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Absolutely American and Absolutely Democratic: National Parks and Policy Change

But ever since I was old enough to be cynical I have been visiting national parks, and they are a cure for cynicism, an exhilarating rest from the competitive avarice we call the American Way.... Absolutely American, absolutely democratic, they reflect us at out best rather than our worst. Wallace Stegner

Unless the scientist reads outside her/his field, or takes a sociology class and learns how such Kuhnian paradigms as "cultural baggage" lead humans by the nose in all they think and do, one can go through life ignorantly believing that science is detached, objective, factual, unmythic, and withal goal-setting. Michael Barbour

ost of us are familiar with the above observation of Wallace Stegner on the importance of the national parks. In that observation are some important clues as to how we might need to think about the parks, and hence policy, as we discuss wildlife policy in the national parks. The parks, as Stegner's comments should remind us, are creatures of a democratic society. That society, both in its "American" form and its "democratic" form, affects the making of our national park policy.

The Environment of National Park Policy-Making

It would seem obvious that any attempt to change, or defend, wildlife policy must pay attention to the factors, both within and outside of the National Park Service (NPS), which might impinge on that attempt. Two of the most serious, and intertwined, arguments over park policy occur over which *side* of the (in)famous "dual mission" ought to emphasized, and over *who* gets to "make" park policy (Freemuth 1989, 278-286).

There are number of actors who clearly favor or support the "enjoyment" side of the NPS mission. Among them one can find park concessionaires, members of Congress and their staff who have heavily visited units of the National Park System in their districts, various presi-

dential administrations, local parkdependent communities, and interest groups who support recreation and tourism. These actors are most likely to be in favor of wildlife policies which support wildlife as a resource to be enjoyed by park visitors, as long as those policies don't create other unresolvable conflicts. Perhaps the reintroduction of the wolf in Yellowstone would fall into this category.

Conversely, other actors can be found on the "resource protection" side of the ledger. Environmental groups, congressional park policy specialists, and some academics, for example, have often urged NPS to better protect park resources, promote resource management, and develop a stronger research program. These groups and individuals would seem obvious allies for a wildlife policy which sought to protect park wildlife resources.

One obvious point about all of the external interests is that they pay attention to national park policy and will often intervene to attempt to countermand agency policies and decisions with which they disagree. Of course, they are no more "right" about park policy than any one else, but their potential opposition is a factor that must be taken into account in the making and implementation of policies. It cannot be enough to dismiss these interests as either ignorant or "political," as often seems the case. These external groups may, or may not, represent the view of the public regarding wildlife policy, if such a "public" actually exists.

It would do well at this point to introduce a brief observation about the proper meaning or "interpretation" of the 1916 Organic Act's stated purpose of national park management to "conserve [not preserve, as is often assumed] the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

It is striking how much time and ink has been spent trying to determine, argue, or prove what aspect of the NPS mission is the dominant one. While such discussions can be enjoyable, they seem, at the end, a waste of time. Neither conservation or enjoyment is dominant, for that would have led NPS and the parks to be different than they are. Of course, that would seem to be the point of those arguing for a dominant mission or policy change which would view parks as either wildlife preserves or tourist-oriented theme parks.

What is rarely discussed is the premise that park visitors understand (or would understand) the need for limitations on use if resources or park experiences were threatened. There are examples of such an approach that could be used as policy experiments to learn from. Zion Na-

tional Park, for example, has just instituted a limitation on how many visitors per day can use a popular side canyon in the park. The key here is how the public responds to use limitations in the name of resource protection and the experience of the park visitor. Such an approach might have merit, as it would move all of us away from the stale debate over the "trump" in the Organic Act.

The second point about national park policy is about control: Who makes policy? In a sort of Progressive-era vision of the world, NPS would be the dominate entity when it came to the making of park policy. This, however, is not the case. Consider the following categorization of public-sector agencies. Barbara Romzek and Melvin Dubnick once described the National Aeronautics and Space Administration (NASA) as having had what they term a "professional accountability" system during the 1960s. Under this system, "public officials must rely on skilled and expert employees to provide appropriate solutions" (Romzek and Dubnick 1986, 229). Under a professional accountability system, the general public also shows deference to expertise and thus there is not nearly as much outside interference in agency decision-making. This type of accountability system is relatively rare. In land management policy, only the U.S. Forest Service ever approached this ideal. Samuel Hays caught the spirit of that ideal at the turn of the century when he noted that—

Conservationists were led by people who promoted the 'ra tional' use of resources, with a fo cus on efficiency, planning for future use, and the application of expertise to broad national problems. But they also promoted a system of decision-making consistent with that spirit, a process by which the expert would decide in terms of the most efficient dovetailing of all competing resource users according to criteria which were considered to be objective, rational, and above the give-and-take of political conflict (Hays 1980, 7).

NPS is not an expert-centered agency, but more a responsive one. A "responsive agency," in the words of Romzek and Dubnick, is concerned with questions of representation, access, and responsiveness to public demands.

The potential constituencies include the general public, elected officials, agency heads, agency cli entele, other special interest groups, and future generations. Regardless of which definition of constituency is adopted, the ad ministrator is expected to be responsive to their policy priorities and programmatic needs (Romzek and Dubnick 1986, 229).

These constituencies are the groups and individuals discussed above who are external to NPS and who influence park policy.

The notion of agency responsiveness to other political actors fits our expectations of democratic theory.

We do not relish our public bureaucracies making policy without taking the opinions and values of others into their decision calculus. This does not enshrine public opinion as unerring truth, but it does mean that agency judgements are constrained, as they should be, in a system which celebrates, however fitfully, the checking of power and the notion of value diversity. What compounds the problem is that many natural resource professionals have been trained within a model of decisionmaking that assumes that the expert "knows best" and does need to seek out other views regarding the management of natural resources.

However, the 1916 Organic Act also charges NPS to manage parks "for future generations." The clause gives NPS a focus which is different from all of the other actors who claim to have an interest, or power, over agency policy. NPS can act in the name of park resources, and in the name of visitor experiences with a long-term "public interest" perspective. But, NPS must speak in those terms, rather than solely in the language of expertise or of science. There is no guarantee that NPS perspectives on park management issues will prevail, but such a public interest perspective is different from a perspective which looks out for constituents or is based on political ideologies and agendas currently in play. The future generations who will visit the parks could become a

benchmark for whom parks are managed today, and thus this long-term perspective can legitimately be inserted into debates over park management. Expertise, and science remain *necessary* tools, however, in this debate. NPS might then present to its public(s) and other interests management decisions framed with a long-term perspective and designed to help those interests deliberate over choices NPS must make. It seems that wildlife policy choices are suited to perform in this role of public deliberation.

NPS Organizational Culture

NPS is not a monolith, and questions of who decides agency policy must also be looked at from an internal perspective. There is surprisingly little information available on the internal culture of the NPS. What does seem apparent, however, is that there are a number of "world views" within the agency. One example, told to me anecdotally, is the so-called Yosemite Mafia, employees with formative experiences in law enforcement gained at Yosemite who are now in positions of influence throughout the agency. For the purposes of wildlife management, one can discern differences between superintendents, resource managers, and scientists. There may be vital disagreements between what a scientist might view as a "correct" policy and the "art of the possible" as seen from the position of park superintendent. These differences matter.

They matter when it comes to the concerns of those who argue for more spending for park resource management and scientific research. A recent General Accounting Office (GAO) report noted that recent funding increases for NPS "have mainly been used to accommodate upgraded compensation for park rangers and deal with additional park operating requirements, such as safety and environmental regulations" (GAO 1997a). The increased funds were not apparently used then, for resource management and scientific research.

A closely related issue is the expectations and reward system for the scientific endeavor within the National Park System. Put simply, more thought may have to be given to encouraging, listening to, and rewarding park science which helps with a management issue facing the agency. NPS scientists cannot expect to have the freedom of their academic colleagues in the choice of research topics, but they need rewards which compensate for that loss of freedom.

Students of organizations know that the two examples above are explained by in part by NPS culture. Any attempt to change or refine wildlife policy must pay close attention to how NPS culture would affect such change. To put it another way, agency culture could also frustrate policy change. If the role of science and resource management has yet to receive proper attention or "respect" from those in management, then a clear strategy would need to be developed to change that aspect of NPS. Such a change would seem to need a commitment from top levels of the agency.

The Roles of Science

Another issue which influences the development of areas such as wildlife policy is the sociology of science. It is of immense interest to students of natural resource policy that science is not a monolith. There is an argument going on in ecology that has striking implications for how we should think about managing the national parks. Put simply (that is the only way I can do it), the argument centers on whether nature is "simplistic and deterministic" or "complex, fuzzy-edged, and probabilistic" (Barbour 1995). The debate centers on the work of Frederick Clements and Henry Gleason and reflects an ongoing discussion on holism and reductionism in science. (NPS's arch-nemesis, Alston Chase, has a very readable discussion of this debate in his 1995 book In a Dark *Wood.* The book does a good job of showing how the debate has entered into political discussions over such issues as the northern spotted owl.) What is so interesting about the debate is that "the language and perceptions of many of today's nature conservationists are considered to be 'unnatural' by most ecologists" (Barbour 1995, 233). Thus, it becomes

problematic what a concept like "natural-process management" actually means.

One must add the increasing use of such popular terms as "making decisions with the best science" or the "learning the lessons of ... (fill in the blank, with "nature," "conservation biology," etc.). What is presented to be "scientific," I argue, is more a set of values masking as science. What is left is an overt political act. "Letting science decide" (or some alleged fact) is actually letting scientists decide, which, of course, excludes non-scientists from the decision. This is not science; it is politics. Scientists, too, have values: as J. Stan Rowe has said, "We're all strongly influenced in our science by our political beliefs. Look at the emphasis we put on competition. If one is trying to see nature holistically and integrated, you tend to see cooperation more than competition and aggression" (cited in Barbour 1995, 251). If we are not careful with this logic, we end up in the silly position of arguing that a political scientist's vote should count one hundred times more than that of everyone else, because, after all, they "know more" about what a correct vote should be.

It seems obvious to this writer that science is a necessary but insufficient condition for the making of wildlife policy. For example, my research into the politics and policy of visibility protection offers one case study of this latter role for science. It is hard to see how the Navajo Generating Station near Page, Arizona, would have had to install retrofit technology without the source identification work of the NPS air quality division and others. But the work that went into identifying that power plant as a source contributing to impairment at Grand Canyon could not "force" anything on its own. That required the teeth of the Clean Air Act and coalition-building. political Yet, without the work of the air quality scientists and specialists, nothing would have happened either. (Freemuth 1991).

The linkage of agency policy with scientific knowledge can get confusing when it comes to wildlife policy. NPS's *Management Policies*, in the section on biological resource management, have this to say about "population management":

Natural processes will be relied on to control populations of native species to the greatest extent pos sible. Unnatural concentrations of native species caused by human activities may be controlled if the activities causing the concentrations cannot be controlled. Nonnative species will not be allowed to displace native species if this displacement can be prevented by management (NPS 1988, chap. 4:6).

One can imagine the questions of those who pay attention to agency policy. How can native species be controlled by natural processes while non-native species are to be actively

managed? What principle or goal allows for this differentiation? Would active management also affect the native species too? What is a native species? Isn't this a completely arbitrary term? What does the term "unnatural" mean? In short, what is the basis for this policy? Science? The Organic Act? A personal value system of those who wrote it or of the democratic society of which NPS is a part?

Finally, we remain caught up in a confusing debate about "nature." It is clear that the term refers to something observable in the physical world, but it also used as a metaphor to describe the type of world we ought to desire. Thomas Hobbes referred to nature as where life was dangerous, in order to set up his argument for strong government. Darwin's nature was bastardized by the view that life was competitive, so why worry about the poor? What needs to be disentangled is the observable natural world from the use of nature as a metaphor to prescribe normative public policies (cf. Cawley and Freemuth 1993, 41-53).

Yellowstone and Wildlife: Reflections of a Grumpy Political Scientist

Wildlife policy implemented for specific units reveals that many in NPS and outside the agency have struggled with questions like those above. It seems an impressive struggle, a battle where new ideas about policy are being articulated. Yet from a policy perspective, it is Yellowstone, once again, that appears most visible and most insightful when it comes to the making and possible alteration of NPS wildlife policy.

To a student of policy, politics, and organizational processes, the Yellowstone experience is a fascinating one. The Yellowstone policy of "natural regulation" has been likened to an ongoing "experiment" some twenty-nine years old. There is harsh criticism of this experiment, which calls for more active management of the Yellowstone elk; the response to that criticism is to allow the experiment to continue. There is evidence to support both the critics and proponents of the current policy. The nature of the debate, has, at times, taken on all the trappings of a high war in academia: charges and countercharges fly. Yellowstone's biologists are "dogmatic and defensive," and restrict who gets to do research in Yellowstone, while critics are said to support some sort of "Ecosystem Oz." One can only imagine the *perception* outsiders must have about this affair (even if there are some people who deserve a lot of the blame) and the capacities of professionals and academics in our society to carry on an civil debate about national park wildlife policy.

Let us assume that the debate over natural regulation remains a debate, and that the evidence on the success of the policy remains ambiguous.

What remains vital is the process by which we argue out natural regulation as a policy. It seems that this process is what has become unhealthy and "overgrazed," as it were. Perhaps Congress has allowed for a way out by calling on the NPS to "initiate a review by the National Academy of Sciences of all available science related to the management of ungulates and their ecological effects on the rangeland of Yellowstone" (GAO 1997c, 10). What would remain unanswered by the study, however, would be how, whether, and why management would respond to its conclusions. These questions are as important as the Academy's study charge.

One more point need to be made. In a recent edition of *The George* Wright Forum, John Varley and Paul Schullery wrote a fascinating article on public involvement at Yellowstone. They laud a strategy which "smothered the opponents, proponents and the undecided in information" about wolf restoration. The point was to use fact inundation, "the most science, the best science ... the only science" to overwhelm people. This was all done to "advance a cause" (Varley and Schullery 1996, 68-75). There is nothing wrong with this strategy as long as it pays attention to what the various publics are telling the agency about its policy. When we enter the area of the Yellowstone northern range, however, things become more complicated.

The GAO has noted that "supporters and critics of the Park Service's policies have scientific evidence that supports their points of view" (GAO 1997c, 8). One of the criticisms of the "great experiment" at Yellowstone is that it uses selective science and discards evidence that contradicts the so-called success of the experiment. What Varley and Schullery have done, paradoxically, is leave the door open to continued criticism by essentially admitting that their defense of natural regulation could be a massive public relations campaign designed to sway public opinion towards the conclusion that the policy is a success.

NPS Policy-Making: The Problem of Goal-Setting

Current debate over NPS wildlife policy moves in two directions. One direction leads towards the search for the evidence of policy success or failure—an all-too-rare example of policy evaluation. Last year's symposium had several papers which took that approach. The other direction leads towards a review of the process of developing wildlife policy. Here, the debate appears to center on whether it is desirable to have clearer policy goals, with management prescriptions designed to meet the goals, and able to be evaluated for success, failure, and redesign.

The process of setting NPS wildlife policy has been, and will be, developed and implemented in a legal environment fraught with ambiguity.

The overall management mission of the agency is unclear, as reflected in the Organic Act. Park units have enabling legislation which often creates exceptions, if not more ambiguity, regarding the 1916 act. Many units have had grazing, mining, and hunting authorized within them.

As another example, should national recreation areas be managed the same as the national parks, even though both have natural zones within them? At one time the answer to this question was "No," according to George Hartzog, former NPS director. He has asserted that wildlife management under the natural, recreational, and cultural area policies of the 1960s was different for each of the three areas (Hartzog 1988, 253). Under later policies, all the units in the park system became co-equal jewels in a crown, guided by the Organic Act and the unit's enabling act. The Organic Act and a unit's enabling act became the only guides to policy. The question, then, is the relationship between a *national* wildlife policy, and a policy based on *specific* circumstances in an individual unit of the System—units which often ironically still bear a close relationship to the discarded three-tier policy.

These caveats aside, there is ample opportunity to rethink national park wildlife policy. Recent congressional action has provided a framework for those interested in better policy evaluation.

A Window of Opportunity to Develop Wildlife Goals?

In 1993, Congress passed the Government Performance and Results Act (GPRA); NPS is beginning to implement it. GPRA is a congressional mandate to link the mission of an agency to outcome-related goals, statements on how the goals will be achieved, and program evaluations of whether the goals are achieved or not. For example, one goal of the NPS mission has already been clearly stated through GPRA procedures as "protect park resources" (NPS n.d.). From this goal statement, a number of park-specific actions that can be documented and evaluated through quantitative measures of performance are supposed to follow. The congressional intent of the GPRA is to measure and evaluate outcomes rather than outputs. In this example, one would evaluate "results" (e.g., was a resource protected) rather than "processes" (i.e., money spent, personnel activities, and so on).

There are, of course, problems with GPRA. In the field of education we might term this the "teach the test" problem. Let us suppose a board of education mandated a similar approach to measuring teacher success by requiring a certain percentage of students to score above the 70th percentile on a standardized test. If the percentage is not reached, then the teacher has not met the required outcome measure. One way for a teacher to increase the percent-

age would be to spent a lot of time focusing on passing the test by essentially teaching the test to students. We would likely be able to see a higher student success rate, but we would have no way of knowing whether the students were actually "better educated." More fundamentally, it has never been clear that tests can measure all attributes of an education, or that what is measured is what ought to be, but cannot be, measured. Thus, NPS might find ways to measure certain attributes of resource protection, but will that be because those attributes are easier to quantify? Or, will agency personnel be compelled to manage to meet preordained outcome measures, while disagreement remains whether the measures actually signify much? One way to avoid falling into this trap too easily is to rely on both NPS and external scientists (and others) to help decide what appropriate measures might be, as suggested by Wagner et al. in their discussion of wildlife policy in the parks:

Specifying these ecological parameters for all of the parks in the system with natural resources involves an aggregate of ecological knowledge beyond that held by ecologists formerly in NPS and now in NBS [the National Bio logical Service, now subsumed under the U.S. Geological Survey Biological Resources Division], or any other agency. It must draw on the experience and insights of the entire ecological community (Wagner et al. 1995, 167).

These GPRA-related outcome measures are all actions that appear as though they are under NPS management control. Cross-boundary issues and actions related to them, such as air pollution or intergovernmental coordination, may also be able to be documented, but they also relate to another aspect of GPRA. Under the act, each federal agency is to have a strategic plan, which, among other things, requires an "identification of those key factors external to the agency and beyond its *control* [emphasis added] that could significantly affect the achievement of the general goals and objectives" (such as protecting park resources, or more specific wildlife management policies) (Public Law 103-62. amending U.S. Code 3; quotation from section 306-a-5). This is clearly a fortuitous time for NPS to document what aspects of protecting park resources are beyond its control, since this law requires such documentation. NPS should seize this opportunity to clarify the scope and extent of the "external threats" problem, an action which might help clarify what is or is not resolvable by its wildlife management policies.

The Problem of Policy Conflict

It is also striking how NPS is dealing with this new law and its relationship to the agency's ecosystem management efforts, which, of course, is another federal policy initiative of huge scope and import.

This comparison provides insight into the complexity of coordinating and making agency policy.

The "cooperative" or "collaborative" aspects of ecosystem management may not fit well with GPRA. NPS training materials have already interpreted actions such as "forge strong collaborative relations with all partners and integrate them in all operations" as being *not* appropriate GPRA criteria (NPS 1996). Compare this statement with the following one from a NPS ecosystem management document which is very similar to some government-wide ecosystem management definitions: "Ecosystem Management is a collaborative approach to natural and cultural resource management..." (NPS 1994, 3).

By GPRA standards, it is hard to show how such collaboration has been accomplished, and what the *measurable outcomes* would be. The difficult question for NPS is whether it ought to spend more time on process (collaboration) or on results (outcomes), because Congress has asked one thing and the Clinton administration another. Yet, until a better definition of ecosystem management is achieved, it may make sense for NPS to pay more attention to GPRA. There are several reasons why the agency might wish to do so.

First, there is a growing critique of ecosystem management from a number of directions and perspectives, which illustrates that the term is amorphous and somewhat questionable scientifically (Chase 1995, 401-405; Lackey, forthcoming). Allan Fitzsimmons has made the following scathing observation about USFS's 1995 rule calling for the implementation of ecosystem management throughout the National Forest System. The rule "calls for the Forest Service to oversee the National Forest System in order to sustain undefined conditions on undefined landscape units that exist in limitless numbers in undefined locations and that are dynamic and constantly changing over time and space in unclear ways.... This is an unintelligible basis for managing the National Forest System" (Fitzsimmons 1996, 221).

Put simply, because of fundamental vagueness in key parts of its definition, ecosystem management is becoming a target, and one possibility would be to move slightly and subtly away from the line of fire, rather than spend inordinate agency resources and energies trying to define and implement a policy that many view as both ill-defined and without necessary public support at this time. Or, NPS might at least begin to link ecosystem management with the outcome-oriented procedures of GPRA.

Second, GPRA, while flawed, sets out a process that appears a bit more specific; a process that the agency as well as its interested publics might be able to use to get a better under-

standing of what actually is being valued as well as accomplished by NPS. GPRA might even provide NPS a way to define what it means by terms such as "ecosystem management" and how the agency will measure whether it is successful. Given the huge public disagreement over the goals and purposes of much of the federal estate, this understanding would be no mean accomplishment.

What is most intriguing about GPRA for wildlife policy is that it might provide a way to resolve the sometimes acrimonious debate over that policy. To this observer, many of those who write about wildlife policy clearly would like to see better goal specification and the development of measures of whether those goals were being achieved or not. GPRA appears to offer a process for doing just these things, but caution is in order for a number of reasons.

goal-setting will. First. and should, occur, within the democratic system discussed at the beginning of this paper. There are many people who will, and should, have some voice in the determination of the goals of national park wildlife policy. We might complain that there will be political influence on the setting of wildlife policy. We must remember, though, that the national parks are embedded in the human world, and they mean different things to different people. They are a place, said Stegner, that is "nothing in itself. It has no meaning, it can hardly be said to exist, except in terms of human perception, use and response" (Stegner 1989, 169). Stegner's phrase suggests that parks have appeal to people. As Ronald Foresta reminds us about a national park: "It strikes people grand or sublime, or it just makes people happy to be there, for whatever reason" (Foresta 1984, 268). The various meanings we find in the parks will be a constraint on unfettered setting of wildlife policy. There is opportunity here, but it should be in the form of persuasion and conversation.

Second, there appears to be need for clarity regarding the balance between universal NPS wildlife polices, and the needs and requirements of individual units of the system. Many observers, both within and external to NPS, have argued for a clear and focused System-wide set of policies on wildlife management. At the same time, the notion of "adaptive management" would argue for discretion at the unit level in order to better promote policy "learning" that could then be used to make necessary alterations in the System-wide policies. Such discretion, however, exposes one of the primary issues facing NPS. As GAO put it, "superintendents exercise a great deal of discretion in setting operational priorities" (GAO 1997b, 4). There is nothing wrong with a system so organized, and there are many strengths associated with it. Yet, as GAO goes on to note, there is

weak accountability system in place, because

... key components needed to hold superintendents accountable are missing. Without expectations about the goals that are to be achieved in the parks, a means for measuring progress toward these goals is not in place. As a result, the agency's ability to determine or ensure that the desired results are achieved is diminished (GAO 1997b, 7).

Those who argue for System-wide wildlife policy goals need to pay attention to this observation. For example, if such goals are developed, should they be done with the input of park superintendents? Are there problems with that approach?

There remains the question of how best to address the forum for wildlife policy-making in the parks. The history of NPS wildlife policy suggests that the agency has sometimes made policy changes on its own, while at other times Congress has chosen to intervene. To some, political intervention, and NPS sensitivity to that intervention, has characterized wildlife management policy, a charge undoubtedly true. But what do we do about that? NPS will find it difficult, if not impossible, to insulate itself from political influence. But NPS can lead, too, by presenting to Congress and the American people some of the difficulties in managing wildlife in the national parks. Such a presentation might well cause people to back up a step and see that some of these difficulties stem from the mission of the agency. Regardless, the dialogue is needed and it must be between NPS (and within the agency) and those it seeks to serve and respond to. From this dialogue could then come both the ideas and the support for policy change. Congress is the appropriate forum for resolution of conflict over wildlife policy, but it is NPS which has been charged with protecting parks for future generations. What NPS may really be up against is our society's uncertainty about the role of the public administration during this era of increasing distrust of all institutions of government. How we puzzle this out is the major challenge facing agencies such as NPS.

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