the effort to increase access to broadband for rural areas); Lisa R. Pruitt, *Rural Broadband—Its Expansion and the Various Approaches and Challenges*, LEGAL RURALISM (Feb. 11, 2018, 9:45 AM), <https://legalruralism.blogspot.com/2018/02/rural-broadband-its-expansion-and.html> [https://perma.cc/MUK7-MPXY].

III. WHY RURAL BASHING IS PROBLEMATIC AND COUNTERPRODUCTIVE AND JUST NEEDS TO STOP

Maybe you agree with us that rural bashing of the sort documented in this Article is evidence of both civility and empathy deficits, and even that it is downright rude. But maybe you are also thinking that it does not really matter. Besides, people often tell us, the bashing flows both ways as rural folks needlessly criticize urban folks, often lapsing into the same sort of hyperbole and hate we see some progressives direct at rural Americans.³⁰⁸

And certainly, as we acknowledged in Part I, it is impossible to say who started this fight, though the answer to that question should not matter. What we might all agree on—now that we have seen a more nuanced picture of rural power and powerlessness—is that among all the bases upon which people have come to be sharply divided in recent years, this split across the urban-rural axis is as silly as—if not sillier than—most. It is also highly counterproductive.

If our concern about rural bashing strikes you as overwrought and you think everyone needs to just chill out or toughen up, consider a 2022 study by political scientists Nicholas Jacobs and B. Kal Munis.³⁰⁹ They found that rural voters care about being “mocked and derided in popular culture” and that the phenomenon has aggravated urban-rural polarization.³¹⁰

Jacobs and Munis concluded that the other issues we have written about here matter, too. Describing their academic study in *The Washington Post's Monkey Cage Blog* in October 2022, the political scientists wrote that “rural voters care about what we might call ‘geographic inequity’—the idea that rural areas receive less than their fair share from the government [and] are ignored by

308. See Lisa R. Pruitt, *What Does It Mean to Be “Anti-City” or “Pro-City”? And Where Does “Scared of Cities” Fit In?*, LEGAL RURALISM (Oct. 26, 2022, 9:45 AM), <https://legalruralism.blogspot.com/2022/10/what-does-it-mean-to-be-anti-city-or.html> [<https://perma.cc/2CXY-7D6D>]; Lisa R. Pruitt, *“With Plenty of Urban Folks Bashing Rural Folks and Vice Versa, What’s the Goal?”*, MINNPOST (Oct. 19, 2022), <https://www.minnpost.com/community-voices/2022/10/with-plenty-of-urban-folks-bashing-rural-folks-and-vice-versa-whats-the-goal/> [<https://perma.cc/8JHD-VBCT>].

309. Jacobs & Munis, *supra* note 41.

310. Kal Munis & Nicholas Jacobs, *Why Resentful Rural Americans Vote Republican*, WASH. POST (Oct. 20, 2022, 7:45 AM), https://www.washingtonpost.com/politics/2022/10/20/midterms-rural-urban-divide-resentment/?utm_source=twitter&utm_medium=social&utm_campaign=wp_monkeycage [<https://perma.cc/TA99-4KMJ>].

politicians.”³¹¹ Jacobs and Munis thus confirm quantitatively what more qualitative studies like Arlie Hochschild’s in Louisiana³¹² and Kathy Cramer’s in Wisconsin³¹³ revealed: rural people resent what they see as disproportionate urban power. Many no longer believe democracy is working for them.³¹⁴

It is sometimes easy to forget that folks like Munis and Jacobs, as well as former Governor Bullock, are writing about the world as it is, which is not necessarily how they want it to be. The same is true of us. But as we saw in the responses to Bullock’s essay, the impulse to “shoot the messenger” is strong.³¹⁵ That is, readers often rant at commentators like Bullock simply because they are so furious at the folks about whom he writes. Those readers are like Pruitt’s colleague who was so angry that Trump won the presidency that he was willing to have poor rural white folks sickened by a factory hog farm. Maybe it even felt like a bit of sweet revenge, akin to folks who seem to take perverse pleasure in red-state suffering when natural disaster strikes.³¹⁶

Consider, too, Paul Krugman’s response to Munis and Jacobs’ October 2022 *Washington Post* essay, a response we hold out as a model of what *not* to do. As detailed above in Part II, Krugman asserted in his column—rushed to press within a day of Munis and Jacobs’ high-profile essay—that rural folks’ resentment is not grounded in fact. He did so in a column somewhat provocatively headlined “Wonking Out: Facts, Feelings and Rural Politics,” in which he said that rural folks’ feelings did not matter because they had gotten their facts wrong.³¹⁷ He then proceeded to selectively curate and present a set of facts which he said supported his argument.³¹⁸ In fact—no pun intended—even the data Krugman chose in rebuttal did not prove his argument, as we explained in detail above. Certainly, it did not prove that rural people consistently get disproportionately great government support.³¹⁹

311. *Id.*

312. *See generally* HOCHSCHILD, *supra* note 76, at 247.

313. *See generally* CRAMER, *supra* note 76, at 7, 13.

314. *See* JENNIFER SHERMAN, DIVIDING PARADISE: RURAL INEQUALITY AND THE DIMINISHING AMERICAN DREAM 157–89 (2021).

315. Bullock, *supra* note 110; *see also supra* notes 110–13 and accompanying text.

316. *See supra* notes 128–30 and accompanying text.

317. Krugman, *Wonking Out*, *supra* note 170.

318. *Id.*; *see supra* notes 169–91.

319. *See supra* notes 169–91 and accompanying text.

In invoking facts—or at least purporting to—Krugman committed another cardinal sin of communicating about these increasingly sensitive matters. Krugman relied on an overly simplistic calculation of what flows to and from different states, using low population or even “red state” status as a proxy for rurality. Krugman did this even though the scale of the state, as compared to a lower scale like that of the county or municipality, reveals relatively little about whether rural folks are being subsidized by urban ones.

Indeed, there is no such thing as a “rural state.”³²⁰ The only states with more than half of their population living in rural places, as defined by the U.S. Census Bureau, in 2020 were Maine (61.4%), Vermont (64.9%), Mississippi (53.7%), and West Virginia (55.4%).³²¹ So Krugman should really admit that he is angry with states that have small and/or sparse populations, especially those dominated by Republicans.

More precisely still, Krugman is angry at the voters in those states. Or maybe he is just angry at everyone who voted for Trump. But a relatively small fraction of these voters live in red states. Whatever Krugman is feeling, he would be more accurate if he said that some of these states benefit from their balance-of-payments with the federal government and others do not. That is different from depicting rural people across the board as disproportionate beneficiaries of government largesse, as some sort of “taker” class.

Indeed, it is interesting that the famed economist led his column with an expression of concern about the radicalization of rural America because he then ironically went on to address rural Americans in a way that seemed designed to radicalize more of them. That is, Krugman’s dismissiveness of their “feelings”³²² probably rendered them less receptive to his substantive points. Indeed, the disdainful tone of his response seemed crafted to send them

320. See Margaret Renkl, *This is How Red States Silence Blue Cities. And Democracy*. N.Y. TIMES (Jan. 16, 2023), <https://www.nytimes.com/2023/01/16/opinion/nashville-city-county-tennessee-republicans.html> [<https://perma.cc/TC82-34HF>]; see generally *supra* notes 169–95 and accompanying text.

321. *State-level Urban and Rural Information for the 2020 Census and 2010 Census*, U.S. CENSUS BUREAU, <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html> [<https://perma.cc/BX8S-63Y2>] (Oct. 28, 2021) (access data by scrolling down to the spreadsheet download link titled: “State-level Urban and Rural Information for the 2020 Census and 2010 Census”).

322. See generally Krugman, *Working Out*, *supra* note 170.

running in the direction of the right-wing radicalization he says he fears.

Like so many others on the left, Krugman did not meet rural Americans where they are. He was, instead, generally derisive of them. Yet after all that, Krugman had the chutzpah to quip sarcastically that what he had just written would no doubt be dismissed as “another example of elite disdain.”³²³ Well, yes, that would be a fair construction of it.³²⁴

We suggest that the folks doing the rural bashing need to take a step back and consider what their goal is. What many are doing now—and Krugman’s column is the proverbial exhibit A—is making more enemies than allies. Indeed, he seems emblematic of a subset of urban folks who have become convinced that they do not need rural folks—either to supply their food, consumer products (think lithium for electric car batteries),³²⁵ and recreation, or as part of a broader political coalition.

But if the goal is to build a coalition large enough to solve collective, cross-cutting problems that afflict folks along the urban-rural continuum, approaches like Krugman’s—along with those of other *New York Times* columnists and many lower-profile social media users and lay commentators—are surely moving us in the wrong direction. If urban people treat rural voters like idiots, they can hardly expect to gain rural buy-in to an agenda that might lift all boats.³²⁶

323. Paul Krugman (@paulkrugman), TWITTER (Oct. 20, 2022, 8:15 AM), <https://twitter.com/paulkrugman/status/1583069356946526209?s=20&t=GPl6PTpvozgNhTzb7toDcA> [https://perma.cc/QVW8-MZS9]; see also Krugman, *Wonking Out*, *supra* note 170.

324. See Kal Munis (@KalMunis), TWITTER (Oct. 22, 2022, 11:14 AM), <https://twitter.com/KalMunis/status/1583839280740589568> [https://perma.cc/T79Z-9XJZ], (responding to Krugman’s tweets about his *Monkey Cage* post); see also Lisa R. Pruitt, *Paul Krugman Misses the Boat in Response to Empirical Work on Rural Resentment and Who Gets What from the Federal Government*, LEGAL RURALISM (Oct. 23, 2022, 1:30 AM), <https://legallruralism.blogspot.com/2022/10/paul-krugman-responds-to-post-about.html> [https://perma.cc/5S6H-UEZ8].

325. Benjamin Purper, *California’s ‘White Gold’ Rush: Lithium in Demand Amid Surge in Electric Vehicles*, NPR (Apr. 28, 2021, 5:00 AM), <https://www.npr.org/2021/04/28/990867075/californias-white-gold-rush-lithium-in-demand-amid-surge-in-electric-vehicles> [https://perma.cc/V92Y-MDR7]; Matthew L. Wald, *Start-Up in California Plans to Capture Lithium, and Market Share*, N.Y. TIMES (Sept. 28, 2011), <https://www.nytimes.com/2011/09/28/business/energy-environment/simbol-materials-plans-to-extract-lithium-from-geothermal-plants.html> [https://perma.cc/KHZ9-EKZ6].

326. See generally IAN HANEY LOPEZ, *MERGE LEFT: FUSING RACE AND CLASS, WINNING ELECTIONS, AND SAVING AMERICA* (2019) (strategizing how to build political coalitions that

Rural bashing suggests that urban and coastal folks—those we might simply label blue staters as a parallel to the way Krugman and many others focus on red states rather than on rural individuals or communities—see politics as a zero-sum game in which they must wrestle power from “dangerous” rural folks.³²⁷ This mindset ignores the fact that rural and urban are interdependent, that urban folks need and want what rural America produces and supplies, just as rural folks desire the innovation and culture associated with population density.

What Tom Vilsack pointed out to Ezra Klein more than a decade ago remains true: “[i]f there’s not economic opportunity [in rural America], we can’t utilize the resources of rural America.”³²⁸ If we let rural America dry up and blow away, everyone will be worse off. Surely the international supply chain disruptions associated with the pandemic have taught us that. At least these disruptions have gotten more folks talking about making more stuff in America.³²⁹

The impulse to berate rural Americans and to shoot messengers like Kunis and Jacobs, Steve Bullock—or even us, as we anticipate will be the case after this Article is published—is unhelpful. It reminds us of the law student who fights the hypothetical rather than getting down to the work of solving the problem as it exists. Or maybe it is more like the person who does not have the wisdom to know the difference between the things they can change and the things they cannot change. Those folks thus set about calling rural people names rather than talking to them about their experiences

draw White voters, especially economically precarious ones, into a progressive coalition with people of color).

327. See *supra* notes 232–33 and accompanying text.

328. Klein, *supra* note 75.

329. John Fetterman, U.S. Senator for Pennsylvania, made American-made goods a campaign issue, often expressed as “I’ll fight to make more sh*t in America.” John Fetterman (@JohnFetterman), TWITTER (Sept. 17, 2022, 12:43 PM), <https://twitter.com/JohnFetterman/status/1571177991996149764?s=20&t=TG6YIWFOKFfN9BIsWPS8y9g> [<https://perma.cc/68GH-QE9U>]. Tim Ryan, U.S. Representative for Ohio in Congress from 2003 to 2023, has also fought for domestic manufacturing investment. See Elizabeth Brotherton-Bunch, *Rep. Tim Ryan Wants to Close a Buy American Loophole for Solar Power*, ALL FOR AM. MFG. (Aug. 15, 2022), <https://americanmanufacturing.org/blog/rep-tim-ryan-wants-to-close-a-buy-america-loophole-for-solar-power> [<https://perma.cc/7GH4-FE2N>]; YBI, *Brite Form Joint Economic Development Initiative*, BUS. J. (Oct. 26, 2022), <https://businessjournaldaily.com/ybi-brite-form-joint-economic-development-iniative/> [<https://perma.cc/U7E3-EFVU>]; Paul Giannamore, *Ryan Stresses Importance of Manufacturing Jobs During Toronto Visit*, WTOV9 FOX (Aug. 23, 2022), <https://wtov9.com/news/local/ryan-stresses-importance-of-manufacturing-jobs-during-toronto-visit> [<https://perma.cc/ZQY2-VEYB>].

and needs. They don't bother first to identify the things that are negotiable, the common ground that can be found.

Take annoyance about the outsized power rural voters have in the Electoral College. This urban frustration is understandable, but it should be kept in perspective. Rural voters per se don't have a lot more power than urban ones, though some in low-population red states do.³³⁰ As we detailed in Section II.D, a problem bigger than disproportionate political power of folks in small-population states is the winner-takes-all system that operates in 48 states.

As it is, talk about minority power and doing away with the Electoral College only serves to threaten rural voters. When they already feel disempowered, such talk only riles them up and leads them to cling more tightly to the sources of power they have.³³¹ Further, as a strictly practical matter, progressives would surely be wiser to take on the winner-take-all allocation of electoral votes. Winner-take-all is not only a more problematic structure than what Professor Katherine Florey calls the "constant two" of the Electoral College; it is probably more amenable to reform.

Currently, rural and urban are too often cast as enemies of each other. This undermines the prospects for collaboration and leaves only the far right—which we fear as much as Krugman does—holding the winning trophy. If progressives want to convince rural folks of the correctness of views and ways associated with urban places, there is surely a more effective way to do so.

Rachel Held Evans writes that "[s]ociologists tell us that winning an argument is actually a terrible way to change someone's mind. . . . In fact, it tends to produce the opposite of the desired effect, because when people feel as if their worldview is being threatened, they become protective and defensive, digging in their proverbial heels even more."³³² She goes on to quote Jonathan Haidt's *The Righteous Mind* for the proposition that "people are far more likely to be persuaded when they feel seen and heard, when

330. See *supra* notes 229–83 and accompanying text (discussing the Electoral College in terms of rural power).

331. See *supra* notes 229–83 and accompanying text (discussing the Electoral College in terms of rural power). This may also explain the "disproportionate" role Katherine Florey sees the "constant two" (the two senators and two votes they represent in the Electoral College) taking in the eyes of those opposed to abolishing the Electoral College. Florey, *supra* note 237, at 320–21, 386.

332. RACHEL HELD EVANS, *WHOLEHEARTED FAITH* 89–90 (1st ed. 2021).

they believe their own argument has been fairly presented, and if they are confronted by a story.”³³³

Sadly, if Paul Krugman’s column and many responses to Steve Bullock’s *New York Times* essay are any indication, too many urban voters are unwilling even to see and hear their rural counterparts. Many seem unwilling to let the rural argument be fairly presented. The latter would require some agreement on definitions and on the terms of engagement. It would also require an acknowledgment of the nuances—and limits—of rural political and economic power. Certainly, urban dwellers are not going to convince rural folks of anything by casting them as stupid and speaking to and about them in ways that “other” or outright denigrate them.

It is interesting to think about this othering in relation to the “ordinary,” “normal,” and “regular” adjectives that politicians, pundits, and laypeople on social media so often squabble about.³³⁴ Rural advocates like Bullock draw angry criticism when they refer to rural folks as “ordinary” or “regular.”³³⁵ But might folks like Bullock be seen *not* as trying to establish that rural folks are or should be some sort of standard or norm? Rather, Bullock and other rural advocates might be seen as seeking to rehabilitate, destigmatize, and reverse the othering of a part of our populace who are increasingly cast out of polite society by their typically more affluent and powerful urban counterparts. These advocates might be seen as trying to bring rural back into the mainstream, which is now undisputedly urban.³³⁶ After all, whether rural is the norm or urban is the norm really comes down to context, to one’s perspective, or positionality. One thing remains certain, however: squabbling over who is a “real” or “ordinary” American is a dead-end, no-win conversation. Perhaps we could just agree that all—regardless of where they dwell along the urban-rural continuum—have claims to being real Americans.

Interestingly, we have noticed another politician who stands up for rural folks and uses language like “normal” and “regular” but

333. *Id.*

334. *See supra* notes 110–13 and accompanying text (detailing disputes over who gets to call themselves ordinary and regular).

335. *See* Bullock, *supra* note 110.

336. *See generally* GREGORY M. FULKERSON & ALEXANDER R. THOMAS, *URBANORMATIVITY: REALITY, REPRESENTATION, AND EVERYDAY LIFE* (2019); Lisa R. Pruitt & Marta R. Vanegas, *Urbanormativity, Spatial Privilege, and Judicial Blind Spots in Abortion Law*, 30 *BERKELEY J. GENDER, L. & J.* 76 (2015).

who has not drawn the ire of progressives—at least not that we have seen. Consider Mary Peltola, who defeated Sarah Palin to become the sole member of Congress from Alaska in 2022.³³⁷ Peltola often refers to herself as a “regular Alaskan” and says she is “trying to look out for those living here alongside me.”³³⁸ She writes, for example, of the need to “reduce inflation ... [to] better[] the lives of regular Alaskans.”³³⁹ She tweets that “[r]egular Alaskans deserve to be able to come home after a week’s work and know they have food in their pantries and enough money to pay the bills.”³⁴⁰ She says, “[r]egular Alaskans deserve an advocate that will fight to make sure their lives and the lives of their families are better off.”³⁴¹

Peltola, who is from remote Bethel, in western Alaska, identifies where she is from as rural and often talks about rural-specific issues like Alaska’s need for roads. She tweeted, for example, “Only about 20% of our state is accessible by road. That means there’s plenty of room for infrastructure projects that connect more of our communities and create more good-paying jobs for Alaska’s working families. That infrastructure funding is what I plan to get us.”³⁴²

Peltola has shown particular solicitude for the economic struggles of rural Alaskans, tweeting, “I grew up in rural Alaska. I know how genuinely difficult it can be to afford basic needs and feed your family. That’s why I’m fighting to get rural Alaskans the resources they need and the stability they deserve.”³⁴³ Peltola’s messaging

337. *Democrat Mary Peltola, the 1st Alaska Native in Congress, Wins a Full Term*, NPR (Nov. 24, 2022, 10:11 AM), <https://www.npr.org/2022/11/24/1139155670/mary-peltola-wins-alaska-election-congress> [<https://perma.cc/SX32-YGH4>].

338. Mary Peltola (@MaryPeltola), TWITTER (Sept. 20, 2022, 10:30 PM), <https://twitter.com/MaryPeltola/status/1572412802077429761> [<https://perma.cc/H3BV-HPBU>].

339. Mary Peltola (@MaryPeltola), TWITTER (Sept. 16, 2022, 6:01 PM), <https://twitter.com/MaryPeltola/status/1570895657736572928> [<https://perma.cc/S7VG-GBHG>].

340. Mary Peltola (@MaryPeltola), TWITTER (Sept. 6, 2022, 7:03 PM), <https://twitter.com/MaryPeltola/status/1567287342171316232> [<https://perma.cc/R87B-S4Q8>]. The tweet continued, “Bringing good paying jobs to our state and supporting union efforts is how we’re going to make sure they can.” *Id.*

341. Mary Peltola (@MaryPeltola), TWITTER (Oct. 11, 2022, at 8:00 PM), <https://twitter.com/MaryPeltola/status/1579985318924914688> [<https://perma.cc/2ZYD-NKVK>].

342. Mary Peltola (@MaryPeltola), TWITTER (Sept. 15, 2022, 5:15 PM), <https://twitter.com/MaryPeltola/status/1570521707022254080> [<https://perma.cc/WC8N-CMC3>]; *see also* Mary Peltola (@MaryPeltola), TWITTER (Oct. 5, 2022, 1:58 PM), <https://twitter.com/MaryPeltola/status/1577719970473050113> [<https://perma.cc/TJ92-E258>].

343. Mary Peltola (@MaryPeltola), TWITTER (Dec. 3, 2022, 2:12 PM), <https://twitter.com/MaryPeltola/status/1599119406591639552> [<https://perma.cc/U7S9-CPSE>].

frequently notes the importance of fishing to the state's economy, including to what she calls its subsistence communities.³⁴⁴

In spite of Peltola's "regular" language and her explicit advocacy on behalf of rural folks, we have seen no liberal backlash to Peltola's messaging. Perhaps Peltola can get away with talking about "regular" Alaskans because she is a woman of color, a Native Alaskan (Yup'ik).³⁴⁵ Perhaps urban and coastal progressives are willing to let Peltola play the "rural" and "regular" cards because she is a Democrat, and they need her in Congress.

Whatever the reasons urban progressives are not criticizing Peltola, her presence on the national political stage in 2022 suggests an exit ramp from the rural bashing trend. Implicit in much of what we have written from page one of this Article is that rural folks are White. At least, they are presumed to be White. It's what drew Professor Pruitt's colleague's ire against the folks who were suffering from the hog farm in rural Arkansas. It's why calling rural folks "normal" and "ordinary" provokes such strong responses from urban and coastal folks—because they hear these words as a dog whistle for "[W]hite."³⁴⁶ And the left sees White folks—at least the unwoke variety presumed to populate rural America—as a problem, indeed, sometimes "the problem."³⁴⁷

The truth, however, is that a full quarter of residents of rural America are like Mary Peltola in that they are people of color.³⁴⁸ And they have material needs, e.g., schools, health care, roads, and broadband, that are not so different from those of their white neighbors or from their urban counterparts. In theory, progress-

344. Mary Peltola (@MaryPeltola), TWITTER (Oct. 6, 2022, 4:33 PM), <https://twitter.com/MaryPeltola/status/1578121189175836672> [<https://perma.cc/PBD5-9F29>]; *My Policies*, MARY PELTOLA FOR CONG. (2022), <https://www.marypeltola.com/my-policies> [<https://perma.cc/FDU5-6DTG>].

345. Peltola is the daughter of an Alaska Native (Yup'ik) mother and—as she expresses it—"a white guy from Nebraska." Liz Ruskin, *Mary Peltola, First Alaska Native Elected to Congress, Will Be Sworn in Today*, NPR & HOUS. PUB. MEDIA (Sept. 13, 2022, 1:31 PM), <https://www.houstonpublicmedia.org/npr/2022/09/13/1122705880/mary-peltola-first-alaska-native-elected-to-congress-will-be-sworn-in-today/> [<https://perma.cc/P3WX-WYZY>].

346. See, e.g., Chait, *supra* note 83.

347. Pruitt, *supra* note 7, at 553–54.

348. DW Rowlands & Hanna Love, *Mapping Rural America's Diversity and Demographic Change*, BROOKINGS INST. (Sept. 28, 2021), <https://www.brookings.edu/blog/the-avenue/2021/09/28/mapping-rural-americas-diversity-and-demographic-change/> [<https://perma.cc/3JYC-WQJ8>] (24% of rural Americans were people of color according to the 2020 Census); see also Daniel Lichter & Kenneth Johnson, *Urbanization and the Paradox of Rural Population Decline: Racial and Regional Variation*, 9 *SOCIUS* 1–21 (2023).

sives want to help all of these folks, to see all of their needs met, but progressives seem to get hung up on the negative associations of rurality with whiteness.

Perhaps, then, Peltola—and the growing number of people of color who live in rural America—can be a bridge between urban and rural communities. This might work because urban progressives seem highly motivated to help people of color, regardless of where they live. This phenomenon could prove to be an interesting twist on Derrick Bell's interest convergence theory.³⁴⁹ Bell posited that the way to get Black people what they need is to find a way to frame the need so that it dovetails with or compliments the needs of White folks.³⁵⁰ In so doing, Black folks' needs were more likely to be met, Bell argued, albeit on the coattails of the energy that would arise to respond to White needs.³⁵¹

We may now be living in a world where the opposite is true. Pulling together a coalition motivated to meet rural needs may require foregrounding the needs of rural residents of color. Doing so may optimize the prospects that the needs of all rural folks will be met. And that could be a very good outcome, for reasons both symbolic and material.

349. See generally Derrick A. Bell, Jr., Comment, *Brown v. Board of Education and the Interest-Convergence Dilemma*, 93 HARV. L. REV. 518 (1980) (proposing the idea that the interests of colored people will be met when they align with the interests of white people).

350. *Id.* at 523.

351. *Id.*; see generally LOPEZ, *supra* note 326 (discussing how to build cross-race political coalitions).