A CASE STUDY OF THE
NATIONAL PARK SERVICE PLANNING PROCESS:
GRANT VILLAGE, YELLOWSTONE NATIONAL PARK

A Thesis

Presented in Partial Fulfillment of the Requirements
for the Degree of
Master of Science
in the Graduate School of The Ohio State University

By

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* * * *

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1988

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DEDICATION

This research effort is dedicated to those men and women of the National Park Service who believe in and are devoted to the National Park Service's mandate to "conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for future generations." In particular, this study is dedicated to the National Park Rangers who have chosen to specialize in interpretation. This special group of Park Rangers go above and beyond the National Park Service's legislated mandate of acting as guardians of the lands entrusted to them; they passionately teach others of the wonders of the natural world in the hope that they, too, will learn to love the land and join in the effort to protect it. The Natualist strives to impress upon the park visitors that the parks are a microcosm of the world and that the loving care we give our national parks needs to be extended to the entire planet. This vigilant attitude was exemplified by Horace Albright, whose words, written fifty five-years ago, are as important today in providing guidance for National Park Service personnel, as they were the day they were written:

STATEMENT BY HORACE M. ALBRIGHT TO THE NATIONAL PARK SERVICE PERSONNEL

UPON HIS RESIGNATION AS DIRECTOR IN 1933

In this letter, perhaps one of my last official statements to you, let me urge you to be aggressive and vigorous in the fulfillment of your administrative duties. The National Park Service, from its beginning, has been an outstanding organization because its leaders, both in Washington and out in the field, worked increasingly and with high public spirit to carry out the noble policies and maintain the lofty ideals of the service as expressed in law and executive pronouncement. Do not let the service become "just another Government bureau"; keep it youthful, vigorous, clean and strong. We are not here to simply protect what we have been given so far; we are here to try to sweep our protective arms around the vast lands which may well need us as man and his industrial world expand and encroach on the last bastions of wilderness. Today all the elements of nature, the rivers, forests, animals and all things co-existent with them must survive as well.
I hope that particular attention will be accorded always to that mandate in the National Park Service Act of 1916 and in many organic acts of the individual parks which enjoins us to keep our great parks in their natural condition. Oppose with all your strength and power all proposals to penetrate your wilderness regions with motorways and other symbols of modern mechanization. Keep large sections of primitive country free from the influence of destructive civilization. Keep these bits of primitive America for those who seek peace and rest in the silent places; keep them for the hardy climbers of the crags and peaks; keep them for the horseman and the pack train; keep them for the scientist and student of nature; keep them for all who would use their minds and hearts to know what God had created. Remember, once opened, they can never be wholly restored to primeval charm and grandeur.

I also urge you to be ever on the alert to detect and defeat attempts to exploit commercially the resources of the national parks. Often projects will be formulated and come to you "sugar-coated" with an alluring argument that the park will be benefitted by its adoption. We National Park men and women know that nature's work as expressed in the world-famous regions in our charge cannot be improved upon by man.

Beware, too, of innovation in making the parks accessible. For a half century, elevators, cableways, electric railways and similar contrivances have been proposed from time to time and have been uniformly rejected. The airplane while now an accepted means of transportation should not be permitted to land in our primitive areas.

Park usefulness and popularity should not be measured in terms of mere numbers of visitors. Some precious park areas can easily be destroyed by the concentration of too many visitors. We should be interested in the quality of park patronage, not by the quantity. The parks, while theoretically are for everyone to use and enjoy, should be so managed that only those numbers of visitors that can enjoy them while at the same time not overuse and harm them would be admitted at a given time. We must keep elements of our crowded civilization to a minimum in our parks. Certain comforts, such as safe roads, sanitary facilities, water, food and modest lodging, should be available. Also extra care must be taken for the children, the elderly and the incapacitated to enjoy the beauty of the parks.

We have been compared to the military forces because of our dedication and espirit de corps. In a sense this is true. We do act as guardians of our country's land. Our National
Park Service uniform which we wear with pride does command the respect of our fellow citizens. We have the spirit of fighters, not as a destructive force, but as a power for good. With this spirit each of us is an integral part of the preservation of the magnificent heritage we have been given, so that centuries from now people of our world, or perhaps of other worlds, may see and understand what is unique to our earth, never changing, eternal.
VITA

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FIELDS OF STUDY

Major Fields: Environmental Science and Management
# TABLE OF CONTENTS

DEDICATION .................................................. ii
VITA .......................................................... v
LIST OF FIGURES ............................................. ix

<table>
<thead>
<tr>
<th>CHAPTER</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>INTRODUCTION ........................................... 1</td>
</tr>
<tr>
<td></td>
<td>Background ............................................. 1</td>
</tr>
<tr>
<td></td>
<td>Nature of the Problem ............................... 3</td>
</tr>
<tr>
<td></td>
<td>Significance of the Problem ....................... 4</td>
</tr>
<tr>
<td></td>
<td>Purposes of the Study ................................ 5</td>
</tr>
<tr>
<td></td>
<td>Definitions of Terms ................................ 6</td>
</tr>
<tr>
<td></td>
<td>Limitations of the Study ........................... 7</td>
</tr>
<tr>
<td></td>
<td>Basic Assumptions .................................. 8</td>
</tr>
<tr>
<td>II</td>
<td>REVIEW OF LITERATURE ................................ 9</td>
</tr>
<tr>
<td></td>
<td>Planning in the National Park Service ............. 9</td>
</tr>
<tr>
<td></td>
<td>The Planning Process, NPS-2 ....................... 17</td>
</tr>
<tr>
<td></td>
<td>Statement For Management ......................... 17</td>
</tr>
<tr>
<td></td>
<td>Outline For Planning Requirements ............... 18</td>
</tr>
<tr>
<td></td>
<td>Task Directives .................................... 18</td>
</tr>
<tr>
<td></td>
<td>General Management Plans ......................... 19</td>
</tr>
<tr>
<td></td>
<td>Development Concept Plans ....................... 21</td>
</tr>
<tr>
<td></td>
<td>Resource Management Plans ...................... 21</td>
</tr>
</tbody>
</table>

vi
Scoping and Environmental Compliance ........... 22
Rational Comprehensive Planning ............... 24

III METHODOLOGY ................................................. 28
Description of Study Site ....................... 28
Research Design ............................................. 33
Interview Methodology ............................... 36

IV THE HISTORY OF GRANT VILLAGE ........... 42
The Root of the Problem ............................. 42
Masterplanning .............................................. 46
The Genesis of Grant Village .................... 55
Wyoming Attempts Takeover of Yellowstone
Park Company .............................................. 59
Yellowstone Park Company's Financial Problems... 62
Mission 66 .................................................. 66
Mission 66 in Yellowstone ......................... 72
Project Roche Jaune ..................................... 78
Management Study of Concession's Operations .... 82
Mission 66 Comes to a Close ....................... 87
The Yellowstone Master Plan of 1974 ............. 97
Bears, Fishing Bridge, and Grant Village ........ 108
Continuing Problems With the Concessioner ....... 119
Grant Village In the John Townsley Era .......... 126
The Current Status of Grant Village, West
Thumb, Old Faithful, and Fishing Bridge ....... 168

V ANALYSIS, SUMMARY, AND RECOMMENDATIONS .... 175
Analysis .................................................... 175

vii
## LIST OF FIGURES

<table>
<thead>
<tr>
<th>FIGURE</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The Yellowstone Region (Map)</td>
<td>29</td>
</tr>
<tr>
<td>2. Yellowstone National Park (Map)</td>
<td>32</td>
</tr>
</tbody>
</table>
CHAPTER I
INTRODUCTION

BACKGROUND AND SETTING

The construction of Grant Village in Yellowstone National Park has generated considerable controversy in the past decade. Planning by the National Park Service began in the mid 1950s as a joint venture with the concessioner. Grant Village was originally designed to: (1) replace the dilapidated facilities at West Thumb that were encroaching upon the thermal area; and (2) become a major visitor accommodation center providing lodging for the increasing number of tourists. Construction of government built facilities--marina, campground, visitor center, and associated roads and utilities--took place in the early 1960s, with plans for Grant Village to be completed by 1966.

After twenty years of unsuccessfully attempting to persuade or coerce the concessioner to fulfill his contractual obligation to construct visitor accommodations at Grant Village, in 1979 the National Park Service attempted to gain control of the situation by purchasing the concessioner facilities, building the visitor accommodations using government funding, and then leasing them to a new concessioner.
The Grant Village controversy culminated in 1981 when Interior Secretary James Watt stopped construction of the first 100 government-financed visitor lodging units to investigate complaints by West Yellowstone business owners that taxpayer-funded motels in the Park would compete with private motels in West Yellowstone, Montana, and possibly put them out of business. Interior Secretary Watt ordered construction to resume a week later after an investigation indicated that over $600,000 in government funds would be lost by cancellation of the construction due to the resultant lawsuit that the building contractor would initiate (NPS, 1981b). National Park Service Director Russell Dickenson, however, ordered all subsequent construction of lodging facilities to be financed with private funds (Dickenson, 1981).

Three years have passed since the completion of 200 privately financed visitor lodging units. At present, it does not appear likely that the additional 400 units the Grant Village Development Concept Plan calls for will ever be constructed (Iobst, pers. comm.).

Throughout the planning and construction stages many obstacles have arisen to block the completion of Grant Village: lack of government funding; changing park management goals and philosophy; unsuccessful National Park Service policies and contractual arrangements for operating concessions; changing desires of the public and of Wyoming
political officials; passage of the National Environmental Policy Act requiring public input in the planning process of federal agencies; listing of the grizzly bear (*Ursus arctos horriblis*) as a threatened species; and the exponential growth of public involvement in National Park matters.

Because of the considerable interest and controversy Grant Village has received and because it is unlikely that Grant Village will ever be completed as planned, documentation and analysis of the planning process that led to the development not being completed is vital to identifying any shortcomings and weaknesses that may exist in National Park Service planning processes. Upon identifying these weaknesses, the National Park Service will be able to move forward with the implementation of a successful planning process in the future. The research effort that follows attempts to assist in the attainment of this goal through the documentation of the history of the development of Grant Village, a comparison and analysis of the planning process utilized with the planning process that exists in National Park Service planning literature, followed by recommendations for future planning efforts.

**NATURE OF THE PROBLEM**

In the case of Grant Village, did the National Park Service engage in a planning process that was consistent with National Park Service planning literature and did this
process result in the development of plans that could be successfully implemented?

SIGNIFICANCE OF THE PROBLEM

Besides being the world's first national park, Yellowstone is also considered the cornerstone of America's "crown jewel" parks. Yellowstone was further distinguished in 1976 when the Park was recognized as a United Nations Biosphere Reserve Site and in 1978 when the International Union for the Conservation of Nature and Natural Resources designated the Park a World Heritage Site (NPS, 1986a). The Yellowstone Statement For Management reads:

These honors bring with them responsibilities. The attention of the world is focused on the park, and the manner in which America cares for the park is the subject of intense international attention.

Given the considerable international attention that the Yellowstone area receives and given the long-felt conviction that the Yellowstone landscape is one of the most valuable natural treasures, it is clear that the United States has more at stake here than in most other situations where national parks, national forests, and other management units must cooperate and integrate their mandates (NPS, 1986a).

Because of the diverse array of wildlife and geothermal features present in the Park, Yellowstone has been designated and is managed as a natural area rather than a recreational area (NPS, 1986a). The Yellowstone National Park Master Plan states the Park's purpose is:

To perpetuate the natural ecosystems within the park in as near pristine conditions as possible for their inspirational, educational, cultural, and scientific values and for future generations (NPS, 1974a).
As a result, park managers must insure that in their planning efforts they take care to allow recreational activities and tourists' developments to take place only when and where these actions do not jeopardize the geothermal features or the continued existence of Yellowstone's rare and endangered species—the peregrine falcon (*Falco peregrinus*), trumpeter swan (*Cygnus buccinator*), whooping crane (*Grus canadensis*), bald eagle (*Haliaeetus leucocephalus*), bighorn sheep (*Ovis canadensis*), bison (*Bison bison*), wolverine (*Gulo luscus*), wolf (*Canis lupus*), and grizzly bear (*NPS, 1986a*).

If Yellowstone National Park is going to set the standard of leadership in the national and international field of park management, then the National Park Service planning process needs to be evaluated to insure, within the National Park Service's legislated mandates, the optimal use of the Park resource, budget, and personnel. The assessment of the Grant Village planning process is one way of evaluating the attempt to obtain this goal.

**PURPOSES OF THE STUDY**

Based on the nature of the problem and the need for this study, the purposes of this study will be to:

1. Trace the historical events that led to the development of Grant Village;

2. Identify the factors that influenced the National Park Service's planning process that led to the development of Grant Village;
3. Compare and analyze the planning process utilized in Grant Village with the planning process delineated in National Park Service literature to ascertain if the process utilized was consistent with this literature; and

4. Develop recommendations for future National Park Service planning efforts.

**DEFINITION OF TERMS**

The terms defined below are used frequently throughout the remainder of the thesis.

CEQ: Council on Environmental Quality

DAP: Developed Area Plan

DCP: Development Concept Plan

EA: Environmental Assessment

EIS: Environmental Impact Statement

FONSI: Finding Of No Significant Impact

GMP: General Management Plan

NEPA: National Environmental Policy Act

NPS: National Park Service

OMB: Office of Management and Budget

(pers. comm.): personal communication, information transmitted to the author during the course of this study via in-person or telephone interviews.

SFM: Statement For Management

USFWS: United States Fish and Wildlife Service

YPO: Yellowstone Park Company
LIMITATIONS OF THE STUDY

The analysis section (Chapter 5) of this study is based upon the historical documentation of the events related to Grant Village that took place over a period of more than one hundred years. The historical documentation is limited by the quality and quantity of information such as memoranda, letters, documents, records, reports, etc., that have been preserved, primarily in the Yellowstone National Park Research Library and Archives, as well as by the quality of previous historical research. Not all important conversations, transactions, plans, etc. were remembered; of those remembered, only a small percentage were transcribed; and of those transcribed, not all have been preserved. Additional loss of the retrievable data occurs when that which has been preserved is not: (1) discovered; or (2) obtained due to the time and financial restrictions involved in travelling to the various government information storage facilities where pertinent data may be located, e.g., Washington D.C. and the Denver Service Center. The data that were gathered may not tell the complete story. In addition, much of the historical data were collected via oral interviews of people who were involved with Grant Village and, consequently, is limited by the memories, and, to some extent, the perspectives of the people interviewed.
BASIC ASSUMPTIONS

Although complete knowledge of historical events is never available, sufficient information is available for the historical documentation and analysis of the planning process that led to the development of Grant Village in Yellowstone National Park.
CHAPTER II
REVIEW OF LITERATURE

PLANNING IN THE NATIONAL PARK SERVICE

Since the establishment of Yellowstone as the world's first national park in 1872 until Horace Albright arrived in 1919 as its Superintendent, Yellowstone had never known the benefit of any real planning (Albright and Cahn, 1985).

By 1916, there were sixteen national parks and twenty-one national monuments in the United States. However, these areas were not the inviolate sanctuaries that the preservationists had envisioned and desired (Clarke and McCool, 1985). Due to inadequate funding plus the absence of any federal agency charged with the responsibility of protecting these parks and monuments, they were routinely used for grazing, farming, and lumbering. The parks existed on paper only (Clarke and McCool, 1985). The negative attitude of some people toward national parks was illustrated by a comment attributed to a Congressman from Oregon, who, during the 1916 House debate on the bill to appropriate funding for Hawaii Volcanoes National Park, said, "It should not cost anything to run a volcano" (Albright and Cahn, 1985).
Because there was no federal agency to administer the national parks and monuments, no cohesive, guiding philosophy of park management existed. This resulted in each park being administered differently. After years of procrastination, Congress decided to correct this situation by creating a separate agency to administer the national parks and monuments (Clarke and McCool, 1985). Much time and effort went into drafting the "Organic Act" that created both the National Park Service and the National Park System. When the Act became law on August 25, 1916, the "governing sentence" defined the NPS mission. According to NPS planner David Wright (1986), the "governing sentence" remains today as the foundation of all NPS planning efforts:

The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life 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 (39 Stat. 535, 16 U.S.C. sect. 1 et seq.).

Thus the mission of the NPS is to conserve park resources and provide for the public enjoyment; to allow for present use without letting this use impact the resources and thus interfere with future use. The attempt to resolve this self-contradictory mission by striking the appropriate balance between conservation and use is the underlying issue in all NPS planning efforts (deFranceaux, 1985). Congress
further guides NPS planning through the individual enabling acts passed for each unit of the National Park System.

The NPS's first set of policy objectives was issued on May 13, 1918, as a letter from Interior Secretary Lane to NPS Director Stephen Mather. The Lane letter became the basic creed of the NPS. Outlining NPS administrative policy, the letter stated:

[The national parks must be maintained in absolutely unimpaired form for the use of future generations as well as those of our time;...they are set aside for the use, observation, health, and pleasure of the people; and...that the national interest must dictate all decisions affecting public or private enterprise in the parks (Albright and Cahn, 1985).

The Lane letter continued by stating that roads, trails, buildings, and other improvements should always be constructed in a manner that paid attention to harmonizing improvements with the landscape. All improvements were to be carried out in accordance with a preconceived plan developed with an emphasis on the preservation of the landscape. Comprehensive plans for future development of the national parks were to be prepared as funds became available for this purpose (Albright and Cahn, 1985).

In a 1925 policy letter, Interior Secretary Hubert Work specified that the NPS should use trained landscape engineers with "a proper appreciation of the esthetic value of parks" whenever roads, trails, buildings, and other improvements were constructed (Albright and Cahn, 1985).

NPS planner Cynthia deFranceaux (1987) stated that the history of NPS planning can be characterized as an evolution
from development planning to management planning—from a single goal of providing facilities that would encourage use to a broader focus on strategies for resource and visitor use management. During the early years, with management emphasis on stimulating use, park planning was development planning. To allow public use, the parks needed roads, trails, accommodations, campgrounds, and visitor services (deFranceaux, 1987). The NPS also wanted—and needed—to develop this infrastructure to allow visitation in order to build a public constituency to support the National Park System (Albright and Cahn, 1985).

The year 1926 marked the beginning of the NPS park planning program with the initiation of a five-year construction program to provide needed facilities. In 1931, the first formal instructions were issued on how to plan and what should be included in park development plans. In 1932, the NPS began calling the park development plan a "Master Plan," a term that continued to be used until the mid-1970s (deFranceaux, 1987).

The park Master Plan provided a conceptual vision of what the park should look like and served as a general guide for how land within the park was to be used. deFranceaux (1985) stated that the development focus of Master Plans continued through the 1960s guided by the NPS handbook entitled the Master Plan Manual of Standard Practice.

In 1949, NPS Director Newton Drury issued a report called "The Dilemma of Our Parks," which described the
deterioration and destruction of park land and property caused by large numbers of visitors and a small NPS staff (the NPS budget had been cut from $21 million to $5 million during World War II with the post-war Congress not reinstating the NPS funding to pre-war levels) (Clarke and McCool, 1985). The solution to this problem was to initiate a massive development program to accommodate increased visitation—Mission 66 (Clarke and McCool, 1985). Clarke and McCool (1985) feel that the NPS compromised its preservation mandate, opted for the more publicly attractive utilitarian goal of developing the parks for use, and in the process, overlooked the possibility that such a development program might, in the long run, exacerbate the problems it was designed to cure by encouraging greater visitation than the agency could keep up with. This spiraling effect, where resources never quite keep up with visitor use, has been a major theme in the history of the National Park System (Clark and McCool, 1985). Darling and Eichorn (1967) earlier noted that some of the parks' problems could be traced to the NPS's efforts to attract the public.

In 1956, Mission 66 plans sought to complete the development and rehabilitation of parks in a ten year period by proposing complete line drawings of developments. Other planning components were included as an afterthought in text notation on the margins of the drawings (deFranceaux, 1987).

In 1964, NPS Director George Hartzog established a new management framework by dividing the national parks into
three categories: natural, historic, and recreational; thus giving direction to the planning of the use of the parks. This allowed the agency to follow a preservationist orientation for the parks placed in the natural areas category, thus reducing development in those areas (Clarke and McCool, 1985). Yellowstone was placed in the category of parks to be managed as natural areas.

Adoption of a multidisciplinary team approach to planning in the late 1960s marked a new phase in NPS planning and a branching out from development planning into a more comprehensive planning process. An area's road and building development was no longer the primary reason for the park Master Plan. The planning process was expanded to provide concepts for park administration, resource management, and visitor use (deFranceaux, 1987). Despite this broadening of the scope of the Master Plan to consider resource protection, some plans were still criticized for stressing facilities development and serving the interests of the concessioners which operated park facilities (Randolph, 1987).

This time period also marked the beginning of a NPS planning process that sought public involvement in the planning process (deFranceaux, 1987).

An overhaul of the NPS planning process occurred in the 1970s. Planning guidelines were established in the 1978 NPS document Management Policies which stated:

The mandate of the National Park Service requires that the use of areas under its jurisdiction be
carefully planned and regulated so that resources are perpetuated and maintained unimpaired for the enjoyment of future generations. Thus, the limits and kinds of use are circumscribed by requirements of resource management and protection. Use of National Park System areas is essentially resource based and is not consumptive. The quality of park use depends upon the visitors understanding park values and resources (USDI, 1978).

Since the 1970s, plans have been prepared by planning professionals who work with park and regional office managers. The key to the NPS concept of planning is the use of interdisciplinary teams of specialists with expertise to address different planning issues. The teams normally consist of technical experts from the park, regional office, Washington Office, and the Denver Service Center. The Denver Service Center is a technical center employing a variety of people in specialized disciplines that the NPS could not efficiently or economically replicate in regional offices. The Denver Service Center includes park planning teams, design specialists, and contracting, construction, and administration services. The plan/design/construction groups are essentially in-house consultants whose time is contracted for and reimbursed by NPS regional directors and park superintendents (deFranceaux, 1987).

According to deFranceaux (1987), the formulation of a range of alternative actions to be considered, including the no action alternative, is an integral step to decision making in the planning process. This serves to provide an objective basis for selecting the plan's proposals and to comply with the requirements of NEPA (deFranceaux, 1987).
Public participation has been a vital force in the park planning process since the mid 1960s (deFranceaux, 1987). By 1970, the NPS had instituted a more uniform practice of reviewing Master Plans at public meetings (Wright, 1986). deFranceaux (1987) states that the level of public involvement planners choose depends on the level of interest or controversy surrounding the plan. Public participation occurs throughout the planning process. This may include public workshops and meetings as well as informal work sessions on particular issues. In addition, all draft General Management Plans undergo a formal period for public review and comment (deFranceaux, 1987).

Park planning became a legislative requirement with the passage of The National Parks and Recreation Act (Public Law 95-625) in 1978. This Act directed the NPS to prepare and revise in a timely manner "general management plans for the preservation and use of each unit of the National Park System" (deFranceaux, 1987).

Although the General Management Plan (GMP) is now the backbone of NPS planning, from the broader prospective the NPS conducts planning to achieve the purposes of the park as defined in its enabling legislation (deFranceaux, 1987). Through the planning process, documents are produced to provide specific guidance for preservation, use, and development to accomplish these purposes.
THE PLANNING PROCESS, NPS-2

The planning guidance document that the NPS has followed since its initial issuance in 1975 is entitled Planning Process, NPS-2. Other than specifically cited references, the following sections are from this document and are referenced as (NPS, 1982a).

Statement For Management

The first step in the planning process is a park's Statement For Management (SFM). This document, evaluated every two years and revised as necessary, is prepared by the superintendent. The SFM provides a description of the park's purpose and the ways it is currently being managed, operated, and utilized. It also includes an analysis of influences on management and use, a status report on plans and studies underway and completed, major issues and problems, and management objectives. Park management objectives developed in the SFM describe the conditions that need to be achieved to realize the park's purpose. The SFM does not contain decisions or prescribe solutions, rather it leads directly to an analysis of plans and tasks that must be done to resolve issues and achieve objectives.

deFranceaux (1987) stated that the means to the end is left for the rest of the planning process.

At this early stage in the planning process, the goal simply is to bring together information about the park's purpose, the significance of its resources, the existing use of its lands and waters, the legislative and administrative
constraints on its management, the influences on park resources and the experience of park visitors for the purpose of identifying major issues that need to be resolved (deFranceaux, 1987).

The SFM document also plays an important role in the park planning process because it helps the superintendent determine what studies, plans, and designs will be needed (deFranceaux, 1987).

**Outline of Planning Requirements**

The SFM leads directly to an analysis of the plans and tasks that must be done to resolve issues, gather information, and achieve objectives. This analysis, the Outline of Planning Requirements, is a priority listing of the studies, surveys, and tasks needed to provide the information base for planning. The Outline of Planning Requirements is an interdisciplinary task completed by park, regional, and Denver Service Center personnel. The park superintendent is responsible for keeping the Outline of Planning Requirements current on an annual basis.

**Task Directives**

Once a task is programmed and funded, a task directive is prepared. This is a written agreement among the regional director, the park superintendent, and the persons assigned to accomplish the task. The task directive sets forth the work to be accomplished, how it will be accomplished, who will be involved in the task, a schedule of completion dates and costs, and the opportunities for public participation.
General Management Plans

In 1975, the NPS adopted the term General Management Plan (GMP) for the document that had been formerly called the Master Plan. The GMPs placed greater emphasis on resource protection, visitor use management, and public involvement than did the Master Plans (Randolph, 1987). Since 1975, the combination GMP/environmental document has become the major planning document for all parks. According to deFranceaux (1987), a GMP is similar to earlier generations of park plans, providing a general concept of what the park should look like and how its lands should be used and managed. It produces an image of how the NPS wants the area to be perceived by the public (deFranceaux, 1987).

A GMP sets forth a basic philosophy for the park and formulates strategies for resolving issues and achieving identified management objectives, usually within a ten year time frame. Facility development, resource management, protection, and visitor use are aspects of the management plans. The assessment of environmental impacts and other required compliance documentation are included in the document. Once the objectives and issues have been agreed upon, the development of reasonable and alternative strategies to resolve the issues and achieve the objectives begins.

The National Parks and Recreation Act of 1978 states that every GMP must address three types of alternatives for the issues being considered: no action; minimum
requirements; and other reasonable alternatives. In addition, the GMP must address the environmental impacts of both the proposal and the alternatives.

The Planning Process, NPS-2 states that every draft GMP/environmental document must also include "identification of and implementation commitments for visitor carrying capacities for all areas of the unit" (the NPS 1980 "State of the Parks" report rated overuse as the fourth most prevalent threat facing the parks (USDI, 1980)). However, the analysis of visitor carrying capacities has yet to play a significant role in park planning (Wright, 1986).

Measures for the preservation of the area's resources must also be included in the GMP.

The draft GMP is circulated to the public and other agencies for review and comment. After the public review period, the regional director reviews, modifies, and then approves the GMP once it is assured that NEPA and other compliance requirements have been met.

For environmental documentation, the NPS prepares an Environmental Assessment (EA); if the NPS determines from the EA that an Environmental Impact Statement (EIS) is not required, a Finding Of No Significant Impact (FONSI) is filed and the EA will be the environmental document accompanying the plan. The more thorough of the two documents, an EIS, is required if the proposed action is a major federal action that may significantly affect the human environment. Only about 10-15% of NPS's GMPs in the last
six years has included an EIS. A Record of Decision is issued at least 30 days after the Final Plan/EIS is released (Randolph, 1987). The Record of Decision is a concise statement of the decision that was made, the alternatives that were considered, and the acceptable mitigating measures developed in order to avoid or minimize environmental impacts (NPS, 1988).

**Development Concept Plans**

The GMP may be general or very specific depending upon the nature of the issues. In complex planning efforts a Development Concept Plans (DCP) is utilized. These are detailed plans of visitor facilities or other developments in a specific area of a park that are not covered by the GMP.

The DCP grows out of the NPS organic act's mandate to provide for visitor use of the park. It amplifies development decisions made in the GMP for a given developed area of the park and is an intermediate step between the GMP and comprehensive design drawings. Where practical, DCP level planning is incorporated within the GMP, particularly for revised GMPs in parks with an existing infrastructure of buildings, roads, and utilities (Wright, 1986).

To insure NEPA compliance, DCPs are accompanied by an EA or EIS.

**Resource Management Plans**

The Resource Management Plan is the mechanism by which the NPS addresses the Organic Act's mandate to conserve the
park resources "in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Resource Management Plans complement DCPPs in the balancing of the dichotomous development/preservation mandate of the organic act (Wright, 1986).

A Resource Management Plan is a comprehensive resource management, monitoring, and research program developed to deal with important natural and cultural resource problems (Wright, 1986).

**Scoping and Environmental Compliance**

The Council on Environmental Quality (CEQ) regulations direct federal agencies which have made a decision to prepare an environmental impact statement to engage in a public scoping process. Public hearings or meetings, although often held, are not required; instead the manner in which public input will be sought is left to the discretion of the agency. The purpose of this process is to determine the scope of the EIS so that preparation of the document can be effectively managed. Scoping is intended to ensure that: (1) problems are identified early and properly studied; (2) issues of little significance do not consume time and effort; (3) the draft EIS is thorough and balanced; and (4) delays occasioned by an inadequate draft EIS are avoided. According to *The Planning Process, NPS-2*, the scoping process should identify the public and agency concerns and clearly define the alternatives to be examined in the EIS. An effective scoping process can help reduce unnecessary
paperwork and time delays in preparing and processing the EIS by clearly identifying all relevant procedural requirements. Early involvement leads to early identification of significant issues, better decision making, and avoidance of possible legal challenges. Thorough scoping may have the effect of reducing the frequency with which proposed actions are challenged in court on the basis of an inadequate EIS.

Public notice of EA availability should be provided, although public review of EAs for actions not normally requiring an EIS is at the discretion of the decision maker. Where appropriate, environmental agencies, applicants, and the public should be involved in the EA process. Any appropriate method of notice including mailings, a Federal Register notice, a news release, or a meeting with concerned agencies and individuals may be used. The preparing office should determine the best method to reach the affected public, with emphasis placed on interested groups and individuals, including those likely to be opposed to one or more alternatives. EA availability should be announced in the Federal Register for an NPS action likely to be of national interest:

If the proposed action requires compliance with other legislation (such as the Endangered Species Act...)...evidence of such compliance should be completed and documented prior to the approval and signing of the FONSI...The FONSI...must be a separate document rather than part of the EA.
Concerning NEPA responsibilities, The Planning Process, NPS-2 states that the Director, Regional Director, and the Denver Service Center are responsible for compliance.

The NEPA and CEQ regulations are concerned primarily with those "major federal actions significantly affecting the quality of the human environment" (42 U.S.C. section 4332). Accordingly, agency procedures, resources, and efforts should focus on determining whether the proposed federal action is a major federal action significantly affecting the quality of the human environment. If the answer is yes, an EIS must be prepared. If there is insufficient information to answer the question, an EA is needed to assist the agency in determining if the environmental impacts are significant and require an EIS. If the EA determines that the impacts are not significant, the agency must prepare a FONSI. Requirements of 40 CFR 1501.4(e) state that the FONSI must be circulated for a minimum of thirty days of public review before a final determination is made by the agency. [NOTE: This ends the sections that can be found referenced as (NPS, 1982a).]

RATIONAL COMPREHENSIVE PLANNING

According to Randolph (1987), the basic structure of the planning processes used by all federal land management agencies to develop their plans is identical with the processes reflecting the classic rational-comprehensive approach. This involves the following five basic steps:
1. identifying the problem;
2. gathering and analyzing data;
3. formulating of alternatives;
4. assessing the impacts of alternatives; and
5. evaluating alternatives and selecting a plan (Randolph, 1987).

Lord (1981) defined the rational comprehensive planning model as having the following components:

1. problem definition;
2. establishment of objectives;
3. proposal of alternative solutions to the problem; and
4. selection of one of the alternatives.

The National Environmental Policy Act of 1970, passed as a sunshine law, attempted to: (1) bring the planning process from behind closed doors and into the public forum; (2) provide the public with the legal right and means to participate in the governmental planning process; and (3) legislate rational comprehensive planning. NEPA (Public Law 91-190) states in section 102(A) that all agencies of the Federal Government shall:

[U]tilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and decision making which may have an impact on man's environment....

The procedures government agencies are to follow when writing an EIS were delineated by NEPA and CEQ guidelines (40 CFR, Part 1500) and are basically the same as those used in the rational comprehensive planning model. Components of
an EIS include:

1. identification of the problems, issues and concerns, and statement of the purpose of and need for the plan;

2. consideration of alternatives to the proposed action, including the no action alternative;

3. evaluation and prediction of the environmental impacts of the alternatives; and

4. selection of an alternative announced in a Record of Decision (Canter, 1977).

In addition, NEPA requires the proposing agency to inform the public of impending agency plans before final decisions are made and actions are taken, thus allowing the public the opportunity to comment (NPS, 1982b). The intent of the National Environmental Policy Act was to insure that balanced decision making occurred in the total public interest (Canter, 1977). Prior to this legislation technical and economic factors dominated the decision making process. Since then it has been required that environmental, social, and other "presently unquantified environmental amenities and values be given appropriate consideration in decision making" (Public Law 91-190).

In the NPS, rational comprehensive planning as required by NEPA is implemented through EAs and EISs. EAs are prepared in order to determine whether an EIS is necessary. The EIS is to be used when the proposal is a major action that may significantly affect the human environment (NPS, 1982b).

The planning process is a blend of rational and political approaches. The rational side requires the use of
a variety of planning methods and techniques. The political side requires public involvement and a variety of disciplines throughout the planning and decision making process (Randolph, 1987).
CHAPTER III
METHODOLOGY

DESCRIPTION OF STUDY SITE

Yellowstone National Park, located primarily in the northwest corner of Wyoming with portions extending into south-central Montana and east-central Idaho (see Figure 1), is the major destination of more than two million tourists per year. Some tourists come to Yellowstone to see the world famous geysers, hot springs, and other geothermal features. Others come to see Yellowstone's spectacular waterfalls, or participate in water-oriented recreation such as boating and fishing on the numerous lakes, rivers, and streams. All come to view one of the greatest displays of mammalian wildlife remaining on the North American continent. This includes a diverse ungulate population that includes elk (*Cervus canadensis*), bison, mule deer (*Odocoileus hemionus*), pronghorn antelope (*Antilocapra americana*), moose (*Alces alces*), bighorn sheep, and Yellowstone's famous bears—black (*Ursus americanus*) and grizzly. The student of ornithology delights in the avifauna of Yellowstone that includes the great grey owl (*Strix nebula*), golden eagle (*Aquila chrysaetos*), bald eagle, several species of hawks, osprey (*Pandion haliaetus*),
Legend

- Locations of Major Cities
- Locations of State Capitals
- State Boundary Lines
- National Park Service Areas
- National Park Service Historical Trails

ROCKY MOUNTAIN REGION
National Park Service
United States Department of the Interior

By permission of the National Park Service

FIGURE 1
double-crested cormorants (*Phalacrocorax auritus*), sandhill cranes (*Grus canadensis*), whooping cranes, great blue herons (*Ardea herodias*), belted kingfishers (*Ceryle alcyon*), several species of ducks, Canadianian geese (*Branta canadensis*), trumpeter swans, and white pelicans (*Pelecanus erythrorhynchos*), as well as the more common species.

At 2.2 million acres in size (3,400 square miles), Yellowstone is the largest national park in the contiguous United States. The combination of Yellowstone and Grand Teton National Parks comprise the central core of the "Greater Yellowstone Ecosystem," which, at over six million acres, is the largest nearly intact natural ecosystem in the temperate zone of the earth (NPS, 1986a). A few mountains are located in the Park, but Yellowstone is best described as a high plateau (mean elevation of 7,200 feet) consisting primarily of flat to rolling terrain. Approximately 80% of the Park is forested, with 80% of the forested area dominated by monoculture stands of lodgepole pine (*Pinus contorta*). Higher elevations in the Park contain whitebark pine (*Pinus albicaulis*), subalpine fir (*Abies lasiocarpa*), and Englemann’s spruce (*Picea engelmannii*), while the lower elevations consist of Douglas fir (*Pseudotsuga menziesii*), limber pine (*Pinus flexilis*), Rocky Mountain juniper (*Juniperus scopulorum*), and aspen (*Populus tremuloideae*). The non-forested areas of the Park consist of open valleys and meadows dominated by the various species of grasses that support the abundant population of ungulates.
The Park's visitor season is mid-June through the end of August. Visitation during this time averages 20,500 people per day while auto travel is over 700,000 vehicles per year (NPS, 1986a). Although winter visitation has traditionally been low, it is now increasing as the gateway communities promote winter activities such as snowmobiling and cross-country skiing.

The West Thumb thermal area is located on the west shore of the West Thumb of Lake Yellowstone, one and one-half miles north of Grant Village. The thermal area is small, consisting of approximately ten acres of hot springs, geysers, and fumaroles located on the shore of the Lake. Currently, the only development at West Thumb is a Hamilton Mini-Store, restrooms, and a log cabin the NPS utilizes in the winter for a warming hut/visitor contact station.

Overnight tourist accommodations can be found in one of the twelve campgrounds located throughout the Park, in a recreational vehicle park, or in one of the numerous cabins, lodges, or hotels found in six developed areas of the Park. The developed areas also have restaurants, service stations, general stores, souvenir shops, visitor centers, and ranger stations.

Grant Village is one of the developed areas in the Park. It is located on the southwest shore of the West Thumb of Yellowstone Lake (see Figure 2). Grant Village has a marina, day-use boat launch/fishing area, a 403 site campground with outdoor amphitheater, camper services
BOUNDARY MAP
YELLOWSTONE NATIONAL PARK
United States Department of the Interior - National Park Service
By permission of the National Park Service

FIGURE 2
building, visitor center, service station, two restaurants, Hamilton General Store, post office, 300 visitor lodging units, a ranger station, concessioner housing (dorms and trailer court), NPS housing and maintenance area, and a sewage treatment plant.

Outside of the Park, accommodations can be found in gateway communities of Gardiner, Montana; West Yellowstone, Montana; Jackson, Wyoming; and Cody, Wyoming. Tourism and related recreational activities associated with Yellowstone and Grand Teton National Parks are the economic lifeblood of these communities (USDI et al., 1979).

RESEARCH DESIGN

The methodology of this study follows a case study research design with the investigator attempting to discover the variables that were important in the planning process that led to the development of Grant Village in Yellowstone National Park. The emphasis of the study is on: (1) identifying and documenting the NPS planning process as it evolved from the creation of Yellowstone National Park in 1872 to the present; and (2) analyzing this process by comparing it with NPS planning literature.

The impetus for this investigation came from within the NPS as a result of: (1) internal criticism of the Grant Village development; (2) the controversy, citizens complaints, and adverse publicity that occurred during the start of Phase 1A construction of accommodations in April of
1981; and (3) the publication of Alston Chase's book *Playing God In Yellowstone* in 1986. Chase's criticisms of the NPS and the Grant Village development, specifically Chapter 13, entitled "Grant Village and the Politics of Tourism," aroused sufficient interest in the NPS that Yellowstone National Park management requested this researcher to investigate the history of Grant Village.

After reviewing Chapter 13 of Chase's book, Yellowstone National Park Management Assistant Steve Iobst and this researcher compiled a list of questions to be investigated. Most of these questions were developed as a result of questions and criticisms of the NPS that Chase raised in *Playing God In Yellowstone*. Because the development of Grant Village had taken place over several decades, no one, the NPS included, seemed to know for certain when, why, or how Grant Village had come into existence or the events that had occurred throughout the years that led to its development.

Thus, the NPS's goals for this study were twofold: (1) to uncover the historical events that led to the development of Grant Village; and (2) to determine the accuracy of Chase's criticisms. In addition to the NPS's goals, a goal specified by this researcher was to conduct a comparison and analysis of the NPS's planning process that led to the development of Grant Village with NPS planning literature.

The following list of questions was developed, from discussions with Steve Iobst and a review of Chapter 13 of
Playing God In Yellowstone, to guide the investigation in discovering the historical events that led to the planning and development of Grant Village.

1. When was the idea first proposed to withdraw facilities from the West Thumb area and relocate them at a site south of West Thumb (which was later named Grant Village)?

2. Why was the Grant Village site chosen?

3. Why was Grant Village constructed?

4. Were sufficient studies conducted during the planning process to ascertain if the Grant Village location was prime grizzly bear habitat?

5. Why did the concessioners repeatedly reject the plan to construct Grant Village?

6. What role did Wyoming elected officials play in influencing decisions to build Grant Village?

7. What position did the environmental organizations take throughout the planning stages of Grant Village?

8. Was the EA and the declaration of a FONSI adequate or should an EIS have been prepared?

9. Did the NPS violate the Endangered Species Act in the section 7 consultation on the grizzly bear with the United States Fish and Wildlife Service (USFWS) by requesting funds for construction of Grant Village one year before publication of the EA?

10. Was the USFWS pressured into giving a no jeopardy biological opinion on the grizzly bear at Grant Village?

11. Did the NPS adequately foresee and plan for an orderly replacement schedule of facilities on a one-for-one basis from Fishing Bridge to Grant Village?

12. Why were public funds used to construct Grant Village?

13. After the project had been deemed unprofitable by several concessioners and a couple of economic studies, and with the gateway accommodations industry receiving federal disaster relief loans from the Small Business Association due to low visitation resulting from a gasoline shortage in the late 1970s, why did the NPS continue to pursue the development of accommodations at Grant Village?
14. Did the NPS go against Office of Management and Budget (OMB) orders not to build Grant Village by giving the Order to Proceed with construction the day after employees of the Carter Administration had left office and President Reagan's appointees, who did not know of the orders, were in office?

15. Did the NPS construct Grant Village because, as Chase (1986) suggests, it was easier to spend another $60 million than to admit that $10 million had been wasted?

16. What were the events of April, 1981, that caused the construction to be stopped by Interior Secretary Watt and then ordered to resume one week later?

A detailed historical account documenting the planning and development of Grant Village in Yellowstone National Park was developed by gathering data from the Park's archives and research library, which is located in the basement of the Albright Visitor Center at the Park Headquarters in Mammoth Hot Springs, Wyoming. Additional information was found in files located in offices in the Park Administration Building in Mammoth Hot Springs. These offices were the: Superintendent's Office; Management Assistant's Office; Mail and File Room, Office of Concessions Management, Landscape Architect's Office; and Office of Public Information. Additional documents were supplied by the Denver Service Center upon request.

**INTERVIEW METHODOLOGY**

In addition, oral histories were obtained via personal interviews with more than fifty people who were involved in the planning and construction of Grant Village or would be affected by the development. Appendix A contains a list of the people interviewed and the positions they held. Some of
the interviews were conducted in person, while the majority
were conducted as telephone interviews due to time and
financial constraints.

At the start of the research effort, the questions
asked of the interviewees were the thirteen previously
listed questions. As happens in case study research, as
answers to questions were uncovered, new questions to
investigate were raised and old questions were revised,
reworded, expanded, or eliminated. Thus, during the study
an extensive list of questions evolved which resulted in the
expansion of the original thirteen questions to ninety-six
questions. These questions are reproduced in Appendix B.
Each interviewee was asked only those questions that
involved the time period in which he/she was involved in
Yellowstone National Park and Grant Village. Consequently,
no interviewee was asked all the questions in Appendix B.
Also no two interviews were identical or followed strictly
the format of the questions in the Appendix B. During the
interview, the initial questions asked were from the
Appendix B list. As the interview progressed, subsequent
questions were based on the interviewee's previous response
and/or new information that the interviewee articulated.
With each bit of new information uncovered, new questions
were formulated during the interview and asked.

Interviews were recorded manually by note-taking.
Consideration was given to tape recording the interviews but
this was rejected because it was felt that some of the questions might appear to the interviewee to be accusatory in nature due to the controversy surrounding Grant Village, and, therefore, would put him/her on the defensive. The possibility existed that this would result in a reluctance on the part of the interviewee to speak freely for fear of self-incrimination or the incrimination of friends and/or colleagues. It was felt that tape recording the interview would be more threatening to the interviewee than note-taking, thus compounding the possible reluctance of some of the interviewees to speak freely, which would result in the loss of valuable data.

After locating documents on Grant Village in the Park archives, files, and research library, reading all publications that could be located that had an account of Grant Village, and interviewing the accessible participants in the history of Grant Village; the historical documentation was written.

The historical research conducted was a prerequisite to providing the data to undertake the analysis of the Grant Village planning process because little research has been conducted in this area. In his book *The Yellowstone Story*, former Yellowstone National Park historian Aubrey Haines (1977) superficially touched on a few of the significant events that took place in the planning and development of Grant Village from its beginning to the mid 1970s. In
Playing God In Yellowstone, Alston Chase (1986) included a chapter on Grant Village that, at thirty-four pages in length, was not intended to be a thorough history of Grant Village, did not specifically address the planning process that gave rise to Grant Village, and raised as many questions as it answered. A third researcher, Brian Kenner (1984), in his thesis entitled *An Examination of National Park Service Decision Making: A Case Study of Grant Village, Yellowstone National Park*, relied heavily upon secondary sources of data for his historical research and focused his efforts on an analysis of the NPS decision making process that led to the development of Grant Village, rather than the planning process. Kenner based his analysis of the Grant Village decision making process on two competing philosophies of park management. The biocentric philosophy is based on the Organic Act's preservation mandate to conserve the scenery and wildlife in the parks in such manner and by such means as will leave them unimpaired for future generations. The anthropocentric philosophy is based on the Organic Act's mandate that the national parks are to be used for the enjoyment of the people. The followers of biocentric park management argue that the Organic Act should be interpreted to emphasize park preservation while the followers of anthropocentric management favor increased access and development of the parks. Kenner concludes that the biocentric philosophy has
a stronger basis of legal and literary support and, therefore, is the correct management path for the national parks to follow.

According to Yellowstone National Park historian Tim Manns (pers. comm.) there have been no other efforts to document the history of Grant Village.

Upon completion of the historical documentation, a comparison and analysis was conducted of the planning process that led to the construction of Grant Village with the NPS planning literature as discussed in the review of literature in Chapter II.

This research methodology was chosen because: (1) sufficient historical knowledge was not available to conduct an analysis of the planning process that led to the development of Grant Village; (2) case study research provides the flexibility necessary in oral interviews to allow the researcher to add, delete, and expand upon the original set of questions based on the interviewees answers to previous questions, thus providing a more thorough, in-depth set of data than could be obtained using other research methods; and (3) by examining a particular case history and comparing the actual planning process that took place with the planning process as delineated in NPS literature, an analysis can be undertaken to determine if the NPS planning process is being followed and if that process is adequate.
This researcher has been unable to locate similar studies of the NPS planning process. Randolph (1987) compared the planning approaches used by the U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, and Bureau of Land Management to each other. Clarke and McCool (1985) compared the power differentials among federal natural resource management agencies in the U.S., discussing the planning processes of the NPS.

However, no cases of research efforts that document the history and analyze the planning process of Grant Village have been located. In addition, no similar case studies of the NPS planning process that includes an analysis and comparison of the actual planning process of a specific park development to the planning process as found in the NPS literature have been located.
CHAPTER IV

THE HISTORY OF GRANT VILLAGE

THE ROOT OF THE PROBLEM

The area now called Yellowstone National Park was "dedicated and set apart as a public park or pleasing ground for the benefit and enjoyment of the people" and "for the preservation, from injury or spoliation of all timber, mineral deposits, natural curiosities or wonders...and their retention in their natural condition" by the Act of March 1, 1872 (17 Stat. 32).

Because this was the world's first national park, there were neither rules governing how the park would be managed nor did anyone have any idea how to administer it. The U.S. Congress, in an effort at fiscal restraint, created the Park only after agreeing that no money would be spent on it. It was assumed that private companies would operate within Yellowstone providing visitor services and accommodations. At the time, there were no proposals for the federal government to run concessions in the Park (Council on Environmental Quality, 1972).

The enabling legislation that created the Park gave the Secretary of the Interior the authority to grant leases to
private individuals for the construction of buildings to accommodate park visitors. The Council on Environmental Quality in their *Third Annual Report* said:

Private operators were also looked on as a primary source of revenue for the parks. During Yellowstone's first five years, Congress did not appropriate any funding; it expected that rents paid by the park's private operators would yield adequate revenues to administer and protect the area (Council on Environmental Quality, 1972).

The Act of March 3, 1883 (22 Stat. 626), specified that leases on which hotels and other necessary facilities were constructed:

> [S]hall not include any of the geysers or other objects of curiosity or interest in said park, or exclude the public from the free and convenient approach thereto; or include any ground within one quarter of a mile of any of the geysers, or the Yellowstone Falls.

Despite this, numerous buildings were constructed inside this buffer zone both before the 1883 law was passed and afterward. The construction of visitor facilities, sometimes built practically on top of the various thermal features and Park attractions, violated this legislation. Without some type of a law enforcement regiment, the Park was unable to stop this illicit construction. In the early years everyone knew the Park rules were toothless; this caused respect for Park rules and regulations to sink lower and lower (Haines, 1977). The state of lawlessness that existed in the Park was the catalyst that spurred the Congress to send the army to Yellowstone to administer and protect it during the years 1886-1918.
Corruption had been common in the early days of Yellowstone. One of the early superintendents, Robert Emmett Carpenter (Sept. 10, 1884 to June 30, 1885), conspired with the Yellowstone Park Improvement Company allowing them to illegally construct a hotel within the 1/4 mile buffer zone because he had a financial interest in the facilities under construction (Haines, personal communication). After Carpenter was fired from the superintendency, he took over the management of the hotel and proceeded to violate the buffer zone again by constructing a privy for the hotel in the grove of trees located halfway between the hotel and the cone of Old Faithful geyser (Haines, 1977).

Historian Hiram Chittenden pointed out that to Superintendent Carpenter the purpose of the Park was quite clear: "In his opinion, the Park was created to be an instrument of profit by those shrewd enough to grasp the opportunity" (Haines, 1977).

Rather than have the concessioners tear down their buildings that were inside the buffer zone, the Park, in recognition of what had already been done, bowed to reality and went along with the Act of August 3, 1894 (28 Stat. 22) which reduced the buffer zone from 1/4 to 1/8 of a mile (Haines, pers. comm.).

Prior to the use of the automobile, travel in the Park by horse and stagecoach was slow and the distances that could be covered in a day were short. This necessitated
that visitor accommodations be constructed adjacent to or on
top of the Park attractions as a matter of convenience
(Capek, 1982). Capek (1982) states that "people did not
realize the extent of their impact on the fragile
environment and the protection it required to be preserved
for future generations."

Conrad Wirth, former Director of the National Park
Service (NPS), stated:

In the early days of Yellowstone the explorer and
his party could camp next to Old Faithful geyser
without greatly harming the natural features
because their requirements were very simple. The
tents and log structures required later to
accommodate the stage coach visitor needed
permanent sites, and because they were few in
number they were located adjacent to the points of
interest. By the time the bus and automobile
arrived on the scene, these overnight
accommodations were well-established facilities,
some located within the geyser area (Wirth, 1980).

In 1919, the objective of Stephen Mather, the first
Director of the NPS, was to develop facilities to open the
parks to everyone as a "people's playground" (Capek, 82).

Fifty years after its birth, Yellowstone was entering
an era of increasing visitation, thus creating the need for
additional accommodations for visitors. The locations for
these accommodations would continue to follow the trends
that had been established for the needs of travelers in the
horse and stagecoach days—directly adjacent to the prime
resource areas with no regard for the buffer zone.
One-hundred years after Yellowstone's birth the impact of
these actions would still be presenting problems for
Yellowstone National Park managers.
MASTERPLANNING

In the late 1920s, NPS Director Horace Albright, requested Chief Landscape Architect Tom Vint to bring the concessioner's development plans for Mount Ranier National Park to their meeting at the Park. Vint went to work drawing plans of the concessions proposals, Park boundaries, land acquisition, roads, etc. Albright was so impressed with Vint's Master Plan concept that he immediately requested him to have Master Plans drawn up for all of the parks (Wirth, 1980).

To carry out this directive, landscape architects were hired for each park or group of parks. The landscape architect would spend each summer in the park obtaining the information that would be needed to develop the Master Plan and, then, in the winter they would return to the Regional Office to complete the plan (Wirth, 1980).

According to Hummel (1987), Master Plans originated in the Economic Stabilization Act of 1931. To assist in the stabilization of industry and employment, section 8(a) of this act declared that there should be advance planning of public works in the form of a six-year advance plan with estimates showing projects allotted to each year. Hummel (1987) states that Albright assigned Chief Landscape Architect Vint to implement this policy for the parks; the Master Plan was the result.

Regardless of how they came about, by the early 1930s there was an effort at drawing up Master Plans on an annual
basis at Yellowstone National Park. Work on the first Master Plan for Yellowstone began in 1930 and was completed in 1932 (Mattson, pers. comm.). From 1932 to 1949 the Master Plans consisted of approximately thirty pages (36" x 48") of plans and illustrations done with powdered pastels and colored pencils. Included in the plans is a written text printed on a narrow sheet of paper to the left side where it can be read while referring to the plan.

The 1932 Master Plan acknowledges special areas in the Park where no development shall take place within the 1/8 mile buffer zone as specified by law. These areas are called "Sacred Areas" and are defined as:

[T]hose special areas which are of such vital importance as to warrant protection from encroachment in any way detrimental to its preservation.

In general a Sacred Area should have no building or structure within the area to be preserved.

Roads and trails are to be permitted within the limits affording accessibility only. Whenever possible roads are to be excluded.

The established Sacred Areas are those set aside by Act of Congress, namely the eighth-mile circle around Old Faithful Geyser and the Grand Canyon of the Yellowstone.

It is proposed to establish the following areas as Sacred Areas:
1. Mammoth Hot Springs
2. Norris Geyser Basin
3. National Park Mountain
4. Lower and Midway Geyser Basin
5. West Thumb Thermal Area
6. Tower Falls and Tower Canyon (NPS, 1932)

The Act of March 3, 1883, and later, the Act of August 3, 1894, had already given protection to these areas by
making it illegal to construct any buildings within 1/4 and 1/8 of a mile respectively of any of the geysers or Park attractions. Since these laws had been largely ignored, this reiteration of the NPS intent to disallow construction within the Sacred Areas may have been the Park's attempt to gain control over the situation. Although this would seem to mark the beginning of the era in which the NPS became more oriented toward resource protection, a number of years passed before the Park's actions corresponded with its words. Part of the reason this occurred was because the NPS had ignored the mandate that disallowed construction inside the buffer zone for so long that this stipulation was actually unknown to many Park employees (Mattson, pers. comm.).

With the Master Plans in their infancy, there were no guidelines on how to prepare them and Master Plans became the task mainly of one person, Frank Mattson, the Junior Landscape Architect. Mattson did the field work and prepared the plans and illustrations while his supervisor compiled the written text. Because the plans and illustrations were prepared separately from the written text and with little communication or coordination, they contradicted each other. The written text stated that no development would occur in the Sacred Areas but the plans and illustrations showed continued development proposed within these areas. The text, containing the section on the Sacred Areas, apparently went unnoticed or was ignored. The
Master Plans of 1932 and 1933 show that most of the existing tourist facilities were directly adjacent to the Park's attractions and within the 1/8 mile buffer zone; and the proposed new facilities were also to be within the 1/8 mile buffer zone. In these plans there was no mention of the removal of any buildings or facilities within the buffer zone for relocation elsewhere.

In the West Thumb area, which was later relocated to Grant Village, the Master Plans of both 1932 and 1933 show that almost all the existing facilities were within the 1/8 mile buffer zone, as were the new buildings proposed—a gas station, shower bathhouse and laundry combined, 10-person bunk house, garage and storage shed for rangers, and log cabins to replace all remaining frame and canvas cabins.

Increasing development at the rim of the Yellowstone Canyon had caused such a traffic congestion problem that in the 1935 discussions held concerning the problem, Mattson suggested that "we pull back facilities from the rim" (Mattson, pers. comm.). As a result of these discussions, Aubrey Haines was asked to survey the Canyon area and prepare a topographical map (Haines, pers. comm.). Mattson (pers. comm.) also felt that the development at West Thumb was straddling the thermal features and the resulting traffic congestion was abusing the area. The idea began to emerge that the development at West Thumb needed to be moved. Mattson studied the area in 1934-35 but left Yellowstone to work at Great Smoky Mountain National Park in
1936 and with him went the concern for a solution to the problem of encroachment of facilities at the West Thumb thermal area. However, the discussions begun on the removal of facilities that had encroached upon the park features did lead to action taken where it was needed most--on the rim of the Grand Canyon of the Yellowstone River.

The 1939 Master Plan continued its inconsistency by stating in the text that no development would be allowed within the Sacred Areas and then in the illustrations showing the new buildings proposed to be constructed within the Sacred Areas. However, a major change was taking place. The Master Plan of the Canyon area showed major relocations and design changes. The plan proposed the relocation of the main road away from the rim, the use of the old road as a scenic drive, and a new canyon village area with cabins, campground, and retail area located away from the rim. It also proposed the elimination of most roads and buildings that were located close to the rim, many of which were in the Sacred Area.

In 1940, Acting Superintendent J.W. Emmert wrote in the Special National Parks Areas (For inclusion in the Master Plans for Yellowstone National Park):

The present Canyon area development has violated, and continues to violate this Act [that excludes development within 1/8 mile of the park features] to a considerable degree to the detriment of the area and to the exclusion of thousands of tourists enjoying the area....The present concentration of development about the Upper and Lower Falls is gradually breaking down the natural conditions so that within a comparatively short while the area will be barren....It is not readily accessible to
the other tourists without intimate knowledge of the area or without a guide.

The circumstances are such that it would seem wise to try to correct these mistakes, and justify the effort for a number of reasons. Conservation is primary and that point is readily conceded. Aesthetically the present development is beginning to compete with the Canyon for attention. Gradually it becomes more prominent as the vegetation dies or is done away with. This alone should be reason enough for restoring it to its original state if possible.

Economically it is advantageous to concentrate this development at some other location. Under the present setup there are three separate and unrelated water systems and sewer systems.

The administration of the area would be facilitated if a well organized scheme were carried out. The object of such an improvement would be to eventually remove all of the development away from the edge of the canyon to an area better suited to such developments and yet allow expansion on a well ordered scale (Emmert, 1940).

Evidently, when Emmert wrote the above passage, the NPS still did not feel it had the authority to exclude development from the Sacred Areas as indicated by the following paragraphs from the same above text:

Since 1935, all of the sacred areas (except West Thumb)...recommended by the Superintendent in memorandum of February 16, 1932, have been shown on the Master Plan for Yellowstone. On the revised Master Plan of 1939 all of the designated sacred...areas which were shown were indicated as "proposed," except (1) Old Faithful and (2) Canyon-Tower Falls sacred areas which were indicated as "existing."

From information available in the Yellowstone Park files, it appears that the NPS policy in regard to formal designation of special areas has never been completely defined....It is...quite definite sacred...areas should be made by the Superintendent for approval by the Director (Emmert, 1940).
Immediately following this is a list of seventeen sacred areas including most of the major thermal features of the Park. But, again, in the Master Plan of 1941, as if the issue had not yet been settled, there is a proposed definition of a Sacred Area. Although this plan calls for the withdrawal of facilities from the rim of the Canyon, as did the 1939 plan, it also includes extensive proposed development to take place in the West Thumb area. In the fashion of Canyon Village (the name for the new Canyon development) the proposed development to take place at West Thumb is labeled "West Thumb Village Development." Use of the name "Village" indicates that the NPS was thinking of substantially increasing the size of the development at West Thumb. The illustrations show a large proposed development consisting of an additional 70-180 new tourist cabins, a photo shop, ranger station, gas station, boat house, Hamilton General Store, and a parking lot for approximately 200 cars near the thermal area. Except for the tourist cabins, all the proposed new development was to be located within the Sacred Area (the tourist cabins could not be constructed in the Sacred Area; there was no unoccupied space remaining). This is quite a contrast to the 1933 plan which shows a very small development. Demonstrating very progressive thinking for the era, in 1940 Interior Secretary Ickes stated:

In the newer eastern park areas, a policy is gradually being formulated whereby only the daytime needs of visitors for gasoline, oil, food, and picnic supplies shall be met by
operations within the parks. The Department favors development of overnight accommodations by private enterprise outside park boundaries (Ickes, 1940).

Continuing with his visionary thinking, Ickes said:

In the older national parks the original lay-out of visitor facilities, under then prevailing slow modes of travel, was based on the need for overnight accommodations within the park and near points of interest. In general, this condition no longer prevails. The question, therefore, arises: Should future planning envision only such facilities as are necessary for daytime use, depending upon nearby communities to furnish sleeping accommodations as in the case of the Great Smoky Mountains National Park? (Ickes, 1944)

At this time, Yellowstone National Park officials were far from thinking in the strong resource protection mode that Ickes suggested. Besides, Yellowstone, it was thought, was so much larger than any of the other parks that it did not seem reasonable for visitors to have to stay outside of the Park and make the long commute in and out every day. Park concerns were more oriented toward solving the problems associated with providing accommodations and services for the tourists. Even in the late 1930s the problem of more tourists than personnel or facilities could adequately handle plagued the Park (Bartlett, 1985).

Other than the plan to withdraw from the rim of the Canyon, which was not carried out until the mid 1950s, in most of the developed areas of the Park the Master Plan continued to propose new buildings to be constructed inside Sacred Areas. Also, few discussions on withdrawing from thermal areas seemed to be taking place. A casual glance at
the Master Plans may lead one to believe otherwise since the plans do show a relocation of the Mammoth area development further away from the hot springs and the relocation of the road to the Norris Geyser Basin away from the geysers. However, the relocation of the Mammoth facilities was not due to an attempt to move away from the thermal area for protection but was simply a redesign of the area (Mattson, pers. comm.). As for the Norris Geyser Basin, the Master Plan proposed to relocate the road away from the thermal area; however, the reason was not out of concern for protection of the geyser basin. The 1941 Master Plan states:

Under present conditions the location of the main road and museum parking area develop a very serious traffic hazard, since the tourist must park his car near the museum and then cross the main highway to see the points of interest. The alternate scheme shown on the master plan eliminates this traffic by locating the road east of the museum, thus eliminating cross traffic.

The alternate route has been suggested as a solution for the traffic hazard, which has developed in front of the museum (NPS, 1941).

Further development for the West Thumb area was also being planned in 1942 when a museum/administration building was designed and proposed for construction (partially in the Sacred Area) by the Regional Headquarters. A memorandum from the Acting Superintendent to the Assistant Chief of the Museum Division stated:

It will be 2 floors high, consisting of naturalist office, library, storage and work facilities, exhibits room, information desk, infirmary, auditorium to seat 500, and projection booth (NPS, 1942).
Because of a lack of money due to the depression and later World War II, practically none of the construction proposed in the Master Plans between 1932 to 1946 took place.

In 1941 not a single concessioner overnight accommodation in the Park was open due to the war. Gas and rubber rationing made it impossible for anyone to be able to drive to Yellowstone; those few who did come were military personnel on their way from one military base to another. Meals were served by the concessioner at only a few places in the Park. Former Yellowstone National Park Historian Aubrey Haines states:

The entire visitation during the four years of World War II was less than the figure for 1941. The government's activities in the area were also greatly reduced—practically to a caretaker status—both as an economy measure and because military service made recruitment of seasonal employees extremely difficult (one-third of the Park's permanent personnel was eventually drawn off also) (Haines, 1977).

**THE GENESIS OF GRANT VILLAGE**

When Frank Mattson returned to work at Yellowstone in 1946 as the resident Landscape Architect, he discovered that a permanent intersection, curbing, and parking section had been installed at West Thumb in 1939 at a time when the NPS had no intention of withdrawing from the area. He called Superintendent Rogers' attention to the still-present problem of encroachment of tourist facilities on the West Thumb thermal area and asked him plaintively if he thought they needed to look over the Master Plan and make some
changes to correct the situation. Rogers responded by saying he thought the plan was adequate and that they should live with it (Mattson, pers. comm). This bothered Mattson a good deal because of the abuse the thermal area was receiving and because the facilities at West Thumb were so old and deteriorated that money would soon have to be spent on renovations. Instead of spending money refurbishing the area, it seemed wiser to Mattson to build new facilities elsewhere. He began to study the terrain in that area to determine if it was reasonable to consider a completely new development at a better location (Mattson, 1979).

While Tom Vint, Chief of the Washington Office of Design and Construction, was visiting Yellowstone in the summer of 1946, C. A. Hamilton (of Hamilton Stores) asked Vint, Mattson, and a few others to confer with him at West Thumb. At the meeting, Hamilton complained of the inadequacy of the parking area. He emphasized that it was not large enough to meet the demand, and because of this, they would have to come up with a plan for a much larger parking area (Mattson, pers. comm.). The problem was that there was not sufficient room at West Thumb to enlarge the parking lot. As the conversation expanded to the topic of the development's straddling the thermal area and the resultant abuse it was receiving, Vint asked for suggestions on where in the area the development could be moved. Having already given this question much thought, Mattson was ready with an answer. He led them down to the lake and pointed to
the area approximately one mile south along the lake shore (Mattson, pers. comm.). This was the only available site for the West Thumb relocation since there were hot springs to the north, mountains to the west, and Yellowstone Lake to the east (Haines; Mattson, pers. comm.).

Shortly thereafter, Mattson took Vint to investigate the area of the present-day Grant Village campground (Mattson, pers. comm.). The following year, 1947, Aubrey Haines surveyed the area for a topographical map from which planning could be done (Haines, pers. comm.).

Subsequently, a decision to withdraw from West Thumb and relocate the development one mile south was made as explained in the West Thumb Development Outline:

Pre-war planning, directed somewhat by the desire of concessioners to have commercial facilities adjacent to the wye, was confined to a relatively conservative development in the immediate vicinity of the wye which encroached upon the hydro thermal area. This resulted in the construction of the present [facilities]....

The increased number of visitors, evident travel trends, and the fact that encroachment upon the thermal area is not desirable has directed the need for planning these public accommodations at a more adequate site. Contributing factors are lack of acreage, and unstable soil conditions for large buildings within the thermal area. The decision to move was made in 1947 during a field meeting at which many of the interested parties including the concessioners were present. At that time the campground, service station and garage would have remained at the wye. Subsequent study has determined that it would be more desirable to have all of the development within certain bounds and leave the wye free of commercial development.

The site selected for development is approximately one mile south of the wye between
the highway and the lakeshore....[The area has] definite bounds which would confine development but because of adequate acreage this is considered a desirable feature. From a public use standpoint, these areas have decided advantages over many other public use areas within the park. They lie between the road and lake and include enough acreage to provide facilities on a more generous scale than is now practiced in the park. The orientation, facing the lake to the east and northeast away from the afternoon and evening sun, the possibility of taking advantage of the extensive views over the lake, and the opportunities for boating make this area superior to others now in use (NPS, 1949).

By 1947, Yellowstone Superintendent Edmund Rogers recognized that the problems of inadequate visitor accommodations and encroachment of the facilities upon the Park's attractions could only be solved by the gradual removal of facilities from these areas and their replacement elsewhere. Rogers (1947) felt that this replacement would involve "the construction of entire new community developments...[that] would amount to a small town." The three areas under consideration for withdrawal and relocation were Old Faithful (Rogers, 1947), West Thumb, and the development at the rim of the Yellowstone Canyon.

The Master Plan of 1953 shows, for the first time, the Canyon Village area proposed very nearly as it is today. However, due to a lack of funding, no planning for the relocation of Old Faithful and West Thumb took place for several more years.

The twenty-year concession contracts were to expire in 1955 and new contracts would have to be negotiated. Any changes the NPS may have wanted that would affect the
concessioner needed to be considered at this time. Director Wirth had Superintendent Rogers, Landscape Architect Mattson, Chief Ranger Otto Brown, and Chief Naturalist Dave Condon meet with him in Washington for a week to examine in detail the Yellowstone Master Plan. At these meetings:

The main thing we had to do...was to review these master plans and bring them up to date, since many had not been kept current during World War II and the cold war (Wirth, 1980).

From these meetings the group suggested that the Park should abandon and remove the West Thumb facilities and develop a new area 1 1/2 miles to the south on the West Thumb Lake Shore to be called Thumbay (NPS, 1955).

The following year, 1956, Haines, who had been working at Mt. Ranier National Park, returned to Yellowstone to work; his first assignment was to re-survey the proposed development area at Thumbay for a topographical map. To his surprise he found his stakes were still in place from his 1947 survey (Haines, pers. comm.). He reworked the area maps and in 1959 the Western Office of Design and Construction took over responsibility for the planning of the area's development (Haines, pers. comm.).

**WYOMING ATTEMPTS TAKEOVER OF YELLOWSTONE PARK COMPANY**

A Yellowstone tourist study initiated by the state of Wyoming in 1950 had revealed that Yellowstone generated an estimated $18,994,301 dollars of business in the immediate area surrounding the Park (Wyoming Highway Department, 1950). With this in mind, the management of the Park and
the Park concessions became a matter of considerable interest to the state of Wyoming (Haines, 1977). When the *Denver Post* (Martin, 1955) charged that Park facilities for the public were so "inadequate, old and worn out that their condition verges on a national scandal," the state of Wyoming, for the first time, recognized that visitor dissatisfaction in Yellowstone's concession facilities could have an adverse effect on the state's economy (Kenner, 1984).

Because of the state's desire to gain control of the Yellowstone Park Company's (YPCO) concessions operation, the Wyoming State Legislature passed legislation (House Bill 228) on February 14, 1955, which would allow the purchase and operation of the concession by the state (Rogers, 1955). Behind this legislation were entrepreneurs who had hopes of making big profits from the takeover of the YPCO (Bartlett, 1985). One of these was Paul Stock of Cody, a large stockholder with Texaco. He met with the Executive Vice President of the YPCO, Huntley Child, to discuss the possibility of a buyout. Stock then helped to push the bill through the state legislature (Child, pers. comm.).

This legislation created the Wyoming Yellowstone Park Commission which would be responsible for operating the concession. It also appropriated $50,000 to hire specialists to study the feasibility of Yellowstone's concessions being purchased and run by a state commission (Bartlett, 1985). There was considerable publicity and
controversy concerning Wyoming's bid to purchase the concessions operations, which resulted in the states of Montana and Colorado introducing legislation opposing the Wyoming takeover (Rogers, 1955).

Park officials feared that a takeover of the concessions by the state of Wyoming would lead to the state's attempt to dictate Park policy for the benefit of the state (Haines, pers. comm.). To assess the situation:

On April 21, Superintendent Rogers, Director Wirth, Assistant Director Albin, Regional Director Baker and Thomas Flynn, Executive Staff Assistant to Assistant Secretary of Interior Lewis conferred in Cheyenne, Wyoming, on the proposal of Wyoming taking over the park concessions with Governor Milward Simpson, the 5-man committee appointed by the Governor to study the proposal, the Legislative Intern Committee appointed by the Wyoming Senate and House, and Representatives of Allen and Company, New York brokers, who have been handling preliminary studies on the proposal (Rogers, 1955).

However:

Wyoming's plan proved a bit too complex. First a sale price for the Yellowstone Park Company had to be agreed upon, and then approved by the Interior Department; federal enabling legislation had to be passed to allow a state commission to run facilities in a national park; this in turn would be followed by state legislation and finally by sale of bonds to finance the purchase and initial operations of the concessions (Bartlett, 1985).

To the relief of the NPS, the plan fell through, and in 1956, with no purchaser appearing, the YPCO was able to secure a loan from eastern banking interests. Subsequently, the YPCO had its lease renewed for another 20 years.
Throughout the attempt by the State of Wyoming to purchase the park concessions, the YPCo was in favor of the buyout. According to Huntley Child:

We were all for it; we were trying to sell it because it was impossible for a family owned business to run it on its own with a short season....We suggested back in the 50s that the National Park Service buy out the Yellowstone Park Company. We knew private concessions could not afford it (Child, pers. comm.).

There had been two companies considering buying the YPCo--Eddy's Bakery (which later became General Host, Inc. and did buy the concessions in 1966) and Western Hotels. However, at this time, both companies decided against the purchase because of the diffulties of trying to run a business that was under tight government control (Hallin, pers. comm.).

YELLOWSTONE PARK COMPANY'S FINANCIAL PROBLEMS

The facilities of the YPCo had become increasingly run down and obsolete over the years since their construction in the 1920s and 1930s. First the YPCo had to contend with the lean years of the depression, then came the World War II years that made the depression era seem like good times. During the war both the concession's and government's buildings that were already in a deteriorated state went from bad to worse. Dilapidated facilities were the rule not the exception when the war ended and the park was deluged with Americans who were now ready to start enjoying
themselves by visiting their national parks. Post-war travel soared from 178,296 visitors in 1945 to 814,907 in 1946. This presented a problem for the concessioner:

The wave of visitors that inundated Yellowstone Park in the summer of 1946 was nearly one and one-half times greater than the peak visitation before the war, and that load was put upon obsolete, neglected facilities (Haines, 1977).

This resulted in protests streaming into Congressional offices, newspapers across the country, and chamber of commerce meetings in Wyoming and Montana. Soon the whole nation was aware of Yellowstone's poor food, wretched housing, surly clerks, and inadequate concessions management (Bartlett, 1985). Although the NPS and U.S. Department of Interior were aware of the bad situation:

[T]he bureaucracy had lacked consistency in its approach to the concessions problem. At a time of rapid inflation it was reluctant to allow the company to raise prices. The report of a "Concessions Advisory Group" in 1948 simply increased Park Service-Interior Department indecision; the bureaucracy could not make up its collective mind what to do.

Park Service and concession officials had stock answers to complaints. "This is not New York City or Miami Beach; you cannot expect posh facilities in a rustic area. The company has to make a profit during a very short season. We are not allowed to charge enough to make it worthwhile to build better cottages."

To spread the criticism, it is true that the Park Service, despite postwar inflation, had held the rental at $3.75, just twenty-five cents higher than in the depression year of 1936 (Bartlett, 1985).

Even though the YPCO had the problem of low rates, which the NPS would not allow them to raise, Huntley Child (pers.
comm.) felt the accommodations were not worth a higher price.

The financial weakness behind the YPCO's failure to modernize, or even maintain its investment in the Park, was complicated by the loss of their source of low interest credit on which they had depended for financing all of the major improvements made prior to World War II (Haines, 1977). From the inception of our first National Parks, the railroads had been willing to lend money to the concessioners at low interest rates. At the time, the railroads were the primary source of transportation to the Park. The railroads did not want to be in the hotel business; their plan was to make money on transporting tourists to the parks. But once there, the tourists had to have a place to stay. This led the railroads into the business of lending money to concessioners so the tourists could be accommodated once they arrived in the Park.

Three railroad companies serviced the Yellowstone gateway communities. As time passed, fewer people arrived by rail each year with the number falling from 86% of the visitors in 1915 to fewer than 3% by 1940 (Haines, 1977). As the era of the car came to dominate visitor transportation to the Park, rail service was discontinued, first by the Northern Pacific Railroad to Gardiner in 1948, then by the Burlington Railroad to Cody in 1956, and last by the Union Pacific to West Yellowstone in 1961 (Haines, 1977). With the passenger rail service to Yellowstone out
of business, it no longer made sense for the railroads to
finance low interest loans to concessioners. As this
practice was discontinued it left the YPCO in a difficult
position:

The problems faced by the Yellowstone Park Company
in 1955 came out of the past....To an indebtedness
of $186,800 remaining from the amount borrowed in
1928...an additional $500,000 (to be retired at
$50,000 per year) was added January 29, 1937.
More than one-quarter million dollars of the total
obligations remained unsatisfied at the end of the
1941 season...and business was so poor during the
summer of 1942 that the Yellowstone Park Company
was forced to ask for a suspension of further
repayment. Even the interest went unpaid until
November 22, 1944, when President William M.
Nichols sold his Gallatin Gateway ranch to raise
the money. That desperate measure carried the
company through until the resumption of
operations in 1946 furnished revenue with which to
continue liquidation of the outstanding
indebtedness. Most of the earnings of the postwar
years were thus absorbed, and the Yellowstone Park
Company was not free of its financial obligation
to the railroads until March 25, 1955.

It would seem that the Yellowstone Park Company
had done well to clear itself of that longstanding
obligation, but it was a gain made at a fearful
cost. The construction of additional facilities
to handle the postwar visitor load...was entirely
neglected and maintenance of the existing,
obsolete facilities was held to a bare minimum.
The failure to modernize and provide services
expected by postwar visitors led to many, often
quite justified, complaints concerning the
parsimonious operation by which the company
struggled toward financial solvency (Haines,1977).

With the loss of the source of their loans, the YPCO faced a
different problem:

Due to the hazardous nature of the investment...we
find it impossible to secure loans from banks,
trust and insurance companies, or private capital.
Hence reinvestments in betterments must come out
of earnings, which in the very nature of resort
operations are problematical (YPCO, undated).
Edmund Rogers tried, during his reign as Superintendent (1936-1956), to get the YFCO to spend money on renovation and new construction but they would not budge. Because of their financial predicament they stalled, complained, pleaded, whined, argued, procrastinated, and politicked to avoid spending money (Bartlett, 1985).

MISSION 66

By the mid 1950s a serious problem faced our National Parks. Growing leisure time and the affluence of the average American had raised nationwide park attendance from twenty-one million in 1946 to fifty million in 1955, with eighty million people expected by 1966 (McKay, 1956). It was feared the parks would be destroyed by overuse unless something was done to improve the situation (Garrison, 1983). However, chances of the situation's improving were remote since appropriations for the NPS were a million dollars less in 1955 than in 1940, even though visitation had tripled in the same time period (Wirth, 1980).

Due to the concurrence of numerous problems - dramatically increased visitation, obsolescence of facilities, feared buyout of the concessioner by the state, and the inability of the NPS to obtain anything other than piecemeal funding for new developments - NPS Director Conrad Wirth realized action had to be taken to upgrade the shameful condition of the National Park System. He decided to investigate alternative methods of funding NPS plans
other than the traditional short term appropriations in Congress.

"As I pondered our dilemma," Wirth (1980) wrote, "I asked myself, 'What would I want to hear from the Park Service if I were a member of Congress?'"

Wirth (1980) noticed that the other agencies that were able to obtain large appropriations did so by lobbying for long term package deals. With this in mind, he came up with the idea of requesting funding for a ten year program, beginning in 1956 and culminating in 1966, which would mark the fiftieth birthday of the creation of the NPS. Needing a "provocative" name he called this program Mission 66.

Former Yellowstone National Park Historian Aubrey Haines believes it is possible that the State of Wyoming's proposal to buyout the YPCO may have been the impetus for Mission 66 since Wirth conceived the idea of Mission 66 the same month and year (Feb. 1955) that Wyoming passed the legislation to attempt the buyout of the YPCO (Kenner, 1984).

Lemuel Garrison, who left his position in Washington where he chaired the Mission 66 steering committee, was sent to Yellowstone to become the new superintendent specifically to implement Mission 66. He gives this account of the birth of Mission 66:

One morning Connie called a special meeting of selected staff people and addressed himself to the park budget and the park visitor situation in honest recognition that many of the parks were being "loved to death." What could we do about it? He recognized that depending on routine
budgeting and planning procedures was not going to be enough. The parks would be destroyed by overuse and financial starvation unless the situation improved. Bernard de Voto and other writers were urging that the parks be closed simply because we could not care for them adequately (Garrison, 1983).

With projected estimates of eighty million tourists arriving in 1966, the thrust of Mission 66 was to serve more visitors:

...the pressing need was for visitor services. We were still destroying wilderness. [The development of] Grant Village was a normal outcome of this growth... (Garrison, 1983).

Specifically, the goals of Mission 66 were to replace outmoded and inadequate facilities with new facilities designed (1) to meet the expected demands of increased visitation, and (2) to be located in areas that would reduce the impact of the public use on the fragile or Sacred Areas. Because the first goal of Mission 66 was to provide facilities in sufficient quantity to keep up with and even slightly ahead of visitor requirements (NPS, 1956), massive new developments were planned. Park developments were planned in terms of "pillows," the number of people that could be accommodated overnight. These new developments were (1) Thumbay with 2,700 pillows to replace West Thumb, (2) Firehole Village with 2,850 pillows to replace Old Faithful, (3) Canyon Village with 2,250 pillows, to replace the development on the canyon rim, and (4) Bridge Bay with 1,500 pillows, plus a marina and campground (YPCO, 1960a).

Before Mission 66, NPS Master Plans across the country were loaded with projects like this that needed financing. The
purpose of Mission 66 was to update and carry out these plans (Wirth, 1980).

The NPS rationale for the number of "pillows" to be added was based on the servicewide ratio of capacity of overnight accommodations for visitors to the total number of visitors per day. This ratio was approximately 1:4, and it was felt that this should be maintained (NPS, 1956). Accordingly, Yellowstone, with 14,347 visitors per day (in the summer), would require accommodations for 3,587 people. The anticipated 62.5% increase in visitors expected by 1966 would result in a needed guest capacity of 5,829. However, Yellowstone already had a nightly guest capacity of 8,417, a 1:2 ratio, and Mission 66 proposed to increase the number of pillows in the park to 14,500, which would maintain the 1:2 ratio. No explanation was given as to this discrepancy between the servicewide goal of a 1:4 ratio and the Yellowstone goal of a 1:2 ratio. Yellowstone was an anomaly, though, as the statistics in 1955 show that even with the 1:2 ratio the concession's occupancy rate was still 90%. This may have been the reason Yellowstone National Park managers were willing to provide a higher ratio of pillows to park visitors. Kenner (1984) points out that the pillow count chosen (14,500) represented the number of pillows believed to be necessary to meet the demand for overnight accommodations in the future and was not intended to represent a ceiling.
The second goal of Mission 66 emphasized protection of the park features. One way this was to be accomplished was by removing facilities that had encroached upon Park features and by relocating them elsewhere. It was felt that good development saved the landscape from ruin and protected it for its intended recreational and esthetic values:

It is the purpose of Mission 66 to locate developed areas where they will not invade the wilderness, abuse fragile areas, or encroach upon significant features. When these principles are followed, the development...contributes...to the protection of the park (NPS, undated).

In addition, some of the other basic elements comprising the Mission 66 plan for protection of the parks were to:

Provide the service which will make the parks more usable, more enjoyable, and more meaningful, and thereby improve the protection of the park through visitor cooperation.

Provide the protection and preservation of the wilderness areas within the National Park System and encourage their appreciation and enjoyment in ways that will leave them unimpaired.

To protect the parks, adequate staffing is necessary. Mission 66 calls for the hiring of new personnel for research, public relations and contact, forestry, fire, and soil moisture control, law enforcement, and interpretation to better educate the visitor, because a more enlightened and intelligent visitor will abide by the rules and regulations that have been established to protect the park (NPS, 1956).

[Mission 66]...will ultimately lessen visitor impact on the National Park System by means of a national recreational plan (NPS, undated).

To understand the goals of Mission 66 it is necessary to understand the philosophy of its author, Conrad Wirth. In the forward of Mission 66 for the National Park System, he writes:
It is significant that the basic Act of 1916 that says the purpose of our National Parks "is to conserve 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"], uses the singular form of the word purpose - it defined one purpose, a single objective, not several. True, that single purpose combines use with "conservation unimpaired." These are merely the components of one purpose, a concept that at once embraces and indistinguishably combines both use and preservation. Neither, standing alone, out of context, can be accepted as the true and adequate expression of the reason-for-being of the National Park System. The isolation and over-emphasis of either of these concepts can seriously impede and distort park planning and management.

[The]...inspirational products of parks are supplied by the natural or historic scene undamaged, unmodified, and unimpaired. To change the character of a park area in any important way destroys a park of its ability to yield those benefits to the human mind and spirit. Protection, then, while not an end in itself, but a means to an end - is requisite to the kind and quality of enjoyment contemplated in the establishment and perpetuation of parks by the Nation. Thus, we complete our concept of park purpose: The primary justification for a National Park System lies in its capacity to provide enjoyment in its best sense, now and in the future (NPS, 1956).

Continuing with this philosophy, Mission 66 for the National Park System established the task for the NPS "to assure the American people opportunity for maximum beneficial use and enjoyment" and to "provide the service which will make the parks more usable" (NPS, 1956).

Due to the Depression and then World War II, little money had been available to carry out the visionary Master Plans that each park had been updating over the years with the hope that some day the funding would become available to
carry out these plans. But to the NPS's surprise, Congress approved the ten year, projected $787 million budget of Mission 66.

The concessioners were asked to share in the task of investing large amounts of money for Mission 66 with their responsibility being to construct the visitor accommodations called for in the new developments of the revised Master Plans. To accomplish the Mission 66 goals, then, required the willingness and cooperation of the concessioners:

In its broad outline the plan was a joint venture through which the government and private concessioners could expect to overcome two decades of obsolescence in half that time through their joint efforts (Haines, 1977).

MISSION 66 IN YELLOWSTONE

In this joint effort Thumbay was to be constructed, with the government clearing the area of timber, putting in roads and utilities, service station, campground, ranger station, marina, and visitor center, while the YPCO would be responsible for constructing the visitor accommodations. During the planning stage, the NPS felt there would have to be a two or three year "interim period of adjustment" at West Thumb as facilities there were closed down and provided at the new location (NPS, 1957). The Mission 66 prospectus for Grant Village goes on to say:

...it is desired to retain the pleasant forest character on the land as much as possible. However, this forest scene is not a superior or unique characteristic of the site, and is duplicated in many places elsewhere in the Park, so the clearing required will not destroy any
primary values.

At this location there is ample opportunity for Park recreational and interpretive use. The Lake already has demonstrated that it draws many people who are primarily interested in boating or fishing, and boat trips into the wilderness sections of upper Yellowstone Lake are readily made from here....[T]here is evidence of enough interesting natural history within trail reach to warrant further exploration leading to development of a full-scale interpretive plan for the village, including trails for hiking and horseback parties, boat trips, etc.

It is thought that with the present demonstrated interest in both day use and overnight stays in this general vicinity, it will be economically sound for the concessioner to plan to abandon the present site at West Thumb and concentrate an expanded and improved service at this location. It will be partially sustained financially by those interested in the Lake and fishing and boating, but we do not believe we should emphasize this as a primary park purpose....The village will have a fairly central location...and will be attractive to many Park visitors who desire the lakeside atmosphere as a center from which they can make many day trips around the Park besides taking advantage of the program available at the village.

We believe this site presents a good opportunity for the concessioners to make the required investment in public use developments and have a sound business proposition (NPS, 1957).

While the planning for Thumbay was taking place the idea was suggested to honor former President Ulysses Grant, the signer of the Act that created Yellowstone National Park, by naming something in the Park after him. This idea probably came from his grandson Ulysses Grant III (Haines, pers. comm.). Consideration was first given to changing the name of Thumb Bay to Grant Bay (Mattson, pers. comm.) but this was rejected because there was opposition to change a name already in place (Haines, pers. comm.). Suggestions
were then made that the new village be named Grant Village. Thus, Thumbay became Grant Village (cira 1956).

The YPCO resisted the development of Grant Village from the beginning although they knew that if they wanted to remain in the park as the concessioner, sooner or later they would have to construct accommodations there (Hallin, pers. comm.). Billie Nichols, President of the YPCO, was flabbergasted to think the NPS would consider developing a site so far off into the woods and away from the main road (Mattson, pers. comm.). He believed that no one would want to stay in the new Grant Village - people preferred to stay next to the Park's main attractions like those at West Thumb. Even though the facilities at West Thumb were in poor condition and in need of renovation, from a business standpoint it did not make sense to relocate the facilities elsewhere (Gallagher, pers. comm.) because the West Thumb Housekeeping Cabins were more profitable than the hotels and lodges located elsewhere in the Park (Mattson, pers. comm.).

The first clearing of timber at Grant Village was in July of 1956 to get wood for the building of amphitheatres at campgrounds throughout the park (Haines, 1977). No further action was planned for Grant Village until after the completion of Canyon Village in 1957.

The construction of Canyon Village was a terrible financial fiasco for the YPCO (Hallin, pers. comm.) due, among other reasons, to cost over-runs that led them to bankruptcy (Haines, pers. comm). The government's $55
million Mission 66 investment in construction at Yellowstone was to be complemented by a private investment of $15 million in new concession facilities (Haines, 1977) of which 1/3 of this investment was for Canyon Village:

It is significant that, by this step, the Yellowstone Park Company obligated themselves for a $5,000,000 capital expenditure over a three year period for one plant, a sum nearly equal to that spent for the improvement and expansion of all other facilities for the period of 1936-1955. The story of Canyon Village was not a happy one. Plagued by bad weather, mud, inexperienced crews and indifferent supervision, production schedules lagged and the project was not completed until 1958 which resulted in a considerable loss of revenue (YPCO, 1960a).

The YPCO's experience with Canyon Village - costs rose to $6.7 million (YPCO, 1960a) - caused them to resist the additional investment of an estimated $8 million in Grant Village:

...such enormous expenditures...are simply the inept wishful thinking of incurable optimists divorced from reason as far the Yellowstone Park Company is concerned. Nevertheless, it is the intent of management to accomplish to the utmost degree as much of the program that is humanly and financially possible. Ours, the will to do, is limited by the intrusion of stark reality (YPCO, 1960a).

Financial difficulties were not the only problems the YPCO had with Canyon Village. Other problems in planning, design, and landscaping occurred primarily due to a lack of communication and cooperation between the YPCO and the NPS. According to Huntley Child, Executive Vice President of the YPCO:

The President of the Company, my uncle [Billie Nichols], was not forward looking. The lack of cooperation was not due to antagonism between the
Park Service and the Yellowstone Park Company. He just didn't want to commit himself. When we did give our input the Park Service listened and often did what we asked. We didn't always get what we wanted but I think they were fair. The problem of Mission 66 at Canyon Village may not have occurred if we would've had our input. If we would have been involved in planning like we should have been, we probably would have discovered the problems of the location and been able to persuade the Park Service to change their plans (Child, pers. comm.).

Mattson (pers. comm.) concurred that the NPS had a difficult time getting the YPCO to give them their plans so that the NPS could work them into the Master Plan. This resulted in concession buildings that did not fit in well with the NPS Master Plan.

One of the occasions when the YPCO did give their input was in the planning of Grant Village. At an on site meeting in 1956 attended by both NPS and concessioner employees, the concessioners were asked to propose their own design concept of Grant Village. The YPCO hired a design firm who drew up plans that were submitted to the Park. None of the YPCO's ideas were incorporated in Grant Village (Hallin, pers. comm.).

As visitation continued to increase, the concessioner realized that concession facilities had to be expanded. Regardless, they dragged their feet the entire way. Having to comply with the Master Plan was not an easy task:

Shifts in policy frequently result in reorientation of what the National Park Service considers the "Sacred Areas" of the Park. Compliance frequently requires that a particular facility must be razed and rebuilt in another area without materially increasing over-all capacity or revenues....
Condemnation of an existing facility...does not carry with it compensation for the facility destroyed. While such relocations are designed in the light of the basic concepts of conservation and preservation to advance the public interest,...to the concessioner...they present another financial hurdle (YPCO, 1960a).

The Western Office of Design and Construction took over the planning of Grant Village in 1959 soon to be followed by the start of NPS funded construction in 1961. This construction - roads, utilities, campground and boat launch - was completed in 1962. On June 23, 1963, opening ceremonies for Grant Village were held with Ulysses Grant III - grandson for whom Grant Village was named - in attendance.

It was becoming evident that the projected number of 14,500 pillows needed by 1966 was far beyond what would actually be necessary. Anticipating two million visitors by 1966, the number of pillows needed was revised to 8,000, enough to accommodate 40% of the 20,000 visitors expected to enter the park each day. Because any future additional concessioner facilities were going to be expensive to construct, the NPS felt:

We must be well convinced that there is an actual seasonal need of 75 to 90 days before we place too much pressure on the concessioner, or we are not being realistic about our responsibilities.

I believe there is little question that if we require the concessioner to provide a basic minimum of accommodations...there is every likelihood that once the demand begins to get greater than the supply of "pillows" the concessioner will propose expansion without any urging on our part.
...I recommend that this matter should be thoroughly explored...as there is too great a potential investment at stake to continue to proceed basic planning on accommodations which now do not appear realistic (Gastellum, 1961).

Even with this downward revision, the YPCO still had the Herculean task ahead of them of constructing Grant and Firehole Villages:

We've got a housing problem facing us over the next period of Mission 66, which I suspect is going to be like the Russian Five Year Plans during the twenties. Mission 66 will still be very much a problem...sometime around 1970 or 1980 (YPCO, 1960b).

At the Visitor Housing Building Conference held at Canyon Village in July of 1960, Hugh Galusha, legal counsel for the YPCO, stated their caution in wanting to avoid building too many units too soon:

In terms of usage, we've got to operate close to 100% capacity...[due to the] limited number of days in which to make a return on your investment.

...if you build in excess capacity in a National Park with a short season, you're going to get into trouble. You've got to always have almost enough units but not quite enough in Yellowstone because you cannot afford to carry excess (YPCO, 1960b).

PROJECT ROCHE JAUNE

Unfortunately for the YPCO, its problems ran much deeper than a single issue such as the difficulty they were experiencing in securing the investment money for Grant Village. Realizing it faced large problems, the YPCO began an objective appraisal of the problems confronting it. The result was a report called "Project Roche Jaune" (French for Yellowstone).
The report confirmed that 80% of the YPCO's facilities were 30 years of age or older resulting in considerable potential revenue being diverted to their competitors because of this obsolescence. It also noted that the percentage of visitors staying in their accommodations dropped from 83.8% in 1940 to 42.4% in 1959 while visitation almost doubled in the same time period. Other problems it faced were sub-standard and badly deteriorated accommodations, bad public relations due to the indifferent attitude of their seasonal employees, a "frightful lack of basic cost control," and only one department operating on a budget (YPCO, 1960a). The report recommended that all departments be required to begin preparing a budget and submit periodic progress reports of which "failure to enforce this important recommendation...is tantamount to flirtation with financial collapse (YPCO, 1960a).

Over the years the concessioner's primary problem had been attempting to secure enough income in the short operating season to finance a constantly expanding operation and provide a return on capital. In the 48 years the YPCO had been in business (1910-1957), they had sustained losses in 17 of them.

To accomplish its purpose of overcoming these problems, Project Roche Jaune included a long range program for the reorganization of the company. Included as one of the YPCO's goals was to overcome "the most obvious and serious
defect in the company's management program...**lack of enthusiasm** throughout the entire operation" (YPCO, 1960a).

As for the YPCO's operation, the report stated that management must make more use of accounting, and that:

Rigid thinking must supplant the crystal gazing and personal feelings that have influenced so many decisions in the past....A "get tough" policy is in order (YPCO, 1960a).

In response to criticism of their foot-dragging when it came to constructing new facilities such as those at Grant Village, **Project Roch Jaune** reported:

To guard against any misconception that could arise because of a cautious approach to the scheduled concessioner projects as envisioned by the framers of Mission 66, management wishes to reiterate that it wholeheartedly endorses the idealistic program and will endeavor to meet its assignments. The cold, hard facts of commerce are the principal restraints wherein the company's enthusiasm is tempered by the dictates of financial feasibility; within these limits; it will cheerfully do its bit and more if possible (YPCO, 1960a).

On the positive side, the report stated that due to the increasing population, affluence, and travel time of the U.S. public, the YPCO's potential revenue opportunities were greater than ever before (YPCO, 1960a).

This viewpoint was supported by a study, commissioned by the state of Wyoming on out-of-state highway travelers, that was completed in 1961. It stated that Teton County had four sources of basic income, the most important of which was recreation and tourist trade. Statewide it found that recreation and tourism was the third most important industry. The study also suggested that recreation and
tourism may become the most important sector of the economy in the near future (Lund, 1961).

So important was the growth in tourism that the study concluded that the future of Teton County is so intimately connected with the growth in tourism that "it is generally thought hardly worthwhile to consider anything else" (Rajender et al., 1967).

For awhile the YPCO made a sincere effort to improve their services. Then, between 1961-63, there was a change in the Board of Directors attitude. They were tired of not making large profits and dividends so they hired new managers whose job it was to institute new cost cutting measures. This was reflected in the YPCO cutting service in an attempt to take out of it every penny they could get (Child, pers. comm.). This change in the YPCO's attitude might have resulted from a study conducted by John Amerman, Controller of the YPCO. Amerman (1976) states that during this time period the YPCO conducted an inhouse economic feasibility study of Grant Village. Due to the short season and the high cost of construction in a remote area, the study indicated that Grant Village would be operated at a loss that was sufficiently high enough to "dilute the total profit from operations to a point substantially below a fair and reasonable figure" (Amerman, 1976). These two factors, knowing they were not going to be able to fulfill their obligation to construct Grant Village and being tired of not
making large profits—might have been the catalyst that caused the YPCO to engage in profiteering.

**MANAGEMENT STUDY OF CONCESSION’S OPERATIONS**

As it became apparent that *Project Roche Jaune* was not going to be successful in turning the YPCO around, the Park hired Dr. Ralph Wilson, Director of the University of Denver's School of Hotel and Restaurant Management, to prepare a report on the YPCO's operation and the Grant Village financial setup. Dr. Wilson spent the spring and summer of 1963 in the park evaluating the YPCO operations. Dr. Wilson found that:

The basic concept of private enterprise operating the concessions in the National Parks is well established and has been operating with varying degrees of success for a number of years. The theory is good and is in keeping with the overall concept of business operation in the United States (Wilson, 1963c).

The NPS was given added incentive to resolve the concessions problems when Dr. Wilson noted:

Most Park visitors believe that the concessions are run by the Park Service and any visitor reaction to the services provided by the concessionaires reflect both favorably and unfavorably upon the National Park Service, and indirectly upon the Federal Government. ...in most cases, the overall impression of the Park is obtained by the quality of the service rendered by the concessionaire employees.

...in the minds of the visitors the responsibility for the service provided to the Park visitors rests with the Park Service and the Federal Government (Wilson, 1963c).

Visitor impressions of the Park were being negatively affected by the concessioner’s employee’s unfavorable
attitude that were in part due to:

...the college students after deductions for room and board, hospital, income tax, etc. receive a little over $2 dollar a day in cash wages. As a result the college employee [upon which the concessioner relies]...does not come to the Park to earn money but to have a good time and problems result (Wilson, 1963b).

Due to the low wages, poor training, substandard housing, and 6 day work weeks, the morale of the YPCO's employees was low (Wilson, 1963a). This resulted in employees making a regular habit of speaking derogaorily of their employer to the visitor, which often led to the visitor cutting short their stay in the Park with the resultant loss of potential revenue (Gastellum, 1961).

Dr. Wilson called the YPCO's operating practices haphazard, their managers were without adequate knowledge of the operations and they lacked foresight and understanding of the visitor needs. This had led to unhealthy business practices becoming a part of the daily operating procedures (Wilson, 1963b).

Of utmost importance to the NPS was the basic question of whether the concessioner had the financial resources to construct the proposed Grant Village. Wilson (1963a) felt the current rate of earnings indicated that a major project such as Grant Village would be impossible to finance out of earnings. To the YPCO's plus, the previous three years of good business and the prospect of continued profits had put them in a much more favorable position to obtain loans than in previous years (Wilson, 1963a). Even so, if a 100% loan
were obtained, Dr. Wilson concurred with the concessioner that this still would not appear to be feasible at 10 year financing. If 20 year financing could be obtained, then the expansion would be "reasonably feasible" (Wilson, 1963a).

Most importantly he stated that "no serious expansion should be made by the company until the major loan to the Security First National Bank is repaid or greatly reduced" (Wilson, 1963a).

If private financing with long term repayment and low interest rates could not be obtained, Wilson (1963a) suggested that with the visitor's welfare in mind, government financing may be necessary. This could take the form of (1) long term low interest rate loans to the concessioner, (2) "direct financing of the facilities with management contracts for operation", meaning government purchase of concession facilities with the government maintaining possessory interest and leasing them back to a concessioner, or (3) concessioner "purchase of existing facilities with the stipulation that reinvestment by the concessioner be a part of the purchase" (Wilson, 1963a).

However financed, Dr. Wilson (1963b) stated that the most economically feasible method for developing Grant Village was in phases, moving slowly, beginning with 150 accommodation units with later expansion of 150 additional units when the West Thumb Camper Cabins were removed.

Dr. Wilson (1963a) also suggested that consideration should be given of another concessioner other than the YPCO
operating Grant Village. Or, "Perhaps the ideal solution" stated Wilson (1963a) would be "to have one concessioner providing all visitor services." To accomplish this would require merger or sale.

The YPCO's financial position was recognized as being so tenuous that Dr. Wilson stated that it would be to the owners benefit to sell the YPCO to a more financially sound company (Wilson, 1963b).

Not all of the blame for the YPCO's problems went to the concessioner:

The National Park Service has been negligent in allowing accommodation "slums" to develop in certain areas of the Park. These "slums" like all "slums" have a great appeal to both the owner-operator of the facilities and a type of visitor who desires the minimum of accommodations at a relative low cost (Wilson, 1963b).

The concessioner's efforts at overcoming their problems were largely unsuccessful as evidenced by this correspondence from Lemuel Garrison, Superintendent of Yellowstone, to George Beall, Executive Vice President and General Manager of the YPCO:

There remain areas with which I cannot help feeling continued disappointment. After seven years of optimism that the Yellowstone Park Company operation would finally shift direction to become customer orientated, I again am tasting defeat.

Old Faithful Cafeteria--there is a bottle neck at the entree counter and it has been true for at least seven years. No one has taken the trouble to even try to revise the line or make shifts which will reduce waiting.

The Old Faithful garage is giving execrable service. It is supposed to operate as a first aid station--it is not!
We hear from local managers that they must hold back as many as twenty-five rooms a night to cover errors arising from the central reservations system. ...it is doubtful if your operation could survive without the protecting umbrella of the franchise (Garrison, 1963).

In the midst of all these problems, the YPCO wrote to the Park inquiring what the procedure was for putting in a request for installing a swimming pool, shuffle board courts, and having the government build a golf course that would be operated by the concessioner. Their justification was that "all of the[se]...are in various other parks and we have many requests from visitors as to why we do not have them..." (YPCO, 1963).

Some people in the NPS were thinking along entirely different lines:

We now seek to correct our past mistakes and plan for the future - a future we hope will represent our best thinking and knowledge. To do this I sincerely believe the approach should have been on the basis of what we do today and how would we develop the Park if it were completely untouched so far as development is concerned. This, of course, may sound "way out" but I believe it is the only way to approach the matter if we are to have a clear long range-concept of what the Park should be like in the future, say thirty or forty years hence. We all recognize we will have to live with the present situation for a long time. If we can develop a long-range plan as if the Park were now untouched the problem of slowly and carefully adjusting between what is and what should be undertaken as a firm long-range program with a good chance of success (Baggley, 1964).

Meanwhile, the 1963 Master Plan called for facilities at Grant Village to serve a community of 7,000 visitors with 900 guest rooms and a marina for 215 boats.
MISSION 66 COMES TO A CLOSE

In July of 1964, George Beall wrote to the Director of the NPS, George Hartzog, stating that the YPCO would begin construction of Grant Village in 1965. When this date passed without construction beginning, Hartzog again wrote to the YPCO, in March of 1965, inquiring if they would have the required financing by September 1, 1965 to start construction of Grant Village in 1966. The YPCO wrote back in April requesting more time to work out their plans. Hartzog denied their request in May, and one month later the concessioner informed the NPS that they could not build Grant Village because they were unable to obtain construction capital (National Park System Advisory Board, 1979).

NPS attitudes had changed quite a bit since the inception of Mission 66, which chose modernization and expansion as the panacea for the system's problems. By 1959-60 the NPS began to see that with all the roads and pillows they had added, they still weren't winning the battle to provide adequate facilities. To the contrary, the situation was getting worse. The NPS realized that it could not continue its attempt to provide for a never ending increase of park visitors. Thus, Mission 66 was abandoned half way through the program (that is why Firehole Village was not constructed) but there was an unwillingness to back out of Grant Village because of all the time, effort and money that had already been invested (Haines, pers. comm.).
Superintendent Lemuel Garrison had originally given his support to the construction of Grant Village:

I encouraged it because we needed to replace the West Thumb complex. Hamilton's Store was new and adequate. Everything else was dilapidated. The public campground was worn out by our standards—road ruts, dust, crowded, and scant vegetation....Overnight cabins were forlorn and maintenance was poor. A tiny dock was inadequate....The abrasive gravel land surface of West Thumb lacked dignity, usability, safety, and information services....

We had so much wilderness. It was a popular topic of planning. But there had been few access points. Grant Village would become the wilderness take-off point. Trails would lead to Heart Lake and Flat Mountain Arm. A short trail from Lewis Lake would provide access to Shoshone Lake and on into Belcher River country. The interpretive theme of our visitor center would be "Wilderness and Ways to Enjoy it." Our new marina would be a takeoff point for canoes, and include a major campground, a campfire circle, and a visitor center. This would be a great congregation point (Garrison, 1983).

Early in Mission 66, Garrison (1983) had felt that "appropriate development" of facilities actually could be viewed as a "conservation and protection measure, as it tended to channel and restrict use." He later came to realize that, contrary to his original thinking, the NPS could not continue to expand accommodations for park visitors:

In the context of the times, we were still operating under the principle that every visitor that wanted to come to Yellowstone, you'd let in. If he wanted to camp, you tried to provide a campground for him. We got off of that before very long because it became obvious we had to do something in restriction....camping, for instance. We built the Madison Junction Campground, rebuilt it, enlarged it. We built the...Grant Village Campground, but it was so obvious that to really meet the forward demand, we would end up with a
ring of campgrounds around Yellowstone Lake from Grant Village through to Mary Bay, which was about 33 miles, and they'd be full all the time. This was a perversion of the purpose of the park. So we just finally, I say finally, it wasn't too late in coming, adopted the principle we just weren't going to expand our campgrounds at all (Garrison, 1973).

The other major concessioner in the park, Hamilton Stores, remained in favor of continued development of new areas of the park:

Since Yellowstone National Park was created about 100 years ago, only about 1 1/2% of the total area of the park has been used for roads, trails, housing areas and business locations.

If in the next 100 years only an additional 1 1/2% of the park area were used for visitor accommodations, the increased visitor traffic could be accommodated and the vast Yellowstone area still conserved for their enjoyment without significant impairment (Povah, 1964).

Trevor Povah, President of Hamilton Stores, also suggested extending the road system to include Mirror Plateau, Shoshone Lake, and a loop road around Yellowstone Lake. At several areas in the Park he felt there was a need for additional stores and service stations. Povah (1964) wrote that to "adequately accommodate the needs of the increasing number of visitors in the years ahead," Hamilton Stores "is both willing and ready to build." By 1965 neither the NPS nor the YFACO were satisfied with the situation and both were attempting to locate a company to buy out the concessioner.

The NPS initiated a dialogue with Laurance Rockefeller who, through his company Rockresorts, Inc., operated the Jackson Hole Preserve, Inc. The Jackson Hole Preserve was a
private foundation that ran the non-profit concessions operation in Grand Teton National Park and did so at a loss. Between 1954-1976, the Jackson Hole Preserve had nineteen years of losses, virtually all of them reaching well over one hundred thousand dollars (Smith, 1978). Here, the NPS thought, would be the perfect concessioner—one interested in conservation and who does not require to make a profit. However, although the Jackson Hole Preserve was willing to absorb a loss, that certainly was not its intent.

The Jackson Hole Preserve conducted a feasibility study of the proposed buyout and concluded that in order to have a profitable business, 14,000 pillows were necessary parkwide. To have that many pillows would require constructing facilities at Grant Village, a location the Preserve probably felt was unprofitable (Chase, pers. comm.). Because of the run-down condition of the facilities and the cost of constructing Grant Village, Rockefeller decided not to purchase the concession (Chase, 1985).

By April of 1966, a buyer had been found in the Goldfield Corporation. Shortly after buying the concessions, Goldfield sold out to General Baking Corporation, who six months later changed its name to General Host, Inc. The YPCO, now under ownership of General Host, then entered into a 30 year contract with the Park committing itself to construct new overnight accommodations for 4,000 people and to renovate existing facilities by 1975. The Park now had a concessions contract with a
company that was eager and required by contract to begin
construction of Grant Village.

Reflecting on the events of Mission 66, Haines notes
that:

Overall, Mission 66 was not a success. In the
matter of providing visitor accommodations there
was no real gain, for the available "pillows"
within the Park in 1972 were only 9,000, not much
above the 8,500 available at the opening of the
program. For the past three years [1974-77] there
have been pillows to spare throughout the Park
during the summer season, so that one wonders what
the result would have been had the Yellowstone
Park Company constructed up to the 14,500 capacity
called for in the Mission 66 prospectus. Perhaps
the Park was saved from unnecessary scarring
(Haines, 1977).

Throughout the Mission 66 era, the concessioners had
pointed out the difficulty of obtaining loans to undertake
the construction the NPS demanded of them:

We in the private sector are being asked to
provide services, but the criticism we're getting
from these congressional committees ties our hands
so we can't provide better service. Our bankers
don't like all this upset and uncertainty. We
need stable policies that will permit access to
adequate financing.

[We feel the concession system offers the best
chance of solving the problem in the parks....But
any shift to government ownership would only
change the source of the problem. We feel that
your policy is adequate, but we need legislation
to remove the uncertainties, to make sure your
policies remain constant...we need to remove the
possibility that the present policies will be
retracted (Hummel,1987).

During Congressional hearings on the matter of the
concession's difficulty in obtaining loans, former NPS
Director Albright concurred with the concessioners:

If we are to entrust private enterprise to provide
these services, we must recognize the requirements
of private capital. The first requirement is security of investment. A policy that recognizes these needs and provides this security will permit the concessioner to compete with other demands for capital (Albright, 1964).

The Outdoor Recreation Resource Review Commission supported the above statements in its report of the Outdoor Recreation Resource Review Commission:

Since concessioners cannot own the land upon which they build, they do not have title to their buildings. The contracts under which the concessioners operate allow a great deal of discretion to the administering agencies and little security to the concessioners.

These factors combine to make it extremely difficult for concessioners to borrow large sums for capital expansion. Banks and institutional lenders have not been willing to advance long-term capital in the face of these adverse factors. The majority of concessions have been financed from personal savings and from money generated by the business. This works well enough in small operations but is often inadequate for the needs of large operations in national parks.

There are actions which could be taken to ease the difficulty of concessioners in obtaining capital. These include a strong statement of policy at a high level to create confidence in the system; a government loan-guarantee program; contracts of long duration and on favorable terms; tax incentives. Some aspects of these actions amount to a subsidization of the concession system.

The problems of short seasons, high costs of construction and shifting desires of consumers were exacerbated by contradictory government attitudes and supervision, occasional introduction of political consideration, changes in public policies, vaguely worded contracts and legal concepts novel to the world of orthodox finance (Outdoor Recreation Resource Review Commission, 1962).

As a result of these difficulties, the Concession Policy Act of 1965, Public Law 89-249, was passed. It provided that a concessioner who constructs or has
constructed any legal structure or improvement in a national park shall have possessory interest in that facility and that interest shall not be taken for public use without just compensation (Bureau of Budget, 1966).

The following year the Bureau of Budget's "Study of Concessions on Federal Lands Available for Public Recreation" gave its approval of concessioners operating in national parks:

It is generally agreed that the use of concessioners offers the best means of providing the bulk of needed recreation facilities and services on federal lands.

It would be contrary to general federal policy to have the federal government directly engage in such operations which private enterprise is willing to provide on reasonable terms (Bureau of Budget, 1966).

Meanwhile, as planning for Grant Village continued, at least one park planner was frustrated over the results:

I would like to see the next hotel facility in Yellowstone designed so that most rooms would have balconies facing outstanding scenery and have a restaurant with a "parkscape." However, I was distressed to see that the Master Plan for Grant Village provides for the lodge to be in the village center surrounded by parking lots and stores. In such an environment, it will be another dull building offering dull living.

There must be something fundamentally wrong that results in our developments being so poorly planned. There are good individual buildings, but in grouping facilities we are failures. I recommend that the next time a Canyon or Grant Village type development is needed in a park, we hire a top-flight landscape architectural firm to design it (Bergman, 1967).
In 1968 the NPS completed its Developed Area Plan for Grant Village outlining the type of overnight accommodations that were to be developed as well as their location.

In the following years, 1969-1973, the NPS continued construction of government-built facilities at Grant Village with the completion of the marina building, service station, camper service building, and employee housing.

When General Host first purchased the concessions contract they felt that Grant Village was a great location which would generate large profits; however, after several years had passed they realized their accommodations had to be 60% full year round just to break even. Since the Yellowstone season was only 90 days, they decided they did not want to build Grant Village (Gallagher, pers. comm.).

The YPCO commissioned the firm of Laventhol, Krekstein, Horwath and Horwath to prepare a profitability study on Grant Village in 1969 (Amerman, 1976). This study cast serious doubt over the project for two reasons: (1) It projected that Grant Village would lose money, reducing the YPCO's overall returns to negligible levels, and (2) the rates for accommodations would be abnormally high in relation to other similar facilities in the west (NPS, 1976a). As a result of this study, the YPCO's eager attitude to construct Grant Village changed to one of rejection of the construction.

But the NPS continued with its plans of withdrawing from West Thumb by having 126 cabins removed from the area,
leaving forty-one cabins for concessions employee housing which were eventually removed in 1973.

With each passing day it became evident to the NPS that the YPCO had no intentions of fulfilling their contractual agreement to construct visitor accommodations. This led Superintendent Jack Anderson to write the following letter to the Regional Director of the NPS:

When I first arrived at Yellowstone some six years ago the Grant Village construction plan was near completion and during my tenure we have finalized the program to the point where we have all of the Park Service construction done for the most part, yet there is minimal use of the area.

With today's money lending market so high neither the present concessioner nor anyone we have approached can place in line the investment required for overnight facilities and realize a pay-out. Business-wise it is just not possible to use 9% money for a maximum 80 day operation.

Inasmuch as we have something in the neighborhood of $7 million in the ground including a major marina that has received no use since it was installed, we feel that the answer lies somewhere in between at least until such time as investment money becomes available which would be attractive to a concessioner.

We are recommending that with a minimum amount of work at a minimum cost the area could be utilized for hard-sided overnight units....

We feel that with the addition of this plan there would be a much better utilization of the area, particularly, making use of existing utilities and parking areas....

Public outcry concerning shortage of developed camper sites and related facilities focused our attention upon the pressing and hurried need to cope with the situation and we think to do so successfully, the park should provide more facilities for the recreational vehicle users. Since development of visitor use and concessioner facilities went in at Grant Village over six years ago involving an investment of over $6 million,
redirection toward new concessioner growth at Grant Village grows colder with time. It is the idle roads and parking areas intended for new concession growth that we deem as a suitable location for this proposed campground (Anderson, 1973).

Anderson's plan for converting the visitor accommodations area of Grant Village into a trailer village called for the construction 130 trailer sites (Anderson, 1973).

Anderson thought the construction of Grant Village was a mistake, citing bad climate, short season, snow levels, wind, and the presence of grizzly bears as reasons (Kenner, 1984). In an interview with Kenner (1984), Anderson stated that he suggested to the Director that the NPS "take our red face and walk back to Congress and say, 'We made a real mistake here. We think we should pull out.'"

Instead of taking this advice, Director Hartzog, who was unwilling to invest any money into Grant Village because he agreed with Superintendent Anderson that it was a bad idea (Hartzog, pers. comm.), went to Congress to seek another solution:

Testifying before the House Appropriations committee in April, 1971, the Park Service Director announced that almost one-third of all park concessioners lost money in 1970 and that an equal number, from a financial point of view, could be considered only marginal operations. He informed the committee that he intended to request appropriations to purchase the holdings of General Host and concluded, "I am confident that that is just a prelude to buying out the possessory interests of a number of other concessions" (Everhart, 1972).
However, the Office of Management and Budget (OMB) turned down this request.

Since (1) the NPS was not going to convert Grant Village into a trailer village, (2) the concessioner was not going to construct new accommodations, and (3) the OMB had turned down the NPS's request to purchase the concessions facilities; Grant Village continued to be put on hold. However, Anderson came to realize that even though he disliked Grant Village, it was going to be completed somehow. According to Dale Nuss, South District Ranger at the time:

On three occasions, during meetings, I asked, "Why don't we take $2 or $3 million and tear out everything and restore the area at Grant Village?" Superintendent Anderson, who I got along with very well, chewed me out and told me to shut up because there is going to be a development in Grant Village (Nuss, pers. comm.).

**THE YELLOWSTONE MASTER PLAN OF 1974**

By the mid 1960s, the evolving philosophy of the NPS had changed substantially, creating the need for a new Master Plan. Director George Hartzog appointed a ten member Master Plan Advisory Team in 1964 to develop a new Master Plan for Yellowstone National Park. Members of this team included: Sigurd Olson; Harold Fablan; Joe Penfold, Conservation Director of the Izaak Walton League; Daniel Poole, President of the Wildlife Management Institute; three NPS Planners; and the Superintendents from Yellowstone, Grand Teton, and Sequoia-Kings Canyon National Parks.
Hartzog wanted the blue ribbon advisory team to consider developing a schedule for the orderly removal or relocation of facilities intruding upon significant Park resources (Hartzog, 1967). Team member Poole (pers. comm.) noted that additional instructions from Hartzog to the planning team were "to be free thinking, not to be bound by anything that happened in the past." However, creativity was hard to achieve, at times, due to the bonds of traditional thinking which restrained the team:

On a number of situations...[one of the planning team members] said that what we were considering was contrary to the policy manual and we couldn't do it. He kept pulling out the policy manual and reading it to us. We finally had to get out George's letter of instructions to us and read it, and then tell him to forget the policy manual (Poole, pers. comm.).

After meeting several times, the Team held public hearings in Jackson, Wyoming; Idaho Falls, Idaho; and Livingston, Montana to find out what issues the public felt were important. The majority of the responses made at the 1967 hearings were in favor of plowing Yellowstone's roads in the winter so the Park could remain open. This would give the gateway communities a better opportunity to make a living since the short three month summer season made it difficult for them. Also, a large number of people expressed a desire for the NPS to allow the gateway communities to take up the slack in providing additional overnight accommodations. The subject of Grant Village was hardly mentioned in the hearings and its construction was definitely not a controversial issue at the time. There
were some people who wanted more development and access to the Park but few suggested that an increase in accommodations was needed.

At the Fourth Intragency Meeting of the Committee for Recreation and Travel, James R. Simon, Assistant Director of the Wyoming Travel Commission, said that "the gateway communities must provide more accommodations and the trend reversed so as to provide more facilities outside of the parks and reduce those within" (NPS, 1967).

As Yellowstone continued to be faced with summer crowds that were larger than the Park's facilities could properly accommodate, two diametrically opposed viewpoints were expressed. Frank E. Moss, Senator from Utah, expressed his view at the meeting of the Subcommittee on Employment, Manpower and Poverty:

Some 14 million acres have been set aside in these parks for the enjoyment of all Americans.

Yet, of these 14 million acres only about 5 percent—or about 700,000 acres—have actually been developed with roads and campgrounds and visitor centers. Most of the remaining 13,300,000 acres of natural beauty are accessible only by foot or bicycle or horseback trails.

Many of our parks are no longer a place of escape and repose, but a massive traffic jam, as nerve-racking as a 5 o'clock urban rush hour.

The major reason our parks are so crowded—is from the fact that we do not have nearly enough of them—is that we are wedging from 90 to 95 percent of all our visitors into 5 percent of the space, and walling off all of the remaining acres in their natural state to be visited by perhaps one out of 10 of those who pass through our national park portals.
And now there is a developing philosophy in the Department of the Interior and the National Park Service that additional limitations and regulations and restrictions should be established—that the number of people who can come in the park must be limited, for example, rather than opening access to additional acres with scenic roads or more campgrounds.

We have been zoning people out of national parks...by setting aside larger and larger sections of these areas as "wilderness" or "primitive" or "natural," which keeps them so that they are visited and enjoyed by only the small minority of our population who have the money to buy expensive pack and camping gear, and have the time to trek into the roadless, completely wild expanse.

We are forgetting, I believe, that our national parks are for people, and that a vast majority of Americans see most of our natural wonders...from the window seats of their automobiles, or after a short hike from a visitor's use area.

It would be more equitable to open up our national parks more widely—say to provide access to 25 or 35 percent of the area—and then unhesitatingly tell those who cannot find a spot in the campgrounds or a hotel or lodge accommodation that they have to go elsewhere. At the same time we should urge those who cannot find enough remote "natural" areas in our parks to seek pristine natural beauty in the vast wilderness and primitive areas of our national forests.

What we need are automobile roads so that thousands of Americans and their families can drive into this wonderland and see some of it on a week's vacation or a weekend.

The people of America are entitled to visit their national parks in as large numbers as we can accommodate them, and to have as deeply satisfying experience as it is possible for us to provide them. The policy today is to deny most of them the experience. The trend is to restrict the use of the parks for the majority to keep them in a primitive state to be enjoyed by a minority.

But we cannot ignore the interests of the majority of our citizens...they want...more...roads...more access to our parks....
It may be necessary to put some traffic lights in some of the more popular parks...(Moss, 1968).

Idaho Senator Len Jordan agreed with Moss's philosophy. In a letter he wrote to Director Hartzog, Jordan (1968) expressed his desire to modernize and expand the Park road system so the number of visitors could be doubled and to encourage new facilities development. Jordan wanted to encourage as many people as possible to visit "this wonderland of nature."

The opposing viewpoint was expressed in a letter to the Chairman of the Master Plan Advisory Team, Chester Brown, from fellow team members Poole, Olson, and Penfield:

People are at the root of the problem in Yellowstone....Visitation increases steadily....Greater public use stimulates demands for overnight and day use facilities, which in turn creates a need for rest rooms, sewage treatment capability, solid waste disposal, and the myriad other services that arise from providing for...the needs of people. The management response to these demands...can result in diminution of the park's natural character, in scarring and disturbance, in violation of habitat needed by wildlife, and in accepting less than adequate handling of human waste disposal. This management direction is wasteful of public funds, the talents of service personnel, and, of even greater importance, of the parks themselves.

Parks are not for people if it means that public use will be permitted to the point that park values are destroyed. The only practical way to avoid such an unacceptable alternative is to establish a daily ceiling on the number of people that may be in the park during peak visitation....

Our investigations show that concessioners...are spending in excess of $100,000 annually on advertising and sales promotion staff to encourage park visitation. We seriously question whether this is proper in that added visitation further burdens the parks and complicates their management problems (Olson et al., 1970).
Early drafts of the Master Plan were very idealistic as can be seen from parts of the September 1970 draft:

Conceived in idealism, but necessarily established and developed to conform with a heritage which righteously rationalized and even glamorized exploitation, spoliation and genocide as taming the wilderness, "Colters Hell," like the nation it mirrors, now must make peace with nature. Unfortunately, environmental peace may not come easily to Yellowstone.

At the heart of the issue is the fact that...Yellowstone National Park can no longer be managed as a destination resort community for the masses....

Certainly there will be inconveniences [to the changes and restrictions of personal automobile use]. But sometime, somewhere, we must reverse the tide, "fire the shot," and "nail the article to the door," if only to dramatize that we have come this far, but can go no further. Let this be the place—that place in history—where a new era in park management was born (NPS, 1970).

The draft Plan also gave a soft-sell approach to suggesting some radical changes such as allowing natural-caused fires to burn rather than suppressing them. The Planning Team feared the public would not accept their ideas (Hendrickson, 1970), and as a result the version that was released to the public was watered down quite a bit in an effort to satisfy all the interested parties (Smith, pers. comm.) and to be more pragmatic (Poole, pers. comm.).

The Master Plan Advisory Team released the Master Plan for public review in 1972 and two years later, the final version was approved. Unlike previous Master Plans that had been composed mainly of a landscape architect's illustrations and description of proposed developments, this 34 page plan consisted mostly of a philosophical text that
developed a rationale for future park management:

With each passing year, Yellowstone becomes more and more valuable as an island of wilderness serenity in the midst of a world suffering from the pollution of air, water, and land; from the destruction of animal and plant life; and from overpopulation. And as urbanization and mechanization spread, this island will become more and more precious—providing a memorable glimpse of the deer and elk, the bison and antelope, the beaver, the trumpeter swan, and the lovely valleys, lakes, rushing streams, and dense forests that once covered so much of this land. In this sense, even those wonderous natural phenomena, the great geysers and thermal pools, for which Yellowstone is world-famous will take on a new and deeper meaning.

But, if Yellowstone is to survive the next 100 years, a new equilibrium must be achieved—the irreplaceable park resources must be weighed against the human impact upon them and a new balance struck.

To this end the master plan speaks (NPS, 1974a).

The Plan goes on to say that with the Nation and the Park facing an enviromental crisis, the original purpose of the Park must be translated in terms of contemporary language.

As such, the Park purpose should read:

To perpetuate the natural ecosystems within the park in as near pristine conditions as possible for their inspiritional, educational, cultural, and scientific values and for future generations.

The Master Plan continues by stating:

A growing population, more leisure time, and widening individual mobility seriously threaten the basis on which the National Park System is founded.

To this end, and recognizing that we may have already come too far, a moratorium on stopgap expansion has been declared. The master plan calls for holding the line on accommodations and support services in the park and thoroughly considering the alternatives.
In brief, very fragile elements comprise the ecological framework of a national park. Destroy or damage these delicate and interdependent facets and the opportunity for continuing public appreciation and enjoyment diminishes. Therefore, in the face of visitor projection figures, all planning for public use of national parks must give priority to the preservation and maintenance of natural values for which each park was established.

With locations [of facilities] originally dictated by requirements of the horse-and-wagon era, it is not surprising to find Yellowstone's cumbersome facilities incongruent with today's economic realities and life-styles; therefore, the validity of the park's visitor accommodation base must be questioned.

In its search for alternatives, the Service is presented with a unique opportunity to pioneer in the evolution of a new kind of program-orientated wilderness threshold community, particularly at Lake and Grant.

In the final analysis the public must be made to recognize that there is a limit to the ability of the park to withstand open-ended overnight use. Ultimately, the public must recognize that unlimited development signals eventual destruction.

With the establishment of ceilings for overnight accommodations within the park, the private sector is already being encouraged to provide for the projected increases in travel to the Yellowstone region.

Ultimately freed from having to provide the mass terminal creature-comfort facilities and services within its prime resource zone, Yellowstone National Park can begin to expand its interpretive, educational and environmental functions (NPS, 1974a).

Because of encroachment of facilities on the natural features, the Master Plan proposed the removal of all accommodations and services at West Thumb, Fishing Bridge, and Old Faithful with their eventual conversion to a day-use area. The Plan also placed a ceiling on the pillow count at
8,300 and called for encouragement and assistance to be
given to gateway communities to develop overnight
accommodations. Finally, the Master Plan stated that Grant
Village would become a major development. Regarding Park
research needs, the Master Plan states:

It is a basic tenet of this plan that Yellowstone
National Park once again stands at the threshold
of a new and exciting era of national park use.
Unfortunately, as was the case in 1872, there is
little knowledge to aid management in charting a
new course. One need only remember what existed
at Old Faithful and West Thumb but a short time
ago to sense that the traditional resort-community
concept may no longer be valid within Yellowstone;
yet how, where, and to what level these functions
are legitimate and are to be developed - in Grant
Village for example - is not as obvious (NPS,
1974a).

Concurrent with the release of the Master Plan,
Yellowstone also issued its Environmental Statement. The
Environmental Statement concluded that the environmental
effects of the proposed wilderness threshold community at
Grant Village were unknown (NPS, 1974b).

To implement the Master Plan objective of removing
overnight accommodations from environmentally sensitive
areas, the remaining cabins at West Thumb were removed in
1973. Two years later the cabins at Fishing Bridge were
closed to the public due to their dilapidated condition
(lobst, pers. comm.).

The 1974 Master Plan marked a substantial change in
philosophy from the previous development oriented Master
Plans. The new Master Plan shifted management emphasis to
preservation of Park resources as being of primary
importance. Yet, like past Master Plans, it too, seemed to be inconsistent. After calling for a halt on stopgap expansion of facilities, instituting a ceiling on the pillow count, and calling on the private sector in gateway communities to provide additional accommodations in the region, the Master Plan made a 180 degree turn by stating one of its primary goals was the construction of a new development—Grant Village.

Bill Everhart (pers.comm.), former advisor to Director Hartzog, felt this was not a contradiction since the unlimited development called for in Mission 66 never occurred. As such, the reduction from 14,500 pillows to the ceiling of 8,300 was a paper reduction because the 14,500 pillow level was never achieved (Everhart, pers. comm.). Since the actual pillow count never got above 9,000, the ceiling was really nothing more than an attempt to maintain the status quo.

Addressing the Master Plan's call for putting a halt to stopgap expansion of facilities and then proposing to build Grant Village, Planning Team member Smith states:

There was supposed to be a trade-off to remove facilities from Old Faithful and Fishing Bridge with replacement at Grant Village....To not replace the pillows was not politically or philosophically acceptable. We did not consider not building Grant Village (Smith, pers. comm.).

One of the reasons the Planning Team had not considered aborting Grant Village was that at meetings of the Master Plan Advisory Team, the development of Grant Village had
been presented to the members of the Team as the NFS showplace for planning (Poole, pers. comm.). Fellow Planning Team member Poole concurred with Smith's statement:

Due to the pillows being removed from Old Faithful and Fishing Bridge, the pillows [at Grant Village] were to be replacement and those areas were to be returned to their natural condition. We had looked at some areas that had, in just a year or two, been returned to their natural condition and it was amazing how good they looked. We were very interested in setting a ceiling on the pillow count. The idea was to not lower it any less than it was because political pressure from surrounding communities would not allow for less development in the park. We didn't want to raise it either because the sewage system was a limiting factor. You can only allow for as many people as the area's sewage system can handle due to the need to maintain the quality of water. The streams are the arteries of Yellowstone... (Poole, pers. comm.).

Just as the ceiling was intended to put an upper limit on the number of pillows, it was also intended to be the lower limit as well. Therefore, 8,300 pillows was the goal to be achieved and maintained. This was true not only because of the political pressure Smith had mentioned, but also because: (1) there was a responsibility to the concessioner to replace the pillows removed from Old Faithful and Fishing Bridge (Haraden, pers. comm.) because a minimum number of pillows had to be maintained to make the concessioner's operations profitable; (2) the belief that the Park's large size was too much territory to cover commuting in and out every day; (3) the opportunity for an overnight stay in the Park was considered to be a desirable experience that should not be denied to park visitors (Smith, per. comm.); and (4) the belief that forcing people
to stay in gateway communities would result in additional
traffic on Yellowstone's already overburdened road system
(Smith, pers. comm.).

BEARS, FISHING BRIDGE, AND GRANT VILLAGE

At the time the idea of relocating the West Thumb
development to Thumbay was first conceived there was no
concern over whether the area was prime grizzly bear
habitat. Bears did not seem to frequent the area often
(Haines, pers. comm.) and their populations were considered
to be stable. Certainly no one feared their numbers were
dwindling. When construction of Grant Village's roads,
utilities, and campground began in 1961, concern for the
grizzly population still had not developed nor had the NPS
begun to use research as a tool for management decisions
(Varley, pers. comm.). Consequently, no research had been
conducted to determine if the Grant Village area was good
grizzly bear habitat.

When John Townsley took over as Yellowstone's
Superintendent in 1975, he did everything in his power to
get Grant Village completed. To justify the construction,
he usually made reference to the Park's intent of carrying
out the Master Plan. He sold the public on the importance
of constructing Grant Village as a replacement for
facilities removed from Fishing Bridge and Old Faithful.
Townsley emphasized the importance of withdrawing from
Fishing Bridge to restore the area to its natural condition
because the area was prime grizzly bear habitat. Author Alstone Chase (1986) questioned the Master Plan rationale to construct Grant Village for the purpose of allowing the withdrawal of facilities from Fishing Bridge. Because of the questions that he raised, an examination of the motivation behind the Master Plan's call for withdrawal from Fishing Bridge to restore prime grizzly bear habitat as the primary reason for constructing Grant Village is in order. Concerning the Fishing Bridge area, the Master Plan states:

Current planning proposes to ultimately relieve congestion and eliminate accommodations and services from this existing developed area in order to facilitate restoration of critical wildlife habitat at Yellowstone Lake's outlet....

Because of proximity to choice grizzly bear habitats in the Pelican Valley and in the lake outlet area, as well as the outstanding environmental education opportunities, overnight facilities should be phased out of Fishing Bridge area. The area from the mouth of the Yellowstone River at Lake to one mile downstream is superb ecological environment and should be restored to natural conditions (NPS, 1974a).

Scientists as far back as Adolph Murie in the 1940s had recognized there was something other than camper's food that attracted bears into the area (Varley, pers. comm.). When the Park proposed to install a road bypass around Fishing Bridge, Park Biologist William Barmore wrote:

Lower Pelican Valley between Mary Bay and Lake and as far north as LeHardy Rapids on the Yellowstone River has unique ecological value for the following reasons:

1. The merging of lake, river and terrestrial ecosystems creates a complex of environmental conditions and habitats that supports a great diversity of plant and animal life (The "edge effect" in ecological parlance).
2. Areas with the ecological diversity of the lower Pelican Valley are uncommon in or out of the park (compared, for example, with the abundance of representative areas of lodgepole pine or subalpine forest). In areas other than parks, such attractive and productive areas are usually developed for ranching or townsites (The original location of the Fishing Bridge development where it is may reflect this latter tendency).

3. The likelihood that the Yellowstone River and Pelican Creek valleys provide important corridors for animal movement (bison, elk, grizzly bear, moose) between Hayden Valley and Pelican Valley.

For these reasons, greater than usual concern should be shown for maintaining the ecological integrity of lower Pelican Valley.

Eliminate all concessioner facilities at Fishing Bridge, the trailer court, and the Fishing Bridge and Pelican Creek campgrounds. Limit facilities to those necessary for day use and visitor enjoyment and understanding of the area (visitor center, nature trails, scenic overlooks, perhaps a picnic area or two, etc.).

**Justification:** If we had it all to do over again, it seems unlikely that we would create an extensive and heavily used development at Fishing Bridge. Thus it seems reasonable from a long term standpoint to eliminate these facilities and to restore the natural integrity of the area (Barmore, 1968).

Another Park Biologist, Glen Cole (1971), suggested that the area had an abundance of natural food for grizzlies. He also stated that studies would be expanded to document these beliefs and that it should be anticipated that these studies "could show that substitute overnight facilities should be provided away from what is apparently prime grizzly habitat" (Cole, 1971). According to Yellowstone grizzly bear researcher John Craighead:
As for the Pelican Valley area...it was well known that it was good habitat; we recognized this area as prime habitat (Craighead, pers. comm.).

Yellowstone Plant Ecologist Don Despain noted:

[For the period 1943-1959, of the total 48 grizzly bears killed (including accidental as well as control kills), 24 came from Fishing Bridge and Pelican Creek, and 3 from Lake. For the same period a total of 328 black bears were killed, with 37 from Fishing Bridge and 28 from Lake. As indicated by Mr. Cole, there is more involved than the attraction of grizzly bears to a campground (Despain, 1972).

These beliefs, regardless of their accuracy, were based upon intuitive feelings. The Park had no scientific evidence that indicated the area was prime grizzly bear habitat (Craighead, Varley, pers. comm.). The only study to have been conducted on grizzly bears was the Craighead study, which was on population dynamics. No studies on grizzly bear habitat had been conducted. So, based on their belief that the Fishing Bridge area was prime grizzly bear habitat, the Park proposed to withdraw from Fishing Bridge and relocate facilities at Grant Village, when in reality they did not have any scientific evidence to support this belief. Lacking scientific evidence at that time, management decisions were based upon conventional wisdom (Varley, pers. comm.).

When asked in an interview if the Fishing Bridge area was thought, in 1970-72, to be good grizzly habitat, John Craighead said:

...I would say no. Any development was going to be an attractant due to the fact that the more
people in the area the more opportunity for food
to be available to bears (Craighead, pers. comm.).

It was common knowledge that bears frequented the Fishing
Bridge area because of the availability of human food from
campers and picnickers, garbage, and from unwanted fish
thrown on the shore by fishermen. Dale Nuss, former
District Ranger states:

In the Fishing Bridge area where the slough is,
the bears were sucked into the area because of the
fisherman. Fisherman would catch suckers, an
exotic fish; they were fishing for trout, and
throw the suckers over their shoulders into the
willows because they didn't want them. That's
what made the area prime bear habitat. Unlike
Pelican Creek, the Yellowstone River is too deep
there during the spawning season for bears to
fish. The bears came into the area to get the
fish that fisherman threw away.... We had to go in
there when there were fishermen along the river,
between the bridge and the lake, and kill bears
that were in the willows along the slough because
of the potential injury to people (Nuss, pers.
comm.)

Specifically, then, it was the Pelican Valley area that
was thought to be prime grizzly bear habitat, albeit there
was no scientific evidence to support this belief, while the
lodgepole pine forest of the Fishing Bridge area was
suspected to be an attractant to bears mainly due to humans
with their food, garbage, and fish. As later demonstrated
in the 1980s, this situation could be largely prevented by
strict measures to separate bears and humans. Consequently,
it was the failure of the NPS to separate bears and humans
that resulted, to a large extent, in the Fishing Bridge area
becoming an attractant to bears. Author Alston Chase
writes:
For the grizzly bear, knowledge of habitat was critical. If Grant was as important for the bear as Fishing Bridge, then shifting services would not benefit him (Chase, 1986).

Addressing this subject, Dr. Robert Jonas, professor of wildlife biology at the University of Idaho, wrote to the Superintendent of Yellowstone National Park saying:

It is my understanding that one of the reasons for eliminating all or parts of the Fishing Bridge complex has to do with designation of this area as "prime" grizzly bear habitat. I hope there is good, solid scientific data to confirm that claim. Too often I have seen biological reasons given for various actions when the real reasons are economic, social or political. I suspect more bears might be there or sighted there because of the presence of the humans rather than anything innate about the natural habitat....If the Fishing Bridge complex is reduced or eliminated, I assume replacement visitor facilities will be constructed elsewhere. If that "elsewhere" is Grant Village, I suggest we might be moving one problem from one place to another at taxpayer's expense. Grant Village is as good (probably better) a habitat for grizzlies as the Fishing Bridge system (Jonas, 1983).

The number of bear-human encounters probably played a large role in influencing the decision to move out of Fishing Bridge (Varley, pers. comm.). During the forty years from 1930-1970, approximately 48 people per year were injured in Yellowstone by bears with the vast majority of these injuries resulting from black bears (Schullery, 1980). By 1970 the NPS realized it was facing a crisis situation due to the threat of visitor lawsuits resulting from bear injuries. The park area with the largest percentage of grizzly bear caused injuries was Fishing Bridge. Therefore, removing facilities from Fishing Bridge seemed to be the best way to insure visitor protection. Concerning visitor
protection, the Master Plan stated:

The visitor must be made to see that if Yellowstone's unique wilderness essence is to survive, he must be willing to accept nature on her own terms, rather than his own, contrived within the framework of contemporary ethics....For the present...the best hope is to separate the visitor from exposure to real hazards, especially those he is unaccustomed to experiencing at home.

With respect to the park's traditional bear problems such an approach has been highly successful to date. For years the Service has tried with little success to impress upon a generation of visitors, desensitized by cartoon wildlife, that roadside bears are wild, dangerous, and therefore should be enjoyed from the safety of their cars. Faced with the dilemma of increased maulings and traffic fatalities from such encounters, and unable to convince enough visitors of the seriousness - and often tragic results to both bear and human - of their misguided philanthropy, park managers found that separating the offended bears from the temptations was the only alternative. Hopefully, the supplemental interpretive system will provide the means whereby the visitor might be reached so that this unique species can be restored to its native habits (NPS, 1974a).

Moving facilities from Fishing Bridge to Grant Village would give the Park the opportunity to separate bears from visitors, assuming grizzly bears did not frequent Grant Village, and would contribute to reducing the number of bear caused human injuries each year. However important maintaining a grizzly bear population may have been, preventing people from becoming injured by bears was a higher priority than restoring the Fishing Bridge area for the benefit of the bears (Varley, pers. comm.). However, the Master Plan's only stated reason for withdrawal from Fishing Bridge was for the purpose of restoring the area for the benefit of grizzly bears.
Craighed (pers. comm.) and newspaperman Joe Cutter (pers. comm.) suggest that the NPS did not want to withdraw from Fishing Bridge for the benefit of grizzly bears because they were not concerned about the grizzly bear population. The grizzly had originally been placed on the Endangered Species list in 1966. Four years later it was delisted for political reasons. When the grizzly was being reconsidered for listing in 1975, the NPS opposed this action because it felt the grizzly population in the Yellowstone Ecosystem was healthy. Yellowstone biologist Glen Cole estimated the grizzly population to be between 300-400, substantially higher than then the Craighead's 1971 estimate of 175 grizzlies (Schullery, 1980). Cutter (pers. comm.) suggests that it is difficult to believe the NPS wanted to spend millions of dollars to build Grant Village due to a desire to restore the Fishing Bridge area for the benefit of a bear population that they considered to be healthy.

Craighed (pers. comm.) feels the NPS did not have enough concern for bears to withdraw from Fishing Bridge for their benefit as evidenced by the fifty grizzlies removed from Yellowstone National Park for control purposes (killed intentionally or accidentally, or sent to zoos) by the NPS (1984) between 1968-1972, the years following the closure of the garbage dumps in the park. When all other grizzly removals (state control actions, killed by vehicles, hunted, poached, etc.) from the Yellowstone Ecosystem are added to the number of Park removals, the total number of grizzlies
removed from the ecosystem between 1968-1973 was 189
(National Academy of Sciences, 1974). Craighead (pers.
comm.) states it is inconceivable that an agency involved in
the declination of the Yellowstone grizzly population would
want to restore an area of natural habitat for their
benefit. Consequently, the motive for withdrawing from
Fishing Bridge and relocating to Grant Village must have
been for reasons other than concern for grizzly bears
(Craighead, pers. comm.).

Craighead (pers. comm.) raises the possibility that even
more bears were killed than the 50 that were reported by the
NPS. Craighead states that when he left the park at the
completion of his study, 20-25 bears he had tagged or
collared were never accounted for again. He contends that
it would have been impossible for that many bears to go
unaccounted for, and therefore, he feels the NPS had to be
involved in the killing of nuisance grizzly bears that went
unrecorded (Craighead, pers. comm.). In 1975, Dick Knight,
now head of the Interagency Grizzly Bear Study Team, began
extensive trapping of grizzlies to determine the population.
When asked if he agreed with John Craighead that 20-25
marked bears had gone unaccounted for Knight stated:

I agree with him that something did happen. Some
of them should have turned up. If they were not
dead, then a lot of them just disappeared (Knight,
pers.comm.)

However, no evidence to prove the NPS was involved in the
killing of nuisance bears that went unrecorded has ever
surfaced.
When asked if the Park was not concerned enough about the health of the grizzly bear population to withdraw from Fishing Bridge and restore the area for their benefit, Knight stated:

I think that is correct, there was absolutely no concern for bears by the National Park Service. Bears didn't enter into the Park Service decisions until 1980 because that was the time when I finally came up with the statistical information that showed the bear population was in trouble (Knight, pers. comm.).

Wally Steucke, Area Manager of the United States Fish and Wildlife Service (USFWS) agrees with Knight:

I don't think the National Park Service was concerned with bears in the late 60s and early 70s, not calloused unconcern, just unaware. Knight continually suggested there were less bears there than what people had been saying. By 1979 he was stating there weren't very many bears left. In 1980, the Park Service became aware of a real problem (Steucke, pers. comm.).

John Varley, head of research at Yellowstone, comments:

The primary concern in moving out of Fishing Bridge was for people, due to the high incidence of injuries resulting from bear encounters. The grizzly wasn't on the Threatened Species list at the time. But, I don't think you can separate the bear issue from human injuries and say the Park had no concern for bears. It is really one issue, and so moving out of Fishing Bridge would benefit both bears and people (Varley, pers. comm.).

In 1969, Park biologist Barmore may have offered a clue to the reason the NPS wanted to withdraw from the Fishing Bridge complex when he wrote:

The facilities at Fishing Bridge are old, shoddy and will either have to be replaced or eliminated in the not too distant future. We should use this opportunity to eliminate the facilities (Barmore, 1966).
Jonas (pers. comm.), Craighead (pers. comm.), and former Chief Naturalist Al Mebane (pers. comm.) believe that contrary to what the Master Plan of 1974 states, it is possible the main reason for withdrawing from Fishing Bridge and relocating to Grant Village was due to: (1) the deteriorated condition of the Fishing Bridge facilities and the fact that this gave the NPS a reason for eliminating them and constructing new facilities elsewhere; and, (2) millions of dollars had already been spent on Grant Village and the infrastructure was already in place, thus making the perfect opportunity to eliminate the eyesore at Fishing Bridge.

Although the Master Plan's only stated justification for removing facilities from Fishing Bridge and replacing them at Grant Village was to restore the area for the benefit of grizzly bears, in reality there were several reasons: (1) the need for reduction of visitor injuries from bears, (2) the dilapidated facilities at Fishing Bridge, (3) the large amount of money spent on the infrastructure lying idle at Grant Village, (4) the need to remove accommodations from the Old Faithful area, and (5) concern for the grizzly bear--this concern was probably not on top of the list.

An additional reason for the apparent discrepancy between the stated reason for withdrawing from Fishing Bridge and relocating to Grant Village and the actual reason might be that what the idealistic Master Plan Advisory Team
wrote was not consistent with the thinking of the more pragmatic Park managers.

CONTINUING PROBLEMS WITH THE CONCESSIONER

When General Host took over the YPCO in 1966 they signed a 30-year contract requiring a minimum capital expenditure of $10 million, $5 million for the completion of 500 visitor housing units at Grant Village and the remainder for rehabilitation of existing facilities to be completed by September 30, 1975. If these expenditures were not completed, General Host would be in violation of their contract, which could then be terminated.

In October of 1969, shortly after the concessioner received the results of the Grant Village profitability study they had commissioned, Bert Laacks of General Host wrote to NPS Director Hartzog indicating that the YPCO could not undertake the construction of Grant Village due to the projected monetary losses that they would incur.

Meanwhile, following the path of their predecessor, General Host continued to allow their facilities to deteriorate. This resulted in the number of visitor complaints concerning the YPCO increasing from 145 in 1974 to 182 in 1975 (Townsley, 1975).

As the September 1975 contract deadline for investment approached, General Host's contract was extended for two years to give the NPS time to evaluate the YPCO operations. In a letter accepting the contract extension, the YPCO
replied that they had met their obligations and were entitled to the full thirty year contract. A few months later, the YPCO responded to NPS criticism concerning the condition of the conces­sioner's facilities by stating:

In all candor, we do not readily understand, and respectfully disagree with your statement that "most of the Yellowstone Park concession facilities are obsolete and in need of considerable upgrading." We believe that a careful examination of the records will show that a substantial amount of time and money has been spent...in new facilities and in the upgrading of older locations. [I]n our view Yellowstone Park Company has fully complied with its obligation under the contract....Prior to our committing to this significant expenditure, we received assurances from Park Service officials that they concurred in our view that Yellowstone Park Company has met its obligations under the concession contract and is entitled to the full thirty year term (Cummings, 1976).

The Yellowstone Concessions Study Team completed their evaluation of the concessioner in October of 1976 with the publication of a 355 page document. The Study Team found that rather than being oriented to serving the public, the concessioner's only goal was to make money, and that the only reason they were successful at this was that people who entered the Park had no choice but to stay in their accommodations. Without a captive audience and in a competitive situation outside of the Park, the YPCO could not survive (NPS, 1976b).

The deficiencies the Concessions Study Team found in the YPCO were similar to those found by Dr. Wilson's study thirteen years earlier. Management operations were deemed
to be so inadequate that poor business practices cost the YPCO $232,500 annually in profits (NPS, 1976b).

The Yellowstone Concessions Study Team also compiled a two volume set of pictures illustrating the state of disrepair of the YPCO's facilities, documenting that the concessioner was not meeting the contractual agreement of investing $5 million into maintenance of the facilities. The pictures show visitor accommodations with holes in the outside walls and roofs, jury-rigged electrical wiring, warped wooden porches and steps, crumbling concrete building supports, and sagging roofs. The following description gives an indication as to the condition of the interior of visitor accommodations:

Probably the most striking first impression of the interiors of most lodging units in the park is the dark, drab, unimaginative decor. Further examination reveals that faded and stained bedding; mismatched pillow sizes; uncoordinated drapes, carpets, bedspreads, and furnishings; threadbare carpets or work floor coverings; lack of wall decorations; low-wattage light bulbs and ineffective lighting fixtures; vintage bath fixtures with stained and chipped porcelain; metal showers covered with a caked film of soap and lime; and stained and torn shower curtain showers are typical in guest rooms and/or public areas. In all too many rooms there are vintage metal furnishings; mixed furniture styles; torn, dirty, stained, and worn-out linoleum, tile or carpeting; ill-fitting window screens; damaged tables; insufficient chairs and lamps; and warped, cracked doors and windows with nearly ineffective locks (NPS, 1976b).

The Study Team concluded that the YPCO and its owners, the General Host Corporation, had not met their contractual commitments. Recognizing that the need to develop Grant Village still existed and that it was not economically
feasible for the concessioner to finance and construct lodging units, the Study Team stated that the development of Grant Village accommodations should be the responsibility of the Government. The Study Team then recommended that the NPS should (1) purchase the possessory interest in all concession-owned buildings at Grant Village, (2) begin a building program to include visitor accommodations and other public buildings, and (3) lease back all, or a portion, of the Grant Village facilities to a concessioner (NPS, 1976b).

The NPS did not want to recreate the conditions that resulted in the need to buy out the YPCO's possessory interest (Clary, pers. comm.), but, if the possessory interest was granted to another concessioner, then this would once again obligate the government to purchase the interest in the event of contract termination. This put the NPS in a dilemma because the Government was not in the business of buying and owning hotel accommodations. On the other hand, the NPS felt it had to purchase the concessioner because no company could afford the expense of buying the YPCO's possessory interest, investing in maintenance and renovation of existing facilities to bring them up to acceptable standards, and constructing new lodging at Grant Village (Povah, pers. comm.). These factors, combined with years of tolerating the dilapidated facilities, poor service of the YPCO, and the 355 page Concessions Management Review convinced the NPS that the only way to gain control of the
concession situation was to buy them out as recommended (Clary, pers. comm.).

Although the Concessions Study Team had concluded that the only goal of the YPCO was to make money, the situation was not that one-dimensional. National Parks Advisory Board member Fred Smith visited Yellowstone National Park in 1978 to discuss with Park employees the state of concessions operations and possible solutions. Smith, who was also a Trustee of the Jackson Hole Preserve which had run the non-profit concessions operations in Grand Teton National Park since 1954, refuted the notion that concessioners were only out to make money:

The statement sometimes heard that concessioners are in the position of ripping off captive consumers does not hold up. We recently heard the statistic that 445 concessioners in 1977 had sales of $189 million and realized what is termed a net profit - let's assume that is not simply profit on sales and is after taxes - of $10.7 million. These sound like large figures. Simple division, however, indicates that the average profit of the 445 concessioners was $24,000. With about 300 million people visiting the parks, these statistics indicate that the captive consumers were ripped off to the tune of almost four cents each.

To anyone with business experience, these figures are a clear warning that we have a very sick industry on our hands. Further investigation proves also, beyond question, that even this level of profit has been realized in most critical cases as a result of failing to maintain facilities in good repair, of neglecting important improvements, and, even in the most successful of the larger concessions, keeping safely on the shelf a large "deferred maintenance" program. In anybody's business, this is the beginning of the end.

The economic difficulties involved in serving the public as it needs to be served, at prices which
are fair and reasonable, particularly in out-of-the-way, limited-season parks, have always been present, and any experienced business hand could have foreseen the crisis developing as the result of the Park Service concession policy. The Yellowstone disaster comes as no surprise (Smith, 1978).

Smith emphasized that the Jackson Hole Preserve had a twenty-four year loss of $4 million in the operation of the Grand Teton National Park concession facilities. Regarding these concession facilities, Smith stated:

In short, there would have been no way to make this a sound commercial enterprise under the present Park Service Policy.

There is the nub of the problem: the normal large park private enterprise complex requires a vast investment of funds over many years to function effectively, but if it is to maintain its structures and service, as Jackson Hole Preserve has done, it cannot function economically. Obviously, there has to be a better way.

If there were no Jackson Hole Preserve Incorporated, Grand Teton's facilities in all probability would be in much the same desperate condition as those at Yellowstone - and, as in the case of Yellowstone, no concessioner in his right mind would undertake to bail it out.... If, in time, it becomes necessary for the federal government to move in and rescue facilities...a great many millions in taxpayers' money will be required. This certainly should be avoided if a practical alternative can be developed.

Government ownership would not only prove an unnecessary use of tax funds, but the stark and compelling fact is that it would place the Park Service in a role for which it is peculiarly unfitted, and for good reason should not be fitted. The business and purpose of its personnel and policies is operating, protecting, understanding and interpreting parks. Their hearts are and should be in the natural beauty, the history and the wonders of the phenomena they are administering. It is a fine calling, an enviable profession, and the Service does an outstanding job of it. Don't let them go wandering off in other directions (Smith, 1978).
Smith concluded his speech by suggesting that a solution could be found in the formation of a Public Benefit Corporation to operate the concessions. In a situation similar to Yellowstone's, over a twenty-five year period a Public Benefit Corporation could develop a surplus of more than $16 million while a private concessioner using the same operational figures, could be expected to lose $17 million in the same time period (Smith, 1978).

However, Smith's advice was not taken. In 1979, the NPS convinced the Congress of the need for the Government to purchase the concessioner facilities, thus eliminating their possessory interest. However, the agreed-upon sale price of the concessioner's facilities--$19.9 million--was higher than the $15 million Congress appropriated. To make up this difference, the NPS was directed by the House and Senate Appropriations Committees as well as the OMB to reprogram other NPS funds to come up with the additional $4.9 million. While awaiting completion of the buyout of the concessioner, the Park terminated General Host's contract and leased the facilities to TWA Services for a two year period. Upon the reprogramming of NPS funds for the concessioner buyout, and the expiration of the concessioners two year contract, TW Services (their new name) was awarded a five year contract with a five year renewal option. This contract required TW Services to invest 22% of the previous year's gross revenues along with pretax profits in excess of 5% toward maintaining and upgrading the facilities they operate. These provisions
in the contract were intended to prevent the concession facilities from reaching the state of disrepair that had occurred in the past.

**GRANT VILLAGE IN THE JOHN TOWNSLEY ERA**

In the late 1960s and early 1970s, Grant Village had lacked support from both Superintendent Anderson and Director Hartzog. When asked if there were people in the NPS who felt that building Grant Village was not a good idea, Hartzog replied:

> There were a hell of a lot of them. I thought it was a stupid location. It's the first place to get snow in the spring and the last place snow leaves in the fall. The attempt to stop it resulted in nothing being done while I was director (Hartzog, pers. comm.).

Upon his appointment as Superintendent of Yellowstone National Park in 1975, John Townsley began a relentless pursuit of resurrecting Grant Village. According to Bill Everhart, NPS Historian and former Advisor to Director Hartzog:

> [T]ownsley never lost his belief that Grant Village was the thing to do. I believe John Townsley was the push behind getting Grant Village developed. Director Whalen was not strong in his viewpoints and I do not think he had a "fire in his belly" to do this. John was difficult to resist and probably was the person responsible for convincing Congress to fund the construction of Grant Village. There is no way to document the power of a person's personality. John travelled constantly to speak about Yellowstone....He was a salesman (Everhart, pers. comm.).

Why he was so highly motivated to complete the Grant Village development will never be known since he died in 1982. In
the course of interviewing people for this historical account, many reasons for his indefatigable pursuit of Grant Village were put forth:

I took it as his personal interpretation of the Master Plan and his vision for Yellowstone (Davis, pers. comm.)

Townsley...[was] trying to make the best of a bad situation (Jarvis, pers. comm.).

The interest of getting away from the prime resource....I think he was convinced that Grant Village was a good concept. If he didn't feel this way he would have tried to convince Washington otherwise because he believed in the National Park Service and would not have gone to Congress to push so hard for something he didn't believe in (Clary, pers. comm.).

John wanted to leave his mark on Yellowstone to be remembered by. John told me on several occasions that it was his personal goal to have Grant Village completed in his lifetime. It was his baby. He said he would make sure Grant Village would get done. Nothing was going to stop him (Povah, pers. comm.).

I think the thing driving John was the complaints concerning the Yellowstone Park Company on their deplorable service and facilities. Due to the dilapidated facilities at Old Faithful and the bear habitat at Fishing Bridge he wanted to build Grant Village (Strunk, pers. comm.).

Townsley told me several times his marching orders from Washington were to get the concession problem under control (Clary, pers. comm.).

Townsley felt we were taking the other pillows out and it was our responsibility to maintain the pillow count at 8,300. I think he believed in the development as a way to move out of Fishing Bridge and Old Faithful. [T]here might have been a commitment to the concessioner to maintain the pillow count so the concessioner could have a profitable business (Haraden, pers. comm.).

The Grant Village Project became Townsley's mission; (Chase, 1986) his single-minded pursuit seemed beyond the
call of duty (Whalen, pers. comm.). Chase (1986) states that while researching his book *Playing God in Yellowstone*, many people told him that Townsley was "building a monument to himself." In interviews for this historical account, this author heard these same exact words used often.

In September of 1978, the NPS submitted a $3 million budget request for Grant Village to Congress (Chase, 1986). This money would be used to construct Phase 1A of Grant Village, consisting of 150-200 lodging units. By December, it was apparent that appropriations for Grant Village were going to become available in the near future. This was much sooner than the Park had anticipated and caught them unprepared since the Park had not yet conducted an environmental assessment. When asked why the NPS requested funding for Grant Village before their environmental assessment had been issued, former Yellowstone National Park Assistant Superintendent Ron Wrye stated:

> The funding process is usually in advance of arrears, sometimes as much as three years. Your project is competing nationally for funding with hundreds of other projects so you never know if you're going to get the funding (Wrye, pers. comm.).

In January of 1979, Townsley assembled a planning team and arranged to have them meet at the Denver Service Center for 2-3 days. These meetings were to serve as brainstorming sessions for providing all the information that would be needed to write an environmental assessment for Phase 1A, which due to a shortage of time, needed to be done quickly (Given, pers. comm.). Environmental Engineer Dave Given and
Environmental Specialist Denis Davis were charged with the responsibility of writing the environmental assessment after the meetings were completed. Shortly after the January meetings, a Grant Village Development Concept Plan (DCP) Planning Team was assembled and they began their planning effort. Many of the members of the DCP Planning Team had also been involved in the planning effort for Phase IA. On May 25, the Environmental Assessment for Phase IA was approved and a Finding of No Significant Impact (FONSI) declared.

One month later, June of 1979, the Park completed the Grant Village Environmental Assessment and Preferred Alternative (DCP) and submitted it for internal review. The DCP stated the Park's intention to construct 700 new lodging units to compensate for overnight accommodations removed from West Thumb and to allow the eventual removal of lodging from Fishing Bridge and Old Faithful. The Phase IA Environmental Assessment stated:

The revision of the Grant Village DAP [Developed Area Plan] is necessary. A new DAP however, will not be completed in time to allow design and construction to proceed on schedule.

In order for the development...to proceed on schedule, sites for 150-200 lodging units need to be selected at this time.

The park's priorities, which are to develop visitor service facilities, especially lodging, at Grant Village as rapidly as possible to take some load off outdated facilities at Fishing Bridge and Old Faithful were of major importance...(NPS 1979a).
With construction money available (Wenk, pers.comm.) and the knowledge that the DCP would take a couple of years before it would be approved, the NPS decided not release the Environmental Assessment to the public. Instead, the Assessment was approved as a memorandum to the Central Files (NPS, 1979a). According to the Planning Process, NPS-2 (NPS, 1982a), public notice of EA availability should be provided, although public review of EAs is at the discretion of the decision maker. Where appropriate, the public should be involved in the EA process with emphasis placed on those interested groups and individuals likely to be opposed to one or more alternatives (NPS, 1982a). The Planning Process, NPS-2 continues by stating that the availability of the EA should be announced in the Federal Register for an NPS action likely to be of national interest. The Park did not publish a notice of the EA in the Federal Register nor was a news release published notifying the public of the availability of the document. This prevented the public from having the opportunity to review and comment on the document because the public would have no idea the document existed. The NPS had justified this by stating that both the Phase I A Environmental Assessment and the DCP conformed to the 1968 Developed Area Plan and the 1974 Master Plan, both of which were previous environmental assessments that evaluated Grant Village and had been reviewed and accepted by the public (NPS, 1979b). However, neither could suffice for a proper environmental assessment. The Developed Area
Plan had been approved prior to the passage of the National Environmental Policy Act (NEPA) in 1970. Because NEPA does not have a grandfather clause, all federal construction projects subsequent to 1970 are required to comply with NEPA criteria. The 1968 Developed Area Plan did not meet these requirements. The Environmental Statement also did not suffice as a proper environmental assessment of the impacts of Grant Village because it had stated that "the environmental effects of the proposed wilderness threshold communities, particularly at Lake and Grant, are unknown" (NPS, 1974b).

The Phase 1A Environmental Assessment states that the threatened grizzly bear inhabits the Grant Village area, there will be an increase in the overnight visitor population, and no rare or endangered animal species will be affected by the proposed action (NPS, 1979a). The Phase 1A Environmental Assessment concludes by declaring a Finding Of No Significant Impact (FONSI):

Since the preferred alternative does not constitute a major federal action, does not have significant environmental impacts, and is not controversial, it is recommended that no further environmental documentation be prepared (NPS, 1979a).

The DCP, released for internal review one month after this FONSI was declared, contradicts the Phase 1A Environmental Assessment by stating:

Increased visitation associated with the construction of 100–200 units will increase the probability of encounters between humans and bears. The likelihood that bears will be killed, injured, or transported from the area will also
increase as will the possibility of humans being injured or killed (National Park Service, 1981c).

The Environmental Specialist who wrote the Phase 1A Environmental Assessment section that states no rare or endangered species would be affected by the proposed action, had telephoned the USFWS and Yellowstone National Park to obtain information on whether grizzly bears would be affected by the Grant Village development:

I contacted the Fish and Wildlife Service and they said there was no problem. This should have been thoroughly documented but it was sort of ho-hum at the time (Davis, pers. comm.).

However, the USFWS has no documentation indicating they were contacted by the NPS on the Phase 1A Environmental Assessment (Harms pers. comm.). Wally Steucke (pers. comm.), Area Manager of the USFWS at the time, feels it is highly unlikely that the USFWS would have told the NPS that Grant Village would not have an impact on the bear. To the contrary he stated:

Any activity at Grant Village would display an impact on grizzlies. We recognized that any development would cause an impact (Steucke, pers. comm.).

When asked if there could have been any information on grizzly bears in the Grant Village area that might have become available after the time of the writing of the Phase 1A Environmental Assessment and before the writing of the DCP (a one month period), Steucke stated:

No. We knew all along that Grant Village would have an impact on the bear. There was plenty of information out there (Steucke, pers. comm.).
Steucke (pers. comm.) claims that the USFWS, like the public, was unaware that a Phase 1A Environmental Assessment even existed until section 7 consultation began on August 21, 1979. At that time the USFWS was presented with the Grant Village DCP that had a no action alternative that included the construction of 150-200 lodging units, indicating a previous environmental assessment had been done without their knowledge.

Consequently, the responsibility of providing information on grizzly bears in the Grant Village area belonged to Yellowstone National Park employees. Yellowstone employees had told Phase 1A Environmental Assessment authors that no threatened species would be affected by the Grant Village development (Davis, pers. comm.), and told the DCP team members of the likelihood there would be an increase in bear deaths, injuries, and transplants at Grant Village due to the development. It appears that the information concerning the likelihood of increased grizzly bear deaths, injuries, and transplants was intentionally withheld or omitted from the Phase 1A Environmental Assessment by the NPS to prevent the stalling of the Phase 1A construction (Iobst, pers. comm.).

The following Council on Environmental Quality (CEQ) Regulations had been violated by these two documents:

1) CEQ Regulation 1501.4(e) states that the FONSI must be circulated for a minimum of thirty days of public review before a final determination is made by the agency. Because
the EA had been done as a memo to the Central Files, the public did not: (1) know the EA existed; (2) know a FONSI had been prepared; and (3) have an opportunity to comment during the required minimum thirty day review period.

(2) CEQ Regulation 1508.3 (40 CFR 1508.3), which states that the declaration of a FONSI is required to be a separate document done at a different time from the environmental assessment and attached to the assessment; the FONSI cannot be part of the environmental assessment. This regulation prevents the environmental assessment and the FONSI from being one and the same document without giving legitimate consideration to the various alternatives in the environmental assessment (Schmalz, pers. comm.). The Phase 1A Environmental Assessment's FONSI was prepared as part of the Environmental Assessment and included in the Environmental Assessment. The FONSI is not a separate document as the CEQ Regulations require (Edwards, pers. comm.).

(3) CEQ Regulation 1508.25 (40 CFR 1508.25), which pertains to the writing of two environmental assessments for one project. This regulation would disallow 700 environmental assessments being written, one for each lodging unit, because each unit taken singly could be argued to not have any significant adverse environmental impacts (Schmalz, pers. comm.). In Jettee vs. Bergland, 579 F.2d 59 (1978, 10th Circuit) the court interpreted the regulation to mean that in circumstances of like projects, they should be
considered in the same document (Schmalz, pers. comm.). Also, in *Cady vs. Morton*, 527 F.2d 786, (1975, 9th Circuit) the court dealt specifically with the issue of segmentation of environmental assessments for the same project and ruled that one environmental document should be prepared rather than two (Schmalz, pers. comm.).

Dave Given (pers. comm.) states that the intent to construct 700 lodging units at Grant Village had been common knowledge to all members of the planning team that worked on the initial environmental assessment. Further evidence that the Park had intended on constructing more than 150-200 lodging units during the early planning stages of the project comes from the Phase 1A Environmental Assessment which states this is the "first phase of overnight accommodations at Grant Village" (NPS, 1979a). If further development is planned at the time of the initial environmental assessment but not included in the initial assessment at the time it is written, this is in violation of the CEQ Regulations because cumulative impacts need to be considered (Riddle, pers. comm.). The Park did two environmental assessments for the project, rather than one, because the money available was only enough to build 100 lodging units (Wenk, pers. comm.) and because a more extensive Environmental Impact Statement (EIS) would take several years to complete.

(4) CEQ Regulation 1508.13 (40 CFR 1508.13), which states that if a proposed action requires compliance with
other legislation, such as with the Endangered Species Act, evidence of compliance should be completed and documented prior to the approval and signing of the FONSI (Schmalz, pers. comm.). To be in compliance with section 7 of the Endangered Species Act, any federal action that may jeopardize the continued existence of a threatened or endangered species requires the agency to consult with the USFWS to obtain their biological opinion of whether the proposed action will jeopardize the species. The NPS did not initiate section 7 consultation with the USFWS until August 21, 1979 (Harms, pers. comm.), approximately three months after the completion of the Phase 1A Environmental Assessment and the declaration of a FONSI.

(5) CEQ Regulation 1508.26 (40 CFR 1508.26), which states that if there is any possibility of the action's causing significant impacts, then a more thorough EIS must be prepared (Schmalz, pers. comm.). Because the DCP stated the increased likelihood that a threatened species, the grizzly bear, would be killed, injured, or transported from the area, the planned construction should be interpreted as having significant impacts requiring the writing of the more thorough EIS (Schmalz, pers. comm.). Geoffrey Swan, former Yellowstone National Park Landscape Architect and Grant Village DCP Planning Team Member concurs. During the Grant Village DCP public comment period, he wrote the following comments to the Park:

Certainly in light of comments received from the U.S. Fish and Wildlife Service...
development contemplated and fiscal resources committed, this should be regarded as a major action, with potentially significant impacts on endangered species; it is controversial and consequently a full Environmental Impact Statement should be prepared (Swan, 1981).

Because NEPA is a full disclosure law, providing that federal agency decisions are made in the public forum rather than behind closed doors, it requires the agency involved to fully inform the public of their plans so that (1) the public can be involved in the planning and decision making process and (2) the public has adequate information on which to evaluate the environmental document (Schmalz, pers. comm.). The DCP's no action alternative stated that due to prior approval and programming the 100-200 units described in Phase 1A would be constructed. This did not give the public the opportunity to comment on the construction or any choice in the matter. Also, the DCP public comment period was not until July of 1981, four months after construction of the 100 Phase 1A lodging units had already begun. The construction of the initial 100-200 units was presented to the public as the no action alternative. Section 102, part C, of NEPA requires a no-action or no-project alternative to be considered (Canter, 1977). This alternative requires the proposing agency to predict what the future environment will be without the project (Canter, 1977). It also represents the basis against which the action alternatives and their environmental impacts can be compared (Canter, 1977). Neither of the environmental assessments for Grant Village had a no-action alternative. The DCP stated:
If the no action alternative is implemented in its entirety, no development beyond what is already programmed will occur at Grant Village. Because of prior approval and programming, the 100-200 lodging units and utility improvement described in the Phase 1A study will be constructed (NPS, 1981c).

According to Chase:

It was, the Assessment told us, too late to stop Grant Village. The project had already been approved; the die was cast (Chase, 1986).

Because NEPA and the CEQ regulations are written very loosely as guidelines, if these instances are not violations of the letter of the law, they are instances of the NPS violating the spirit or intent of the law (Schmalz, pers. comm.).

According to Schmalz, everyone involved in the preparation of the environmental document is responsible for knowing the NEPA compliance requirements, with the people who sign the assessment being ultimately responsible for its contents. By signing the assessment the signers have accepted responsibility that compliance has been met (Schmalz, pers. comm.).

The following scenario was presented to Jim Riddle of the NPS, Rocky Mountain Regional Office of Planning and Compliance:

It appears the NPS desired to have construction started quickly and an extensive environmental assessment or EIS with a public comment period would take several years to complete. The NPS didn't want to take that time since the funding was available. Consequently, they wrote the Phase 1A Environmental Assessment quickly and without a public comment period so that construction could begin. Since funding was not immediately available for the additional 400-500 units, the
more extensive environmental assessment with a public comment period, was initiated on the remainder of the project.

Riddle responded by stating:

I think everything you said is absolutely right. It was wrong. I hope we wouldn't do that today (Riddle, pers. comm.).

The Grant Village DCP proposed the construction of 400-500 lodging units, which would be in addition to the 150-200 units proposed in the Phase IA Environmental Assessment.

The DCP states:

The major impetus for developing Grant Village is the desire to remove overnight facilities from environmentally sensitive areas. (The 8,300 pillow ceiling) was developed for the master plan in an attempt to balance the need for accommodations in the park, the desirability of promoting support industries in gateway communities, the ability of gateway communities to handle future development, and the traveling distances between lodging centers.

A second important reason for developing Grant Village is the desire to mitigate congestion problems on the Grand Loop Road and at Old Faithful. By spacing out lodging facilities, traffic inputs to the Grand Loop Road and, to a certain extent, visitor arrival times at Old Faithful can be staggered.

Construction will require the removal of vegetation from areas that are now undisturbed. A maximum of 100 acres will be affected.

Most vegetation that will be eliminated by new development is lodgepole pine. Since this type is the most common vegetation in Yellowstone National Park, removing lodgepole at Grant will eliminate an insignificant percentage of the stands represented in the park.

Impact of constructing the other facilities are not significant because the restaurant complex and lodging units will be located in an area that was clearcut in preparation for future development.
Possible future developments include an additional 300 motel-type lodging units to the north of the road to the lagoon, a recreational vehicle campground to replace the 358 site recreation vehicle park at Fishing Bridge, or a "hard-sided tent" complex.

Any increase in destination visits (i.e., if a larger percentage of visitors stay more than one or two days) also has the potential to increase the incidence of encounters between bears and humans because these visitors are more likely to hike around the outskirts of the developed area.

If a serious increase in bear problems occurs, the National Park Service will consider blocking all but the easternmost and westernmost spawning streams to trout, so that bears will not be attracted to the area. The two drainages in the campground are the most suitable places for using this approach. If the streams were blocked, bears would have to seek an alternative food supply during the spawning season. Since food is relatively abundant in May and June when the spawning season occurs, significant adverse impacts are not expected. Other possible mitigative actions are limiting length of stay in the lodging units to discourage destination visitation and closing campground loops closest to the spawning streams in May and June.

Although additional development at Grant Village may have some undesirable effects on bears in the immediate area, it will allow the eventual removal of development from Fishing Bridge, an area that is prime grizzly habitat. In the opinion of NPS and Fish and Wildlife Service biologists stationed in the park, the benefits of eliminating development from Fishing Bridge outweigh the costs of increasing it at Grant.

The spawning streams that would be blocked have less than a 5 percent influence on trout populations in the lake. Loss of spawning area would be acceptable to park biologists, if removal of development from the Fishing Bridge area is facilitated.

Implementation of the action alternative is not expected to destroy habitat critical to the survival of the local grizzly population.

Demand for overnight motel-type accommodations outside the park will decrease by approximately
750 pillows. While this number is insignificant on a regional basis, there are a few gateway community motels which do not operate at or near capacity during peak visitor season. These marginal concerns and support business operations such as restaurants, gas stations, and souvenir shops which would serve these patrons will experience a slight decrease in business.

These impacts will be short-lived if regional visitation increases 1 to 2.5 percent per year as expected.

The construction of 700 lodging units (approximately 2,800 pillows) will permit the removal of approximately 2,050 pillows from outstanding natural areas elsewhere in the park while raising the pillow count of the park to around 8,300 from its current value of around 7,550 (NPS, 1981c).

During the winter and spring of 1979 Townsley travelled around the Yellowstone region promoting the importance of constructing Grant Village. He would often cite the importance of the Park in the regional economies as a reason for building Grant Village. In February of 1979, the Greater Yellowstone Cooperative Regional Transportation Study had concluded that (1) the major part of Teton County's income was derived from the tourist trade, (2) the other counties surrounding the Park also experienced high tourist impacts, and (3) visitation to the Greater Yellowstone Region was expected to increase at an annual rate of 1% to 2.5%, resulting in an accumulative increase of 22% to 64% by 1997 (USDI et al, 1979). The Study continues by stating:

[I]t is apparent that the plans of major gateway communities for meeting demands for accommodations are inadequate or barely adequate (USDI et al, 1979).
In addition, the Study reported that recreation surpassed agriculture and livestock industries as the economic base of the region with visitors to Yellowstone and Grand Teton National Parks contributing an estimated $261 million to the tri-State region in 1976 (USDI et al, 1979).

Armed with this information to support him, Townsley convinced the gateway communities that (1) the limited accommodations in the Park were necessary, (2) the Park accommodations would not compete with those outside of the Park, and (3) if the Park's accommodations were not brought up to high standards, then tourists would stay away from the area and they would all suffer. Townsley also convinced the gateway communities that it was in their best interest for the Park to buy and rehabilitate the YPCO's facilities and to build Grant Village.

To succeed in pulling off the construction of Grant Village, Townsley knew he also needed to gain the support of the environmental organizations. According to Phil Hocker, former chairman of the Wyoming State Chapter of the Sierra Club, Townsley went to Jackson, Wyoming, and talked to representatives of local environmental groups to insure there would not be any opposition to Grant Village (Hocker, pers. comm.). He convinced the groups that Grant Village was needed as an alternative to Fishing Bridge and that the facilities at Fishing Bridge could not be removed without plans for replacement. He also stressed that the benefits of getting out of Fishing Bridge outweighed the harm of
Grant Village. When asked what the position of the Sierra Club on Grant Village was in the late 1970s and early 1980s, Hocker said:

We were cautiously watching it, not campaigning one way or the other. We were concerned about, "What does this mean for the long term of the Park?" We agreed with the 1974 Master Plan but were concerned with whether or not Grant Village was going to be another development rather than a replacement. And as it turned out, our fears were well founded. The reason the environmental organizations weren't too involved is because in the whole scheme of things it was a small issue. Basically, we felt that if facilities at Fishing Bridge and Old Faithful were removed and replaced at Grant Village, although we weren't in favor of a new development, we felt it was worth the trade-off. Because of the way this has gone on, we wound up getting both facilities, Fishing Bridge and Grant Village, the environmental community will be resistant to a new development in the future. We were offered a quid pro quo and all we got was a quid.

One of the things that disappoints me is that the Park Service told us that Grant Village would be a little community tucked away in the woods, but instead it sticks out like a light house along the shoreline (Hocker, pers. comm.).

The National Parks and Conservation Association also gave their support to Grant Village. Townsley had gained their support by convincing them that Grant Village represented replacement facilities only and this construction would allow for the withdrawal from Old Faithful and Fishing Bridge. Destry Jarvis of the National Parks and Conservation Association says their position was one of:

...cautious support without adequate information. There was a strong feeling there was too much development at Old Faithful and Lake. It was explained to us that there would be no new net development in the park, that Grant Village was to
be a replacement. Our view is whenever possible to put new developments outside the park and if not possible to put them in non-sensitive areas. If we had known at the time about the grizzly habitat at Grant Village we probably would not have endorsed it.

Yellowstone is so large that it is not reasonable to expect people to stay in Cody, Jackson, etc. In Yellowstone we've not had a policy of having no facilities in the park (Jarvis, pers, comm.).

Townsley was also able to enlist the support of the politicians in the region because of the importance Yellowstone played in their state's economy. The Wyoming Travel Commission, fearful that the NPS's cancellation of the YPCO's concession contract would damage the state's tourist industry, voted to have their Director write to Governor Herschler to gain his support. Governor Herschler soon became a supporter of Grant Village writing:

Because tourism is a major driving force behind Wyoming's economy, I fully support in-park developments which will increase the attractiveness of the Park as a vacation destination. I believe the proposed Grant Village development will help achieve this goal... (Herschler, 1981).

If accommodations do not exist at Grant Village, tourists may choose travel routes to and from the Park that would avoid Wyoming entirely. We simply can't afford to allow West Yellowstone in Montana to become the chief overnight center for Yellowstone vacations (Herschler, 1982).

Townsley had done his work well. The Grant Village DCP had little opposition with only 32 people interested enough to respond to the DCP during the public comment period. Those who did respond, however, by a three to one margin, were opposed to Grant Village.
The Park identified four "primary areas of concern" expressed as opposition to the Grant Village development, none of which were significant enough to cause the abandonment of the project. The four primary areas of concern and the NPS's response were as follows:

**Need for additional lodging facilities in the park:** The Master Plan sets a limit for overnight accommodations at 8,300. At present there are approximately 7,500 pillows. The gradual conversion of Old Faithful to day use will remove an additional 500 pillows. The addition of up to 2,800 pillows at Grant Village will bring total pillow count in the park to the approved level of 8,300 pillows.

**Government competition with private enterprise:** The National Park Service had invested approximately $7 million at Grant Village by 1968 for construction of utilities, roads, ranger station, visitor center, campground, camper services building, gas station, marina and maintenance area. The first 100 units are being constructed with Government money. A decision was made by the Secretary of the Interior that any additional units would be built by private enterprise....

**Effects of development on the grizzly bear:** The Fish and Wildlife Service stated their opinion that "[T]he proposed development within Grant Village is not likely to jeopardize the continued existence of the grizzly bear...." However, they did question the need to develop Grant Village, and recognized the significance of the trade-offs of natural restoration at Fishing Bridge and the construction of Grant Village....It is our opinion that all of the concerns of the Fish and Wildlife Service have been addressed and that the development at Grant Village does not jeopardize the continued existence of the grizzly bear.

**Disturbance of a presently undisturbed area:** The Grant Village area was significantly disturbed by the construction of roads and utilities in the area. Construction proposed in the preferred alternative is confined to those previously disturbed areas (Townsley, 1981a).
This memo ended by recommending a FONSI be prepared for the DCP. On February 8, 1982, the NPS announced a FONSI for the Grant Village DCP.

In November of 1979, the Senate and House Interior and Related Agencies Subcommittees of the respective appropriation committees directed the NPS to reprogram other NPS funds to come up with the $4.9 million necessary to buyout the concessioner (Congress had only appropriated $15 million). Herbst, Assistant Secretary of the Interior, that the $3 million for Grant Village was necessary. Herbst had then recommended to the Interior Secretary that funds other than those for Grant Village be reprogrammed for the buyout of the YPCO (NPS, 1981b). On March 27 and 28, 1980, the House and the Senate appropriations committees, respectively, approved the reprogramming of funds other than the Grant Village $3 million (NPS, 1980). The largest amount of these funds ($2.4 million) was reprogrammed from funds originally allocated to Chaco Canyon National Monument for road construction. The remaining funds, all approximately one-half million dollars or less, came from construction projects at Glacier and Sequoia National Parks, Wright Brothers National Museum, Cape Cod National Seashore, George Washington Memorial Parkway, and planning for the Bicentennial Land Heritage (Garrett, 1980).

Upon completion of the draft Grant Village DCP, the USFWS was contacted to begin the Section 7 consultation of
the Endangered Species Act. This section of the Endangered Species Act requires any federal agency that is planning a project that will affect a threatened or endangered species to consult with the USFWS on the impacts of the proposed action on the species. After studying the agency's plans, the USFWS then issues a biological opinion as to whether the proposed action will jeopardize the continued existence of the species.

When asked if the USFWS was aware, in May, 1979, that the NPS had written a previous Grant Village environmental assessment, Wally Steucke, Fish and Wildlife Service Area Manager of the Billings, Montana, office that handled this consultation stated:

I am unaware that took place. We didn't know about the initial environmental assessment, as far as I'm concerned, when consultation began. We were presented with the Grant Village DCP, and the no action alternative said that due to prior approval and programming 150-200 lodging units would be built; so our approach was, since it is inevitable, what solution/trade-offs can we find to make this acceptable? (Steucke, pers. comm.)

When asked if there was any discussion of the two environmental assessments, Steucke stated:

I have no recollection of that. We took issue with the Park Service on the no action alternative. At that stage of the game we had to look at our options and our insistence on mitigating actions. The first 150-200 beds being already approved were not an issue. The Park Service should have initiated consultation before approval. Our view was that we might impact bears at Grant Village but we were going to "unimpact" bears at Fishing Bridge (Steucke, pers. comm.).
According to Steucke, during the summer of 1979:

[W]e, in the Department of Interior, had a problem with the Grant Village Project because the National Park Service was going to march ahead with Grant Village and we were saying, no we've got a problem with this, that there will be an impact on bears that we will be unwilling to accept. We had a meeting with John [Townsley], in Billings, where we looked at maps and came up with the solution. John was not entirely happy with the idea of getting out of Fishing Bridge. As I remember it, I think that was not his idea to do so; it was our solution to the issue. It wasn't unacceptable to him, but he was uncomfortable with this. I think John recognized the difficulty of getting out of Fishing Bridge. He was not going to get out of Fishing Bridge if he didn't have to (Steucke, pers. comm.).

In October of 1979 the USFWS issued their opinion on the impacts of the Grant Village development on the grizzly bear stating:

It is our biological opinion that the proposed development within Grant Village is not likely to jeopardize the continued existence of the grizzly bear. However, we question the need and justification for such extensive commercial development within occupied grizzly habitat and believe that adverse impacts to the bear will result, although they may be at a level that does not constitute jeopardy to the species. We also believe the project will negate many of the benefits acquired through the phase out of facilities at Fishing Bridge and view such a "trade-off" as an unfavorable solution to a wildlife conflict that, with development of Grant Village, will likely be duplicated rather than eliminated.

While conflicts at Grant Village are likely to increase due to the new development, they should not reach the levels that have occurred at Fishing Bridge. Thus, if the grizzly is not jeopardized by the present bear management policy and development and associated human use at Fishing Bridge, we would not expect the new development at Grant Village to jeopardize the species if current management continues and facilities at Fishing Bridge are eliminated. We are concerned, however, about the adverse impacts and possible bear losses
that may occur even though at below a level representing jeopardy. Considering the threatened status of the grizzly...such losses seem unwarranted.

In effect, the reduction of conflicts at Fishing Bridge and subsequent new development at Grant Village may simply transfer these problems. We are highly concerned about the consequences of these conflicts and believe that, though not likely to be of the magnitude that has occurred at Fishing Bridge or cause jeopardy to the species, the lives of individual bears inhabiting the Grant Village area may inevitably be jeopardized.

[We question whether the blocking of spawning streams conforms to the Endangered Species Act's mandate that Federal agencies utilize their authorities to conserve endangered and threatened species. Spawning streams are important components in grizzly habitat and may constitute one of the biological elements within officially designated critical habitat (44 FR 47863) that are essential to the conservation of the species. Preservation of critical habitat focuses on the biological or physical constituent elements within the defined area of critical habitat that are essential to the conservation of the species (44 FR 47863). Although critical habitat has not been officially designated, to deliberately eliminate a natural component of grizzly bear habitat appears to be neither good bear management nor good Park management (USFWS, 1979).

In subsequent meetings between NPS and USFWS representatives in September of 1980, it was mutually agreed:

...that impact on grizzly bear habitat and the potential confrontation between grizzlies and humans will be minimized as the result of phased elimination of many facilities at West Thumb, Fishing Bridge, and Old Faithful, [and] that concentrating facilities at Grant Village will result in a net reduction of impact on grizzly habitat (Mintzmyer, 1980).

At a November 21, 1980 meeting with the NPS, the USFWS emphasized that their main concern was to lessen bear/human contacts and to accomplish this it would be necessary to
eliminate facilities from Fishing Bridge. The USFWS told
the NPS they:

...would be in favor of providing pressures if
need be to accelerate actions and support for
removal of facilities at Fishing Bridge
(Slatkavitz, 1980).

In December, the USFWS wrote to the NPS that the
adequacy of the Section 7 consultation depends upon the
phasing out of Fishing Bridge (Ballou, 1980). In an attempt
to pin the NPS down to a specific date for the phasing out
of facilities, the memo ended by stating:

[We are unable to discern whether the present
campground, RV park, and housing for Lake
employees now located at Fishing Bridge will be
moved to Grant Village or whether they will remain
open at Fishing Bridge. The benefits to the
grizzly from closure of Fishing Bridge will be
greatly reduced unless the entire area is eventually
eventually restored. We are unable to determine
from the plan when restoration will be finalized
(Ballou, 1980).

Townsley (1981b) responded by writing to the USFWS that
the Park was committed to the phaseout of facilities at
Fishing Bridge but specific timetables for "replacement or
rehabilitation of facilities at Fishing Bridge are dependent
upon public finance" and therefore could not be predicted.
The Park recognized the RV park was not in a good location
due to its proximity to crucial bear habitat in Pelican
Valley, but predicted it would remain in use for the next
five years. Townsley continued this correspondence by
writing:

Several years ago, consideration was given to
replacement of the RV park in the Grant Village
area. If the RV park is to be replaced, a
thorough evaluation of grizzly bear-human conflict
will be undertaken. The recreational vehicle park will not be placed where there is a substantial potential for human-bear conflict.

It must be recognized that our intent to remove all facilities from Fishing Bridge must be politically and socially accepted (Townsley, 1981b).

When asked, because of the wording of the last sentence, if Townsley actually intended to remove the facilities from Fishing Bridge, former Yellowstone National Park Landscape Architect Dan Wenk stated:

Yes. That sentence was written because Townsley was a consummate politician and manager and because it was not going to be an easy battle. But he recognized that the decision was not necessarily up to the National Park Service because other forces may later make it hard (Wenk, pers. comm.).

Steucke replied to Townsley by writing:

Your comments and affirmation that the Park Service is indeed committed to the phaseout of facilities at Fishing Bridge is appreciated. The FWS supports your objectives and looks forward to their achievement. I am now satisfied that our respective Section 7 responsibilities for the Grant Village Development have been met (Steucke, 1981).

The USFWS intended the no jeopardy opinion to be contingent upon the removal of facilities at Fishing Bridge (Steucke, pers. comm.) and the Park understood and agreed to this contingency (Wrye, pers. comm.). When asked, "If it had been known that the Fishing Bridge facilities were not going to be removed, would this have changed the no jeopardy biological opinion given by the USFWS?", Steucke replied:

It certainly would have caused us to look at some alternative solution. The agreement of removal of facilities allowed us to write a no jeopardy
opinion. If other alternative solutions could not become available we would have had to write a jeopardy opinion (Steucke, pers. comm.).

steucke (pers. comm.) felt Townsley had a personal interest in completing Grant Village, and, therefore, he would keep his word and have all the facilities removed and the natural environment restored.

Due to the controversy surrounding the withdrawal from Fishing Bridge in the early 1980s, NPS Director Dickenson requested the Park to consolidate all available information pertaining to Fishing Bridge. In 1984 this project was completed with the publication of Fishing Bridge and the Yellowstone Ecosystem: A Report to the Director, November 1984 (NPS, 1984). This report was a justification for withdrawal from Fishing Bridge:

The use of the Fishing Bridge area by park visitors has a tradition of more than seventy years, thus causing some people to wonder why now, after so much time has passed, the development must be removed. The answer is relatively simple: it has only been within the past twenty years that sufficient scientific information has accumulated to measure the impact of the development. Merely that the development has been present for many years is not proof it is not harmful or misplaced.

The harm done by the Fishing Bridge development to grizzly bears is of concern to a far greater number of people than the number who may be affected by relocation of campsites from Fishing Bridge. The grizzly bear is in a real sense a ward of the people of the United States, who have entrusted its welfare to the National Park Service. Though all effort must be made to accommodate the needs of visitors in Yellowstone, ultimately there must be equal concern for accommodating the needs of the grizzly bear, too.

In light of the legislative mandate of the National Park Service, Fishing Bridge has proven
itself to be an ecological mistake with serious consequences.

Yellowstone Park became a Biosphere Reserve as a part of the UNESCO program in 1976. One of the primary goals of the Biosphere Reserve program is the preservation of ecological and genetic diversity. We now know that in Yellowstone there are few if any areas as diverse as the Fishing Bridge area, and perhaps none as significant to such a wide variety of park life forms.

[F]ishing Bridge should have a special role to play in Yellowstone Park's stature as a Biosphere Reserve; it cannot play that role as long as the Fishing Bridge development exists (NPS, 1984).

The report notes that the most direct evidence of an area's negative influence on grizzly bears, was bear deaths and other removals from the population in which Fishing Bridge lead all developed areas of the Park. Nearly half of all the Park removals could be attributed to problems that began at Fishing Bridge. In addition, 62.5% of the human injuries caused by grizzlies that occurred within a one mile radius of a developed area, occurred at Fishing Bridge. Further reason for withdrawing from Fishing Bridge and relocating facilities at Grant Village was that in comparison Grant Village was an area of noticeably low biological diversity. The last sentence of the report sums up the problem:

If Fishing Bridge alone were able to seriously affect the grizzly bear in Yellowstone, Fishing Bridge operating in concert with Grant Village has a potential cumulative effect that is disastrous (NPS, 1984).

Author Paul Schullery in The Bears of Yellowstone states:

The problem is bigger than a misplaced development. The problem is increased pressure on grizzly bear habitat throughout the park. As the
Interagency Study Team gathered data on the movements of the free-ranging bears of Yellowstone, it gradually became clear that those movements, even miles from any development, were significantly affected by human presence. By the early 1980s, for example, it was apparent that the entire lower Pelican Valley, one of the richest bear habitats in the park, was largely deserted by the bears once summer came and hikers and fisherman moved in. Scientists use polite terms like "avoidance behavior," but practically speaking we are just squeezing bears off their range (Schullery, [1980] 1986).

To some people, the Fishing Bridge and the Yellowstone Ecosystem Report was not convincing enough evidence to remove facilities from Fishing Bridge. The Wyoming Congressional Delegation felt that a thorough investigation of the Park's various alternative actions needed to be undertaken. Consequently, the Park made the decision to honor a request from the Wyoming Congressional Delegation to write an EIS that addressed, among other things, the human socioeconomic impacts of the alternative actions that could be taken at Fishing Bridge. The Draft Fishing Bridge EIS and DCP was completed and circulated for public comment in the autumn of 1987 and a decision is expected to be made by the end of the summer of 1988.

Because of the Park's decision to prepare an EIS on Fishing Bridge, the Park was unable to remove the facilities at Fishing Bridge by 1986 as agreed upon with the USFWS in their Section 7 consultation on the grizzly bear and Grant Village. Until the decision on the EIS is made, the USFWS has agreed to allow the Park's Interim Management Plan For
Operations At Fishing Bridge and Grant Village to be implemented to reduce impacts on grizzly bears (NPS, 1986).

In August of 1980, construction firms interested in building the Grant Village lodging units were invited to the Park, shown the Grant Village site, and informed of the specifics of the Park's plans for the construction of the Phase 1A lodging units. Upon completion of the Park's presentation, the companies were invited to submit their own designs for the project. Twelve companies submitted designs. Of these, all but five were eliminated from consideration due to inappropriate designs. The five companies with acceptable designs had their designs evaluated and returned with the request that they incorporate the changes each of them had been given to bring the plans up to the Park's specifications. In addition to the design changes, they were requested to submit bids for construction of these lodging units by December 4, 1980.

The Kober Construction Company submitted the lowest bid and on December 22, 1980 was awarded a contract for $1,241,200 to construct 100 lodging units.

On January 20, 1981, a pre-construction conference for Grant Village was held at Yellowstone National Park Headquarters. In attendance were twenty-two representatives of: Yellowstone National Park; the Denver Service Center; Kober Construction Company; and, Ackerly-Hurlburt and Associates, the architectural firm Kober had hired. At the meeting an agreement was made that the Company should begin
work immediately, and, therefore, the official Order to Proceed would go into effect the following day, January 21, 1981 (Hudson, 1981). By contractual agreement the construction company's deadline in which they would be required to complete the construction was based on the date of the Order to Proceed. As a result of the January 21, 1981, Order to Proceed date, construction of the lodging units was required to be completed by July, 1982.

The NPS had given the Order to Proceed based on the Phase 1A Environmental Assessment which had stated that no threatened or endangered species would be affected by the construction of the Phase 1A lodging units. However, as noted in the previous discussion of the Phase 1A Environmental Assessment, NPS and Department of Interior compliance employees concluded that the Phase 1A Environmental Assessment was in violation of CEQ regulations, thus, making this assessment invalid. The Endangered Species Act requires the agency proposing the action to initiate Section 7 consultation with the USFWS to obtain the USFWS's biological opinion on the impacts of the agency's proposed action on threatened or endangered species. The Endangered Species Act states:

Such assessment shall be completed...before any contract for construction is entered into and before construction is begun with respect to such action (16 USC Section 1536, subsection c).

On February 13, 1981, the USFWS wrote to the Park stating that Section 7 consultation had been met in the Grant Village DCP. By this timing of events, the NPS had violated
the Endangered Species Act by (1) awarding the construction contract to the Kober Construction Company and (2) giving the Order to Proceed with construction before receiving the USFWS' biological opinion as to whether the grizzly bear's continued existence would be in jeopardy by the construction of Grant Village.

The NPS conducted a Design Analysis of Grant Village in February, 1981, estimating that when all five phases were completed the construction costs for the 700 lodging units would total $21,848,200 (NPS, 1981a).

Also in February, the Kober Construction Company began purchasing materials and hiring a work force to construct the Grant Village lodging units. In March, Kober began construction of the modular units in Billings, Montana, with plans to begin on-site construction on April 6, 1981.

Meanwhile, Joe Cutter, West Yellowstone resident and publisher of a summer newspaper--the Old Faithful Times, was upset over the Park's plans to construct Grant Village. The town of West Yellowstone had received $3.2 million in disaster relief loans from the Small Business Administration (Brooks, 1981) because of low tourist visitation in the summer of 1979. This problem was aggravated by low summer visitation in 1980 and a mild winter in 1980-81 which did not attract the usual number of winter visitors. According to the West Yellowstone Chamber of Commerce, one-third of the motels were experiencing serious financial difficulties (NPS, 1981b). Cutter felt it did not make sense for the
federal government to spend $3 million of taxpayers' money to build motel facilities that would compete against the same motels in the gateway communities to whom the federal government had given disaster relief loans (Cutter, pers. comm.). Cutter called David Stockman, the Director of the OMB. Stockman referred Cutter to Dale Snape, who had the responsibility, in the OMB, of overseeing the NPS budget. When Snape discovered that the Park was about to build Grant Village, he was stunned (Livingston Enterprise, 1981). When the OMB had directed the NPS to reprogram the $3 million that had been appropriated for Grant Village for the buyout of the YPCO, it never occurred to them that the NPS would not follow the directive (Snape, pers. comm.). According to Snape (pers. comm.), an OMB directive is considered to be equivalent to a directive from the President of the United States, and, therefore, Snape thought it would be followed. In December of 1979, the OMB had turned down a NPS request for $14 million to complete construction of the Grant Village lodging units because the OMB was philosophically opposed to the use of government funds to build motels that would be heavily subsidized, would not regain the capital costs, and would compete with the gateway communities (Snape, pers. comm). Having ordered the NPS to reprogram the appropriated $3 million and subsequently deleting the $14 million request for Grant Village, the OMB had thought that Grant Village was a dead issue. Snape (pers. comm.) had not known that Assistant Interior Secretary Herbst had
decided to ignore the OMB directive and endorse the use of the $3 million for Grant Village and the reprogramming of other NPS funds for the buyout of the YPCO. Nor did Snape know that the Congressional appropriations committees had approved this reprogramming. NPS Director Bill Whalen's feeling toward the OMB's directive to use the Grant Village money for the buyout of the concessioner was, "Thanks for the advice, but we'll do it our way" (Whalen, pers. comm.).

Snape brought the project to the attention of Secretary of Interior James Watt, who, on April 6, ordered a halt to the construction. Just a week before this, at a meeting of concessioners, Watt had said he would seek an aggressive program with private entrepreneurs who were willing to invest in the National Parks (Billings Gazette, 1981).

Discussing the Reagan Administration philosophy, Watt had stated:

We have tremendous biases. We have a bias for private enterprise. We believe concessionaires can do the job (Billings Gazette, 1981).

With the Grant Village construction on hold, Townsley flew to Washington D.C. to meet with Secretary Watt and Director Russ Dickenson to evaluate the decision making process for this project (Dickenson, pers. comm.). During the next several days, 12 letters and telegrams from West Yellowstone residents and motel owners were sent to the Park expressing opposition to the Grant Village development due to the severe loss of business it would cause them. The
following telegram was typical of the opinions expressed by the West Yellowstone residents:

I believe you should halt any further building of housing in Yellowstone Park until you have a complete study of the occupancy rate in the surrounding towns from 1978 till present. It seems unfair that the government should spend our tax dollars to put us out of business (Googin, 1981).

One of the telegrams stated that a telephone survey of West Yellowstone motels showed 49 opposed to the construction of Grant Village, 2 in favor, and 5 who did not know how they felt. According to John Burchill, the Park's concessions chief, "the project should come as no surprise to anyone" since the "plans for development [of Grant Village] have been in the works since 1934" (Nell, 1981).

[NOTE: Prior to this research the viewpoint held by the NPS was, as Burchill states, that plans for Grant Village were first conceived in the mid 1930s. As established by this research, concern for the abuse the West Thumb thermal area was receiving, and the idea of moving the development away from the thermal area did originate at this time by Frank Mattson. However, in the 1930s this idea was not given serious consideration by anyone in the Park except perhaps by Mattson, as evidenced by (1) the construction of a permanent intersection, curbing, and parking section in 1939, and (2) the Master Plan's continued proposed development within the West Thumb Sacred Area thru the year 1942. A decision to move the West Thumb development to a new location was not made until 1947, with the first
planning for the development completed in January, 1949. These plans can be found in the West Thumb Development Outline (NPS, 1949).

Meanwhile, at the meeting in Washington, an Issue Paper on Grant Village was being prepared to help evaluate the decision making process. The Paper summarized the issue as being: "What is the appropriate level of public and private investment in the development of Grant Village?" (NPS, 1981b). The Issue Paper continues:

On April 6, 1981, as a result of questions raised by a citizen of West Yellowstone, Montana, the Office of Management and Budget, the Solicitor's Office, and the Assistant Secretary's Office, a stop order on the the contract was issued to Kober Construction Company until further notice to allow time to investigate the facts and circumstances and determine the appropriate action (NPS, 1981b).

The Kober Construction Company was upset over the shutdown and threatened to sue the government if they were not put back to work (Chase, 1986). The Issue Paper stated:

Auditors have visited the Kober Construction Company in Billings to make a preliminary assessment of potential Government liability under the contract if it is terminated. They estimate the company's claim at $615,000....The claim would cover labor, overhead, materials, bonding, profit, shutdown costs, etc.

The following were some of the items discussed in the Issue Paper on Grant Village:

It is the current policy of the Park Service to put in-park development away from fragile park resources in order to minimize damage, to better control visitation, and to reduce congestion. The construction of overnight accommodations at Grant Village is consistent with this policy; as units are available at Grant Village, at least a like number of substandard accommodations at Old Faithful will be taken out of service.
Current value of all NPS-owned facilities at Grant Village is estimated at approximately $17 million.

Due to the very short visitation season, the front end cost of existing facilities, the continued high price of gasoline, and the prospect of future gas crises, there has been no recent private interest in making capital investments in new overnight accommodations at Grant Village.

During mid-July and early August in-park accommodations fill to about 90%. ... The West Yellowstone occupancy rate during the peak visitation season in 1980 was between 55 and 60% according to the West Yellowstone Chamber of Commerce. In our judgement, removal of overnight accommodations at Old Faithful should help the operators of older and smaller motels in West Yellowstone.

Both the West Yellowstone Chamber of Commerce and City Council have decided not to take a position on the issue of Grant Village.

In 1978, in order to restore the quality of public service in Yellowstone National Park, a decision was made to underwrite the initial investment by purchasing the physical plant of the old Yellowstone Park Company and proceeding with construction at Grant Village. Before proceeding, however, [Bill Whalen], the former Director of the National Park Service made pleas to the Conference of National Park Concessioners [in 1978] for alternatives to using Government funds. None were forthcoming (NPS, 1981b).

Three alternative solutions were offered:

Alternative #1: Proceed with construction of 100 units and use as incentive for additional private investment.

Alternative #2: Cancel Government construction and let private capital assume responsibility.

Alternative #3: Continue the contract for the 100 units and pursue future development through a Public Benefit Corporation.

At the present time, the Secretary's Advisory Board is examining the possibility of creating a Public Benefit Corporation (PBC). Should this occur, it would present an attractive alternative to Government development; but at the soonest PBC
is three years away. The possibility of a PBC, however, also creates the opportunity to explore reimbursement by the PBC for the 100 units. This possibility would depend on the economics of the corporation and the 100 units might also be important to the inability of the PBC (NPS, 1981b).

Alternative #2 can be interpreted to mean a return to the situation that was present prior to the NPS buyout of the YPCO. A new concessioner would have to be located who would be willing to (1) buy the possessory interest of the facilities, (2) sign a long term contract, (3) agree to invest in rehabilitation of existing facilities, and (4) commit to complete the construction of Grant Village.

Alternative #3 suggests a non-profit organization such as the Jackson Hole Preserve, Inc. that had run the concessioner facilities in Grand Teton National Park. This was a viable alternative that the National Parks Advisory Board had been working on with the Congress for a couple of years (Smith, pers. comm.).

On April 14, 1981, Alternative #1 was recommended by Director Dickenson to Interior Secretary Watt. Dickenson's opinion read:

**Recommendation:** That construction proceed on the 100 units at Grant Village and that all future development at Grant Village be done by the private sector. That at least a comparable number of units be taken out of service at Old Faithful.

The Government has a significant investment in Grant Village and in the Kober contract. To cancel this contract now will cause a total loss of Government funds in the range of $600,000 and will make it impossible to have new overnight accommodations in service at Grant Village for the 1982 season. Completing the 100 units at Grant Village at Government expense will show the
Federal commitment to development of the Grant Village area and will provide an incentive for private investment in future development of the area.

The aggregate "pillow count" in Yellowstone should not drop below approximately the present level in order to be economically viable for the concessioner. The accommodations capacity in Yellowstone has been reduced from 9,092 in 1969 to 7,500 today. However, since many of the cabins at Old Faithful are in such poor condition and since it is desirable to move congestion away from such primary attractions as Old Faithful, as units are available at Grant Village, a like number at Old Faithful will be taken out of service. This responds to the objectives of the Yellowstone Master Plan; provides an additional incentive for private construction of replacement units; and continues the NPS attempts to be a "good neighbor" to West Yellowstone.

If the NPS proceeds with this recommended action; it must be made clear to the public that 8,300 is still the target pillow count to meet our responsibility to provide a range of accommodations within the park; that NPS intends that the quality of the accommodations within the park will be upgraded; and that future investment in new facilities will be by the private sector to the maximum extent possible (Dickenson, 1981).

The following day, April 15, Secretary of the Interior Watt ordered construction of the 100 lodging units to proceed saying, "I am convinced that appropriate facilities in Yellowstone are an asset to tourism in the region" (USDI, 1981).

This decision brought strong reaction from both sides of the issue. The following article entitled "Call It Gallstone National Park," written by Frank West (pen name of Joe Cutter), appeared in newspapers across the country:

This summer the National Park Service will spend $3 million of taxpayers' money to erect 100 brand-new ultramodern luxury modular model rooms in Yellowstone National Park on a site where no
lodging has ever stood before. These 100 are the
first installment of 700 such rooms planned for
the next three years at a cost of $28 million.
Never until now in Yellowstone's 109-year history
have taxpayers' dollars been used to build
tourist lodgings.

The National Park Service is building these new
motels while, at the same time, Yellowstone's
privately owned motels have been declared an
economic disaster area. The Small Business
Administration has just concluded a federal
disaster-loan program of direct loans to sustain
these privately owned tourist businesses that are
suffering losses because of the sharply declining
number of visitors to Yellowstone.

So we are witness to the fetching little farce
wherein the U.S. government is bailing out
privately owned motels and then next door using
the same taxpayers' funds to build new motels to
compete directly with the privately owned motels
that the government is trying to save (West, 1981).

An opposing viewpoint was expressed by Randall Wagner,
Director of the Wyoming Travel Commission:

When overnight lodging is reduced (and eventually
eliminated) at Old Faithful, the logical choice
for visitors to make will be to stay at the next
closest location which is West Yellowstone,
Montana UNLESS GRANT VILLAGE IS COMPLETED AT THE
MAXIMUM LEVEL. The West Yellowstone option would
cost Wyoming a lot of sales tax revenue and would
cause many tourists to choose travel routes to and
from the Park that would avoid Wyoming entirely.
Wyoming simply can't afford to allow West
Yellowstone to become the chief overnight center
for Yellowstone vacations.

For that reason, and that reason only, I support,
and urge the State of Wyoming to actively support
[the construction of Grant Village].

More importantly (than returning the park to the
authorized level of 8,300 pillows), it will place
a major accommodations and service area on a
direct line of access to both Wyoming Park
entrances, something that should help business in
Fred Smith (pers. comm.) and the National Parks Advisory Board were disappointed that the NPS had chosen to continue the use of private concessioners in the Park rather than a Public Benefit Corporation. After being very close to finalizing arrangements with the Congress on the use of Public Benefit Corporations, the Advisory Board was surprised at how quickly private enterprise had consummated a deal to remain in Yellowstone National Park to operate the concessions (Smith, pers. comm.). The philosophy of President Reagan and Interior Secretary Watt played a major role in this:

The Reagan administration is planning major changes in the way national parks are operated, including granting increasing power in running the parks to private concessionaires....

Watt has indicated that he wants to give private investors a greater role in running the parks... (Billings Gazette, 1981).

At a time when the NPS was experiencing the same concessions problems with private enterprise service wide as at Yellowstone, the Reagan administration was firm in its conviction that private enterprise was superior to the NPS:

One change...[Watt] said, will be to give the concessionaires a greater role in the management of national park resources. A proposal by the Music Corp. of America, whose subsidiary runs the Yosemite concessions, would have concessionaires take an increased role in dealing with visitors. The visitors would be met at entrances and given orientations by the corporation's employees instead of federal park rangers.

Watt also promised the concessionaires that if any member of the National Park Service gave them a problem, "we're going to get rid of the problem or the personality, whichever is fastest" (Billings Gazette, 1981).
With construction well underway, the Grant Village DCP was released for public review in July of 1981. In November, 1981, TW Services was awarded a long term contract in which they agreed to invest $7 million to construct additional lodging units at Grant Village. According to Steve Iobst (pers. comm.), Management Assistant to the Superintendent at Yellowstone National Park, TW Services' contract requires them to invest 22% of their gross revenues each year into a capital improvement and maintenance program which was designed to prevent the concession facilities from falling into a state of disrepair. The Park will maintain possessory interest of all concession facilities except those constructed with TW Services $7 million at Grant Village. While TW Services has possessory interest in the facilities at Grant Village by virtue of their $7 million investment, this possessory interest is being slowly extinguished (Iobst, pers.comm.). This extinction is being accomplished according to a provision of the contract whereby TW Services is witholding a percentage of the required 22% investment in the capital improvement and maintenance program. The money being withheld is a return to TW Services of their initial $7 million investment. When the $7 million is recouped, which is expected to take 10 years, the possessory interest will be transferred to the NPS (Iobst, pers. comm.).

On February 8, 1982, the NPS, after completing the construction of 100 lodging units and after obtaining a
commitment from TW Services to construct additional units, declared a FONSI for the Grant Village DCP. By this timing of events, the NPS had committed to constructing additional Grant Village facilities before they had found that construction would have no significant environmental impact.

On September 19, 1982, John Townsley died of cancer. He was replaced by Bob Barbee.

In the following two years TW Services constructed 200 lodging units, a restaurant, dormitory, and registration building. Hamilton Stores also constructed a General Store and employee dormitory at Grant Village during this time.

THE CURRENT STATUS OF GRANT VILLAGE, WEST THUMB, OLD FAITHFUL, AND FISHING BRIDGE

To date, a total of $36,100,000 (in 1983 dollars) has been invested in Grant Village by the concessioners and the Park. No additional funding appears to be on the horizon, nor is there motivation within the NPS for completing the additional 400 rooms, restaurants, employee housing, and support facilities called for in the Grant Village DCP (Iobst, pers,comm.).

At West Thumb, all concessioner facilities have been removed except the Hamilton Mini-Store. The Hamilton Store was scheduled to be removed in the fall of 1987, but through an agreement between the NPS and Hamilton Stores, it will remain at West Thumb for three years, the length of time allotted to complete the paving of the road from the West Thumb intersection to Old Faithful. This agreement was
requested by Hamilton Stores because they felt there would be a need for services at West Thumb due to the delays and backup of traffic at the West Thumb/Old Faithful intersection resulting from the road work. In return, Hamilton Stores gave up their possessory interest to the Photo Store located at Fishing Bridge. This will allow the Park to remove the Photo Store without having to buy the possessory interest.

The Park's plan for removal of facilities from Old Faithful aroused the interest of many people who opposed removal of the overnight lodging claiming the facilities have a history of tradition of use by many families. These same people also felt that much of the Old Faithful development has historic value and, therefore, should not be removed. The Wyoming State Historic Preservation Office also wrote the Park urging them not to remove the historic buildings. The Director of the Wyoming Travel Commission expressed his concerns that elimination of facilities at Old Faithful would cause tourists to drive to West Yellowstone for overnight accommodations, and Wyoming's Governor Hershler expressed his concern that the removal of facilities could have far reaching effects on Wyoming communities and businesses (Chase, 1986).

In 1985, the Old Faithful DCP was approved. The implementation of the plan actually began before its approval by the removal of visitor cabins. According to Tim Manns, Yellowstone National Park Historian (1988), between
1980-1987, one hundred fifty-one cabins were removed from the Old Faithful development. In the summer of 1987, two hundred sixty-one cabins were still being utilized; one hundred sixty-six for visitor rentals and ninety-five for the housing of TW Services employees (Manns, 1986). Steve Iobst (pers. comm.), Yellowstone National Park Management Assistant, states that the employee-used cabins will be removed as soon as an employee dorm is constructed away from the thermal area. The Park also intends to remove the remaining visitor cabins but it is not known when this will occur. The Old Faithful Inn and the Snowlodge will remain in use. Further implementation of the Old Faithful DCP is dependent upon the availability of funds (Iobst, pers. comm.).

The Fishing Bridge issue is currently undecided with the NPS needing additional time to study the 3,000 responses to the EIS with which they were inundated. The Fishing Bridge EIS proposes a compromise preferred alternative that would remove most facilities from Fishing Bridge (including the campground), allow the RV park to remain, and, when the need can be documented in the future (1) construct a new campground at a location approximately one mile west of Bridge Bay to be named Lodgepole Campground, or (2) add additional sites at existing campgrounds (NPS, 1988).

Members of motor home clubs are in favor of the preferred alternative because it allows the RV park to remain at Fishing Bridge. Other people are upset, accusing
the NPS of not fulfilling their promise to remove all facilities from Fishing Bridge with no replacement of facilities anywhere in the Park. The National Wildlife Federation brought suit against the Park claiming the NPS was legally required to remove all facilities from Fishing Bridge as a result of their agreement with the USFWS which allowed for the construction of Grant Village contingent upon removal of Fishing Bridge facilities. In their suit, the National Wildlife Federation also claimed that the simultaneous operation of Fishing Bridge and Grant Village constituted an illegal taking of a threatened species. The National Wildlife Federation lost this suit but has appealed the decision. This decision is pending.

According to Destry Jarvis of the National Parks and Conservation Association:

I sat with John Townsley at the Grant Village site with maps in front of me and he told me that the Grant Village campground was a replacement for the Fishing Bridge campground. Everything at Grant Village was to be replacement for Fishing Bridge (Jarvis, pers. comm.).

Current Yellowstone Assistant Superintendent Ben Clary (pers. comm.), former Chief Naturalist Al Mebane (pers. comm.), and former Landscape Architect Dan Wenk (pers. comm.) state that Townsley had agreed to total removal of facilities from Fishing Bridge with no replacement elsewhere in the Park--Alternative E in the EIS. The decision on the Fishing Bridge EIS will be made sometime this summer.

After two concessioners refused to build Grant Village, at least three economic feasibility studies indicated it
could not be profitable, some people in the NPS opposed it, and the OMB ordered funding stopped, why did the NPS proceed with construction of Grant Village? The following are some of the responses received when this question was posed to various people during the course of interviews for this study:

The Park Service ignored the concessioners' advice based on business logic (Povah, pers. comm.).

Many times National Park Service rationale is that economic feasibility is not the major consideration—providing service to the visitor is (Berg, pers. comm.).

Economics wasn't the prime consideration, protecting the resources, getting out of Old Faithful was. People didn't come here to stay in Cody or West Yellowstone. They come here to stay in the Park (Clary, pers. comm.).

A bureaucracy will never admit a mistake. The money spent provided a good argument to go ahead with Grant Village, but since it was a small intrusion, there wasn't much built, sewers and utilities were underground and couldn't be seen, and since it was done years earlier, it was already forgotten. So the Park Service could have not constructed Grant Village and gotten away with it (Everhart, pers. comm.).

Townsley felt we were taking the other pillows out and it was our responsibility to maintain the pillow count at 8,300. I think he believed in the development as a way to move out of Fishing Bridge and Old Faithful. [T]here might have been a commitment to the concessioner to maintain the pillow count so the concessioner could have a profitable business (Haraden, pers. comm.).

We believed you can't see Yellowstone in a day and the gateway communities can't fulfill that desire to spend the night in the Park and have a meaningful Park experience. We believed in the pillow count of the Master Plan. So as pillows were removed from Old Faithful and Fishing Bridge they had to be replaced. The geographic location made sense because it was near the south entrance which is the busiest (Wrye, pers. comm.).
Chase (1986) feels that one of the reasons the NPS relentlessly pursued construction of Grant Village was that it was "better to spend another $60 million than to admit that $10 million had been wasted." Others (Jarvis, Nuss, Mebane, Swan, pers. comm.) agree that the money previously spent/wasted on the infrastructure that had been lying idle for close to twenty years was a factor in the decision to build Grant Village—-not the major factor, but an important factor nonetheless. Former Yellowstone National Park Landscape Architect Dan Wenk disagrees. When asked if there was a sense of urgency to build Grant Village due to the money already wasted, he commented:

None that I know of. The infrastructure was already at Old Faithful and Fishing Bridge and we wanted to get out of those places, so that point is not valid. We made the decision based on what was best for the resource (Wenk, pers. comm.).

Today, Yellowstone National Park is at a crossroads—ironically, the same crossroads it has been at since its inception in 1872 and possibly always will be at due to the dual legislated mandates of the NPS to provide for the enjoyment of the people and to pass the parks on unimpaired to future generations. The underlying issue that Grant Village raises is, perhaps, best expressed by Jerry Mernin, Yellowstone District Ranger in the district within which Grant Village lies:
Within the next few years, we in the National Park Service are going to have to ask ourselves--do some serious thinking about what we want Yellowstone to be. What we have here at Yellowstone is similar to the parks of Africa and Alaska. Do we want it to be a wilderness preserved in the same manner or will we continue to develop the Park? (Mernin, pers. comm.)
CHAPTER V

ANALYSIS, SUMMARY, AND RECOMMENDATIONS

ANALYSIS

Yellowstone National Park was 60 years old before a formal planning process was developed with the inception of the Master Plan concept. Prior to the development of the Master Plan, a laissez-faire atmosphere prevailed in the Park as private individuals and companies did whatever they wanted and constructed their facilities wherever they wished. Often this was in violation of the legislation that required a 1/4 mile (and later a 1/8 mile) buffer zone. Lack of foresight and planning led directly to the Park's developments being constructed in areas that would lead to the problems the Park would be attempting to solve in the second half of the twentieth century—the relocation of facilities from West Thumb, Fishing Bridge, Old Faithful, and the rim of the Grand Canyon of the Yellowstone River, to less fragile areas of the Park.

Prior to the passage of the 1916 Organic Act that created the NPS, no organizational infrastructure existed in Yellowstone National Park to implement a planning process. The Army had been present in the Park during most of this time (from 1886 to 1918). However, its function was
primarily that of law enforcement and protection of the park wildlife and geothermal features. They were not trained in park management nor did they have experience in the field of planning.

The masterplanning process began as an autocratic exercise conducted by each individual park's landscape architect. In the case of Yellowstone National Park, Frank Mattson held this position of responsibility for approximately 22 years between 1932-1962. At that time there were no guidelines for developing Master Plans. Mattson received virtually no input from other NPS employees, and on at least one occasion the Superintendent signed his approval of the Master Plan without previously seeing or reviewing it. The landscape architect was entrusted with the responsibility of planning the Park's future developments. Park administrators assumed that whatever plans the landscape architect developed would be appropriate. Had the Park sufficient money in its budget to implement the Master Plans, the landscape architect would have wielded a tremendous influence over the future development of the Park. However, because the NPS did not have a substantial budget, the elaborate development plans of the 1930s and 1940s went unfulfilled and the landscape architect's impact on the Park was considerably less than it might have been. Caulfield (1974) asserts that the end sought in planning is not plans but fulfillment of these
plans. It appears that a weakness of the NPS's plans of the 1930s and 1940s was that they were not pragmatic, as evidenced by the number of Master Plans that the Park was unable to implement.

The Mission 66 plans were developed in a group process by planning teams in the NPS headquarters in Washington D.C. This planning process moved toward a rational comprehensive planning model as problems were identified and defined, objectives were set, and a course of action established. Generally, the rational comprehensive planning model involves the: (1) identification of the problem; (2) establishment of objectives; (3) proposal of alternative solutions; (4) assessment of the impacts of the alternatives; and (5) selection of the course of action from the proposed alternatives. Unlike the rational comprehensive planning model, though, the Mission 66 planners did not propose various alternatives from which to make a selection; only one alternative was proposed. With the acute problem of obsolete, dilapidated facilities, and visitation projected to increase dramatically, the necessary course of action seemed obvious to the planners--renovation of existing buildings combined with a construction program for additional facilities. An additional area in which the Mission 66 planners differed from the rational comprehensive planning model involved the absence of an evaluation of the environmental impacts of the alternatives--or in this case,
a single alternative.

As in past planning efforts, the public was not involved in the Mission 66 planning process. It is doubtful that the public would have expressed much interest in contributing its input had it been given the opportunity in the 1950s.

By 1964, Director Hartzog recognized the need to consider changes in Yellowstone’s policies due to: (1) the evolving philosophy of park management that the NPS could not and should not continue to attempt to provide increasing numbers and kinds of facilities for a never-ending increase in the number of visitors; and (2) tourists' dissatisfaction with Yellowstone’s traffic congestion and inadequate road system, lack of adequate eating and overnight facilities, and poor concessioner service. To address these problems, Hartzog appointed a nine member Master Plan Advisory Team to develop a new Master Plan. This interdisciplinary team held public meetings in the region to determine the issues the public felt needed to be addressed. Midway through the development of the Master Plan, NEPA was passed and rational comprehensive planning was legislated. As a result of the passage of NEPA, alternative actions were developed and considered. In 1974, the Master Plan and the accompanying environmental document, the Environmental Statement, were approved. The Master Plan represented the NPS’s proposed action while the Environmental Statement evaluated the environmental impacts of the proposed action as well as the
three alternatives. The Environmental Statement did not consider the no action alternative as required by NEPA and the completed analyses of the Master Plan and the various alternatives were superficial. A serious discussion and consideration of the possible alternative actions were not presented. The alternatives that were considered were limited in scope, and two of the three alternatives were extreme in nature and not the least bit pragmatic. For example, the Master Plan proposed a ceiling on the number of pillows allowed in the Park at 8,300, the approximate level it had been for the previous ten years. It also proposed to remove facilities from Fishing Bridge, West Thumb, and Old Faithful for conversion of these areas to day-use. To offset the removal of facilities from these areas, Grant Village would become a major development providing visitor facilities. The alternatives considered to these actions were to: (1) remove all facilities from the park and disallow public entry; (2) allow unlimited expansion of facilities, and (3) reduce the kinds and quantities of facilities, services, and activities to a level below that recommended in the Master Plan. The first alternative would satisfy the Organic Act's preservation mandate but would not be in compliance with the intent of Congress which created the park "for the benefit and enjoyment of the people" and, therefore, would be illegal. It would also be unacceptable to the public and, therefore, was not pragmatic. The second alternative would satisfy the Organic Act's mandate for
providing the parks for the enjoyment of the people but
would not be in compliance with the Act's mandate to
preserve the natural values of the Park and to pass them on
unimpaired to future generations. This alternative would
also be illegal, unacceptable to the public, and not
pragmatic. Although the third alternative was a viable one,
it was not given an in-depth analysis--the Environmental
Statement addresses this alternative with three short
paragraphs that hint that business and economic
considerations were the basis of rejecting this alternative:

[T]he primary impact [of this alternative] would
be social and economic; ecologically the reduction
of visitor use would be beneficial to the ecosystems.

The park concessions, which are currently
operating at a somewhat marginal level, might
either have to be subsidized in some manner or
would be forced to close altogether (NPS, 1974b).

This concurs with the statement made by then Assistant
Superintendent Bob Haraden (pers. comm.) that at that time
the NPS felt it had a responsibility to the concessioner to
maintain the level of facilities so the concessioner could
make a profit. Continuing the analysis of this alternative,
the 1974 Environmental Statement indicated that:

Businesses outside the park would undoubtedly
benefit from this procedure [of reducing the
facilities, services, and activities in the park.] At the public meeting, many of the surrounding
communities indicated intense interest in
furnishing supplies and services to the park visitor.

Use in the park would be primarily day-use, with
the gateway commuities and adjacent federal lands
providing expanded overnight accommodations (NPS, 1974b).

Seven years later the construction of Grant Village was stopped by Interior Secretary Watt due to complaints from citizens of West Yellowstone who were protesting that construction of visitor accommodations would compete with West Yellowstone motels and possibly put them out of business. Perhaps this would have been prevented had the NPS allowed the gateway communities to take over the responsibility of providing any additional needed accommodations as they had requested in the public meetings on the Master Plans. Most likely, in the free enterprise system outside the Park, if the demand for additional accommodations was greater than the supply, then entrepreneurs would quickly and willingly construct them.

The alternative to reducing the quantity and kinds of facilities, services, and activities should have been given a more thorough investigation because it was a viable alternative and because of the nationwide philosophy that was developing in the 1970s that our National Parks were being destroyed due to the phenomenal growth in park visitation, and limits and/or a reduction in use was believed by some people to be the solution. This doctrine was expressed by W. E. Garrett (1978) who questioned if the National Parks were being "loved to death?" This philosophy was also consistent with that of the Master Plan Advisory Team which felt that too many people were the root of the problems being faced by Yellowstone National Park, resulting
in the Park receiving more visitors than the ecosystem could accommodate without being damaged. Discussion of establishing a human carrying capacity took place throughout the 1970s but the NPS was reluctant to restrict the number of people who could enter the Park for fear the public would not accept this policy. Because of Yellowstone's crowded conditions and because of the Organic Act's mandate that the parks were for the benefit and enjoyment of the people, some people argued that with only five percent of the Park developed, the opposite course of action should be pursued—an alternative for a limited increase in facilities. Utah Senator Frank Moss and Idaho senator Len Jordan argued that the overcrowded conditions in the Park were caused not by too many people, but rather because too many people were being crowded into too small a developed area. Moss felt that the NPS should provide facilities and access to twenty-five to thirty-five percent of the Park. The two senators stated that this amount of development would provide for the benefit and enjoyment of the Park for the people and still fall within the legislated mandate to preserve the natural values for future generations.

With a consensus opinion that overcrowded conditions were at the heart of the problems that Yellowstone National Park was experiencing, and with two schools of thought as to how to solve this problem, an alternative that called for a limited increase in facilities and services was as viable an
alternative as was the alternative that called for a limited decrease in these levels, and, therefore, should also have been considered.

However, rather than taking the chance of creating controversy by either reducing or increasing the quantity of facilities and services provided, the NPS choose the "safe" alternative in the Master Plan--to maintain the status quo with respect to the quantity of facilities, services, and activities provided. The NPS felt this was reasonable because although the Master Plan did not reduce the number of facilities, it did not allow for an increase either. Thus, those people who wanted a reduction in facilities did not get what they wanted, but they also did not get what they would have liked even less--an increase in facilities. Those people who wanted an increase in facilities did not get the solution they preferred, but they also did not get what they would have liked even less--a reduction in facilities.

Part of the proposed action, construction of Grant Village, was not analyzed nor were its environmental impacts predicted; the Environmental Statment stated that the "environmental effects of...Grant [Village], are unknown" (NPS, 1974b). According to Bentley and Davis (1967) if the public interest is to be maintained, all relevant values and policy consequences must be considered and the policy maker must be pragmatic in the selection of a workable solution.
Because two of the three alternatives to be analyzed in this instance, were not realistic, pragmatic, legal, or acceptable to the public, it is possible the best solution to the situation was not considered. Bentley and Davis (1967) state that the policy process can go astray right at the start if the optimal alternative is not included for consideration at the beginning. No amount of objective analysis and decision making will produce it in the final decision if the planner does not include it to be among the alternatives to be analyzed. With only one viable alternative to the Master Plan considered, it is possible the optimal alternative was not included in the analysis. Consequently, the optimal alternative was not going to be produced in the final decision. The possibility exists that the NPS intentionally considered mostly non-workable alternatives to the Master Plan as a deliberate device to make it appear to be the only acceptable solution.

Maximum objectivity results when the finished analysis is open to public scrutiny (Bentley and Davis, 1967). In this case, however, public scrutiny did not identify the alternatives that had been overlooked, deleted, not considered, or poorly considered. In all likelihood, the public did not respond to the inadequacies of the environmental document because: (1) there was insufficient interest at the time on the part of the public; or (2) the proposed action—-the Master Plan—was non-controversial and
acceptable to the interested public. Because public interest in the Park's Master plan was not high and sufficient opposition to the Plan did not exist, the Park had no difficulty in approving the Plan.

In the case of Grant Village, the lack of a thorough analysis of the alternatives combined with no analysis of the proposed action in the Master Plan, resulted in non-compliance with NEPA. Such action would probably be unacceptable to the public today. It is doubtful that the NPS could neglect this thoroughness in the public planning process today due to: (1) the increased awareness on the part of the environmental organizations; and (2) new public watchdog groups, such as the Greater Yellowstone Coalition, that have been formed. It is also doubtful that the NPS would be as negligent today. Increased public scrutiny of its planning process has prodded the NPS into conducting much more thorough planning efforts as evidenced by the most recent Fishing Bridge DCP/EIS which is over 300 pages in length. This document contains the results of scientific research efforts initiated to provide a foundation of factual information on which management decisions can be based. From this standpoint, the NPS planning process seems to have improved substantially in the last decade.

With the appointment of John Townsley as Superintendent of Yellowstone in 1975, the Park had, for the first time, a superintendent who felt that his role as the Park's chief
policy maker was to participate in the political process. His appointment was timely, as his arrival in Yellowstone corresponded with the era in which the public was becoming increasingly involved in environmental issues and demanding the right to have a voice in their government's planning and decision making process. To facilitate the planning process, Townsley took on an active leadership role.

When Townsley was appointed superintendent of Yellowstone he was given a directive from Washington to get the concession problem under control. Yellowstone National Park's SFM, approved on February 15, 1977, stated that "development shall be excluded from thermal areas" (NPS, 1977). To accomplish these goals Townsley felt the Park needed to oust the XPCO, purchase the concessioners possessory interest, and implement the Master Plan by constructing Grant Village. Townsley relentlessly pursued the accomplishment of these goals.

Townsley did not feel there was a need to utilize a Scoping Process to identify public concerns and to provide for the alternatives to be examined for the upcoming Grant Village planning documents. He felt the public had been given the opportunity to express its feelings during the public meetings and comment period for the Master Plan. As a result, he took it upon himself to insure that support for the Master Plan and Grant Village was maintained by travelling throughout the Yellowstone region speaking to the
various interest groups in an attempt to gain their support. His leadership ability was exemplified by his power to persuade others. As Bill Everhart stated (pers. comm.), there is no easy way to document the power of a person's personality, and Townsley possessed the powerful ability to persuade others to his point of view. Townsley travelled to Washington D.C. and was able to convince Congress to provide the financing necessary to purchase the YPCO and to construct Grant Village. These were no small accomplishments. Ejecting a major concessioner that was also a Fortune 500 Company from the Park had never been done before. Getting Congress to appropriate $15 million to purchase the YPCO also represented a considerable success. Finally, Townsley was able to convince Congress to appropriate $3 million for the construction of Grant Village lodging accommodations, another success of significant magnitude. Prior to this, federal funds had never been used to build lodging in the National Parks. Townsley's ability to persuade was tested to the limit when the purchase price for the YPCO escalated to over $19 million resulting in the OMB directing the NPS to reprogram the $3 million that had been appropriated for the construction of Grant Village to be applied to the purchase of the YPCO instead. He was able to convince Assistant Secretary of the Interior Herbst of the importance of the Grant Village development and of the government's need to finance the construction, and,
therefore, the importance of reprogramming funds that had been earmarked for other park projects to be applied to the purchase of the YPCO thus allowing Yellowstone National Park to utilize the $3 million to construct Grant Village. Herbst recommended this action to the Interior Secretary who gave NPS Director Whalen his approval to reprogram NPS funds other than those earmarked for Grant Village to be used to make up the deficit for the purchase of the YPCO.

Townsley also spent considerable time talking with the Congressional delegations and governors of the tri-state region in a successful attempt to persuade them to support his plans for Grant Village. Townsley's leadership was demonstrated by his ability to recognize the desires of the various competing interests and to satisfy them. For example, he recognized that constructing Grant Village would be beneficial for the tourist economy and used this argument with the business community. He accepted speaking engagements in Cody and Jackson, Wyoming, and West Yellowstone and Livingston, Montana, enlisting the support of the chambers of commerce of the gateway communities. He was able to convince these groups that Yellowstone's tourist facilities had to be improved if the region was going to experience a healthy tourist economy. When he met with leaders of the environmental community in Jackson, Wyoming, Townsley emphasized the benefits of removing facilities from the prime resource areas--West Thumb, Old Faithful, and
Fishing Bridge—and the restoration of these areas to their natural condition as the basis for earning their support of the Master Plan. Using this strategy Townsley was able to convince the environmental organizations of the benefits of the construction of Grant Village.

The passage of the National Parks and Recreation Act in 1978 required the preparation of a GMP for each unit of the National Park System. Yellowstone policy makers, however, felt that writing a GMP was unnecessary since the Master Plan: (1) already fulfilled the intent of the GMP and was its equivalent; (2) delineated the Park course of action that was still relevant and desirable; and (3) preparing a new GMP would "open a whole new can of worms" due to the competing interest groups at opposite ends of the spectrum attempting to assert their viewpoints on how the park should be managed (Iobst, pers. comm.). Because of these reasons a new GMP was not written.

The 1978 Outline of Planning Requirements placed the construction of Grant Village as the top priority of tasks needed to be studied. To accomplish this, Townsley assembled an interdisciplinary team and arranged to have them meet at the Denver Service Center in January 1979 for 2-3 days. These meetings were to serve as brainstorming sessions for providing the information that would be needed to write an EA for the Phase 1A construction of Grant Village. Shortly after the January meetings a Grant Village
DCP Planning Team was assembled to begin working on the DCP. They met on February 28, 1979, at the Denver Service Center to discuss the Task Directive (NPS, undated). The Task Directive specified who would be responsible for the various tasks and established a timeframe for the accomplishment of these tasks. On May 31, 1979, the Task Directive for Grant Village was approved (NPS, undated).

The completed Grant Village Phase 1A EA was negligent in its lack of evaluation of the impacts of the development on the park resources. Particularly noteworthy was the omission of any impacts on the grizzly bear population. The EA inadequately addressed this topic by stating that "no rare or endangered species would be affected by the proposed action." Yet one month later the draft Grant Village DCP that was published for internal review stated the there would be an increase in bear-human encounters resulting in the likelihood of bear deaths, injuries, and transplants as well as possible human injuries and deaths due to the development. A satisfactory explanation from members of the Phase 1A and DCP planning teams as to why this information was ommitted from the Phase 1A EA was not obtained during the course of this research. Apparently NPS administrators felt that revealing this information would not further management goals since it had the potential of slowing the planning process down and perhaps stopping it altogether at a time when elusive funding was available, construction was
close at hand, and it was felt that since the project had
drug on for over twenty years that the opportunity that
presented itself must be seized.

It also is apparent that the Park reneged on its
agreement to remove facilities from Fishing Bridge. The
environmental organizations in particular stated that
Townsley was able to gain their support by making it clear
to them that the development of Grant Village was contingent
upon the removal of facilities from Fishing Bridge. By not
following through with this action the NPS lost the respect
of many in the environmental community.

Throughout the years of planning for Grant Village, the
planning process that had been followed had not always been
the most efficient, well organized, orderly, or well thought
out, but it appeared to remain within the established
planning guidelines. The demise of the Grant Village
planning effort was most likely precipitated by the
decisions surrounding the Phase 1A Environmental Assessment
to deviate from the CEQ guidelines. The NPS decided to
construct Grant Village based on the Phase 1A Environmental
Assessment that: (1) was written without public input and
knowledge; (2) violated numerous CEQ guidelines; and (3) was
filed away with the apparent intent of preventing the public
from knowing the document existed. This was most likely
done to achieve the goal that Superintendent Townsley and
the NPS felt was of primary importance—to get the
construction of Grant Village started as quickly as possible regardless of what it took to achieve this goal. However, regardless of how worthy this goal may have been, the CEQ guidelines should have been followed for moral, ethical, and legal reasons. Had they been followed, construction could not have started as soon due to the time that would have been necessary to allow for public comment on the plans. Had the public been given an opportunity to comment on the plans, the NPS might have discovered that the public felt the proposed action was a major action that may significantly affect the human environment, and, therefore, would have decided to pursue writing an EIS. This process would have taken a year or two, which the NPS did not want to take. It also would have opened the door to the possibility that sufficient opposition to the plan would develop to block construction. However, if public comment on the EIS was favorable, and if a Record of Decision was prepared, then the NPS would have been in a position where it would be unlikely that the public opposition that developed in 1981 could have prevented the fulfillment of the NPS's plans. This is because the NPS would have been in the position where they were legally obligated to follow through with their plans to construct Grant Village due to CEQ guidelines published in the Federal Register on March 3, 1981 which stated:

Pursuant to generally recognized principles of federal administrative law, agencies will be held accountable for preparing Records of Decisions
that conform to the decisions actually made and for carrying out the actions set forth in the Records of Decision. This is based on the principle that an agency must comply with its own decisions and regulations once they are adopted. Thus, the terms of a Record of Decision are enforceable by agencies and private parties (NPS, 1982a).

Therefore, if an EIS and a Record of Decision had been completed, when the opposition to the construction was raised in April of 1981, the NPS would have had a legal mechanism to allow them to accomplish their goals despite opposition. Even without preparing a Record of Decision the NPS could have chosen to proceed with the construction in the face of opposition, but politically that would have been a difficult path to follow.

In the last fifteen years the NPS has become very concerned with public opinion. Fear of instituting a controversial policy or plan that one segment of the public may not agree with has prevented the NPS from accomplishing some of its goals. The failure to complete Grant Village due to complaints from West Yellowstone residents is an example of this. An additional shortcoming of the NPS's planning process has been the length of time it takes to complete a project. Plans take so long to be carried out that changes in public opinion over the years are bound to occur so that by the time a plan is ready to be implemented it will be necessary to change the plan. For example, the NPS had public approval to construct Grant Village at the time of the 1974 Master Plan. Four years later Superintendent
Townsley was able to convince the public that it was in everybody's best interest to construct Grant Village. However, by the time the NPS began construction in 1981, enough time had passed that the economic, social, and political climate had changed and opposition to the plans had developed. The NPS will be faced with similar instances in the future if the process continues to take so long that public opinion changes, thus forcing the NPS to change their plans several times throughout the planning process.

A similar example of this problem is the case of Fishing Bridge. The 1974 Yellowstone Master Plan called for restoration of the Fishing Bridge area to natural conditions because the area consisted of prime grizzly bear habitat. There was little opposition to this at the time. As a result of the Section 7 consultation with the USFWS in 1979, Superintendent Townsley agreed to withdraw from Fishing Bridge. About this same time, opposition to the planned withdrawal was beginning to develop. By the early 1980s this opposition caused the NPS Director to order a compilation of all the available data that supported the belief that the Fishing Bridge area was prime grizzly bear habitat. This resulted in the publication of Fishing Bridge and the Yellowstone Ecosystem: A Report to the Director (NPS, 1984). This was done to provide the NPS with justification for the withdrawal from Fishing Bridge (Jobst, pers. comm.). In 1983, the four alternatives offered in the Fishing Bridge DCP focused on the removal of most facilities
without replacement including the RV park and NPS campground. Based on public response from these meetings, the NPS revised the alternatives and developed new ones. Again, public response, this time from environmental groups, led to the revision of the alternatives. The revised alternatives were presented to the public in April 1986. As a result of public comment an additional alternative was added. These alternatives were analyzed in the draft EIS/DCP in October 1987. In April 1988, the NPS came out with the final EIS/DCP with a new compromise preferred alternative. This was the sixth set of alternatives. By the time this preferred alternative is ready to be implemented it is possible public opinion may change again and the preferred alternative will no longer be acceptable. Will the NPS go through the process of developing a new preferred alternative for the seventh time?

The entire planning process must be operated in an open, honest, and legal manner. These criteria have not always been met in the case of Grant Village. Recent planning in the case of Fishing Bridge indicates that the past experience of Grant Village has presented a learning situation for the NPS through which valuable lessons have been acquired and are being implemented. The Fishing Bridge EIS process has been open, honest, thorough, and based on scientific data as well as public input. However, the fear of not being sensitive to public comment has driven the
planning process resulting in the NPS changing the preferred alternative too many times.

No analysis of the NPS planning process would be complete without a discussion of the budget. It is, after all, a fact that the planning process is directly affected by the financial constraints the agency faces.

Clarke and McCool (1985) believe that many of the difficulties the NPS has experienced throughout its history can be traced to budgetary woes. Although visitation to the parks has increased dramatically since World War II, funding has increased by small increments. At the close of Mission 66, the NPS suffered a budget cut of over $10 million, which was followed by another budget decrease in 1968. During this same time the number of park areas increased from 218 to 270. This forced the agency into deficit spending in 1969 (Clarke and McCool, 1985). In the thirty-three year period from 1950-1983, the NPS experienced eighteen years of budget increases and fifteen years with budget decreases. Yet during this time the number of park areas increased from approximately 200 to 333. This lack of funding has contributed to the NPS's inability to successfully implement plans. According to Clarke and McCool (1985), a study of the NPS budget from 1970-82 indicates that preservation-oriented agencies do not automatically or necessarily benefit from an era of environmental awareness such as was experienced during this time.
SUMMARY

Listed below are the sixteen questions posed in Chapter III that guided this investigation followed by the conclusions that have been drawn as a result of this research.

1. When was the idea first proposed to withdraw facilities from the West Thumb thermal area and relocate them at a site south of West Thumb (which was later named Grant Village)?

"The decision to move was made in 1947 during a field meeting at which many of the interested parties including the concessioners were present" (NPS, 1949).

2. Why was the Grant Village site chosen?

It was the only area nearby West Thumb that was relatively flat and had adequate space for a development.

3. Why was Grant Village constructed?

Grant Village was constructed as a replacement of facilities at West Thumb that were old and dilapidated and to protect the thermal area. Rather than renovate the existing buildings at West Thumb, it seemed sensible to construct the new facilities a substantial distance away, thus eliminating the cause of much of the abuse the thermal area was receiving. Later, when Mission 66 plans were being developed, Grant Village was needed to fulfill the goal of accommodating the projected increase in future visitation. At the time the Master Plan was written, Grant Village was envisioned as replacing facilities being removed from
Fishing Bridge and Old Faithful, thus maintaining the level of facilities.

4. Were sufficient studies conducted during the planning process to ascertain if the Grant Village location was prime grizzly bear habitat?

No. Studies of this area were not conducted until ex post facto.

5. Why did the concessioners repeatedly reject the plan to build Grant Village?

They did not think it was economically profitable.

6. What role did Wyoming elected officials play in influencing decisions to construct Grant Village?

The construction of Grant Village was most likely the result of NPS desires. Chase (1986) asks, "Who was responsible? NPS? Goverment officials? the state of Wyoming, or private citizens?" The state of Wyoming did not have much say or influence in this matter. In fact, Townsley went to Wyoming elected officials to persuade them to back the plans for Grant Village. The motivation for Grant Village came from within the NPS.

7. What position did the environmental organizations take throughout the planning stages of Grant Village?

They did not get too involved because when they looked at the big picture of environmental problems nationwide, the issue of construction of Grant Village seemed, at the time, to be a minor one to them. Also, although they were not too
keen on developing a new area of the park, they believed the benefits that would be derived by withdrawal from Fishing Bridge, Old Faithful, and West Thumb would offset the loss of the Grant Village area. Therefore, the construction of Grant Village seemed to be a reasonable compromise. In hindsight, the environmental organizations regret they went along with the plan. However, if the plans would have been carried out as intended (full withdrawal from Fishing Bridge, Old Faithful, and West Thumb) the environmental organizations would have been satisfied with the compromise. Today, they feel they did not get a compromise but instead lost the entire issue since Fishing Bridge, Old Faithful, and Grant Village developments are all in operation.

8. Was the EA and the declaration of a FONSI adequate or should an EIS been prepared?

This research has uncovered that there were two environmental assessments prepared. It seems the Phase 1A assessment was knowingly done in violation of NEPA/CEQ regulations, and then filed away so the public would not know of its existence. It would be difficult to believe that the NPS was unaware of the regulations they violated, and even if this was the case, ignorance of the regulations is not a valid excuse. It is the responsibility of those who sign the document (along with the NPS compliance officers in the Denver Service Center) to insure its compliance with the laws and regulations that apply to their
agency. Filing the first EA, unbeknownst to the public, appears to have been done to expedite the process of getting construction started. Townsley most likely felt he could not wait the several years it would take to get the DCP/EA written and approved. He apparently had Congressional approval of the money to construct the initial 200 units at Grant Village and felt he had to get construction started before he lost this money.

9. Did the NPS violate the Endangered Species Act in the section 7 consultation on the grizzly bear with the USFWS by requesting funds for construction of Grant Village one year before the publication of the EA?

   No. The funding process often takes a very long time and it cannot be accurately predicted if the money will become available, when the money may become available, or how much of that requested will be approved. The planning process is such that several issues, such as funding and environmental compliance will take place at the same time. As lengthy as the planning process is, it would become unmanageable if each hurdle had to be cleared chronologically and one at a time rather than having many of them addressed simultaneously.

   It does seem clear, however, that the NPS was in violation of the Endangered Species Act as a result of awarding a contract to begin construction before the USFWS's biological opinion on the grizzly bear was issued. The
Endangered Species Act states: "Such assessment [biological opinion of the USFWS] shall be completed...before any contract for construction is entered into and before construction is begun with respect to such action" (16 USC Section 1536, subsection c). The NPS would argue that the contract was awarded based on the Phase 1A Environmental Assessment and that the biological opinion was being issued as it addressed the Grant Village DCP/EA. However, as this research has shown, the Phase 1A Environmental Assessment was illegal, and therefore, could be argued to be invalid. CEQ guidelines clearly state that only one environmental assessment shall be written for a project and we can extrapolate from that that the biological opinion of the USFWS should be based on this single document. If it is accepted that the Grant Village DCP was the document that addressed the impact of the entire development, since it was the far more comprehensive of the two documents, then the awarding of the contract before the USFWS issued their biological opinion (based on the DCP/EA) was in violation of the Endangered Species Act.

10. Was the USFWS pressured into giving a no jeopardy biological opinion on the grizzly bear at Grant Village?

As would be expected, the USFWS denied being pressured into giving a no jeopardy opinion. John Varley (pers. comm.) of the NPS stated that the USFWS "plays hardball" on issues like this and so he doubted they would give in to any
pressure. Varley's assessment of this is most likely accurate. The USFWS probably realized, as Wally Steucke (pers. comm.) of the USFWS stated, that it was inevitable that Grant Village was going to be constructed. This placed the USFWS in a situation where they viewed Grant Village from the standpoint of asking themselves "How can we offset the damage that will be done?" The USFWS disagreed with the construction of Grant Village but felt that if the NPS was going to proceed, then the removal of facilities from Fishing Bridge would act as mitigative measures preventing the grizzly bear's existence from being jeopardized. However, the power of the politically appointed officials in the Department of the Interior to persuade and/or coerce the USFWS into issuing a no jeopardy opinion should not be overlooked, particularly since the USFWS was opposed to the Grant Village development yet issued a no jeopardy opinion. Although it is doubtful that the USFWS was pressured into issuing the no jeopardy opinion, the possibility that they were pressured into rendering this opinion can not be ruled out.

11. Did the NPS adequately forsee and plan for an orderly replacement schedule of facilities on a one-for-one basis from Fishing Bridge to Grant Village?

No. The NPS naively assumed that when a new facility was constructed that the concessioner would remove the corresponding old facility. However, once a new facility was built the concessioner continued to plea for the use of
the old facility and often would be granted approval to use it for years because of: (1) NPS administrators who were sympathetic to the concessioner's requests; or (2) lack of fortitude on the part of the NPS to require the concessioner to remove the facility combined with the lack of a legal mechanism for forcing the concessioner to remove the old facility.

12. Why were public funds used to construct the initial phase of Grant Village rather than using funds provided by the concessioner?

Since the NPS could not get the concessioner to construct Grant Village the NPS did not have many alternatives. Also, by using government funds the NPS maintained control over the situation, and the importance of this issue—the NPS's desire to gain control over the concession facilities, and the concession problems in general—can not be overstated. The NPS was certainly justified in this desire as the concessioner problem was a disgrace to the Park.

13. After the project had been deemed unprofitable by several concessioners and a couple of economic studies, and with the gateway accommodations industry receiving federal disaster relief loans from the Small Business Administration due to low visitation resulting from a gasoline shortage in the late 70s, why did the NPS continue to pursue the development of accommodations at Grant Village?

The motivation of John Townsley, the prime factor in the construction of Grant Village, may never be known. However, the gasoline shortage and the resultant drop in
visitation was probably viewed as a short term problem while the desire to upgrade the Park's concessioner facilities had been a problem that had plagued the Park for decades and had to be resolved. With this in mind, Townsley was probably attempting to: (1) fulfill the master plan; and (2) correct the concessioner problem.

14. Did the NPS go against OMB orders not to build Grant Village by giving the Order to Proceed with construction the day after employees of the Carter administration had left office and President Reagan's appointees, who did not know of the orders, were in office?

Dale Snape (pers. comm.) stated that the OMB was philosophically opposed to the use of government funds to construct Grant Village because the government would never regain its capital costs. Consequently, when Congress did not appropriate enough money for the NPS to purchase the YPCO, the OMB directed the NPS to use the Grant Village money ($3 million). The following year when the NPS requested additional funding for Grant Village ($21 million), OMB thought this was another request to initiate construction of Grant Village rather than recognizing the request for what it actually was—a request for additional funding to complete the development. OMB turned down this request and thought the Grant Village development was dead. OMB did not know that the NPS had chosen not to follow OMB's directive to reprogram the Grant Village $3 million for the purchase of the YPCO. The NPS took this action with
the approval of both the House and Senate Congressional Appropriations Committees. Although Dale Snape and the OMB accused the NPS of going against their directive (which the NPS did), the NPS: (1) was under no legal obligation to follow the OMB directive; and (2) had Congressional approval for spending the $3 million that Congress had appropriated for the construction of Grant Village.

The evidence does not support Chase's (1986) assertion that the NPS attempted to maneuver around the OMB's directive by issuing the Order to Proceed with construction on January 21, 1981, presumably done because it was the day after the Carter administration appointees in OMB had left and the new Reagan appointees had come into office not knowing that their predecessors had: (1) directed the NPS to reprogram the Grant Village funding for the purchase of the YPCO; and (2) deleted the $21 million request from the NPS budget. On the surface, this appears plausible. However, Chase did not know that the NPS had obtained Congressional approval for the use of the $3 million. In addition, his research did not uncover the series of events that had occurred leading up to the meeting on January 20, 1981, in which the Order to Proceed was given. In summary, construction companies were invited to visit the park in August of 1980, to be shown the plans for constructing Grant Village accommodation units. In September, the companies were required to submit technical designs for the units.
Next, the NPS evaluated the designs and returned them, requesting the five companies with acceptable designs to make revisions so they would fully comply with the NPS specifications. Along with their revised designs they were requested to submit bids. The revised designs and bids were due by December 4, 1980. In December, Kober Construction was awarded the contract based on the lowest bid. On January 20, over twenty representatives of Kober Construction and the NPS met at Park headquarters in Mammoth Hot Springs to finalize their plans. During the meeting it was agreed by all in attendance that the official Order to Proceed should be effective the following day. The importance of this date was that once the Order to Proceed was given, Kober Construction would have, by contractual agreement, a deadline established in which construction had to be completed. If the Order to Proceed date would have been given several months later, the deadline for completion of construction would also have been pushed back by several months. Thus, the significance of the Order to Proceed was in establishing the date when Kober Construction would be required to have construction completed. The natural sequence of events indicate that the date of January 21, was purely coincidental with the inauguration of President Reagan.

15. Did the NPS construct Grant Village because, as Chase (1986) suggests, it was easier to spend another $60 million
than to admit that $10 million had been wasted?

This is difficult to ascertain. To answer this question we would have to know the motivation of the person who was the key player in getting Grant Village constructed--John Townsley. Unfortunately, due to Townsley's death sufficient data were not uncovered to adequately determine what his motivation was. Consequently, the question that begs to be answered--"What was Townsley's motivation to construct Grant Village?"--will probably never be answered. Some people in the NPS agree that the money already invested in the Grant Village area was one of many factors in the decision to continue pursuit of the development. Others rejected this idea and stated that decisions were made based on what was best for the resource. It appears most likely that Townsley was a hard working, highly motivated person who was simply doing his job in the way he felt was best--and that included constructing Grant Village to fulfill the Master Plan and correct the deplorable situation with the concessioner.

16. What were the events of April 1981 that caused the construction to be stopped by Interior Secretary Watt and then ordered to resume one week later?

The citizens of West Yellowstone protested the Park's use of government funding to construct hotel accommodations that they felt would compete with them and possibly put them out of business. They sent telegrams to the Park and Joe Cutter made a few telephone calls to the key
political/government officials (David Stockman, Dale Snape, James Watt) whom he knew agreed philosophically with the West Yellowstone residents that government funding of concession facilities in the park was wrong. Watt, reacting without giving consideration to the Park's past history of the concessioner problem and its need to gain control of the situation and improve concessioner facilities, put a hold on construction to investigate if it could be stopped. However, during the week that construction was on hold it became apparent that the government would lose over $600,000 by cancelling the construction. This could have created a large amount of criticism for the Reagan administration which is probably why Watt allowed the construction of the initial 200 units to be completed but ordered the remaining units to be constructed with private funds. An interesting question that needs further investigation is how the decision to build the additional units was consumated so swiftly when, according to Fred Smith (pers. comm.), the National Parks Advisory Board, of which he was a member, had been working with Congress on creating the means to establish public benefit corporations to operate concessioner facilities. After years of work on this concept, TW Services consumated a deal with the NPS so quickly the National Parks Advisory Board didn't know what hit them and all their years of work on public benefit corporations went down the drain virtually overnight (Smith,
The work stoppage in April, 1981, illustrates that many people in the gateway communities are not concerned with the goals or mandates of the park but rather have only their own self-interests at heart. Consequently, their opinion of park policies change to side with whatever current NPS plan is in their economic best interest at that particular time. For instance, in 1978 West Yellowstone residents were in favor of government construction of Grant Village because they felt that if the park facilities were in poor condition, tourists would avoid the region. Just three years later they changed their minds, claiming Grant Village would compete with them and possibly put them out of business and had the same project that they had previously supported, stopped. How short their memories were.

Although NPS administrators must be sensitive to the needs of the gateway communities, they also must have the political will and fortitude to comply with their legislated mandates, emphasizing that the parks were not created for the purpose of providing the gateway communities with a living, but rather for the purpose of passing them on unimpaired so that all generations may enjoy them.

**RECOMMENDATIONS**

The following are recommendations for the NPS planning process.
1. The NPS needs to follow its own ignored requirement for GMPS, as specified in the Planning Process, NPS-2, to establish visitor carrying capacities. The NPS must then have the fortitude to implement these limits. This action is necessary as a result of current levels of visitation that are making it increasingly difficult, if not impossible, for the NPS to fulfill its legislated mandate to pass the parks on unimpaired to future generations.

2. Because development in the parks destroys the park values that made the area worthy of national park status and because the gateway communities are eager and willing to provide visitor accommodations and services, no additional concessioner operated visitor facilities should be allowed in units of the National Park System. In addition, as existing concessioner facilities age and are faced with renovation, consideration should be given to removing the facilities and placing them outside of park boundaries.

3. If the above recommendations are not implemented and new developments are planned, then they should not be assessed by an EA; they should have the more thorough EIS prepared.

4. If newly planned developments are to be assessed by an EA, then the Scoping Process should be utilized to insure that public concerns are identified and a range of legitimate alternative actions are considered.

5. The NPS should to limit the number of times it requests public input. Public comment is extremely crucial as well as a legislated requirement of the planning process. However, once sufficient input has been obtained, a Record of Decision should be prepared and the plan implemented. The goal should be to reduce the number of times the preferred alternative is reformulated by obtaining sufficient public input at the start of the planning process through the Scoping Process.

6. If the NPS chooses to maintain concession facilities in the parks, then these facilities should be operated by a non-profit Public Benefit Corporation established by the National Parks Advisory Board and have the same goals as the park. The chronicle of Grant Village has revealed that the history of concessions operations in Yellowstone National Park has been marked by the
NPS's inability to control the concessioner due to their conflicting goals. These goals will always conflict due to the nature of a business venture. Private enterprise and the profit motive do not belong in the national parks. When it exists, it will attempt to influence NPS decisions to allow for maximizing profits. The Public Benefit Corporation should exist to serve the park, not its stockholders, much the same way the Natural History Associations operate in most of the national parks today.

7. Park planners must be more pragmatic and realistic with the selection, timing, and financing of plans so that plans can be fulfilled in a timely manner.

8. The planning process must become decentralized with the Denver Service Center playing a smaller role and the individual park's personnel taking on a larger role. Park personnel are closer to the problems and have a better understanding of the needs, goals, issues, public concerns, problems, and solutions the park faces.

9. Compliance with applicable regulatory and statutory provisions must always be met.

10. In cases where strong, polarized interests may exist, an EIS should be prepared rather than an EA, thus insuring that when an alternative is selected, enforceability will be insured by the issuance of a Record of Decision.

11. In cases where facilities are to be removed from a developed area upon completion of construction of replacement facilities elsewhere in the park, a legal mechanism must be developed and implemented to insure that this action takes place immediately upon completion of the replacement facilities. This could be accomplished by language written into a contract that requires the concessioner to remove old facilities within ninety days of completion of replacement facilities.
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APPENDIX A

PEOPLE INTERVIEWED


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Chase, Alston. Author of Playing God in Yellowstone.

Child, Huntley. Executive Vice President of the Yellowstone Park Company, 1950s and early 1960s.

Clary, Ben. Yellowstone National Park Assistant Superintendent.


Culpin, Marcy. National Park Service Historian, Rocky Mountain Region.

Cutter, Joe. West Yellowstone resident and editor of the Old Faithful Times, late 1970s and early 1980s.

Davis, Denis. National Park Service Environmental Specialist, Denver Service Center, late 1970s, member of the Grant Village DCP Team.


Everhart, Bill. National Park Service Historian and Advisor to Director Hartzog.

Gallagher, Charlie. Manager of the Yellowstone Service Stations.


Given, Dave. National Park Service Environmental Engineer, Midwest Region, member of the Grant Village DCP Team.


Hallin, Thomas J. Executive Vice President of the Yellowstone Park Company, 1950s and early 1960s.


Herbst, Robert. Assistant Secretary of the Interior, early 1980s.

Hocker, Phil. member of the National Board of Directors of the Sierra Club, 1970s.

Iobst, Steve. Yellowstone National Park Management Assistant.


Jonas, Robert. Professor of Wildlife Biology at the University of Idaho.

Knight, Dick. Head of the Interagency Grizzly Bear Study Team.


Mernin, Jerry. Yellowstone National Park Snake River District Ranger.

Mintzmyer, Lorraine. National Park Service Rocky Mountain Region Director.


O'Shay, Jay. National Park Service Park Planner, Denver Service Center, member of Grant Village DCP Team.

Petersen, Leslie. Chairperson of Teton County Board of Commissioners.

Poole, Daniel A. former President of the Wildlife Management Institute, member of the 1974 Master Plan Advisory Team.

Povah, Terry. President of Hamilton Stores.

Ramey, Edna. National Park Service employee in the Denver Service Center.

Riddle, Jim. National Park Service employee, works in the Denver Service Center Office of Planning and Compliance.

Schmalz, Barbara. Department of Interior Regional Environmental Coordinator, Denver Office.

Smith, Fred. member of the National Parks Advisory Board, late 1970s and early 1980s, also a Trustee of the Jackson Hole Preserve, Inc., 1970s.

Smith, Merrick. National Park Service Park Planner in the Western Region Office of Design and Construction in San Francisco during the planning of Grant Village, member of the 1974 Master Plan Advisory Team.


Strunk, Mike. National Park Service Planner, Denver Service Center, was Grant Village DCP Team Captain.


Whalen, Bill. National Park Service Director, late 1970s.

Wrye, Ron. Yellowstone National Park Assistant Superintendent under John Townsley.
APPENDIX B

INTERVIEW QUESTIONS

1. When did you work in Yellowstone?

2. What was your position and responsibilities?

3. What year was the first Master Plan approved?

4. How often were the Master Plans revised?

5. Who actually worked on the Master Plans?

6. What guidelines did you have for developing Master Plans?

7. Did the public have any input in the Master Plans?

8. Did the concessioner have any input and/or influence in Master Plans?

9. Who was involved in the planning process for the Master Plans? Were plans drawn up by Yellowstone personnel, Regional NPS personnel, or a combination of the two? Did other non-planners in Yellowstone have any input in these plans (such as naturalists, rangers, maintenance)?

10. The Master Plans of the 1930s and 1940s state that no development shall take place within the sacred area yet turn around and propose development within this area. With this apparent contradiction, what was the thinking at the time?

11. The Master Plans in the 1930s and 1940s show the Mammoth area as being totally revised. Was this merely a re-design of the area or did it represent intentional withdrawal from the thermal area?

12. When were the first discussions held concerning withdrawing developments from the rim of the canyon and the thermal areas?

13. When was the idea first proposed of relocating the facilities to a site south of the West Thumb Thermal area?
14. Who first suggested the area south of West Thumb where the present day Grant Village is now located and when?

15. Do you recall being present at a meeting at West Thumb, probably in 1946, with Tom Vint, Frank Mattson and others in which the discussion focused on removal of facilities from West Thumb and Tom Vint asked where should we should to? What discussion took place?

16. Do you recall walking into the area and looking it over?

17. Between the 1930s and 1946 had anyone suggested relocating West Thumb to the specific Grant Village site?

18. Do you recall late one fall, just after the snow had fallen, probably in 1948, 1940, or 1950, going into the area with NPS and concession personnel and looking over the area, staying long enough to have lunch? What year? Who was present? What was discussed?

19. When was the decision made to redraw from West Thumb to Grant Village?

20. Who made the decision to withdraw from West to Grant Village?

21. In the period from the 1930s thru the end of Mission 66 what was the thought on continued expansion of accommodations? When did the NPS begin to question unlimited expansion of accommodations?

22. Do you recall circa 1956, going in a boat from the dock of West Thumb to show the Grant Village site to the concessioners, and the area had been marked off with gauze from tree to tree to indicate where various buildings would be located, and the concessioners catering lunch? What was discussed?

23. Was Thumb Bay renamed Grant Bay sometime in the 1940s or 1950s?

24. Do you recall Grant Village initially being called Thumbay?

25. How did the name of Grant Village come about? What year was year?

26. Was the development called Grant Village from the start?

27. Did the surrounding states apply any pressure on the Park to influence Park decisions?
28. When did the first discussions of developing the present day Grant Village take place?

29. Why was the Grant Village site chosen over other possible areas?

30. What was the NPS/concessioner viewpoint when the state of Wyoming passed legislation to purchase the YPCO circa 1955?

31. What was the YPCO's viewpoint concerning the construction of Canyon Village?

32. How did this affect the company's viewpoint toward construction of Grant Village?

33. Was the YPCO legally required to build at Grant Village?

34. Why did the YPCO have a difficult time securing financing for new construction?

35. Do you recall the plans for Grant Village being displayed when the conferees to the First World Congress on National Parks visited Yellowstone in 1962? Where? Were the plans on display and how were they displayed?

36. When the NPS cleared the timber in the Grant Village area and began to construct roads and utilities in 1961, had the YPCO already made their decision not to build? If yes, did the NPS know of this decision? If the NPS did know, then why did they proceed?

37. Was there concern at the time that Grant Village might be prime grizzly bear habitat?

38. By 1970-72 was Fishing Bridge thought to be good grizzly habitat?

39. What do you know about the NPS approaching Rockefeller through Rockresorts, Inc. and the Jackson Hole Preserve, Inc., asking them to purchase the YPCO in the 1960s?

40. In 1966 when the Goldfield Corp. bought out the YPCO, was it written into their contract that they were required to build Grant Village?

41. Were there people in the NPS who felt that Grant Village was not a good idea? If yes, did they try to stop it, what did they try to do and what were the results?

42. Was Superintendent Anderson given a directive from the regional office or from Washington to complete Grant Village?
43. What guidelines existed for writing the Master Plan in the time period 1964-1974?

44. Early drafts of the Master Plan that eventually was approved in 1974, were extremely idealistic, much more so than the final version. Why was the idealism in the final version watered down?

45. Why did the Master Plan of 1974 state a change in philosophy from one of development to preservation and then proceed to call for development of Grant Village?

46. What was the YPCO's viewpoint when the NPS decided to terminate the YPCO's contract and buy them out in 1978?

47. In a letter to the Acting Associate Director of the NPS dated Feb. 3, 1976, Frank Cummings, Vice President of General Host Corporation wrote: "In all candor, we do not readily understand, and respectfully disagree with your statement that 'most of the YPCO concession facilities are obsolete and in need of considerable upgrading.' We believe that a substantial amount of time and money has been spent...in new facilities and in the upgrading of older locations...[I]n our view YPCO has fully complied with its obligation under the contract....Prior to our committing to this significant expenditure, we received assurances from Park Service officials that they concurred in our view that YPCO has met its obligations under the concession contract and is entitled to the full thirty year term." What do you know concerning what this letter states?

48. In 1979, why did the NPS chose to purchase the YPCO rather than seek another concessioner?

49. In 1976, the YNP Concessions Management Review of the YPCO recommended the NPS buy the YPCO and begin their own building program. How much did this report influence the decision to buy the YPCO rather than seek another concessioner to buy the YPCO?

50. Since the Concessions Management Review Team consisted of NPS employees rather than having an outside economic firm or university commissioned for the study, could the final recommendations have been what the NPS wanted to hear rather than being objective recommendations? Was it the intent of the study to provide the justification the NPS needed to purchase the YPCO and, therefore, the outcome of the study had been decided upon before it was undertaken?
51. Circa 1979, a meeting of the gateway communities was held to form an organization that had as one of its goals to curb the concessioner expansion of accommodations in the park. In addition Grant Village had been deemed unprofitable by several concessioners and by a couple of economic studies, and the gateway accommodations industry was receiving federal disaster relief loans from the Small Business Association due to low visitation resulting from a gasoline shortage in the late 1970s. With all these factors going against it, why did the NPS continue to push for development of accommodations at Grant Village?

52. What position did the environmental organizations take on Grant Village? Was Superintendent Townsley able to convince the Sierra Club, etc., that the trade-off between building Grant Village and withdrawing facilities from Old Faithful and Fishing Bridge was in their best interests?

53. How would you interpret the USFWS's no jeopardy biological opinion under the section 7 consultation of the Endangered Species Act?

54. The USFWS biological opinion on the grizzly bear and Grant Village states, "It is our biological opinion that the proposed development within Grant Village is not likely to jeopardize the continued existence of the grizzly bear. However, we question the need and justification for such extensive commercial development within occupied grizzly habitat and believe that adverse impacts to the bear will result....We also believe the project will negate many of the benefits acquired through the phase out of facilities at Fishing Bridge and view such a 'trade-off' as an unfavorable solution to a wildlife conflict that, with the development of Grant Village, will likely be duplicated rather than eliminated." How would you interpret this opinion?

55. Was the USFWS's no jeopardy opinion on the grizzly bear a typical opinion?

56. Is it standard procedure to give a no jeopardy opinion followed by a list of reasons why the USFWS felt the development should not take place?

57. During the time period that the no jeopardy opinion was being written, was there any communication between the USFWS and the Secretary of Interior's office on the Grant Village project as it relates to the grizzly bear?
58. During this time period was there any communication between the USFWS and anyone in the Department of Interior (other than NPS personnel) concerning this project?

59. Was the USFWS under any pressure to give a no jeopardy opinion?

60. Was the USFWS aware of the fact that the Secretary of Interior had already given his support for the project?

61. Would the USFWS have issued a no jeopardy opinion if they had known the Secretary of Interior had already approved the project and the funding had already been appropriated?

62. Do federal agencies have a gentleman's agreement not to "step on each other's toes"?

63. Did the USFWS believe the no jeopardy decision they wrote or were they in a position where they had to give a no jeopardy opinion since their boss, Secretary of Interior Cecil Andrus, had already given his approval for the project?

64. Once Grant Village is fully completed, will the NPS find that they have transferred/traded the bear-human problems from the Fishing Bridge area to Grant Village because it was the people with their food, garbage, campsites, etc., that attracted the bears into the Fishing Bridge area resulting in the high number of bear-human encounters?

65. Was the NPS legally required to remove Fishing Bridge and Old Faithful facilities as the result of Grant Village construction? Was the withdrawal from Fishing Bridge and Old Faithful contingent upon construction at Grant Village, and consequently when one action was completed the other action was required to follow?

66. Why did Townsley get together a team of planners to meet in the Denver Service Center for 2-3 days to work on Grant Village in 1979?

67. Were there two separate Grant Village planning teams and planning efforts?

68. Was the purpose of the planning meeting in the Denver Service Center to provide the background information for the writing of the Environmental Assessment for the first 150-200 units of Grant Village?

69. Why wasn't a normal planning process followed?
70. The Grant Village Develop Concept Plan (DCP) as well as other NPS documents state that facilities constructed at Grant Village will be replacement of those removed from Fishing Bridge and Old Faithful. During the planning and writing of the Grant Village DCP, was there any discussion of whether or not the campgrounds at Fishing Bridge were to be replaced? If yes, where?

71. Did Townsley ever say that the Grant Village campground was the replacement for the Fishing Bridge campground?

72. Did Townsley ever say that the Fishing Bridge would not be replaced and/or that the Grant Village campground was the Fishing Bridge campground replacement?

73. Did Townsley ever say that Grant Village was to be the replacement for Fishing Bridge?

74. Was there to be replacement of facilities anywhere other than Grant Village?

75. Was Townsley given a directive from the NPS regional office or Washington (NPS Headquarters) to complete Grant Village?

76. What were Townsley's reasons for working for the development of Grant Village?

77. Did the NPS adequately foresee or investigate the trade-off of facilities between those being removed from Fishing Bridge and being constructed at Grant Village? When facilities were constructed what was to be done? Should each facility have been addressed one at a time to describe what would be done with each? Was any thought given to a contractual arrangement requiring the removal of a facility within a specified time period after the completion of a trade-off facility?

78. Why did the NPS go to Congress and ask for funding of Grant Village?

79. Why did the NPS request funding for Grant Village before the Environmental Assessment had been completed?

80. What were the circumstances under which the Environmental Assessment was written for the first 150-200 units?

81. Why wasn't one Environmental Assessment done for the entire project?

82. Was there a shortage of time that required the Phase 1A Environmental Assessment be done quickly?
83. Was the Phase 1A Environmental Assessment rushed through? If yes, why?

84. Why was public involvement not solicited? Was public involvement not wanted?

85. Is it standard procedure for an agency to consult with only three organizations on an Environmental Assessment?

86. The Council on Environmental Quality regulation's require that an Environmental Assessment be written on the entire project rather than just considering a segment of the project. Was there any consideration of this regulation at the time?

87. The last paragraph of the Phase 1A Environmental Assessment states "since the preferred alternative does not constitute a major federal action, does not have significant environmental impacts, and is not controversial, it is recommended that no further enviromental documentation be prepared." At the time was it felt that there would be no controversy over this construction?

88. Did Townsley testify before Congressional hearings in Washington in 1978 to obtain approval of funding for the purchase of the YPCO and construction money for Grant Village?

89. Of the $3 million requested for 1980 construction, why was $1.2 million not to be mentioned at the hearings (as indicated on the Joggers For Appropriation Hearings)?

90. Why on Nov. 15, 1979, did the director of the OMB order the NPS not to use public funds to build Grant Village? Did the NPS go against OMB orders not to build by waiting until after the OMB employees of the Carter administration had left office and President Reagan had been inaugurated?

91. Why was the project stopped on 1981 by the Secretary of Interior, and why on April 14, did NPS Director Russ Dickenson give the order to resume construction?

92. Why was the NPS given permission to go ahead and construct the first one hundred units using public funds but ordered to seek private industry to build the remaining units?
93. On Oct. 19, 1982, Wyoming's Governor Ed Hershler wrote that "If accommodations do not exist at Grant Village, tourists may choose travel routes to and from the park that would avoid Wyoming entirely. We simply can't afford to allow West Yellowstone in Montana to become the chief overnight center for Yellowstone vacations." (This would cost the state of Wyoming a large amount of sales tax revenue). Did the state of Wyoming pressure the NPS to build Grant Village? How much influence did the state of Wyoming have in pressuring the NPS?

94. Don Hummel, former chairman of the Conference of National Park Concessioners has said that the new TW Services Contract practically guarantees a profit. Do you agree or disagree with this statement? Was the NPS in a position where they needed to create a new style of contract that practically guaranteed a profit so that they could get TW Services to construct Grant Village since they had been ordered to use private industry to construct the remainder of the units?

95. Who or what was the push behind the construction of Grant Village and why? Was the state of Wyoming in favor of it? Was TW Services in favor of it? Were the local tourist industries behind it? Was it solely the desire of the NPS? If so, who in the NPS was in favor of Grant Village? Washington (NPS Headquarters)? The regional office? Yellowstone personnel? The Superintendent of Yellowstone? The NPS Director?

96. It has been suggested by Chase, that in the late 1970s and early 1980s, the reason the NPS constructed Grant Village was because it was easier/better to go ahead and spend an additional $60 million than to admit that the $10 million already spent had been wasted. What are your feelings concerning this statement?