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Can Bureaucracies Change Policy?

In the 1990s, policymakers at Yellowstone and Banff National Parks enacted two of the most controversial programs in the history of protected lands. At Yellowstone, the U.S. National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) personnel reintroduced wolves into the Yellowstone ecosystem. This program restored a crucial element to the park ecosystem that had been eliminated decades before and not returned since extermination. At Banff, federal authorities imposed strict limits to growth of the town of Banff. This action reversed a policy dating to the park's establishment in the late nineteenth century of allowing and encouraging growth and development of the town within Banff. How did these policy changes occur?

The question is important not just for these two preeminent national parks but also for the policy process in general. Typically, public agencies and their political superiors are reluctant, if not unwilling, to pursue reversals of long-standing policy traditions, particularly when such reversals involve enacting controversial policies. Yet, as these two cases show, under certain conditions bureaucracies can change policy even when that means reversing decades of tradition. This article uses literature from the fields of public policy and public administration to posit those conditions and then examines them in the two case studies.

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THEORETICAL EXPECTATIONS

The Yellowstone and Banff cases are obviously important in many ways. At the broadest level of generalization, they reflect upon important theoretical arguments regarding policy change.

The Unlikelihood of Controversial Changes

Perhaps the most dominant perspective on policy change is that change is most likely to occur only incrementally.[1] A large and expanding literature has recently questioned that perspective with compelling theoretical arguments for dramatic change and some impressive empirical evidence.[2] Even given that growing literature, however, much conventional wisdom still casts doubt on the likelihood of dramatic changes.

In particular, a great deal of literature suggests that most policymakers want little to do with changing traditional goals, if for no other reason than such changes will likely be controversial. The literature on the reluctance of Congress to deal with contentious issues has deep roots. Indeed, many scholars argue that Congress uses the ability to delegate policymaking to public agencies precisely to avoid making decisions that may anger some group or constituent that has become accustomed to traditional behavior.[3] These delegations are not received with open arms. Indeed, as one scholar argues, many bureaucrats "shun situations in which they might have to make troublesome decisions."[4] Many other widely cited studies of public agencies suggest that bureaucracies tend to be conservative or at least risk-averse, and bureaucrats try to avoid antagonizing traditional constituents through contentious decision-making.[5] So, under what conditions can bureaucracies change policy?

Conditions Conducive to Controversial Policy Changes

Given that most policymakers prefer to avoid controversial changes to long-standing policies, the literature describing successful change efforts in these areas is somewhat limited. However, some classic works in the public policy literature do discuss conditions conducive to effective implementation in ways that can be extended to propose two broad hypotheses regarding contentious policy change to traditional goals. I posit two conditions as necessary, neither alone as sufficient.

Since public agencies are unlikely to pursue controversial policy change in traditional goals on their own, such actions depend upon meaningful intervention by formal authorities external to the implementing agency. The basis

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for such an argument dates at least to Schattschneider's concept of expanding the sphere.[6] Conflicts always have the potential to expand. If they do expand, then they are more likely to engage higher levels of authority. Schattschneider states this in his discussion of federal-state relations: "One way to restrict the scope of conflict is to localize it, while one way to expand it is to nationalize it."[7] The dynamics of any situation change substantially as those previously outside the conflict become involved. This is particularly relevant when those who become involved have authority. Matland's synthesis of a great deal of implementation literature describes the outcome of the most contentious policies as determined by the actions of those with power.[8] Formal authorities must provide the impetus for controversial policy change by agencies to traditional policies.

To be meaningful, intervention must be real, explicit, accompanied by needed resources, and binding. By real, I mean that intervention cannot be the position-taking condemned by Mayhew as mere rhetoric.[9] Explicit interventions provide, in the terms of the most-cited model of the implementation process, "clear and consistent objectives."[10] Those interventions are more meaningful if they come with substantial resources, not limited to but certainly including financial ones. Finally, those interventions must be binding over time and not just temporary injunctions.

In public agencies such as those that manage national parks, the role of federal authorities is therefore crucial. Their willingness to intervene in a specific policy controversy in a meaningful way is essential for policy change. This is true whether the federal authorities act in a presidential system such as the United States or a parliamentary system such as Canada. Federal authorities significantly affect not just the outcomes of controversial efforts to change policies but also whether or not such controversies are even on the political agenda for discussion.

The second condition involves nonstatutory variables. However meaningful the formal intervention posited above, important policy changes by public agencies will not be effective without the support of nonstatutory variables. Using the implementation framework of Sabatier and Mazmanian as a guide, these variables include the following.[11] Achieving changes is more likely if socioeconomic conditions for those changes are receptive. Media attention must be substantial and at least somewhat continuous. Favorable public opinion can provide crucial support to agency efforts. Finally, and related, the compliance of relevant target groups enhances the likelihood of effective policy change, especially when such changes are controversial. Many implementation studies have shown the importance of target-group behavior, including those who at least initially opposed the policy, to outcomes.[12]

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To summarize, public bureaucracies are unlikely to pursue controversial policy changes to traditional goals except under the following conditions. First, formal authorities must endorse the changes in real, explicit, resourceful, and binding ways. Second, nonstatutory variables including socioeconomic conditions, media attention, public opinion, and target-group compliance, must be receptive to change.

EMPIRICAL ANALYSES

This article examines those propositions in the context of two highly controversial cases: the reintroduction of wolves to Yellowstone and the restriction on development in Banff. These cases are comparable on many dimensions. First, the two parks are the flagship units of each nation's national park system. The two park systems have nearly identical mandates, both established to provide for visitor enjoyment but also preservation of natural conditions in park units. They also have similar histories of growth and development.[13] Yellowstone was established in 1872 and Banff in 1887. Second, the two parks are quite similar geographically. Yellowstone is slightly larger (3,500 square miles compared to 2,500), but both include vast mountainous and forested regions. Indeed, over 90 percent of each park is considered undeveloped wilderness. Third, the parks face similar challenges. Each entertains roughly 4 million visitors per year, most in the summer months, but also some partaking of winter recreation. Both parks also face extensive commercial development on their borders. Fourth, these changes to traditional policy goals were among the most controversial ever attempted at either park.

Important differences between the cases do exist. First, the U.S. and Canadian political systems are different in that the former is presidential while the latter is parliamentarian. This structural difference is largely overshadowed by the fact that both parks are subject to the demands, as described in the cases, of individual politicians. Second, the Canadian park has somewhat more commercial development (fifty-one hotels in Banff compared to nine in Yellowstone, for example), in large part, as discussed later, a result of the presence of the town of Banff. This difference is key to the selection of cases to be examined. I wanted to concentrate on the primary focus of restoration activities in each park. In Banff, because of the presence of the town, the major emphasis has been on limiting growth. In Yellowstone, policymakers concentrated instead on restoration of a crucial predator in the ecosystem, the wolf. Thus, rather than comparing a species reintroduction in one park to reintroduction in the other, or growth limits in one to limits in the other,

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I compare species reintroduction to growth limits. These were not only the most crucial restoration tasks, but they were also the most contentious.

To study these cases, I use historical documents, qualitative accounts, and especially interviews with key policymakers. I conducted interviews in both parks in the mid-1990s, when these policy changes were in formative stages, roughly five years later, and then again in 2005 to assess implementation progress. These interviews included agency officials, scientists, activists, people in the local communities, and trail-level bureaucrats charged with implementing the policies.

Restoring Wolves to Yellowstone

In the mid-1990s, policymakers in Yellowstone changed a century of tradition by reintroducing wolves into the park. Historically, many people, particularly livestock owners, have despised wolves and thus hunted them to extinction. The establishment of Yellowstone National Park in 1872 did nothing to stop the killing of wolves. Rather, the government assisted and encouraged their elimination. Wolves, along with mountain lions, were thus extinct in the park by 1930.[14]

By the late 1960s, some attitudes within the National Park Service (NPS) toward predators were changing. The Leopold report and other documents asserted that predators were an important part of natural processes in ecosystems and that "biotic associations within each park be maintained, or where necessary re-created" (Leopold 1963, 32).[15] Some scientists began to argue that wolves could help restore ecological balance through, for example, reductions in the size of the burgeoning elk populations. At an interagency meeting in Yellowstone in the fall of 1971, officials of different agencies, federal and state, discussed possible actions, including reintroduction.[16]

The official position regarding wolves evolved through the 1970s and 1980s. The Endangered Species Act (ESA) of 1972 called for the protection and recovery of endangered species "solely on the basis of the best scientific and commercial data available" regarding biological, not economic, issues.[17] After the Northern Rocky Mountain Wolf was listed as endangered in 1973, the U.S. Fish and Wildlife Service (FWS) called for a recovery plan along with compensation to local farmers and ranchers for livestock losses. The NPS concurred, the 1974 Master Plan for Yellowstone discussing natural regulation of ungulates by stating, "An important element in this approach is the reestablishment of natural predators within the range of the northern Yellowstone elk herd."[18] The FWS proposed a recovery plan for wolves in the northern Rockies in 1987.

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The idea of reintroducing wolves to this area was highly contested by the livestock community and their allies in Congress. Debates were intense. For example, in the 1989 House of Representatives hearing on possible wolf reintroduction, Rep. Don Young (R-Ala.) vilified the wolf, stating, "God help the poor cattle rancher and the sheep rancher when he tries to protect his stock."[19] Further, if reintroduction occurred, it would be conducted by the federal government, an unwelcome presence in much of the American West.[20] As a result, in 1988 and 1989, Congress refused to authorize the Environmental Impact Statement process regarding wolf recovery.[21] Opponents of the plan were strongly supported by organizations such as the Wise Use Movement.[22]

Meaningful intervention by formal authorities. In the early 1990s, federal politicians formally endorsed consideration of wolf reintroduction. This resulted from increasing pressure on Congress and the election of a receptive presidential administration in 1992. By 1989, Rep. Wayne Owens (D-Utah), an environmental advocate from Salt Lake City, had enlisted seventy-six co-sponsors for a bill calling for reintroduction. Pro-wolf advocates realized, however, that opposition from home-state senators could kill any such proposal. Indeed, senators from Wyoming and Montana had fought wolf reintroduction to the point of placing holds on bills that authorized federal studies. In 1991, the House Appropriations Committee approved funds for an Environmental Impact Assessment (EIA) of reintroduction. Facing opposition in the Senate, House conferees, using compromise language crafted by Owens, agreed not to spend money on actual reintroduction, but they did keep alive the prospects for the assessment. In fact, the conferees appropriated $200,000 for wolf research and called for an Environmental Impact Statement to be produced within eighteen months. The NPS and the U.S. Fish and Wildlife Service appointed a ten-member Wolf Management Committee to develop a plan for reintroduction.[23] Thus, when the pro-wolf Clinton administration took office in 1992, the studies for reintroduction were already under way.

Policy-change advocates rallied around the goal of reintroduction. Environmental groups publicized the possible benefits of reintroduction, not just in terms of ecological restoration but also tourism and economic growth, early in the process.[24] The Defenders of Wildlife established a $100,000 fund to compensate ranchers for losses due to wolf predation. Media attention exploded. For instance, the "Return of the Wolf" was the cover story for Newsweek on August 12, 1991. Public opinion polls reflected growing support for the idea. A Defenders of Wildlife poll in 1992 showed that 97 percent of park visitors were in favor of wolf reintroduction.[25] Other polls found

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support from nearby residents, one showing Wyoming residents in favor of reintroduction by a 3 to 1 ratio.[26]

The EIS process produced an explicit goal of restoring natural processes within the park and recommended a specific way to do so. The EIS discussed five alternatives but proposed reintroducing wolves as an experimental, nonessential population.[27] The ESA stated explicitly that the Secretary of Interior can authorize experimental populations, but "only when, and at such times as, the population is wholly separate geographically from nonexperimental populations of the same species."[28] Experimental status means that wolves do not receive full protection but can be shot if they threaten livestock. The idea of bringing in wolves as an experimental species was a compromise that enabled expansion of the sphere to develop support from several different actors in the policy process.

The plan fostered support within the agencies themselves. The NPS itself had historically been guarded in its official position regarding wolves. As late as 1989, NPS director James Ridenour stated that the agency did not support legislation proposed to expedite the process but rather promised "due consideration of the impacts on both human populations, domestic livestock and wildlife populations, and not without consultation with and substantive input from affected state wildlife management agencies, state elected officials and members of Congress."[29] Agency support grew quickly around the compromise provisions of the reintroduction. NPS authorities argued that the experimental designation would enable more management flexibility.[30] Similarly, FWS officials mobilized around the program, citing less conflict with the experimental status.[31] Thus, this was stated as the preferred alternative in the EIS.

Although many in the livestock community remained adamantly opposed to wolf reintroduction, experimental status at least enabled the recourse of killing problematic wolves. According to John Varley, then Chief of Resources for Yellowstone, senators from Idaho, Montana, and Wyoming were telling their ranching constituents that the wolves were coming and they needed to find middle ground.[32] Reintroduction project leader Doug Smith admitted that the experimental status involved compromise but added, "It relaxed some of the stiffness of endangered species protection."[33] Many environmental groups recognized that experimental status was a necessary reality, admitting that wolves would have had a hard time making it to the park on their own and thus gaining full protection of the law.[34]

Overall, the EIS process involved more than 150 public hearings and more than 160,000 public comments, more than any such action before. The

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comments were wide-ranging and thus not easily categorized, but sources agree that a majority supported the preferred alternative. Indeed, citing the experimental status, one analyst said the reintroduction "incorporates the most people-pleasing compromises in the (Endangered Species) act's 22-year history."[35] Even those who argued for letting wolves return on their own and thus gaining full protection admitted that "most wolf advocates have rallied around the strategy of reintroducing wolves into Yellowstone under an experimental, non-essential designation."[36] The agencies defined the specific recovery goal as a minimum of ten pairs of wolves breeding successfully for three successive years in each of the three recovery areas (Greater Yellowstone Ecosystem, Idaho, and Montana).

This goal was tested in numerous ways over time, but it has remained intact. In 1994 and 1995, program officials released thirty-five wolves into Yellowstone. The wolves themselves did their part, adapting to and thriving in the ecosystem at speeds that exceeded even the most optimistic projections.[37] Funding for the program, though occasionally challenged, has never ceased. In 1995, for instance, Senator Conrad Burns (R-Mont.) tried to add language to appropriations bills banning any more wolves being returned to the park. Failing that, he attempted to cut the FWS budget for the program but managed to reduce it by only one-third.[38] In 1999, I asked Chief of Resources Varley if he worried about congressional cuts to the program. With an answer rare for a bureaucrat, he responded, "The funding for this program has not been cut, the NPS and the FWS have gotten everything they've asked for."[39]

Perhaps the greatest challenge to wolf reintroduction came through the courts. The actual release of the wolves began only after a court ruling when, on January 3, 1995, Federal District Judge William Downes denied a request by livestock interests and their supporters to stop the program. Judge Downes was again involved with lawsuits centered on the explicit goal of establishing an experimental species. In late 1997, the judge ruled against the program. Downes based his ruling on the language in the ESA that explicitly allows experimental populations only when, according to the ruling, they are "wholly separate geographically from nonexperimental populations of the same species." The plaintiffs claimed that naturally-occurring wolves had been sighted in the same geographical area as the reintroduced wolves. Thus, how could the two sets of wolves be treated differently? The judge reluctantly ordered the removal of the wolves but, citing the impressive results of the program, issued a stay to allow appeals.[40] The remove order could have been a death sentence for the wolves as no alternative facilities or sites were available. However, in January 2000, the 10th U.S. Circuit Court of Appeals ruled that the wolves

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could stay in the park. The judges cited the ultimate goal of protecting species and endorsed the flexibility allowed in the ESA, in effect allowing experimental species. The appeals court stated that a limit such as that imposed by Downes to that flexibility "ignores biological reality and misconstrues the larger purpose" of the law.[41]

The courts have continued to protect the larger goal of the program. In early 2003, the Bush administration proposed down-listing the gray wolf from "endangered" to "threatened" in most of the lower forty-eight states, a move that would transfer responsibility of the program to state governments when wolves are found within state jurisdictions. Wolf proponents, wary of state intentions, filed a lawsuit to stop the action. On February 1, 2004, U.S. District Court Judge Robert Jones ruled that the down-listing was based on political expediency rather than science. In January 2005, the FWS issued new rules stating that a gray wolf could be killed in Idaho or Montana if a landowner believes it is in the process of killing livestock, rather than waiting for physical evidence of an attack. One month later, Judge Jones ruled against the FWS action. The ruling said that FWS did not take into account enough factors in evaluating the wolf's status.[42]

Substantial nonstatutory support. Nonstatutory support for the wolf reintroduction program has grown in many ways. Media attention has not declined but rather has increased as the wolves multiplied and became a magnet for tourists. Project leader Smith concluded succinctly, "Wolves have become the environmental poster child for the 21st century."[43] Not surprisingly, public opinion has rallied around the wolves. For instance, shortly after the Downes ruling calling for wolf removal, a national poll conducted by the National Wildlife Federation in early 1998 showed that even a majority of respondents in neighboring states opposed the remove order.[44]

Planners promised significant socioeconomic benefits from reintroduction. They admitted anticipated livestock losses from a recovered wolf population in the Yellowstone area at about nineteen cattle and sixty-eight sheep per year but predicted that tourism increases in the GYE as a result of the wolves would generate at least an additional $5.6 to $8.4 million in benefits each year.[45] Once implementation began, those benefits fostered acceptance by several target groups.

One target group includes scientists, advocates, and interested citizens who pushed for wolf reintroduction as a means to restore natural processes within the park. Success in this regard was substantial and apparent early on, as the wolves dramatically and quickly restored natural cycles that existed only before their extinction.[46] The numbers of wolves in the park increased

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rapidly and immediately had an impact on other wildlife. The most direct evidence of restoring balance in the ecosystem is that wolves have forced the elk to become more vigilant and to move to higher ground. This benefits the plant species, such as aspen, in river bottoms that were suffering from the bulging elk population. For example, willow recovery has been stronger where wolves are more active. As another example, the wolves have killed half the coyotes in the park, thereby significantly contributing to a huge growth in voles, ground squirrels, and gophers. With fewer coyotes, more rodents are available to other predators such as foxes and hawks.

The larger target group consists of the population surrounding the Yellowstone ecosystem. Losses to livestock have been close to or even lower than anticipated in the EIS (and specified earlier). In the first four years of the program, the FWS estimated that wolves in the northern Rockies had killed 80 cattle, 190 sheep, and 12 dogs. To give some perspective on these numbers, Montana livestock ranchers alone lose an average of 142,000 sheep and 86,000 cattle each year to all causes. Further, Defenders of Wildlife has compensated ranchers with thousands of dollars for wolf-caused losses. Although one could not claim the program has swayed the livestock community to accept wolves, NPS official Varley did say that "many ranchers have confided their support privately, and many now say, let's live with them."[47] Benefits to the larger community have been quite noticeable, particularly in economic terms. Very early in the program, those benefits became apparent with the increased tourism, particularly of wolf-watchers. A University of Montana study conducted shortly after reintroduction estimated a total net social benefit to the Greater Yellowstone Ecosystem of about $110 million over a twenty-year period. Other estimates predict $19 million per year in tourism benefits.[48]

Dramatic policy change. After a century of removing and then not allowing wolves into Yellowstone, policymakers made a significant change in the 1990s. Congress made a real and explicit intervention by authorizing an EIS and committing resources to the program. The courts affirmed the binding nature of the intervention in a series of court cases. Nonstatutory support was significant. Wolf reintroduction provided substantial tourism and other economic benefits. Media attention came early and continues to the present. Public opinion has been consistently supportive. Finally, target groups have been, for the most part, pleased with the program. One decade after reintroduction, seven wolf packs with a stable population of about three hundred lived in the Greater Yellowstone area, about two hundred of them in the park itself.[49]

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Restricting Growth in Banff

In the mid-1990s, policymakers at Banff called a halt to more than a century of policies encouraging development and growth of the town within the park. This was not an insignificant or an uncontroversial change. It occurred only after a powerful intervention by an outside authority and with the support of several nonstatutory factors.

Why was restriction of town growth in Banff even an issue? The roots for the answer lay in the fact that Banff the town actually predates Banff the park. The town site of Banff grew up around the hot springs and became a popular destination on the rail line before the managing parks agency could restrict growth.[50] Since then, the parks agency (now Parks Canada) has not been able to prevent the town from spreading further into the natural areas of the park. When lots were leased, the contracts typically involved long terms and low fees and nearly perpetual renewal, not illogical given that authorities were trying to encourage tourism and development. Unfortunately for the wildlife, the town is located in the warm valley bottoms that constitute less than 5 percent of the park but are also the most hospitable to many species.

Questions regarding the size and activity in the town of Banff have always been potentially contentious. On the one hand, the town itself has grown enough so that it now contains many of the things such as air pollution and traffic congestion that people try to escape by going to a national park. On the other hand, many tourists also like to drive, shop, stay in motels, and eat out. While groups such as the Canadian Parks and Wilderness Society (CPAWS) criticize the former, groups like the Association for Mountain Park Protection and Enjoyment encourage the latter.[51] The parks agency has usually been caught between different priorities, their policies toward growth and commercial development constantly challenged.[52]

In the 1970s and 1980s, the relationship between the agency and the town residents intensified. Park officials tried to adopt more limited-tenure leases, proposed limiting residency to providers of essential services, and began to criticize the presence of ski resorts, the golf course, and the airport.[53] However, the agency only went so far in its restriction efforts. In a series of interviews in 1992, many agency officials mentioned the strong ties Banff commercial interests had with high-level politicians who could restrict agency efforts. For example, eighteen-year Banff veteran Perry Jacobson told me, "If you did something someone there didn't like, you could bet you'd be hearing from Ottawa a half hour later."[54] Not surprisingly then, the 1988 Banff management plan states that "limits to the future growth and development of the

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Banff town site must be established," but it admits the difficulty in doing so "due to the complexity of the issue."[55]

Meanwhile, Banff continued to grow. Between 1980 and 1994, more than $500 million worth of development permits were issued within the park.[56] Between 1986 and 1994, shopping space in town grew by 97 percent.[57] Banff officially became a town with a 1990 federal-provincial agreement that recognized it as a municipality with the power to tax and provide services. Although some within the town recognized the consequences of continued development, many encouraged more commercial enterprises, more lodging, and other developments that translated to greater impacts on the surrounding ecosystem. For example, the increased human activity in the vicinity of the town scared away many predators, leading to an abnormally large elk population, and subsequent results ranging from unsafe human-wildlife interactions to the reduction of willow and aspen.[58]

While park officials became increasingly concerned about the size of the town, local authorities showed little interest in limiting growth. Banff is located within the fast-growing province of Alberta. The population of the surrounding region (including Calgary and Canmore) increased from 700,000 to nearly 900,000 in the decade between 1992 and 2001. The growth rate for Canmore, the community just east of Banff, for this period was an astounding 90 percent. Developers and business interests in these communities, as well as supportive policymakers in nearby Edmonton and Calgary, questioned the logic of efforts to restrict growth. One estimate showed Banff bringing billions of dollars per year in tourist money into the Alberta economy.[59]

Meaningful intervention by formal authorities. By the mid-1990s, growth in Banff had accelerated to the point of inspiring considerable criticism.[60] The International Union for the Conservation of Nature warned in 1994 that they might remove the park's World Heritage listing if growth were not slowed. Yet, many people recognized that Parks Canada alone could not stop growth. One member of the subsequent task force told me specifically that much of the motivation for the project came from the fact that "Parks Canada personnel are often frustrated by pro-development forces . . . and they needed help."[61] Others put it more bluntly. Jim Pissot, executive director of Defenders of Wildlife Canada, recalled, "Parks Canada was floundering."[62] Thus, the Minister of Canadian Heritage initiated the Banff–Bow Valley Study in March 1994, in part to address town growth. The BBV Task Force consisted of an independent team of outside experts. Indeed, the study was done external to the agency, a decision intended to give its recommendations more teeth.[63]

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The task force conducted and assessed scientific studies, systematic analyses, and input from outside consultants as well as the broader public over a two-year period.[64] The ultimate report contained more than five hundred recommendations. The study encouraged rethinking management of Canada's flagship national park to "integrate ecological, social, and economic values."[65] The proposal to restrict the growth of the town of Banff was the most explicit and the most contentious recommendation. Specifically regarding the town, the study concluded, "Stricter limits to growth than those already in place must be imposed if Banff is to continue as a national park."[66] Banff Superintendent Jillian Roulet calls it "the most significant" of the Banff–Bow Valley Study recommendations.[67]

This recommendation focused a planning process that was already gestating at the community level. Under the laws of the province of Alberta, towns are required to formulate plans every five years. After being incorporated in 1990, planners in Banff began deliberations to meet this requirement. By the mid-1990s, according to former mayor Dennis Shuler, the town proposed limiting growth to about 850,000 square feet of additional commercial space.[68] This is not an insignificant amount, increasing commercial space by about one-third but also much less than a 1992 plan that would have allowed about three times as much new growth.

The BBV study triggered a strong federal intervention. Minister of Canadian Heritage Sheila Copps, emboldened by the task-force report, responded to the Banff proposal by stating explicitly, "No new lands will be released for commercial development in Banff National Park."[69] Banff officials, led by then-mayor Ted Hart, requested a nonbinding plebiscite in March 1998. The 7,600 residents voted as follows: more than 850,000 square feet (12 percent in favor), between 650,000 and 850,000 (43 percent), less than 650,000 (13 percent), and no growth (31 percent).[70] In June, Minister Copps mandated a more restrictive growth limit, specifically maximum commercial development capped at 361,390 square feet.[71] Policymakers were thus quite explicit about the goal.

They were also explicit about the means to achieve it. Part of the plan called for Parks Canada purchasing enough space and taking it out of commercial development to get the cap down to the 361,000 level. For example, Ottawa purchased several acres and promised to invest millions of dollars there for an environmental education center.[72] Plans for development of a motel and other commercial facilities were aborted. Parks Canada bought out a number of leases, closing down some establishments, including a gas station and a liquor store.

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Federal authorities published official documents to make the cap binding. In April 1997, just before the national elections, Copps filed the plan with Parliament, thus ensuring its survival even if her party lost power. The Banff Management Plan of 1997 cited the Banff–Bow Valley Study recommendations explicitly. For the town of Banff, the plan called for a permanent population not to exceed 10,000 and stated clearly, "The town boundaries will not expand."[73] Five years later, in the State of the Park Report, the agency suggested tightening the restrictions even more. With a 2001 town population of 7,135, Parks Canada stated, "The commercial growth has been capped, and it is anticipated that the town will not exceed 8000 permanent residents."[74]

The cap on growth is now firmly in place. Parks Canada admits that it is still technically over the 360,000-square-foot limit as it has not yet finished such projects as the proposed interpretive center. But, as Parks Canada senior planner Mike Murtha stated emphatically, "The reality is no further growth."[75] The last available space was allocated in 2004. The cap has not yet been formally challenged in the courts or in Parliament. Neither seems likely any time soon. As Superintendent Roulet says, "A change would require a change in the National Parks Act."[76] Or, as former mayor Shuler stated, "Now we have rules and you can't just run off to Ottawa to get it changed."[77]

Substantial nonstatutory support. The proposal to slow growth in Banff received considerable support from nonstatutory sources. Even before the BBV task force began its study, public opinion surveys of Canadians showed overwhelming public opposition to more development in parks, with most criticism directed at Banff.[78] Once started, the deliberations of the task force were the subject of immense media attention. In early 1995, for example, Canada's national newspaper *The Globe and Mail* quoted Heritage Minister Michel Dupuy stating that the study "may well mark the beginning of a new era" in Canada's national parks.[79] Nor was media coverage limited to Canada. International observers and journalists touted the importance of the study. Just as one example, *The Economist* ran a story on the study in 1996 titled "Saving Canada's Wilderness—Perhaps."[80] The release of the Banff–Bow Valley Study in 1996 was highly publicized by the media, receiving front-page coverage by many newspapers. Public opinion polls showed impressive support for recommendations. A 1996 study, for instance, showed 87 percent of respondents supportive of limits on development in Banff.[81]

Pro-conservation interest groups rallied around the proposed changes. These included local groups such as the Bow Valley Naturalists and national organizations such as CPAWS.[82] Academic studies suggest that these groups

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are not as strong as their American counterparts.[83] Indeed, members of these groups acknowledge their relative weakness and admit that having an impact, as current head of CPAWS Dave Poulton told me, "is a constant struggle." Nevertheless, they mobilized behind the criticisms of growth in Banff and the recommendations of the BBV task force. For instance, Harvey Locke, perhaps the preeminent environmentalist in Canada and former head of CPAWS, said in 1997, "What's happening at Banff is that we are losing a fundamental aspect of the Canadian soul. It's being sold off to make money."[84]

The policy change on growth fostered shifting socioeconomic benefits that increased compliance by the most crucial target group, the residents of Banff. Surprisingly enough, most residents now support the cap. The reason is quite simple. Many perceive that the cap is good for the community. As early as 1997, many residents were speaking publicly about the need to restrain commercial development in the town.[85] Shuler, mayor from 1998 to 2004, told me of attending a conference in Japan with other mayors in 2001 where he realized that if Banff continued growing, it would reach a point, as other tourist-destination towns had, where tourism benefits started to decline. Once you reach that point, Shuler said, it's hard to go back. "I came to the conclusion," he stated, "that the cap is probably the best thing ever to have happened to Banff."[86] Many longtime residents of the town agreed. Harvey Locke described how Banff had been "dying as a town" with gentrification, excessive commercial development, and absentee residents. But now, with effects like the restoration of the middle class and the increase in school enrollments from full-time resident families, "The cap has restored the community."[87] Thus, not only did living conditions improve, but property values in the town increased. While systematic polls are rare, one summary of a community meeting in late 2005 reported a "large majority of residents" supporting the growth limits.[88]

As for target groups that advocated the change, most have been quite pleased with the results. Suzanne Bayley, a University of Alberta scientist and a member of the Banff–Bow Valley Task Force, said emphatically that many ecological factors had improved within the park and cited the cap, "The biggest thing is that they've limited development."[89] The consequences are becoming apparent. For instance, along with programs such as reducing human traffic in wildlife corridors, the restrictions on town growth have ameliorated some of the problems associated with elk. The number of elk in the area of the town dropped from more than five hundred in the 1990s to fewer than two hundred by 2003.[90] Such reductions will hopefully result in some restoration of the aspen and willow habitat, which is so important to beavers and other animals.

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Activist Locke stated proudly in 2005, "The Banff–Bow Valley Study put the national park back in Banff National Park."[91]

Dramatic policy change. After literally more than a century of encouraging commercial development in the town of Banff, growth is now capped. This is quite a change. Environmental activist Pissot's term for it is "amazing."[92] Many of those involved in changing the policy attribute a significant role to the federal intervention. It was real, explicit, and binding. As Bow Valley Naturalist head Mike McIvor told me, "It was imposed on us by the federal government, and I'm glad it was, but I wish we could have done it ourselves."[93] Other relevant actors also cite the strong role played by Minister of the Environment Copps. In 1997, BBV Task Force chair Bob Page told me, "The study had a better reaction than expected, due largely to the high-profile involvement of Copps."[94] In 2005, able to look back retrospectively, Page was even more emphatic, saying, "Copps probably was the deciding factor in curtailing the town site."[95] Copps may have been the deciding factor, but others were important. Supportive interest groups and the media paid close attention to the BBV study and to the subsequent implementation of their recommendations. Public opinion was supportive. Socioeconomic conditions shifted in response to the cap to enhance compliance by important target groups, most notably the residents of the town.

DISCUSSION AND CONCLUSIONS

Can bureaucracies change policy? Yes, they can, even in the most controversial circumstances, but certain conditions are necessary. In both the Yellowstone wolf and Banff growth cases, policymakers were able to achieve significant changes to traditional policies in spite of high levels of controversy. Meaningful intervention by formal, external authorities and substantial support from nonstatutory sources, including the media, public opinion, and target groups, made such dramatic changes possible.

The necessity of such conditions for controversial changes to traditional policies is evident in other cases. When such conditions are lacking, public agencies are not likely to pursue such changes. Although beyond full explication in this article, consider briefly even just other cases in Yellowstone and Banff. In the same planning period that spawned wolf reintroduction in Yellowstone, policymakers pursued plans to protect bison from destruction when they wandered outside the park in search of winter food. Those plans have yet to come to fruition, stymied by inconsistent federal guidance, often confused by the contentious battle over snowmobiles, and generally lacking the nonstatutory support that the wolves enjoyed.[96] In Banff, other BBV Task Force recommendations await implementation. These include one

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quite comparable to the Banff town cap, a proposal to limit development at nearby Lake Louise. In contrast to the Banff cap, development at Lake Louise has actually increased in recent years, most notably with the massive new convention center at the Fairmont Chateau. Again, federal intentions on this development were never explicit and nonstatutory factors such as the media and public opinion have been largely unsupportive of policy change.[97]

Nevertheless, the changes to traditional policies that did occur in Yellowstone and Banff in the last decade are remarkable. Specifically, they have helped restore some of the most important missing natural conditions at these spectacular places. More generally, they show that public agencies, under certain conditions, can effectively pursue controversial policy change.

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