

From Conflict to Resolution in the Two Big-Y Parks: Ending 20 Years of Controversy in Yellowstone and Yosemite

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SOMETHING ODD HAPPENED WHEN THE NATIONAL PARK SERVICE (NPS) finalized its latest environmental impact statement on winter use in Yellowstone National Park: no one threatened litigation or filed suit against the agency's plan. With one exception, the previous six plans had all been litigated and remanded to the agency.¹ But in 2013, as the agency issued the latest record of decision and completed the rule-making process, an unusual silence prevailed. Instead, some of the former litigants quietly changed their websites to support the new plan, and the absence of litigation has continued.²

The same thing happened in Yosemite National Park, whose managers have been grappling with limits to use and developments in Yosemite Valley since the late 1990s. Just as in Yellowstone, NPS there has issued a series of plans intended to provide comprehensive direction for the world-famous valley, with all of them until the 2014 plan ending up in court and being tossed out by federal judges.³ As of this writing, though, no one had contested this latest plan, and the agency had begun implementing it.

Why was the agency finally successful with these plans, in contrast to the earlier ones? What did it do to put these hotly contested issues to bed? What changed to make former litigants come out in support of these plans? This article attempts to answer these questions, drawing upon the recollections of the agency staff directing these efforts as well as the literature about contemporary NPS policy-making. After brief histories of both controversies, the article will present a series of reasons that enabled the agency to succeed where it had failed before.

Background: Two debates grounded in Organic Act tensions

Both issues revolve around questions fundamental to the NPS mission, so both of them are

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rooted in long-running debates. In the case of snowmobiles in Yellowstone, the debate—about what forms of recreation (especially winter recreation) are appropriate in national parks—began in the 1930s, when surrounding communities began 35 years of requests for park managers to plow Yellowstone’s roads year-round. With the appearance of the snowmobile in the 1960s, park managers decided not to plow but rather to welcome visitors on oversnow vehicles. Such visitation grew rapidly, creating unforeseen air and noise pollution, along with wildlife harassment. By the 1990s, these problems motivated an interest group to file suit against the agency, alleging non-compliance with the National Environmental Policy Act (NEPA) and other federal laws. Settling out of court with an agreement to write an environmental impact statement (EIS) on the matter, NPS eventually found itself regularly producing EISs (five total) or environmental assessments (EAs; three total), almost every one of which was litigated by environmental groups or snowmobile advocates (often both). Most of the NPS decisions rooted in these documents mirrored the party leanings of the president in the White House at that time, and most of the judicial decisions mirrored the leaning of the deciding judge. Despite (and sometimes because of) the political fracas, the agency succeeded over the last 20 years in converting the free-for-all that prevailed in the 1990s into a well-managed, orderly model of winter tourism, with the previous problems largely gone. The final EIS, completed in February 2013, cemented these policy changes into place, with numerous small changes intended to make this decision a compromise acceptable to all stakeholders.⁴

Events in Yosemite eerily paralleled those in Yellowstone. Again, the fundamental issue was the tensions within the Organic Act, although the debate in Yosemite was more about development within Yosemite Valley and overall visitor numbers than about the appropriateness of certain forms of recreation. As with Yellowstone, the debate began long ago and gained center stage in the late 1990s with a lawsuit that became the first of many. The Yosemite lawsuits found traction in the Wild and Scenic Rivers Act (WSRA) and its requirements both that river resources be protected and also that overall user numbers be specified. The Merced River, flowing through the heart of Yosemite Valley, had been added to the wild and scenic rivers inventory in 1987, but the NPS had not prepared a management plan for it, as also mandated by WSRA. Consequently, to settle the first lawsuit (filed in 1997), NPS agreed to prepare such a plan. Completed in 2000, the agency quickly wound up defending it and its supplement (finished in 2005) in court, both times losing at the appellate court level. Entering into settlement discussions with the plaintiffs after the second unsuccessful appeal, the agency reached an agreement in 2009 to prepare a third management plan and EIS: the Merced River Plan (MRP). The MRP, 3,000 pages long, was finalized one year after the Yellowstone plan, in February 2014. It provides comprehensive direction for the protection and enhancement of the Merced River and its unique values, as well as specifics on the user capacity of the river corridor and how that will be enforced.⁵

Toward resolution: Factors of success

Where once the agency faced off against litigants in several different courts, these more recent policy-making endeavors saw the agency being supported, at least modestly, by the former

litigants. Making this transformation possible were many different factors, beginning with the different political climate that arrived with President Obama's election in 2008. That change was felt most acutely in Yellowstone, which had seen two secretaries of the interior (Bruce Babbitt and Gale Norton) take a strong interest in—but different positions on—the winter use dilemma there (Babbitt favoring snowcoaches and Norton, snowmobiles). While Norton resigned in 2005, her pro-snowmobile direction remained through the end of President George W. Bush's presidency. Ken Salazar, Obama's first interior secretary, took a more hands-off approach to national park policy-making, desiring mainly that any public lands controversy be settled for the benefit of the American public. This change in atmosphere allowed the new Yellowstone superintendent, Dan Wenk, and his staff to seek a solution that was acceptable to both snowmobile fans and detractors. In Yosemite, the change in political climate had less of an influence, though the administration's problem-solving approach still allowed that park's superintendent, Don Neubacher (also new to that park) to pursue a plan that was amenable to most stakeholders. Both parks benefited, then, from a political climate that supported conflict resolution.⁶

New superintendents—and key members of their staffs—also contributed to the success of these planning efforts. It is no secret that arriving personnel can bring fresh perspectives and insights to their new appointments, and both planning efforts benefited accordingly. Neubacher was himself a former planner familiar with controversy, so he was able to direct the MRP effort toward a solution that was likely to stand. Wenk, meanwhile, brought new insights to the snowmobile issue that forced stakeholders to reexamine their positions with an eye toward resolution. Both superintendents, moreover, had key positions on their staffs occupied by persons new to the controversies—the management assistant in Yellowstone and the chief of planning in Yosemite—both of whom took the time to develop personal relationships with key stakeholders. The trust that developed in those relationships helped all to work toward mutually agreeable solutions.⁷

Those solutions, as one might expect, were compromises that solved the major problems while addressing the primary concerns of the stakeholders. Yellowstone's winter use plan, rather than adopting a complete ban on snowmobiles (as proposed in the 2000 EIS, but never implemented) or continuing with high numbers of them (as proposed in the 2003 EIS, but also never implemented), will allow a modest number of the vehicles into the park. All of them will have to be led by trained guides (to prevent wildlife harassment), utilize best available technology (to minimize air and noise pollution), and be grouped (also to minimize noise pollution). These restrictions addressed the major resource concerns, while additional provisions to allow more snowmobiles during busy times of the winter and to allow some non-commercially guided trips into the park, addressed the primary concerns of snowmobile fans. Similarly, encouraging further improvements in snowmobile and snowcoach technologies helped address a major concern of environmentalists. Yosemite's MRP, meanwhile, required significant ecological restoration of the riverbanks and nearby meadows as well as the removal of several unnecessary and unsightly buildings from Yosemite Valley. In addition to thereby tackling the long-festering question of what level of development was appropriate in the valley, the plan also addressed the same question about recreation: not only were most

existing forms to continue, but some additional boating was as well. Significantly, the plan diverged from the park's 1980 General Management Plan (GMP) in proposing to allow private vehicle use to continue in the valley, thereby addressing long-simmering resentment from some stakeholders about the GMP's proposed ban on private automobile use. Park managers also revised the plan midstream to allow ice skating to continue and to restore parts of a popular campground destroyed in an earlier flood. Both plans, then, accomplished important resource objectives while addressing stakeholder concerns. They were compromises, not radical departures from the status quo as proposed in earlier plans in both parks. Incremental these approaches may have been, but the plans set real limits, accomplished needed resource protection, and have yet to be litigated.⁸

As compromises, neither plan radically changed existing access into the parks. As noted, the MRP repudiated the most far-reaching aspect of Yosemite's 1980 GMP: its proposal to eliminate automobiles from Yosemite Valley. In silent recognition that this tremendous restriction of access to the park would not fly—indeed, NPS had not come close to implementing it, even 34 years after the GMP was published—the MRP specifically discarded this unpopular idea. Instead, the MRP embraced private automobile use, limiting it only to the number of vehicles at one time that the valley's roads and parking lots could handle after the traffic problems were addressed. That number—bringing as many as 18,710 people at any one point in time into the valley—would accommodate existing traffic levels on all but the busiest days. Similarly, Yellowstone's winter use plan largely left existing access intact, modifying the rules somewhat to accommodate a modest increase in visitation during traditionally busy times (like Christmas week) and to allow four non-commercially-guided groups per day. Both plans, then, preserved or enhanced existing access, significantly increasing the likelihood that the public would accept the plans.⁹

Similarly, by keeping visitation at or above existing levels, the perception that gateway economies would be harmed was not present, as it was in the public response to earlier planning efforts. By failing to revise the GMP goal regarding automobile access to Yosemite Valley, the earlier versions of the MRP left intact the perception that attainment of that goal would reduce visitation and, therefore, gateway economies. In Yellowstone, previous plans had in fact damaged gateway community economies, so the ability to increase visitation during busy times of the winter would actually boost those economies. For these reasons (although none of the interviewees mentioned it), this closely watched barometer of the public welfare did not become the touchstone of controversy seen in earlier planning efforts in both parks.¹⁰

The incremental approach to the development of new plans brought the agency allies (as previously mentioned) from both sides of the fence dividing the previous litigants. Agency personnel in both parks took the time to seriously engage the concerned public, listen to them, and alter their policy proposals to address public concerns while still achieving agency goals. For example, Yosemite planners took five years—almost five times as long as either previous plan—to complete this MRP, an amount of time that gave agency personnel time to build first-name relationships with the primary stakeholders. The much more rushed time frames of the previous planning efforts made this important part of successful planning impossible. Similarly, when Yellowstone officials realized that the 2011 EIS still left many

stakeholder concerns unaddressed, they kicked off yet another planning effort to address those concerns, rather than finalizing the EIS with another rule-making effort and facing likely litigation again. Again and again, interviewees stressed the importance of their efforts to genuinely listen to the public (especially the key players), develop a relationship of trust with them, and substantively address their concerns. Staff in both parks, then, turned likely litigants into allies, helping the agency in the court of public opinion—and preventing litigation or continued planning limbo.¹¹

Importantly, both plans drew upon a robust research and resource monitoring information base, most of which was a product of the earlier planning efforts. NPS in Yellowstone had been monitoring air quality, the winter soundscape, and wildlife–visitor interactions for more than a decade; that information was complemented by a number of NPS-commissioned research studies into various facets of the issue. Furthermore, park managers had subjected this knowledge base to an independent review that affirmed its comprehensiveness and impartiality. This knowledge base not only provided a solid foundation for the final winter use plan, but it also enabled park managers to turn discussions with their stakeholders away from emotion-based platforms to more dispassionate searches for solutions that addressed resource impacts (some of those solutions themselves consisted of more research, which NPS funded). In Yosemite, park staff began the planning effort by assembling a similarly substantial research and monitoring information base and then targeting a sizeable research effort at the gaps therein. As in Yellowstone, park managers subjected this new research to peer review, shared the research findings with their stakeholders, and then based many of the final plan actions on the resource problems identified by the research. The plans from both parks, then, were based on robust research and monitoring information bases (more robust than earlier planning efforts) that additionally provided a factual grounding for discussions with stakeholders.¹²

In those discussions and in their other public communications, Yellowstone managers consistently used a concept new to that issue: “transportation events,” which were explained to be the experience of standing alongside the road when either a snowcoach (a van or small bus equipped to travel on unplowed roads) or a group of snowmobiles (led by a guide on a snowmobile) passed. The number of visitors in a snowcoach was about equal to the number in a guided snowmobile group, so the transportation event concept forced stakeholders to think of the per capita resource impacts of visitors employing the two modes of travel. The park’s planners regularly framed their discussions in this manner, arguing that the resource impacts of the transportation event should be blind to the mode of travel. Gradually, they succeeded in moving the discussion from the earlier snowmobile versus snowcoach zero-sum game debates to a less emotional discussion of how best to reduce resource impacts while addressing other stakeholder concerns. Combined with the willingness to listen and seek mutually agreeable solutions (mentioned earlier), this issue framing significantly helped create the positive atmosphere necessary to resolve the controversy. In prior versions of the winter use plan, park personnel had rarely attempted to frame the issue in their public communications. Such voids are commonly filled by the press in attention-grabbing—not NPS-supporting—ways, such as by making claims of an infringement of access.¹³

Thanks to these measures—employing new staff, seriously listening to the concerns of stakeholders and gaining their support, developing compromises and plans that addressed resource issues while preserving existing access and local economies, basing those plans on robust science bases, and framing their discussions to emphasize resource concerns—opposition from key politicians disappeared, replaced with actual support. In Yellowstone’s case, whereas elected and appointed officials from both sides of the aisle had previously tried to determine the outcome (through legislation or directives), park managers now found themselves seeing their final plan supported by the governors of Wyoming and Montana as well as Senator Mike Enzi (R-WY). In Yosemite’s case, Tom McClintock (R-CA), the fiery US House member representing the area around the park, actually issued a statement endorsing the final plan when he saw that most of his constituents’ concerns with the draft plan had been addressed. Previous versions of the planning effort had brought criticism from George Radanovich (R-CA), McClintock’s predecessor. For both parks then, bipartisan political support (or at least a lack of opposition) was a desired outcome of the steps they had taken, an important factor in the success of the two plans, and something not seen in the previous planning efforts.¹⁴

Implicit in these efforts is that, in both parks, the agency took the time necessary to get it right. Yellowstone’s effort took two and a half years, with Yosemite’s effort taking twice as long. By taking such lengths of time, managers in both parks demonstrated that they were taking their task seriously. That message was particularly clear when Yellowstone managers kicked off a supplemental EIS process and when Yosemite managers requested extensions of their court-mediated deadline. Having ample time specifically allowed managers in both parks to identify the key stakeholders and build trust with them, address their concerns appropriately, produce comprehensive and legally sufficient documents, and defuse political opposition. Each of these points was discussed previously, but it bears repeating that effective policy-making takes time. Indeed, the prior histories of these issues in both parks repeatedly illustrates that rushed policy-making processes are legally vulnerable. Simply put, outputs are only as good as their inputs (or, you get what you pay for).¹⁵

A final factor in the success of both plans—but not one to cultivate—was fatigue. Managers in both parks felt that their stakeholders, after almost 20 years of court battles and frustrations, were tired of arguing and therefore more amenable to compromise. NPS staff, paid to undergo policy-making processes time and again, may indeed have worn out the adversaries. While there may be an element of truth in this assertion, the final plans in both parks successfully addressed the fundamental resource problems prompting those stakeholders to sue in the first place. Yellowstone’s winter air is clean, its soundscape quiet, and its wildlife migrating naturally. Yosemite’s Merced River and its special values are protected, with a real visitor capacity specified; and visitors can easily enjoy the world treasures in both parks.¹⁶

Discussion: Two conflicts resolved

Table 1 summarizes factors that allowed NPS to successfully resolve these two long-running controversies. Clearly, the staffs of both parks navigated complex policy-making minefields to attain their successes. While the list in Table 1 certainly provides some guidance for managers

Table 1. Factors accounting for success of recent Yellowstone winter use and Yosemite Merced River planning efforts.

Reason	Yellowstone winter use	Yosemite Merced River Plan
Political climate: Salazar’s hands-off policy encouraged conflict resolution	Yes: prior administrations issued verbal directives that alienated some stakeholders	Yes: though Bush administration had little interest in this issue, hands-off policy helped some
New personnel: new staff brought new insights and approaches	Yes: both superintendent and management assistant	Yes: both superintendent and chief of planning
Incremental approach: NPS proposal was not a revolution but did address key concerns	Yes: final decision not too different from prior one, though all concerns addressed	Yes: final visitor numbers similar to before, but ecological and traffic problems addressed
Access: NPS proposal either enhanced access or left existing access alone	Yes: compared with 318 snowmobiles allowed, new rules allowed modestly more, but especially at Christmas; non-commercial guiding also improved access	Yes, mostly: NPS repudiated GMP intent to ban cars, fixed traffic problems, allowed existing visitation to continue except on busiest days
Economy: NPS proposal either enhanced economy or had little effect	Yes: higher numbers modestly improved economy	Yes: MRP would have little effect
Allies: NPS really reached out and took public concerns seriously, which garnered new allies	Yes: NPS did a supplemental EIS to seriously address lingering stakeholder concerns	Yes: NPS seriously considered stakeholder concerns, revising draft proposal to address many of them
Science: NPS had robust monitoring and research base backing up its decision	Yes, NPS had a decade or more of research and monitoring that informed conversations with stakeholders and informed its plan	Yes: NPS had several years of monitoring information and began planning effort with large research thrust to fill gaps in knowledge; these informed its plan
Framing: NPS (re)framed the issue to support its proposal	Yes: NPS repeatedly used “transportation events” concept, which forced stakeholders to consider resource impacts	No: NPS did not consistently use any certain kind of framing
Political support: NPS had overt support or at least a lack of opposition	Yes: NPS had support from MT & WY governors and WY Senator Enzi	Yes: after NPS addressed McClintock’s concerns he dropped his opposition
Adequate time: NPS took enough time to address all concerns and produce solid NEPA document (generally 4+ years).	Yes: although NPS only took from 2011 to 2013 to produce the final plan, it built on the earlier one, which also took three years; NPS also made key decision not to finalize 2011 EIS and instead do a supplemental EIS	Yes: NPS took from 2009 to 2014, including multiple extensions of court deadline
Fatigue: agency wore out its opponents	Yes: issue had been hot since 1997	Yes: issue had been hot since 1997

caught in other policy-making controversies, having all these factors aligned is no guarantee of success. Furthermore, not all of the factors are within the control of NPS managers, or even desirable. For example, park managers can do little to influence the political climate, and they certainly do not want to tire out their stakeholders. Replacing staff members is also not always possible or desirable; many classes of government positions are protected, and NPS may at times benefit more from the trust or popular esteem of some leaders than from the insights of new staff. The same is true of the incremental approach; many stakeholders would view the reintroduction of a top predator, for example, as a major action, no matter how many conditions are attached. Public perceptions may also turn an otherwise favorable factor against the agency; as managers of earlier planning efforts in both parks found out, even if a change in transportation modes would actually provide more access, the public perception that a preferred or existing form of access would be harmed drove the final action.

Nonetheless, the list in Table 1 provides timely guidance to those attempting to resolve similar policy-making controversies today. That two so enduring, highly visible, and fractious controversies were resolved in such a similar manner strongly suggests that there are important keys to success herein. Those keys—the factors listed in Table 1—are the same as the frameworks of success outlined in two recent books about contemporary NPS policy-making: *Repairing Paradise: The Restoration of Nature in America's National Park* by Washington University political scientist William R. Lowry (published in 2009), and my own 2013 book, *Protecting Yellowstone: Science and the Politics of National Park Management*. Those two works utilized different research methods but produced very similar results: to enjoy policy-making success, NPS managers need to align all, or almost all, of the factors over which they have control and that are desirable (in Table 1, everything but political climate, new personnel, and fatigue, and with the other previously discussed caveats).¹⁷

Of course, it is not always possible to align all the factors in favor of policy-making success. Managers may be forced to undergo a planning project when the political climate is not favorable, when a court-ordered deadline makes it impossible to take the time necessary to build alliances, in the absence of sufficient monitoring and research information, or without an easy way to frame the debate to support their ideal policy proposal. In such cases, park managers have little choice but to do their best under the circumstances. Sometimes, they will succeed despite the difficulties. At other times, though, they may suffer setbacks and have to engage in repeated planning processes. However, those instances are not defeats so long as the planning processes foster an increase in our research and monitoring base as well as an enriched understanding of the task to be accomplished. By taking the long view when put in such situations, managers can set the stage for eventual policy-making success. Given the fact that we are approaching NPS's centennial and that the national parks are sometimes described as America's best idea, we are already good at taking the long view. At the least, then, this look back may add some structure or validity to what we already know. It is to be hoped, though, it will help us do our job even better, so that we enter the second century of one of the country's most esteemed agencies even better equipped to leave our parks unimpaired, for the enjoyment of future generations.

Endnotes

1. My first book, *Yellowstone and the Snowmobile: Locking Horns over National Park Use* (Lawrence: University Press of Kansas, 2009) provides a comprehensive history of this controversy. The reader is advised that NPS employed me to write this book and to work on the winter use issue from 2004 to 2009, though I had very little influence on any of the agency's winter use decisions. The 2013 plan is National Park Service, *Yellowstone National Park Winter Use Plan/Supplemental Environmental Impact Statement* (Yellowstone National Park, WY: NPS, 2013; hereafter, NPS, 2013 WUP).
2. For example, the mission of the Greater Yellowstone Coalition on this issue changed from "To phase out snowmobiles in Yellowstone in favor of cleaner, quieter, more efficient snowcoaches..." in October 2012 (<http://www.greateryellowstone.org/issues/lands/Feature.php?id=40>, accessed Oct. 25, 2012) to the statement, "To protect Yellowstone's wildlife, air quality, and natural soundscapes..." with no mention of vehicle preference, in March 2013 (same web address, accessed March 7, 2013).
3. The only two accounts of the Yosemite controversy are the third chapter in William R. Lowry's *Repairing Paradise: The Restoration of Nature in America's National Parks* (Washington: Brookings Institution Press, 2009), and John Cathcart-Rake, "The Friends of Yosemite Saga: The Challenges of Addressing the Merced River's User Capacities," *Environmental Law* 39:3, June 2009. The 2014 plan is National Park Service, *Merced Wild and Scenic River Final Comprehensive Management Plan and Environmental Impact Statement* (Yosemite National Park, CA: NPS, 2014; hereafter, NPS, 2014 MRP). The reader is advised that NPS employed me to work on the Merced River Plan issue from 2009 to 2014, although (again) I had little influence into the agency's ultimate decision.
4. Yochim, *Yellowstone and the Snowmobile*; Michael J. Yochim, *Protecting Yellowstone: Science and the Politics of National Park Management* (Albuquerque: University of New Mexico Press, 2013), 135–150; NPS, 2013 WUP; and Dan Wenk and Wade Vagias, interview by author, Mammoth Hot Springs, WY, July 17, 2013.
5. On the history of public debate about development and recreation in Yosemite Valley, see Alfred Runte, *Yosemite: The Embattled Wilderness* (Lincoln: University of Nebraska Press, 1990). On the planning and litigation history, see Cathcart-Rake, "The Friends of Yosemite Saga," and NPS, 2014 MRP, 2-7 to 2-8.
6. Wenk and Vagias interview, July 17, 2014; Don Neubacher, interview by author, Yosemite Valley, CA, July 3, 2014; and Yochim, *Yellowstone and the Snowmobile*, 164–191.
7. On Yellowstone, Wenk and Vagias interview, July 17, 2014, and Dan Wenk and Wade Vagias, interview by Jo Arney of University of Wisconsin–La Crosse, March 10, 2014, Mammoth Hot Springs, WY, superintendent's office files, NPS, Yellowstone National Park. On Yosemite, Neubacher interview, as well as my personal experience working for Neubacher and Chief of Planning Kathleen Morse.
8. NPS, 2013 WUP, 57–65; and NPS, 2014 MRP (details of the final plan from pp. 8-197 to 8-234, changes between draft and final from pp. 9-1004 to 9-1008, and amendments to the 1980 GMP from Appendix A). On incremental change, see Bryan D. Jones and

Frank R. Baumgartner, *The Politics of Attention* (Chicago: University of Chicago Press, 2005).

9. Yosemite information from NPS, 2014 MRP (details of the final plan from pp. 8-197 to 8-234, and amendments to the 1980 GMP from Appendix A); Neubacher interview; and Lowry, *Repairing Paradise*, chapter 3. Yellowstone information from both Wenk and Vagias interviews and NPS, 2013 WUP, 57-65.
10. Yosemite information from Lowry, *Repairing Paradise*, chapter 3; Yosemite Valley Plan Oversight Hearings before the House Subcommittee on National Parks, 107th Congress, March 27, 2001, 95; and Ryan Dougherty, "Plan for Yosemite Valley Heating Up," *National Parks* 77:7, July 2003, 10. Yellowstone information from Yochim, *Yellowstone and the Snowmobile*, 169.
11. Neubacher interview; and both Wenk and Vagias interviews.
12. Most of the Yellowstone studies are at http://www.nps.gov/yell/parkmgmt/winter_monitoring.htm, accessed August 13, 2014 (the 2009 "summary report" is the independent review), with most of the Yosemite studies at http://www.nps.gov/yose/parkmgmt/mrp_documents.htm, accessed August 5, 2014. Both Wenk and Vagias interviews and the Neubacher interview also informed this paragraph, as did my professional experiences overseeing parts of the research efforts in both parks.
13. Both Wenk and Vagias interviews. Such issue framing was not consistently used in the Yosemite issue.
14. Wenk and Vagias interview, July 17, 2014, and <http://mcclintock.house.gov/2014/02/merced-river-plan.shtml>, accessed July 9, 2014.
15. Neubacher interview, and both Wenk and Vagias interviews. Yosemite planners also sought external legal review of their planning documents, and revised or structured those documents accordingly (Neubacher interview).
16. Neubacher interview; Wenk and Vagias interview, July 17, 2014.
17. Lowry chose one controversy from each of four national parks (including, as mentioned earlier, the MRP issue) while I examined every controversy (six, total) from Yellowstone meeting three pre-defined criteria. Because we both examined wolf reintroduction in Yellowstone, we examined a combined total of nine NPS policy debates. With the updated analyses in this article, we now have 11 NPS policy-making debates supporting this framework. Note that while Lowry's book was available while I was writing mine, I had already outlined my major results and argument when I learned of his book (actually, when I became aware of his book, I almost abandoned mine, but resumed the project when Lowry himself, recognizing the strength of our convergent results, urged me to complete it).

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