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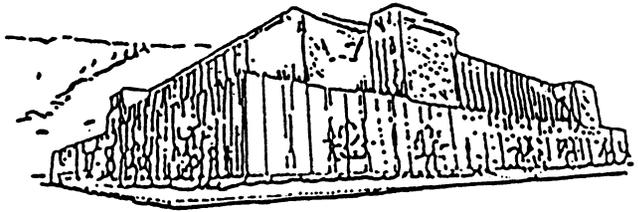
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THE DEVELOPMENT OF SNOWMOBILE POLICY  
IN YELLOWSTONE NATIONAL PARK

by

Michael J. Yochim

M. S., The University of Montana, 1998

presented in partial fulfillment of the requirements

for the degree of

Master of Science

The University of Montana

1998

Approved by:



Chairperson



Dean, Graduate School

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## The Development of Snowmobile Policy in Yellowstone National Park

Director: Bill Chaloupka



Following World War II, Yellowstone administrators began to receive increasing pressure from local interests to plow park roads in winter. This pressure culminated in a congressional hearing on the matter in Jackson Hole in 1967, with virtually all who gave or sent statements supporting the plowing of the Park's roads. Yellowstone administrators did not believe that plowing the Park roads was in the best interest of the Park or its visitors, and formally opted instead to allow visitors to tour the Park in winter via oversnow vehicles. Superintendent Jack Anderson adopted this policy in 1968, and decided to groom the snow vehicle roads and open the Old Faithful Snowlodge for visitor convenience. Following that meeting, he pursued a personal agenda of promoting snowmobile use of Yellowstone because he personally liked snowmobiles, and failed to consider adequately their negative impacts upon the Park. His successor, John Townsley, continued Anderson's policies for the same reasons. Bob Barbee, superintendent after Townsley, continued the same policies again, while casting the first doubts regarding the program. The park's current superintendent, Mike Finley, is taking the first hard look at the snowmobile program, examining its effects on the Yellowstone environment and considering major changes and limitations on the use of snowmobiles in the snow-covered park. As such, he is the first superintendent to consider seriously the possible adverse effects of snowmobiles on the Park, the potential increase for winter use of the Park, and the policies of other national parks toward snowmobiles. However, he has yet to make any significant changes.

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The following individuals went out of their way to assist me with this project. The professors on my committee gave me invaluable advice and constructive criticism: Professors Bill Chaloupka, Tom Roy, Sean O'Brien, and Duane Hampton. John Sacklin and Lee Whittlesey served as expert Yellowstone advisors. My brother Paul assisted me with my research in Glacier National Park; Bronco Grigg assisted me in the Denver, Colorado, area; and Carol Alette assisted me in the Missoula, Montana area.

## INTRODUCTION

This paper will examine the development of the National Park Service's policy toward snowmobiles in Yellowstone National Park from 1940 to the present. While administrators wished to enable the visitor to experience the spectacular beauty of the Park in winter and satisfy public pressure to open the Park in winter, they did not adequately consider the effects of snowmobiles on park resources, the future impacts of winter visitation, the policies of other national parks, or applicable laws such as the National Environmental Policy Act of 1969.

### Yellowstone National Park

Yellowstone National Park, the world's first national park, lies in the northwest corner of Wyoming, and extends into Montana and Idaho. Established in 1872 by President Ulysses S. Grant, Yellowstone occupies a special place in the hearts of Americans and individuals all over the world. Yellowstone's best-known feature is Old Faithful, probably the most famous geyser in the world. Old Faithful is one of over 10,000 geysers, hot springs, mud pots, and fumaroles in the Park. The park has more of such thermal features than the rest of the world combined.<sup>1</sup>

Yellowstone is known for much more than simply geysers, however; in fact, it holds so many other unique natural phenomena that early explorers christened it "Wonderland" in the late 1800's. These wonders include the spectacular Lower Falls of

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<sup>1</sup> T. Scott Bryan, *The Geysers of Yellowstone*, (Niwot: University Press of Colorado, 1991), 17.

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the Yellowstone, a 308-foot waterfall at the head of the Grand Canyon of the Yellowstone, a striking canyon of yellow, orange, pink, and red rocks. In the southern part of the Park is Yellowstone Lake, a very large, cold, and high-elevation lake at the foot of the dramatic Absaroka Mountains. The park's superb mountain scenery impressively complements its unique thermal features.<sup>2</sup>

In addition to its scenery, Yellowstone is home to one of the largest assortments of wildlife remaining in North America. The only herd of wild bison (*Bison bison*) which has survived continuously since ancient times in the United States still ranges through the Park. Yellowstone is home to 30,000 elk (*Cervus elaphus*), part of the largest herd of elk in the world. It is one of only two places in the 48 contiguous states that harbors both the threatened grizzly bear (*Ursus horribilis*) and also the gray wolf (*Canis lupus*). Yellowstone Lake harbors the largest remaining population of cutthroat trout (*Salmo clarki*) in the U.S. In addition to these animals, the Park has five other species of ungulates, some forty other mammals in total, over 225 recorded species of birds, a few reptiles and amphibians, and at least 1500 different plant species, including a thermally-adapted endemic plant known as Ross's bent-grass (*Agrostis rossiae*). The abundant flora and fauna are clearly some of Yellowstone's most significant resources.<sup>3</sup>

Yellowstone's geographic and wildlife resources combine to make it one of the

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<sup>2</sup> Rick Reese, *Greater Yellowstone, The National Park & Adjacent Wildlands*, (Helena: American & World Geographic Publishing, 1991), 23.

<sup>3</sup> Reese, *Greater Yellowstone*, p. 31.

wildest places left in the United States outside of Alaska. In addition to the resources just described, Yellowstone has other notable signs of wildness. The Yellowstone River, the longest undammed river in the nation, courses through the Park for about one hundred miles. The Thorofare Ranger Station in the southeast corner of the Park is one of the most remote places in the 48 contiguous states, located over 25 miles by trail from the closest road in any direction. The 1988 wildfires, which burned almost 800,000 acres in Yellowstone, provided clear evidence that nature, and wildness, reign in Yellowstone by completely defeating one of the largest fire-fighting efforts of the U.S. government. Yellowstone's most precious resource is its wildness, a somewhat intangible resource that is increasingly threatened in our consumptive and overdeveloped society.<sup>4</sup>

Perhaps this wildness is what draws people to Yellowstone. An average of three million visitors per year travel through Yellowstone, making it one of the most popular national parks in the U.S. Nearly all of these visitors travel over 500 miles to get to the Park, further attesting to its popularity.<sup>5</sup>

And perhaps Yellowstone's wildness is most visible and most tangible in the winter. Certainly the weather is wild, bringing some of the coldest temperatures in the 48 contiguous states to Yellowstone—ranging as low as -50° F. in most winters—and an average of 200-300" of snow per winter to accompany the intense cold. Yellowstone receives these cold temperatures and large amounts of snow because most of it is a high

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<sup>4</sup> Michael Milstein, *Yellowstone: 125 Years of America's Best Idea* (Billings: *Billings Gazette*, 1996), 14-24, 93.

<sup>5</sup> Personal communication with Anita Varley, July, 1991, Yellowstone National Park, WY.

plateau, averaging about 8000 feet above sea level. Nearly surrounded by mountain ranges, the Park's normative season is winter, lasting from late October well into May in most years.<sup>6</sup>

The cold temperatures and significant snowpack combine to create impressive sights. First, the winter conditions force most of the Park's wildlife to migrate to the lower elevations both in and out of the Park, where they spend the winter. Because most of the Park's winter roads are at the same relatively low elevations, the wildlife are much more visible in the winter than they are in summer. Many thermal features are near the road in the Old Faithful/Firehole River valley area; bison and elk congregate around them in winter to conserve body heat. The proximity of the thermal features to the road and clustering action of the wildlife in winter make them still more visible in the Old Faithful/Firehole River valley area.

Second, the contrast of the heat from the thermal features with the cold winter air creates a winter fantasyland at times. In such cold temperatures, vapor from the thermal features condenses on all nearby objects, rendering them white-frosted winter masterpieces. Since some rivers receive millions of gallons of hot or boiling water from the Park's thermal features, they do not freeze, even in the coldest weather. On cold nights, rising condensation from the comparatively warm rivers clings to all nearby objects, turning the river corridors into frosty winter wonderlands. Water-dependent

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<sup>6</sup> *Yellowstone National Park Commentary Handbook* (Transportation Department, AmFac Parks & Resorts, Yellowstone National Park, WY, 1995), 150-52.

birds such as trumpeter swans and bald eagles are drawn to these open rivers, further enhancing the wildlife viewing. Also, since many of the roads parallel the rivers and geyser areas, the combination of the wildlife viewing and the winter scenery make for an outstanding natural experience.<sup>7</sup>

Finally, the wildness of Yellowstone may be more perceptible in winter because there are not as many visitors—a mere 4-5% of Yellowstone's three million annual visitors come to the Park in winter.<sup>8</sup>

Yellowstone is a very moving place. Most Yellowstone veterans agree that wildness—which often creates subtle feelings of fear and awe—is its most precious resource. One may always experience wildness in the Park, but some feel its presence most strongly in winter. Perhaps Yellowstone's administrators so readily accommodated the snowmobile in the park to enable visitors to experience this wildness.

#### Brief History of Winter Use in Yellowstone

Winter visitation has a surprisingly long history in Yellowstone. One of the first significant winter visits after the Park was established was that of Henry Schwatka and F.J. Haynes in 1887. They and a number of their assistants undertook a three-week ski tour through the Park during one of the coldest and snowiest winters in U.S. history. Haynes was a noted photographer of the West at this time and became the park's more-

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<sup>7</sup> Jeff Henry, *Yellowstone Winter Guide* (Niwot: Roberts Rinehart Publishers, 1993), 87-89.

<sup>8</sup> "Seasonal Visitation Statistics," flyer available from the Visitor Services Office, NPS, YNP, WY.

or-less official photographer. On this winter trip he became the first to photograph Old Faithful in the winter.<sup>9</sup>

In 1949 the first winter visitors on motorized vehicles entered Yellowstone's frozen interior.<sup>10</sup> Because these early over-snow vehicles were unreliable and often difficult to steer safely, visitation in the early 1950's was quite sporadic. It began to pick up in the late 1950's when two men in West Yellowstone, Montana, purchased the first "snowcoaches," large, enclosed vehicles on tracks and skis that were more comfortable, reliable, and controllable than the earlier over-snow vehicles. They brought the first snowcoach tours into the Park in 1955;<sup>11</sup> other operators continue such tours today. I conducted such tours during three recent winters in Yellowstone.

Bombardier began to manufacture private, one- or two-person snowmobiles in 1959.<sup>12</sup> Beginning in 1963, visitors began entering the Park on private snowmobiles in addition to those touring via snowcoach.<sup>13</sup> The developments of these two forms of winter locomotion, and the apparent willingness of the NPS to accommodate them in Yellowstone, made possible the formal opening of Yellowstone to winter motorized visitation in the late 1960's.

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<sup>9</sup> Paul Schullery, *Yellowstone's Ski Pioneers: Peril & Heroism on the Winter Trail* (Worland: High Plains Publishing Company, 1995), 39-43.

<sup>10</sup> *Superintendent's Monthly Report, January 1949*, YNP Research Library, YNP, WY, p. 5.

<sup>11</sup> Robert S. Halliday, "Yellowstone in Winter," *Parade*, March 13, 1955, p. 11.

<sup>12</sup> Malcolm F. Baldwin, *The off-road vehicle and environmental quality* (Washington, D.C.: The Conservation Foundation, 1970), 7

<sup>13</sup> *Superintendent's Monthly Report for January, 1963*, YNP Research Library, YNP, WY.

In 1971 the National Park Service (NPS) began grooming the snowmobile routes to provide smoother roads for visitors. Snowmobiles and snowcoaches (collectively known as snowmachines) tend to displace the snow over which they travel. Where many snowmachines move the snow in this way, moguls, or bumps of snow, result, making travel bumpy and unpleasant. Hence, the NPS began grooming the roads to facilitate more comfortable winter travel.<sup>14</sup> During the winter of 1971-72, Yellowstone administrators directed the Yellowstone Park Company (“YPCo”) to open the Old Faithful Snowlodge for its first winter season. With that, visitors could stay overnight in the Old Faithful area, as well as obtain food and gasoline there.<sup>15</sup> Both the grooming and the lodging services continue today.

Motorized visitation in the Park has escalated rapidly since it began (with some short periods of decline). This increase was facilitated by the smooth roads and the ability of visitors to stay overnight at Old Faithful. Manufacturer improvements in snowmobile reliability and comfort additionally facilitated the increase in visitation.<sup>16</sup> The present park situation bears little resemblance to the original, 1970’s-era snow-covered Yellowstone.

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<sup>14</sup> Staff Meeting Minutes for Feb. 2, 1971, IN Box A-37, File A40: “Conferences and Meetings, 1971” YNP Archives, YNP, WY p. 3.

<sup>15</sup> “Yellowstone Snowtime Adventures,” promotional brochure for Old Faithful Snowlodge for its first season, 1971-72, located at Chief Executive’s Office, AmFac Parks & Resorts, Mammoth Hot Springs, YNP, WY.

<sup>16</sup> Robert Barbee, interview by author, telephone interview, Anchorage, AK, Jan. 14, 1998.

## Present Park Situation

Today Yellowstone is open for winter visitation from mid-December through early March. The Yellowstone maintenance staff plows only 55 miles of road in the northern part of the Park for automobile travel, from Gardiner to the Northeast Entrance. The staff packs and grooms 184 miles of the remaining park roads for snowmachine travel.<sup>17</sup> Grooming occurs every night or every other night, depending on volume of travel, and costs around \$1 million per winter (with salaries, supplies, and electricity included).<sup>18</sup>

Yellowstone now leads the National Park system in numbers of entering snowmobiles per winter. In a typical winter today, from 60,000<sup>19</sup> to as many as 91,000<sup>20</sup> snowmobiles enter the Park. Voyageurs National Park in Minnesota is the next busiest winter park, with 30,000 snowmobile visits per winter.<sup>21</sup> Fewer than 10% of Yellowstone's winter visitors now enter via snowcoach.<sup>22</sup> From West Yellowstone, as many as 1,400 snowmobiles enter on the busiest winter days. That figure, when combined with visitors entering the Park from its three other entrances, gives a total of

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<sup>17</sup> National Park Service, *Environmental Assessment: Temporary Closure of a Winter Road, Yellowstone National Park* (Yellowstone: NPS, Nov., 1997), 19.

<sup>18</sup> National Park Service, "Overview of Maintenance Trends" (Unpublished Report, Planning Office Files, NPS, YNP, 1997), 1.

<sup>19</sup> National Park Service, *Environmental Assessment*, p. 20.

<sup>20</sup> D. J. Schubert, "Adverse Effects of Trail Grooming and Snowmobile Use on Winter Use Management in the Greater Yellowstone Area with a Special Emphasis on Yellowstone National Park" (Unpublished report submitted to NPS, Yellowstone, February 1997), 14.

<sup>21</sup> Personal communication with Barbara J. West, Jan. 17, 1997, Voyageurs National Park, MN.

<sup>22</sup> National Park Service, *Environmental Assessment*, p. 19.

as many as 2,000 snowmobiles entering the Park on a given winter day.<sup>23</sup>

Over 75% of Park winter visitors travel to Old Faithful during their stay. About 50% also travel to the Canyon area to view the Lower Falls and Grand Canyon of the Yellowstone.<sup>24</sup> A typical tour for a visitor entering from West Yellowstone is to travel the 14 miles to and from the “Lower Loop” (the Park’s main roads are configured in a “Figure 8,” with an “Upper” and a “Lower” Loop), and then travel the entire 96-mile Lower Loop in a day, stopping at Old Faithful, the Canyon, and a few other points of interest. Most will spend less than eight hours on this 130-mile tour.<sup>25</sup>

Visitors now find two hotels open in winter in Yellowstone, the Mammoth Hot Springs Hotel and the Old Faithful Snowlodge. The National Park Service (NPS) operates a visitor center at both of these places. Additionally, there are six warming huts open in the Park, as well as four gas stations.<sup>26</sup>

Yellowstone today allows *more snowmobiles than all other national parks combined* (see Chapter 2). The upward trend in snowmobile visitation to Yellowstone shows no signs of slowing down, especially since the NPS has no restrictions on the numbers of snowmobiles currently entering the Park. Clearly, Yellowstone’s policy of total snowmobile acceptance is extreme for the National Park Service, especially considering

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<sup>23</sup> Greater Yellowstone Winter Visitor Use Management Working Group, *Winter Visitor Use Management: A Multi-Agency Assessment* ([n.p.]: Greater Yellowstone Coordinating Committee, April, 1997), 17.

<sup>24</sup> Margaret Littlejohn, *Visitor Services Project, Yellowstone National Park Visitor Study, Report 75* (Moscow: University of Idaho, 1996), 17.

<sup>25</sup> National Park Service, *Environmental Assessment*; p. 23.

<sup>26</sup> *Ibid.*, pp. 20 and 26.

the impacts of snowmobiles upon the Park.

### Impacts of Snowmobiles

Snowmobiles have many negative effects on the Park and its resources: air pollution, noise pollution, visitor conflicts, crowding, and wildlife displacement. Following is an overview of these problems in Yellowstone.

First, snowmobiles create excessive air pollution in the Park. Snowmobiles are powered by one of the most polluting engines made: the two-cycle engine.<sup>27</sup> They need such an engine because it is lighter and more powerful than conventional four-cycle engines used in automobiles, and hence capable of traveling through very soft snow. The two-cycle engine mixes oil with gas for combustion, a process that creates many times the air pollution of a typical four-cycle engine.<sup>28</sup> Yellowstone's administrators began monitoring such air pollution at the West Entrance in 1994. They found that the emissions from snowmobiles exceeded Clean Air Act and Montana state carbon monoxide standards at times.<sup>29</sup> Snowmobiles also drop pollutants into the snow over which they travel, and their air pollutants may settle onto nearby snow. Consequently,

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<sup>27</sup> Scott McMillion, "Snowmobiles 'extremely dirty,'" *Bozeman Daily Chronicle*, Jan. 9, 1994.

<sup>28</sup> The Fund for Animals, in *Fund for Animals et al., v. Bruce Babbitt et al*, Case Number 1:97CV01126, May 20, 1997, p. 18, claims that snowmobiles produce as much as 224 times the carbon monoxide of the typical automobile, and 1,000 times the hydrocarbons. However, there is little data to support such figures. Perhaps Adams' estimate of 54 times the hydrocarbons is more realistic (John Adams, "Snowmobile Emissions," report submitted to University of Montana, 12/14/96) (Adams gives no comparison of carbon monoxide emissions). Regardless, snowmobiles are commonly known to emit extremely high levels of CO, nitrous oxide, and hydrocarbons (Scott McMillion, "Snowmobiles 'extremely dirty,'" *Bozeman Daily Chronicle*, Jan. 9, 1994).

<sup>29</sup> "Ambient Air Quality Study Results, West Entrance Station, Yellowstone National Park, Winter 1995," brochure available from NPS, YNP, WY.

they may cause significant ground and water pollution as well, though this has not been studied very well in Yellowstone or elsewhere. Snowmobiles, then, pollute both the air and (possibly) the water of one of the most pristine places in the country.<sup>30</sup> While snowcoaches have negative impacts as well, their impacts are far smaller than those of snowmobiles. This is partly because there are only 45 snowcoaches at most in the Park per day, but also because snowcoaches use a conventional four-cycle engine.

Second, snowmobiles are notoriously noisy. Again, this is mainly a result of their two-cycle engines. Visitors have consistently complained about snowmobile noise in Yellowstone since the 1960's.<sup>31</sup> During the winter I spent at Old Faithful (1993-94), there was no place within a 10-mile radius of a snowmobile road that was free of the high-pitched whine of snowmobiles during daylight hours. One of the NPS management guidelines in Yellowstone is to provide opportunities to experience the natural quiet in the Park.<sup>32</sup> Very few persons can ski more than 10 miles into Yellowstone's backcountry to find that natural quiet—hence, arguably the NPS is not meeting its own management standard.

Third, the excessive numbers of snowmobiles in the Park create conflicts between park users. For example, the noise and air pollution just described detract from the quiet,

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<sup>30</sup> E.S. Adams, "Effects of lead and hydrocarbons from snowmobile exhaust on brook trout," *Transactions of the American Fisheries Society* 2:363-373, 1975.

<sup>31</sup> In my research at the Yellowstone Archives at Mammoth Hot Springs, Wyoming, I consistently came across complaints regarding snowmobile noise from the 1960's through the 1990's.

<sup>32</sup> United States Department of the Interior/National Park Service, *Winter Use Plan/Environmental Assessment* (Denver: Denver Service Center, 1990), 33.

peaceful experience many visitors and skiers seek. Over 300 visitors from 1993 to 1995 wrote complaints to the NPS about snowmobile emissions and noise, and such complaints commonly continue today.<sup>33</sup> Clearly, a conflict exists among different users of the Park.

Fourth, crowding is becoming an increasing problem. This may seem strange in view of the fact that there are far fewer visitors in winter than in summer, but is understandable in light of the fact that there are far fewer facilities open in the Park in winter than in summer. Additionally, most of the support facilities, such as sewage treatment centers and gasoline stations, cannot be serviced in winter since the roads are closed to wheeled vehicles, and near capacity by winter's end. For example, the Yellowstone Park Service Stations (YPSS) fills its fuel tanks at the Park's interior service stations in fall, and cannot refill them until spring. In recent winters, the large numbers of snowmobiles refueling at those stations ran some of the service station tanks dry by winter's end.<sup>34</sup> This is one reason that YPSS recently increased the volume of its tanks at Old Faithful.

Finally, impacts on wildlife are still another significant resource problem associated with snowmobiles. Since the 1960's, Park employees have seen snowmobilers directly harass wildlife by chasing or otherwise bothering park animals. More serious is the fact

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<sup>33</sup> Greater Yellowstone Winter Visitor Use Management Working Group, *Winter Visitor Use Management: A Multi-Agency Assessment*, p. 9.

<sup>34</sup> *Ibid.*, pp. 11-12.

that since 1980 the Park's bison have learned to use the snowmobile routes to travel from one grazing site to another. As they have learned this, some of them began to explore further afield, discovering that the snowmobile routes lead to easier grazing outside the Park. Some bison, then, use the roads to travel to better grazing and, by so doing, may save energy and survive winter in higher numbers. The groomed roads may have allowed bison to completely alter their natural movements and increase their population size to a level that is higher than normal, which is about 1,400 to 2,000 animals.<sup>35</sup>

In severe winters such as the winter of 1996-97, over half the Park's bison may leave the Park, some via its groomed roads. Since they carry brucellosis, a disease that if transmitted to cattle (the possibility of this transmission is itself questionable<sup>36</sup>) causes them to abort their fetuses, the state of Montana kills any bison that leave the Park. During the extreme winter of 1996-97, the state shot 1,084 bison, which is about one third of the Park's herd. Another 300 bison died of natural causes inside the Park. All told the bison suffered a 40% population crash that winter.<sup>37</sup> The NPS's own guidelines state that it must preserve and protect park resources "in such manner and by such means as will leave them undisturbed for future generations."<sup>38</sup> Obviously, the bison resource is

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<sup>35</sup> Mary Meagher, "Winter Recreation-induced Changes in Bison Numbers and Distribution in Yellowstone National Park," (Unpublished report submitted to the NPS, YNP, WY), 1993, pp. 28-33. While Meagher believes that groomed roads have enabled bison numbers to increase, other scientists are not as sure. Consequently, the relationship between bison and groomed roads is the topic of several research projects in the Park this winter.

<sup>36</sup> "Babbitt calls for study of bison's brucellosis threat," *Missoulian*, March 1997.

<sup>37</sup> "Latest Yellowstone bison count much lower than fall," *The Missoulian*, Missoula, MT, March 20, 1997.

<sup>38</sup> U.S.C.A. 16 § 1: National Park Service: Service Created, August 25, 1916.

disturbed already, since bison populations and movements have altered due to the snowmobile roads.

Clearly, snowmobiles have many deleterious effects on the Park and its resources. My personal experiences with these problems in Yellowstone directly bias me against snowmobiles. I have good reasons for disliking them: they are noisy and polluting, they displace park wildlife, and they ruin the quiet, tranquil experience that I, and many other park users, desire in winter. I additionally dislike snowmobiles because I perceive that some of their effects are infractions of guidelines that the National Park Service should follow in administering Yellowstone.

#### Purpose of this Paper

Yellowstone National Park is a world-renowned place respected by citizens and other park managers worldwide. Winter is a fascinating season in Yellowstone and has become a popular time to visit. The development of the snowmobile combined with the NPS's actions of grooming park roads and opening Old Faithful Snowlodge have made it possible for large numbers of visitors to experience Yellowstone in winter. Snowmobiles cause many adverse impacts upon the Park. Yellowstone's administrators, however, have until recently welcomed snowmobiles without hesitation, despite evident knowledge of those known or potential impacts and federal law requiring them to assess such impacts before permitting snowmobiles. In contrast, managers in other national parks have had the foresight to prevent such impacts from occurring in their parks by complying with

law and preventing snowmobile use. Yellowstone stands out from other national parks in totally accepting snowmobiles and their concomitant impacts. As such an anomaly, Yellowstone's extreme policy toward snowmobiles bears investigation.

For this paper, then, I propose to investigate the following:

- 1) Why did Yellowstone administrators open the Park to motorized winter visitation, and who were the responsible officials?
- 2) Did Yellowstone administrators ever consider the adverse environmental impacts or long-term effects of snowmobiles and winter use on park resources as they were required to do by law, or the possibility of winter use becoming as heavy as it is today? If they did, what were their conclusions? And if not, what was their rationale for not doing so?
- 3) Has the NPS in Yellowstone ever considered the policies of other national parks such as Glacier toward snowmobiles, or the example it provides to other national parks? Why or why not?

## CHAPTER 1: PUBLIC PRESSURE TO PLOW PARK ROADS RESULTS IN A SNOWMOBILE POLICY: 1940-1971

*Everywhere was the pervading quiet and peace of nature as man [sic] first found it. We dreamed that we were the first humans to set foot upon this spot...The feeling of being alone was never before so strong within me.*

Lon Garrison, 1964.<sup>1</sup>

The period of time from 1940-1967 saw constantly increasing pressure applied to the Yellowstone's administrators from regional constituents to open Yellowstone's roads to automobile traffic year-round. This pressure began just after World War II and culminated in a congressional hearing in Jackson, Wyoming, in 1967. Responding to the pressure, administrators gave serious consideration at least three different times to the feasibility of opening Park roads in winter to automobiles, each time concluding that it was not feasible. But, by 1968, they had instead compromised by opening the Park to snowmobiles for a variety of reasons. Between 1968 and 1971 Yellowstone's administrators formalized the Park's winter program by providing groomed roads, and lodging at Old Faithful. This chapter will chronicle the efforts of the surrounding communities to open the Park in winter and the response of the Park administrators.

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<sup>1</sup> W. Scott Chapman, *Yellowstone Back Country* (Yellowstone: Yellowstone Library and Museum Association, 1971), Foreword, discussing summer in Yellowstone. The quote arguably applies even more strongly to the park in winter.

## Legislative and Historical Background

Yellowstone National Park was created by act of Congress in 1872: “The tract of land lying near the headwaters of the Yellowstone River ... is reserved and withdrawn from settlement, occupancy, or sale under the laws of the United States, and dedicated and set apart as a public park or pleasuring ground for the benefit and enjoyment of the people.” The act stated that the park’s administrators must provide for “the preservation from injury or spoliation of all timber, mineral deposits, natural curiosities, or wonders, within the Park, and their retention in their natural condition.”<sup>2</sup>

Since Yellowstone was the first national park in the U.S. (and the world, for that matter), Congress had little guidance in the field of park preservation. Consequently, the legislation authorizing Yellowstone was somewhat vague on how the Park should be managed, stating only that the Park is “set apart as a public park or pleasuring ground for the benefit and enjoyment of the people.”<sup>3</sup> Despite that vagueness, early park administrators thought they had a very clear sense of what activities were, and were not, acceptable within a national park. For example, the U.S. Army exerted tremendous effort from 1886-1918 within Yellowstone to patrol the geyser basins and keep tourists

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<sup>2</sup> U.S.C.A. 16 § 21-22. Establishment of Yellowstone National Park. Note that, had snowmobiles been developed in 1900 rather than the 1960’s, the first part of the Park’s enabling legislation would clearly have provided for their use within Yellowstone, since it was a “pleasuring ground.” Richard West Sellars discusses the “pleasuring ground” management of the early parks in Chapter 1 of *Preserving Nature in the National Parks: A History* (New Haven: Yale University Press, 1997), 16-22.

<sup>3</sup> Alfred Runte chronicles the early history of the national parks in *National Parks: The American Experience* (Lincoln: University of Nebraska Press, 1979).

from damaging Yellowstone's fragile thermal features. Additionally, the Army regularly patrolled the interior of Yellowstone in winter, keeping a special eye out for persons attempting to poach the Park's snowbound animals.<sup>4</sup>

By 1915, Congress had established several other national parks, including Sequoia, General Grant (now Kings Canyon), Yosemite, Mount Rainier, and Glacier. While the Army did an adequate job in protecting some of these parks,<sup>5</sup> Congress recognized by the early 1900's that it needed an administrator exclusively devoted to managing national park areas. So, in 1916 Congress created the National Park Service (NPS):

There is created in the Department of the Interior a service to be called the National Park Service, which ...shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified, ... 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.<sup>6</sup>

Inherent within this mandate is a dichotomy: the National Park Service must preserve the significant features of the Park while at the same time provide for the enjoyment of those features, without impairing them. In other words, the NPS must facilitate the use of the Parks without impairing them—a fine line to walk when there are three million visitors per year touring a park such as Yellowstone. The NPS has always struggled with this dual mandate, but especially since World War II, after which

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<sup>4</sup> Paul Schullery, *Yellowstone's Ski Pioneers*, pp. 98-115.

<sup>5</sup> Duane Hampton, *How the U.S. Cavalry Saved the National Parks* (Bloomington: University of Indiana Press, 1971), 164-65.

<sup>6</sup> U.S.C.A. 16 § 1: National Park Service: Service Created, August 25, 1916.

visitation has consistently surged upwards.<sup>7</sup>

Until 1970, when Congress passed the National Environmental Policy Act, the acts creating Yellowstone National Park and the National Park Service (the “Organic Acts”) were the only guidance that Congress gave the NPS to administer its national parks.<sup>8</sup> To give itself further guidance, the NPS may promulgate regulations both within individual parks, and also on a system-wide basis. For example, Yellowstone administrators issued the first snowmobile regulations for their park in the 1960’s.<sup>9</sup>

Once World War II ended and the GI’s arrived home, the country settled into what future historians may recognize as America’s “golden age.” Jobs in the military-industrial complex of America were plentiful and wages were good, so Americans enjoyed an unprecedented standard of living. More and more Americans owned cars and had the financial means and free time to travel. Consequently, visitation in the national parks began to increase.

Helping to stimulate tourism in winter was the return to America of the 10<sup>th</sup> Mountain Division, the Army’s very successful and prestigious division of skiing troops. Upon returning, several of the 10<sup>th</sup> Mountain Division members founded the country’s first ski resorts, such as Alta in Utah and Sun Valley in Idaho. By founding these resorts, the Division members stimulated the interest of Americans in skiing and in winter

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<sup>7</sup> William C. Everhart, *The National Park Service* (New York: Praeger Publishers, 1972), 80.

<sup>8</sup> 42 U.S.C.A. §4321 et seq., Pub. L. 91-190 (1970).

<sup>9</sup> “Regulations Governing Winter Activities,” appended to Jack K. Anderson to Regional Director, December 8, 1970, IN Box L-33, File L34: “Recreation Activities,” YNP Archives, YNP, WY.

recreation. Likewise, the Winter Olympic Games after the war undoubtedly stimulated the interest of Americans in winter vacations as well.<sup>10</sup>

#### Round One: Pressure to Open Yellowstone to Winter Visitation Begins.

Yellowstone is a good example of the post-war increase in visitation, as Table 1 illustrates.

Table 1. Visitation to Yellowstone, selected years from 1920 to 1992.<sup>11</sup>

Year	Total Visitation
1910	19,575
1920	79,777
1930	227,901
1940	526,437 (Highest year before WWII)
1943	64,144 (Lowest WWII year)
1946	814,907
1948	1,013,531 (First year over 1 million)
1950	1,109,926
1960	1,443,288
1965	2,095,509 (First year over 2 million)
1970	2,297,290
1980	2,000,273
1990	2,823,572
1992	3,144,405 (First year over 3 million)

Even before World War II, local merchants were beginning to see the benefits of increased tourism to their financial returns. It did not require too much imagination to

<sup>10</sup> James Jurale, "History of Winter Use in Yellowstone National Park," (Master's thesis submitted to the University of Wyoming, Dec., 1986), 102-112.

<sup>11</sup> *Yellowstone National Park Travel Table*, Handout available from NPS, YNP, WY.

realize that, if Yellowstone kept its roads open all year, the merchants could see year-round returns. Hence, Senator Joseph O'Mahoney (D-WY) began the first round of pressure to open Yellowstone's roads in winter in 1940 by urging the NPS to consider plowing. Arno Cammerer, Director of the NPS, responded to him by denying his request, stating the NPS's reasons against plowing:

- 1) Severe cold, sudden storms and the rapid changes in temperature make the Park dangerous in winter;
- 2) Drifting snow would make the roads treacherous; and
- 3) "It would require excessive outlays for equipment and manpower to keep these roads safe for travel."<sup>12</sup>

Between Cammerer's response and the advent of the World War, pressure to open Yellowstone's roads disappeared for the next seven years.

With surging visitation after World War II, the Big Horn Basin Clubs, a federation of all commercial clubs of the Park region in Wyoming, renewed the effort to open Yellowstone's roads in winter.<sup>13</sup> Responding to the pressure, the U.S. Bureau of Public Roads (now Federal Highways) conducted a study to determine if opening the roads in winter was feasible. Citing the following reasons, the Bureau concluded that opening the Park's roads in winter was not feasible:

- 1) The standards of many of the existing highways were rather low, and not well-suited to plowing;
- 2) The buildings in the Park's interior were not winterized; and
- 3) Plowing would be too hazardous.<sup>14</sup>

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<sup>12</sup> Arno Cammerer, to Joseph O'Mahoney, Feb. 8, 1940, IN Box L-46, File "868 Winter Sports," YNP Archives, YNP, WY.

<sup>13</sup> "Seek Year-Round Opening of Yellowstone Hiways," *Cody Enterprise*, Cody, Wyoming, March 17, 1948.

<sup>14</sup> Lemuel Garrison, to Regional Director, Oct. 11, 1957, IN Box D-24, File D30, Book #2: "Snow Removal, July 1957

To arrive at its conclusion, the Bureau derived estimates of the cost of acquiring the necessary plowing equipment and of regularly plowing, estimates that the Big Horn Basin Club criticized as “padded.” In fact, contractor V. F. Habberthier of Cody went on record as offering to sign a five-year contract with Yellowstone administrators to plow the Park’s roads for less than half of their cost estimate. The club went on to request a formal investigation to see whether the Bureau’s objections to winter travel were valid.<sup>15</sup>

The government never did such an investigation, and Yellowstone’s administrators stuck to the over-all conclusion reached by the Bureau: “the proposal to attempt winter snow removal on the Yellowstone Park Highway System ... is economically unsound.”<sup>16</sup> Thus ended consideration of plowing the roads of Yellowstone for eight more years.

### First Motorized Snowcoaches Enter Yellowstone

Meanwhile, with plenty of free time in the long winter of the Northern Rockies, local entrepreneurs tinkered with some spare vehicle parts and developed the first vehicles capable of traveling over snow-covered roads, the “snowplanes.” A snowplane was a noisy contraption of a cab in which two people could ride, set on three skis (only one in front, for steering), with a large propeller mounted on the rear. Akin to an airboat used in the Everglades, the snowplane “blew” around on snow-covered roads without

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through March, 1958,” Regional Archive Depository of the National Archives, Kansas City, MO.

<sup>15</sup> “Yellowstone Plan Gains; contractor Backs Year-Round Idea,” *Denver Post*, March 12, 1949, and “Charge Park Service Costs Padded,” *Cody Enterprise*, March 16, 1949.

<sup>16</sup> Conrad Wirth to Milward Simpson, March 12, 1957 IN Box D-24, File D30, Book #1: “Snow Removal Oct. 1952 through June 1957,” Regional Archive Depository of the National Archives, Kansas City, MO.

ever taking off.<sup>17</sup>

The first definitely known use of such a machine in Yellowstone was in 1942, by Glenn Simmons of the Reclamation Service, who traveled from the South Entrance to Old Faithful and on to West Yellowstone. National Park Service Rangers made the next recorded trip in 1943 from the South Entrance, with an eye toward purchasing one of the machines for government use.<sup>18</sup> By the late 1940's they had indeed purchased two snowplanes,<sup>19</sup> and had begun using them for winter patrols in the Park interior. On one such mission in 1946, Ranger Bob Murphy discovered a large group of bison that had broken through the ice of the Yellowstone River just north of Yellowstone Lake. Already dead and frozen when he found them on February 14, Murphy and his coworkers had no choice but to leave the carcasses in the river for the winter, dragging them out in spring for a mass burial. At that time they counted a total of 39 carcasses.<sup>20</sup>

Yellowstone's administrators escorted two parties of photographers into the Park via snowplane to photograph the snowbound Old Faithful area in February, 1947.<sup>21</sup> Tourism possibilities quickly became obvious, and in December, the Jackson area owners of the snowplanes that the photographers used discussed with Grand Teton National

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<sup>17</sup> Walt Stuart, "Interview with Walt Stuart by Leslie Quinn, 1994," interview by Leslie Quinn, November, 1994, IN Drawer 8, Tape #96-8, YNP Research Library, YNP, WY.

<sup>18</sup> Bob Murphy, "Snoplanes and Frozen Buffalo," Report in the Vertical Files, YNP Research Library, YNP, WY, 1994, p. 1.

<sup>19</sup> Roger J. Siglin to Brenda Black, Nov. 15, 1977 IN Box L-35, File L: "Land and Water Use 75, 76, 77," YNP Archives, YNP, WY.

<sup>20</sup> Bob Murphy, "Snoplanes and Frozen Buffalo" (Unpublished paper in the Vertical Files, YNP Research Library, YNP, WY), p. 4.

<sup>21</sup> *Superintendent's Monthly Report for February, 1947*, YNP Research Library, YNP, WY, p. 2.

Park Superintendent John McLaughlin (who became Yellowstone's next superintendent) the possibility of making regularly scheduled trips by snowplanes into the Old Faithful area to enable visitors to experience the Park in winter. Because it was not his decision to make, McLaughlin demurred, and then wrote Yellowstone to give them a "heads up" on the matter. He expressed his opinion that Yellowstone should deny them permission, because they hoped to use some government buildings for overnight accommodations. He also portended the future by advising Yellowstone's administrators that the snowplane owners would not readily accept "no" for an answer.<sup>22</sup>

The possibility of such regularly scheduled trips touched off a minor panic in Yellowstone, as evidenced by the flurry of letters following Yellowstone's receipt of McLaughlin's letter. First, Acting Superintendent of Yellowstone Fred Johnston wrote the Regional Director requesting advice in the matter, "since we believe the problem to be of a policy nature requiring a decision by higher authority than can be given by us." However, he went on to state that "under present conditions, i.e., extreme isolation of this section of the Park in winter, we do not feel that the type of use ... is desirable" because the numerous dangers involved made such an undertaking very risky.<sup>23</sup> Regional Director Lawrence Merriam responded a mere six days later that "it seems to us that no permit should be issued [for regularly scheduled trips, but] we are hardly in a position to

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<sup>22</sup> John S. McLaughlin to Superintendent, Yellowstone National Park, Dec. 17, 1947 IN Box A-247, File 857-10: "Winter Visitors to Park Interior," YNP Archives, YNP, WY.

<sup>23</sup> Fred Johnston to Regional Director, Dec. 24, 1947, IN Box A-247, File 857-10: "Winter Visitors to Park Interior," YNP Archives, YNP, WY.

prevent *individual* trips by snow plane into the Park” (emphasis added). If such individual trips materialized, Merriam suggested the travelers register with the rangers at the South Entrance, and that the rangers fully inform them of the risks they were taking.<sup>24</sup> Johnston formally adopted Merriam’s policy just three days later.<sup>25</sup>

It seems odd that Regional Director Merriam and Acting Superintendent Johnston felt helpless to prevent such individual trips into the Park, since Johnston and Superintendent Edmund Rogers exercised full authority over the Park in all other matters. For example, in the next two years Johnston or Rogers denied permission to five different parties to take extended ski trips into the Park, and also would not allow automobiles on the snow-covered roads in the interior of Yellowstone.<sup>26</sup> For whatever reason, though, Rogers, Johnston and Merriam felt powerless to control individual motorized trips, a helplessness that their successors would express many times in the future.

It seems additionally odd that Rogers and Johnston permitted such motorized use given the recognition by Superintendent Rogers in 1948 that “the passage of several snowmobiles over the roads would pack the snow so that later freezing would leave a

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<sup>24</sup> Lawrence Merriam to Superintendent, Yellowstone National Park, Dec. 30, 1947, IN Box A-247, File 857-10: “Winter Visitors to Park Interior,” YNP Archives, YNP, WY.

<sup>25</sup> Fred Johnston to Chief Ranger LaNoue, Jan. 2, 1948, IN Box A-247, file 857-10: “Winter Visitors to Park Interior,” YNP Archives, YNP, WY. I am the first to record the information regarding these events in 1947, because Box A-247 was previously unavailable to Yellowstone researchers.

<sup>26</sup> Edmund Rogers (Superintendent), OR Fred Johnston (Acting Superintendent) to the following: Sykes, Jim, Feb. 17, 1949; C.W. Egbert, Dec. 22, 1949; Carroll Wheeler, Nov. 28, 1950; Herbert Richert, Dec. 12, 1950; and Henry Buchtel, March 30, 1951; ALL IN Box A-247, File 857-10: “Winter Visitors to Park Interior,” YNP Archives, YNP, WY.

very hard layer of ice which would seriously impede the progress of our plows when they open the road. This would add materially to the cost of our snow removal operations.”<sup>27</sup> While they recognized this problem with snowmachine use on its roads, they did not do anything to prevent the problem from occurring. By the 1960’s this would become a major problem, requiring the purchase of ever stronger rotary plow equipment for the spring plowing operation (interestingly, administrators in Glacier had the same concern regarding snowmobiles there in the mid-1970’s, and eliminated them from there in part because of this reason (see Chapter 2)).

The decision to allow private snowmachines is, then, the earliest example of Yellowstone’s efforts to accommodate them, disregarding the potential financial and environmental costs to the Park.

The first “purely pleasure” trips by snowplanes occurred two years later, from January to March, 1949. A total of 35 people traveling in 19 snowplanes made the trip to Old Faithful or West Thumb from West Yellowstone (snowplane trips from West Yellowstone probably began earlier than those from the South because visitors traveling from West had thirty fewer miles to travel to Old Faithful—one way—than visitors entering from the south did). The Superintendent of the Park reported that “it appears that this mode of travel is becoming more popular.”<sup>28</sup>

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<sup>27</sup> Edmund Rogers to Caroline Madden, March 11, 1948, IN Box A-247, File 857-10: “Winter Visitors to Park Interior,” YNP Archives, YNP, WY.

<sup>28</sup> *Superintendent’s Monthly Report, January 1949*, YNP Research Library, YNP, WY, p. 5.

And indeed it was. As Table 2 illustrates, motorized visitation to Yellowstone in winter occurred regularly throughout the 1950's. Notice the surge in visitation in the winter of 1954-55, reflecting the fact that two West Yellowstone entrepreneurs began to use a snowcoach for winter tours of Yellowstone that winter. A snowcoach, manufactured by Bombardier of Quebec, Canada, was a van-sized vehicle capable of carrying up to 12 people in its heated interior. In 1952, Harold Young and Bill Nicholls, the two West Yellowstone motel operators, realized that the winter wonderland of Yellowstone could be a "good tourist gimmick." The two men applied to the NPS to obtain a permit to lead charter snowcoach trips into the Park. Yellowstone's administrators refused permission for three years, mainly out of safety concerns, worried that the snowcoaches would get stuck. They finally relented in January 1955, as long as Young and Nicholls would not advertise their service.<sup>29</sup> The reason for the secrecy is unclear. Young and Nicholls began their snowcoach tours that winter, and continued to operate such tours for ten years, finally relinquishing their permit to operate to the Yellowstone Park Company in 1966.<sup>30</sup>

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<sup>29</sup> Robert S. Halliday, "Yellowstone in Winter," *Parade*, March 13, 1955, p. 11.

<sup>30</sup> *Superintendent's Monthly Report for December 1966*, YNP Research Library, YNP, WY, p. 2.

Table 2. Winter Visitation to Yellowstone National Park, 1948-57.<sup>31</sup>

YEAR	Number of Snowmachines	Number of Visitors on Snowmachines	Total Visitation, Dec.-March of each winter
1948-49	> 32	> 61	3888
1949-50	77	162	8077
1950-51	3 (very mild winter)	8	8180
1951-52	35	> 56	8198
1952-53	?	> 59	3314
1953-54	> 9	171	4913
1954-55	> 100	631	4995
1955-56	138	580	3242
1956-57	> 76	533	3223

Note: Total visitation includes visitors entering the North Entrance by car.

There is no record of whether Yellowstone's administrators consulted the Organic Acts or thought of the potential for significant increases in motorized winter visitation. If they did consider these things, they probably felt it was in harmony with the Act and did not think visitation would ever get as busy as it is today.

By 1957 the problem that Superintendent Rogers foresaw—that snowmachines would compact the snow, making plowing more difficult in spring—was becoming apparent. However, Yellowstone's administrators, in a move that presaged their future willingness to accommodate motorized winter vehicles at all costs, found a way to plow the roads despite the compacted snow and ice: "By using a combination of the V-plow and graders with ice blades and discs, it was possible" to get the roads open by their

<sup>31</sup> Compiled from the Superintendent's Monthly Reports from 1948 to 1957, YNP Research Library, YNP, WY.

normal opening dates.<sup>32</sup> Additionally, the snowmachines damaged the road surface in thermally warmed areas—areas unique to Yellowstone in which the ground or road itself is warm, and consequently bare in winter. By the early 1970's, Park administrators discovered that wood chips laid on the road in such thermally warmed areas would both protect the road and also enable snowmachines to travel across such bare areas. They still use wood chips in this manner.

Leading up to 1957, then, Yellowstone administrators had seen some pressure to open the Park roads to automobiles but instead opened them to snowplanes and snowcoaches. This pressure and attendant response were microcosms of what would happen the next year.

#### Round Two: Pressure to Open the Park to Automobiles Increases

In 1956, the National Park Service launched the “MISSION 66”<sup>33</sup> program, which unwittingly began the second round of pressure to plow Yellowstone's roads. Recognizing that the post-war prosperity and increasing urbanization of America were bringing more visitors to the National Park System than the system was able at that time to handle, the NPS directors created MISSION 66, an ambitious ten-year program to “develop and staff these priceless possessions of the American people [so] as to permit their wisest possible use: maximum enjoyment for those who use them.” Construction

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<sup>32</sup> *Superintendent's Monthly Report for April, 1957*, YNP Research Library, YNP, WY, p. 10.

<sup>33</sup> “MISSION 66” was almost always capitalized, as indicated, in the literature of the time.

of visitor facilities was to be an important part of the program: “Modern roads, well planned trails, utilities, camp and picnic grounds, and many kinds of structures needed for public use or administration, to meet the requirements of an expected 80 million [nationwide] visitors in 1966, are necessary. ... Outmoded and inadequate facilities will be replaced with physical improvements adequate for expected demands.”<sup>34</sup> The Secretary of the Interior wrote the President that “MISSION 66 covers all the anticipated needs of the Parks [and] plots a comprehensive and well-balanced schedule of improvement.”<sup>35</sup>

This program of development affected virtually all national park system sites, and focused on the larger parks such as Yellowstone. In Yellowstone the efforts focused on road improvements, housing improvements, and the construction of Canyon Village, with a modern-looking lodge surrounded by 500 cabins available for overnight guest use.<sup>36</sup>

In addition to its development program, MISSION 66 recognized another way to provide for increased numbers of visitors: extending the length of the Park’s tourist season. Initially MISSION 66 only encouraged a longer summer season—from May to October, rather than June to September.<sup>37</sup> It did not take too long, however, for park

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<sup>34</sup> “What is Mission 66?,” pamphlet (no page number given) IN Box W-141, File A98: “Conservation and Presentation of Areas for Public Enjoyment: Mission 66,” YNP Archives, YNP, WY.

<sup>35</sup> Douglas McLay to The President, Feb. 1, 1956, IN Box YPC-91, File “NPS-1956 General Correspondence,” YNP Archives, YNP, WY.

<sup>36</sup> USDI-NPS (author), “MISSION 66 for Yellowstone National Park,” IN Vertical Files, File “MISSION 66,” YNP Research Library, YNP, WY, p. 5.

<sup>37</sup> W.G. Carnes: “A Look Back to Look Ahead,” talk given at the MISSION 66 Frontiers Conference, April 24, 1961 IN Box YPC-91, File “NPS-1956—General Correspondence,” YNP Archives, YNP, WY.

planners to recognize that opening the Park in winter would provide another means to provide for increased numbers of visitors. Consequently, in the MISSION 66 Report for Yellowstone, park planners stated that “oversnow use has already been introduced ... and today’s thinking includes the encouragement of this type of use in preference to [the plowed] opening of the roads.”<sup>38</sup> Here, then, was MISSION 66’s proposal: encourage winter use, thereby allowing more people to visit Yellowstone and also take some of the pressure off the Park during the summer. Additionally, MISSION 66 preferred oversnow use over plowing the roads, pushing the Park to continue allowing snowmachines rather than plowing.

In apparent adherence to the directive of MISSION 66, Conrad Wirth, the National Park Service Director in 1957, issued a “Memorandum to all Field Offices and the Washington Office,” stating:

It is recognized that important recreational benefits are available during the winter months in the Parks of the NPS having a heavy fall of snow. ... It is further recognized that the use of such parks for healthful, out-of-door recreation during the winter months is a very desirable way to make scenic and other natural values of the System available for the benefit and enjoyment of the people.

It is, therefore, the policy of the National Park Service to encourage winter use programs. The objective will be the maximum benefits possible to the largest number of people.<sup>39</sup>

In true MISSION 66 form, Wirth encouraged visitor use of the Parks. Further, Wirth also felt that closing the roads in winter was “not taking full advantage of the

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<sup>38</sup> Yellowstone National Park, NPS, USDI, “MISSION 66: A Look Ahead,” p. 73 of Booklet IN Box D-20, Folder 4: “1956: Final MISSION 66 Report for Yellowstone,” YNP Archives, YNP, WY.

<sup>39</sup> Conrad Wirth to Washington Office and All Field Offices, Jan. 25, 1957, IN Box YPC-91, File “NPS-1957,” YNP Archives, YNP, WY.

investment” the NPS had in them; hence, opening the roads would more fully utilize that investment.<sup>40</sup>

The Director may have been responding to the same pressure Yellowstone began to once again feel, for Lemuel Garrison, Yellowstone’s Superintendent, wrote that “because of the pressure which has been put on the NPS and the Park to get the roads open earlier in the spring, ...we are advancing the snow plowing operations [for spring, 1957].”<sup>41</sup> The “Highway 89” Association—a group of businesses located along U.S. Highway 89, which passes through Yellowstone—was the source of the pressure; they not only desired an earlier spring opening of Yellowstone’s roads, but also wished to see U.S. 89 plowed all winter from Livingston to Jackson, through Yellowstone.<sup>42</sup> Also joining the fray was the Wyoming Highway Commission and Wyoming Governor Milward Simpson, who also urged Yellowstone’s administrators to keep the Park’s roads open all winter.<sup>43</sup>

The pressure worked. Senator O’Mahoney got into the action again, stating that the NPS “would make another survey soon to decide whether it was feasible to keep the Yellowstone roads open all winter.”<sup>44</sup> By July Yellowstone’s administrators had formed the “Snow Survey Committee” to study the matter. On the committee were

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<sup>40</sup> “Summary Minutes, 37<sup>th</sup> Meeting of the Advisory Board on National Parks, Historic Buildings and Monuments,” October 7-10, 1957, p. 21, IN Box A-238, File A1619: “Advisory Board on National Parks, Historic Buildings and Monuments, 1957,” YNP Archives, YNP, WY.

<sup>41</sup> Lemuel Garrison to Huntley Child, Feb. 25, 1957, IN Box YPC-91, File “NPS-1957,” YNP Archives, YNP, WY.

<sup>42</sup> HC, Jr. [Huntley Child, Jr.] to JQN [John Q. Nichols], Feb. 27, 1957, IN Box YPC-91, File “NPS-1957,” YNP Archives, YNP, WY.

<sup>43</sup> “Wyoming Urges All Entrances to Park Open Simultaneously,” *Great Falls Tribune*, Great Falls, MT, March 12, 1957.

<sup>44</sup> *Ibid.*

representatives of the National Park Service; Colorado, California and regional highway departments; the Bureau of Public Roads; the American Automobile Association; and Yellowstone Park Company personnel. The NPS stated that “Eight years have elapsed since the Bureau of Public Roads’ study of 1949, and in the interim improvements in snow removal equipment and methods have been such as to indicate the need of evaluating their applicability to Yellowstone.” The group toured Yellowstone’s road system both that summer and the following winter, discussing at length the feasibility of opening Yellowstone’s roads in winter.<sup>45</sup> The group examined all aspects of the winter situation in Yellowstone, including the climate, topography, safety factors, travel trends, road conditions, and costs.<sup>46</sup>

The following spring, the group made its recommendation: year round operation “is deemed feasible but not practical.” The committee cited as reasons Yellowstone’s poor road standards, the extremely low projections of winter traffic use, Yellowstone’s remote location, and its generally severe winter weather.<sup>47</sup> After all, conditions in Yellowstone’s interior had not changed that much in just eight years.

The committee’s report evidently settled the matter for another seven years, since I

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<sup>45</sup> Warren Hamilton to John Q. Nichols, July 9, 1957, IN Box YPC-91, File “National Park Service—1957,” YNP Archives, YNP, WY.

<sup>46</sup> NPS, USDI, “Information for the Snow Survey Committee Concerning Possibilities of Keeping Park Open for General Public Use the Year Round,” IN Box D-42, File “Snow Removal (Roads), 1932-1959,” YNP Archives, YNP, WY.

<sup>47</sup> NPS, USDI, “Report of the Snow Survey Committee, Yellowstone National Park, May 1958,” pp. 5-6, IN Box A-165, File A4055: “Conferences and Meetings-1969: Tri-State Comm. And Master Planners,” YNP Archives, YNP, WY.

can find no record of any significant pressure on the NPS until 1964; more on that later in this chapter. In the meantime, MISSION 66's encouragement of oversnow vehicle visitation would begin to take effect, as more and more winter visitors continued to trek into the Park.

### First Private Snowmobiles Enter Yellowstone

Visitation in the Park via snowcoach from West Yellowstone steadily increased from 1957 to 1966, as Table 3 illustrates; by the 1963-64 season over 1,000 visitors had taken such a tour. In January 1963, Yellowstone's administrators permitted the first private snowmobiles to enter the Park: three Polaris Snow Travelers.<sup>48</sup> One year later, Acting Superintendent Luis Gastellum noted that "six Polaris Snow Travelers with 14 people visited the Old Faithful area. Polaris is a toboggan with tracks and [is] motor driven-[a] powered oversnow sled—which many people are buying."<sup>49</sup>

These sleds were the first snowmobiles allowed to enter Yellowstone. Their operators registered to enter Yellowstone just as the snowcoach operators did—by stopping at the self-registration station at the West Entrance, which was not staffed in winter.<sup>50</sup> Hence, the Park administrators lumped these smaller machines in with the larger snowcoaches, essentially considering them to be the winter equivalent of the automobile.

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<sup>48</sup> *Superintendent's Monthly Report for January 1963*, YNP Research Library, YNP, WY, p. 2.

<sup>49</sup> *Superintendent's Monthly Narrative Report for January 1964*, YNP Research Library, YNP, WY, p. 1.

<sup>50</sup> *Superintendent's Monthly Report for March 1967*, p. 2, and photographs following page 9.

Table 3. Winter Visitation to Yellowstone National Park, 1957-67.<sup>51</sup>

YEAR	Trips (may include more than one snowmachine)	Visitors traveling on snowmachine	Total Visitation, Dec.-March
1957-58	?	> 85	2442
1958-59	> 34	> 345	2679
1959-60	> 7	> 265	2552
1960-61	77	508	4363
1961-62	52	> 85	4268
1962-63	?	> 98	2999
1963-64	> 70	1067	5571
1964-65	?100	1326	6382
1965-66	400	2662	9741
1966-67	1893	5218	12431

The 1964 Yellowstone Master Plan also stated: “Winter Use of the Park should be encouraged by extending the operation of oversnow equipment from the West Entrance and soliciting additional operators from [the] other entrances.”<sup>52</sup> To say that the Park’s administrators encouraged such visitation is obvious.

In the Monthly Report for November, 1964, Superintendent McLaughlin wrote that snowcoach operator Harold Young “has made arrangements with the Northern Pacific Railway company to have two tours a week out of Chicago,” in which groups of visitors traveled from Chicago to Yellowstone via rail, and then took Young’s snowcoaches into

<sup>51</sup> Compiled from Superintendent’s Monthly Reports, 1957-67, YNP Research Library, YNP, WY.

<sup>52</sup> NPS, *Yellowstone Master Plan Final Draft, April 1964*, p. 100, IN Box D-67, YNP Archives, YNP, WY.

the Park for a tour.<sup>53</sup> Young's agreement with the Northern Pacific illustrated that the winter tourism possibilities were now realities.

Later that winter, NBC television filmed "Winter Comes to Yellowstone," part of the *Wild Kingdom* series narrated by Marlin Perkins of the St. Louis Zoo. *Wild Kingdom* was a popular wildlife show of the time, viewed by an average of 17 million viewers weekly.<sup>54</sup> "Winter Comes to Yellowstone" featured comparisons of various features as seen in summer and in winter, and the activities of winter rangers.<sup>55</sup> Aired on March 14, 1965, it probably contributed to the dramatic increase in visitation in Yellowstone the next year (see Table 3).

A snowmobile demonstration that occurred in March 1965, certainly contributed to the increase in winter visitation as well. Monte Wight, a snowmobile dealer of Pinedale, Wyoming, requested and received permission to take 27 Ski-Doos—a brand of snowmobile—on a two-day trip through the Park. Wight and his companions traveled from West Yellowstone to Old Faithful the first day and on to Moran, Wyoming (south of the South Entrance) on the second day. With no overnight accommodations open at Old Faithful at that time, Wight's party returned via snowcoach to West Yellowstone to spend the night, leaving their snowmobiles at Old Faithful. Returning to Old Faithful via snowcoach the next day, the members fired up their machines and continued on to

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<sup>53</sup> Ibid., p. 3.

<sup>54</sup> *Superintendent's Monthly Report for January 1965*, YNP Research Library, YNP, WY, p. 3.

<sup>55</sup> Staff Meeting Minutes for November 19, 1964, IN Box A-152, File A40: "Conferences and Meetings, Yellowstone Staff Meetings, 1964," YNP Archives, YNP, WY, p. 4.

Moran (south of the south entrance) that evening.<sup>56</sup> In so doing, Wight demonstrated to all the touring possibilities of snowmobiles.

Superintendent McLaughlin's remarks concerning the trip are worth noting. In his 1965 Annual Report, he says:

It seems inevitable [that] mechanized over-the-snow travel may replace skis and snowshoes. ...Undoubtedly more Park travel during the winter months by this type of machine can be expected and *should be encouraged*. This type of recreation is increasing rapidly in this particular section of the country and its influence has spread to Yellowstone National Park. The machines are now relatively inexpensive and maintenance requirements simple. Much of the terrain of the Park and its features are compatible and attractive to this mode of winter travel (emphasis added).<sup>57</sup>

Here again is the seeming sense of helplessness as McLaughlin states "it seems inevitable..." Also obvious is the fact that McLaughlin liked such machines, and wanted to encourage their use in the Park. He also foresaw that their use in the future would increase. Whether explicitly intended or not, McLaughlin here contributed materially to the park's evolving attitude toward snowmobiles.

McLaughlin was correct in his prediction: the popularity of the snowmobile exploded. In another portent of things to come, he soon found himself scrambling for regulations to control the activities of visitors on such machines in the Park, and wrote the Regional Director of the NPS requesting that the same laws that summer vehicle operators followed be applied to the snowmobile operators. Furthermore, McLaughlin asked the Regional Director if "other Service areas are experiencing this type of winter

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<sup>56</sup> *Superintendent's Annual Report for 1964*, YNP Research Library, YNP, WY, pp. 22-23.

<sup>57</sup> *Ibid.*, p. 23.

use and associated problems of control.”<sup>58</sup> It is unclear whether the Regional Director responded.

At this time, snowmobiles were largely a novelty, having been only recently developed. Furthermore, snowmobiles were considerably less expensive than the larger snowcoaches—hence, more affordable to the individual. Imagine how attractive they would have been to the earlier residents of this area, who had longed for years to access the interior of Yellowstone. If Yellowstone would not plow its roads, then perhaps the residents could travel into the snowbound park on such machines, which, after all, the NPS encouraged. Moreover, perhaps they could rent the unusual machines to winter tourists—and profit by doing so. If this realization was not obvious to the local residents already, it would soon be so.

Can we fault McLaughlin for his promotion of such machines? Probably not. After all, the Director of the NPS, Conrad Wirth, had, just seven years earlier, made it the policy of the NPS to encourage winter use. When Wirth issued his policy, he had no idea such machines would become available in a few years. Hence, McLaughlin may have felt he was adhering to Wirth’s directive. Moreover, McLaughlin probably also felt he was adhering to the NPS Organic Act, since snowmobiles would allow the visitor to enjoy the Park’s features without impairing them (presumably). Finally, here at last was a way to make Yellowstone’s spectacular interior accessible to the world in winter.

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<sup>58</sup> John S. McLaughlin to Regional Director, Midwest Region, March 31, 1966, IN Box A-32, File A88: “Oversnow Vehicle Travel,” YNP Archives, YNP, WY.

### Round Three: Pressure to Plow Park Roads Culminates in a Snowmobile Policy

Pressure to open the Park's roads to automobiles resurfaced in 1964, and culminated in a congressional hearing on the matter in Jackson Hole in 1967. Congressmen from the surrounding states reignited the debate in January 1964 by inquiring again into the year round opening of the Park's roads; again, their motive was to boost the sluggish winter economy in their respective states.<sup>59</sup> So, representatives of Livingston, Cody, and Cooke City arranged a meeting between local and Yellowstone officials in Livingston the following month to discuss the feasibility of opening the roads in winter. This meeting's outcome was unclear, although it is clear that, following the meeting, the *Park County News* of Livingston sent a letter to the Montana Congressional Delegation in February, 1964, promoting the opening of the roads in Yellowstone.<sup>60</sup> At the next staff meeting in Yellowstone, assistant superintendent Luis Gastellum, who attended the Livingston meeting, stated "In 1958 we issued a report stating we would be able to have winter travel in five or ten years, but we have not followed through on our development. ... Since winter travel is inevitable, the Service should begin planning for it now."<sup>61</sup> Again, the seeming helplessness of Park administrators in controlling or restraining winter use is evident.

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<sup>59</sup> "Projected Costs (1964) for Winter Snow Operations," pamphlet found IN "Grooming/Winter Preparations Cost," IN *Snowmobile Briefing Book, Volume 1*, black binder in YNP Research Library, YNP, WY (no page number).

<sup>60</sup> "Why Not Open Park For Winter Activity For All The People?," *Park County News*, Livingston, MT, Feb. 6, 1964.

<sup>61</sup> Staff Meeting Minutes for February 13, 1964, IN Box A-152, File A40: "Conferences and Meetings—Yellowstone Staff Meetings, 1964," YNP Archives, YNP, WY.

The congressmens' inquiry and Gastellum's statement touched off a debate among park staff regarding whether the Park should be open to snowmobiles at all—with no mention of whether the Park's roads should be plowed. It appears that, for the first time, the Park staff had second thoughts about whether snowmobile visitation was appropriate to Yellowstone. For example, in a staff meeting on January 28, 1966, park officials discussed the possible future use of oversnow vehicles and decided that they needed to formulate a policy for this type of use by the next year.<sup>62</sup> Evidently, that decision got the members of the staff thinking more seriously about such use, since the topic came up again at the next meeting on February 25, 1966. According to the meeting minutes, “there was some discussion regarding closing down snowmobile operations and whether it would be advisable to stop travel through the Park by any type of oversnow vehicle.”<sup>63</sup> This is the only evidence I found prior to 1990 (in the writing of the Winter Use Plan), indicating that the Park administrators expressed second thoughts about allowing snowmachines into the Park.

Further complicating the debate was the radical proposal put forth in April 1966 by the Yellowstone Park Company, the Park's chief concessionaire, to plow the road from Mammoth to Madison, operate snowcoaches from there to Old Faithful and West Yellowstone, and to open the “Old Faithful Motor Hotel” for winter visitation.<sup>64</sup>

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<sup>62</sup> Staff Meeting Minutes for January 28, 1966 IN Box A-172, File A40: “Yellowstone Staff Meeting Minutes 1966,” YNP Archives, YNP, WY.

<sup>63</sup> Staff Meeting Minutes for February 25, 1966, IN Box A-172, File A40: “Yellowstone Staff Meeting Minutes 1966,” YNP Archives, YNP, WY.

<sup>64</sup> Ronald Beaumont to John McLaughlin, April 5, 1966, IN Box C-4, File C-38: “Concessionaire Contracts and

Superintendent McLaughlin wisely decided that “the ramifications of these proposals need to be discussed pretty thoroughly prior to any preliminary approval on my part.”<sup>65</sup>

The proposal evidently did not succeed, because the YPCo. did not open any facility at Old Faithful until 1971.

At this point the debate became public, for the local Congressmen again stepped into the action, holding a public meeting in Livingston (the second meeting to take place in Livingston) about the opening of the Park’s roads in winter. McLaughlin reported in the June Superintendent’s Report that

there has been a considerable flurry of publicity on keeping the Yellowstone roads open year around. This matter was reviewed [last month] around Livingston and [has] spread quickly to other communities. Since close political contests are in prospect in all three surrounding states for various important offices, the time was ripe to reopen this perennial subject. Candidates and prospective candidates were almost unanimous in their support of local opinion in favor of keeping the Park open all year despite the high costs and doubtful feasibility of the proposal.<sup>66</sup>

In response to the public pressure, Park officials embarked on round three of cost estimates, visitor use estimates, and statements of policy. But this time these governmental ramblings did not mollify the locals. Instead, pressure intensified, eventually drawing Director of the National Park Service George Hartzog into the fray. Hartzog formed the Tri-State Commission, a group of high-level National Park Service

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Permits,” YNP Archives, YNP, WY.

<sup>65</sup> John McLaughlin, to Art Bazata, April 12, 1966, IN Box C-4, File C-38: “Concessionaire Contracts and Permits,” YNP Archives, YNP, WY.

<sup>66</sup> *Superintendent’s Monthly Narrative Report, June 1966*, YNP Research Library, YNP, WY, p. 19.

officials and regional representatives, to study the matter.<sup>67</sup> The group met five times in the next year, with the Wyoming delegates particularly agitating for year-round opening of the Park roads. Hartzog and the Park administrators recognized that most of Yellowstone's use was concentrated in the three summer months; that dispersing that summer visitation peak had not happened so far, despite the longer summer season; and that it would be nice if they could disperse it somehow, although they did not want to deprive the summer program of its already-deficient spending.<sup>68</sup>

By March 1967, it was clear that the Tri-State Commission meetings were going to culminate in a congressional hearing on the "Winter Operations of Roads in Yellowstone National Park."<sup>69</sup> The hearing was held in Jackson, Wyoming on August 12, 1967, and was chaired by U.S. Senator Gale McGee of Wyoming. George Hartzog, Director of the National Park Service, began the hearing by stating the position of his bureau: First, the form of transportation in winter in Yellowstone should be that which is most appropriate to the Park and which improves the quality of park experience for the citizens. Second, over-snow visitation was, unless shown otherwise, the appropriate means of visiting the Park in the winter. Hartzog stated that it should be encouraged, since oversnow vehicles travel on top of the snow, rather than in a plowed trench such as

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<sup>67</sup> George Hartzog to Tim Babcock, Governor of Montana, Aug. 19, 1966 IN Box A-165, File A4055: "Conferences and Meetings—1969: Tri-State Comm. And Master Planners," YNP Archives, YNP, WY.

<sup>68</sup> H.L. Bill to Director, Sept. 1, 1966, IN Box A-165, File A4055: "Conferences and Meetings—1969: Tri-State Comm. And Master Planners," YNP Archives, YNP, WY.

<sup>69</sup> Staff Meeting Minutes for March 9, 1967, IN Box A-226, File A40: "Staff Meeting Minutes, 1967—Yellowstone," YNP Archives, YNP, WY.

automobiles would travel through.<sup>70</sup>

Director Hartzog's position was supported by the Izaak Walton League and the Lander Snow-drifters (an early snowmobiling group) for the same reasons: namely, that over-snow vehicles offered the best means of viewing the Park's attractions. Hamilton Stores and the Yellowstone Park Company agreed with Hartzog, but for different reasons, mostly economic: it would cost too much for them to open facilities in the Park's interior in the winter, since their buildings were not winterized. Finally, Mary Back (a Wyoming conservationist) and the National Wildlife Federation also opposed the opening of the Park's roads as too costly to American taxpayers for the small benefits they would receive in return.

The Wildlife Management Institute of Washington, D.C. was essentially the only group to oppose the plowing of roads for environmental or wildlife reasons. This group mentioned in particular that "winter is the extreme period of physiological stress for wildlife, and both the direct and indirect harassment of the animals by humans could be harmful."<sup>71</sup> It would take another thirty years for the truth of their statement to be fully realized (see Chapters 4 and 5), but because that truth was not obvious then, their testimony was ignored.

In contrast, and as expected, nearly every Chamber of Commerce in Wyoming and

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<sup>70</sup> Department of the Interior, National Park Service, *Hearings Before a Subcommittee of the Committee on Appropriations, United States Senate, on Winter Operation of Roads in Yellowstone National Park*, Ninetieth Congress, Second Session, 1968, pp. 6-9.

<sup>71</sup> *Ibid.*, p. 94.

the Yellowstone region supported the plowing of roads in winter. Chambers as far away as Salt Lake City, Utah, and Amarillo, Texas (both on U.S. Highways that pass through Yellowstone) sent statements or representatives to support the plowing of the Park's roads. Their motive was obvious: the stimulation of the then-slow winter economy. Interestingly, West Yellowstone's Chamber was the only one to even hesitate in supporting the opening of park roads, as snowmobile and snowcoach income was already significant to its town merchants. The chamber, however, changed its mind at the last minute and supported the opening of park roads.<sup>72</sup>

Clearly, pressure to open the roads was intense and coming from all directions. Considering that, it is surprising that Yellowstone did not begin to plow the roads.

But, Hartzog's mind was apparently made up before he ever began the meetings; after all, Yellowstone's administrators had maintained their position for at least the last ten years. By October 1967, he informed Yellowstone's administrators that there would be no additional opening of Yellowstone's roads in the winter, nor even a longer summer season (April-November, rather than May-October).<sup>73</sup> Rather, the Park would remain open to snowmobiles.

In the next four years, Yellowstone administrators would create their snowmobile policy. It would consist of three main prongs: 1) keeping Yellowstone's interior roads

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<sup>72</sup> Ibid.

<sup>73</sup> Staff Meeting Minutes for Oct. 19, 1967, IN Box A-226, File A40: "Staff Meeting Minutes 1967—Yellowstone," YNP Archives, YNP, WY.

open to snowmobiles and snowcoaches, rather than automobiles; 2) grooming those roads on a regular basis to make them comfortable for travel; and 3) opening the Old Faithful Snowlodge for overnight use in winter. The remainder of this chapter will discuss the development of these three prongs of the policy, as well as the efforts of park administrators to develop regulations covering them and their efforts to promote the new winter program.

#### The First Step: Allow Snowmachines, not Automobiles

Around the time of the congressional hearing, Jack Anderson arrived from Grand Teton National Park, where he was superintendent, to assume the superintendency of Yellowstone. Anderson adhered to Hartzog's position on the winter use of Yellowstone, as confirmed at an all-day meeting with all of his leading staff members on March 17 or 18, 1968.<sup>74</sup> This was the crucial meeting at which Yellowstone's administrators formalized their winter use policy.

As he later wrote regarding their decision to permit snowmachines instead of automobiles, Anderson and his staff evaluated their three options: plowing the roads, closing the Park to all but skiers and snowshoers, or developing an oversnow-visitation program. In considering the plowing of the Park's roads, he and his staff felt that this would not enhance the Park visit, since it would result in three problems, all a result of

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<sup>74</sup> Date is March 17, 1968 in Robert Murphy to Chief, Division of Resources Management & Visitor Protection, March 28, 1968, and March 18, 1968 in "Winter Oversnow Vehicle Operations" Minutes, both IN Box L-42, File L3427: "Recreation Activities 1969—Winter Sports (Oversnow Vehicle Use)," YNP Archives, YNP, WY.

creating snow “canyons”—roads with very high snow berms on both sides: 1) the canyons would be difficult for the automobile visitor to see out of; 2) they might become serious obstacles to migrating wildlife; and 3) they might trap snow in the windier, open valleys of the Park, creating traffic hazards. As well, they felt that plowing Yellowstone’s roads would serve only the economic interests of the surrounding communities by giving them easier access to each other in winter.<sup>75</sup> For these reasons, they decided not to plow Yellowstone’s interior roads.

Anderson and his staff likewise felt that closing the Park to all but snowshoers and skiers could not be justified since only a few very hardy skiers could really penetrate such a large park:<sup>76</sup> “Less than 1/10 of 1% of the people have the capability to go out in the Park in the wintertime, using only skis and snowshoes.”<sup>77</sup> Closing the Park entirely was, then, not an option for Anderson, given the intense pressure he and his staff were feeling to open Yellowstone to automobiles. Since one of the two main mandates of the NPS is to provide for the enjoyment of the Park, Anderson and his staff probably felt that closing the Park to all motorized use would not comply with this mandate.

That left the third option, developing an over-snow program. “Public pressure to open the Park gave us little choice—we had to do something,” wrote Anderson later.<sup>78</sup>

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<sup>75</sup> Jack Anderson, “Interview with Jack Anderson, former Park Superintendent,” interview by Robert Haraden and Alan Mebane, June 12, 1975, IN Drawer 3, Tape 75-3: YNP Research Library, YNP, WY.

<sup>76</sup> Robert Haraden (Acting Superintendent), to Lee Wood, March 31, 1972, IN Box N-118, File “Historical Backcountry Correspondence,” YNP Archives, YNP, WY.

<sup>77</sup> Jack Anderson, “Transcript of Conversation, Jack Anderson and Derrick Crandall,” interview by Derrick Crandall, April 1, 1977 IN “Current Stuff” Section, *Snowmobile Briefing Book Vol. 1*, YNP Research Library, p. 9.

<sup>78</sup> Jack Anderson to Raymond Euston, July 20, 1972, IN Box N-118, File “Historical Backcountry Correspondence,”

He struck a compromise, then, between the two options: plowing was inappropriate and too expensive, and skiing-only was too exclusive. Hence, snowmobiling offered a middle ground, a way to allow winter use without the expense of plowing (the cost of grooming park roads was evidently not considered). It was a solution not too expensive—at that time—for the NPS, and also not too exclusive. Most importantly at that time, it was a way to get those interests who were demanding that he plow the roads off his back. So, Anderson and his staff committed themselves to developing a winter program for oversnow vehicles.

As finally formalized, Yellowstone's snowmobile policy came to be thus:

- 1) Snowmobiling, per se, has no place in any natural area of the National Park System;
- 2) A snowmobile utilized for controlled access to a natural area is as appropriate in the winter as a conventional motor vehicle is in the summer;
- 3) Snowmobiles will be allowed to enter Yellowstone National Park if confined to the snow-covered road system which, during the summer months, accommodates conventional motor vehicles; and
- 4) The purpose of allowing oversnow vehicles to enter Yellowstone is to provide an opportunity for winter visitors to see, and enjoy, the many wonderful natural features and wildlife that are present in the Park.<sup>79</sup>

At the time Anderson and his staff made this decision, the only legislation they had to follow was the NPS and Yellowstone Organic Acts, which charged them to provide for the enjoyment of the Park in such a way that the Park's resources would not be impaired for future generations. They were clearly providing for the enjoyment of the

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YNP Archives, YNP, WY.

<sup>79</sup> Harold J. Estey (Acting Superintendent) to Robert B. Ranck, Dec. 20, 1974, IN Box W-129, File W42: "Special Regulations, 1973-75," YNP Archives, YNP, WY.

Park's winter resources by opening its roads to oversnow vehicles. Likewise, as far as they knew at the time, snowmobile use of the Park would not impair its resources. Finally, public pressure to open the roads was intense. As explained above, by facilitating visitation while minimizing the adverse effects that Anderson thought plowing would have on the Park's wildlife and visitors, he was acting in the best interest of the national park and National Park Service.

### The Next Step: Grooming the Roads

As mentioned in the introduction, snowmachines tend to create moguls, or bumps, in the road after several machines have traveled the same stretch. Being malleable, snow is easily displaced by the physical action of pushing against it for propulsion of the snowmachines. Hence, after a number of snowmobiles have traveled the same stretch of road, it can become a field of moguls, and can thus present some very difficult, uncomfortable travel conditions. These conditions are what Yellowstone's administrators wished to remedy when they began grooming Yellowstone's snow roads.

The road-grooming program had its roots in the activities of park concessionaires, who did it before park administrators. When snowcoaches first started touring Yellowstone in the 1950's, they frequently got stuck in the soft, deep snow of the Park's unplowed, unpacked, and ungroomed roads. To remedy that, tour operators would sometimes drive a snowplane ahead of them to break trail for the much heavier snowcoaches. To further flatten the trail, the snowcoach drivers would pull behind them

some sort of “drag,” a large, heavy wooden contraption that, through its sheer weight and force of friction, would smooth the moguls that had formed.<sup>80</sup> In this way the early tour operators would “groom” the road for their use.<sup>81</sup> By the 1960’s the Yellowstone Park Company (YPCo.) used its own snowcoaches in the same manner, going out with an empty coach early in the day following a storm to pack the trail for the passenger-carrying coaches to follow later in the day.<sup>82</sup>

As late as 1968, the YPCo. was still using its drag to groom the roads. The company would groom them after new snowfalls, and whenever sufficient moguls had formed to make travel unpleasant. The drag was made of 2 X 12’s, was around fifteen feet long, and often required two snowcoaches chained together to pull, especially in new snow.<sup>83</sup>

At the policy meeting in March 1968, the NPS officers discussed the fact that this drag tore up the asphalt road surface, especially over the thermally bare spots in the roads. Consequently, they recommended to the YPCo. that they investigate the use of a “roller-type device ... similar to those used on ski areas to smooth ski runs.”<sup>84</sup> This was basically a piece of a galvanized steel culvert pulled behind a grooming machine.

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<sup>80</sup> Bob Jones (former Reservations Manager for YPCo.), interview by author, telephone conversation, Moab, Utah, Nov. 17, 1997.

<sup>81</sup> Walt Stuart, “Interview with Walt Stuart by Leslie Quinn, 1994,” interview by Leslie Quinn, November, 1994, IN Drawer 8, Tape #96-8, YNP Research Library, YNP, WY. Stuart also mentions driving the snowplanes on Yellowstone Lake as fast as 130-140 m.p.h., and chasing coyotes on Hebgen Lake with them.

<sup>82</sup> Harold Estey (Chief Park Ranger), to Administrative Officer, Oct. 16, 1969, IN Box A-32, File A88: “Oversnow Vehicle Travel,” YNP Archives, YNP, WY.

<sup>83</sup> Bob Jones (former Reservations Manager for YPCo.), interview by author, telephone conversation, Moab, Utah, Nov. 17, 1997.

<sup>84</sup> “Winter Oversnow Vehicle Operations”—Minutes of March 18, 1968 meeting IN Box N-115, File L3427: “Winter Sports—Oversnow Vehicle Use,” YNP Archives, YNP, WY, p. 1.

The YPCo. never purchased such a device, because their system of road grooming was adequate for their needs.<sup>85</sup> So, the company continued to use its drag on the roads. Since the coaches often traveled in the very same grooves as previous coaches, they left behind two parallel deep grooves (where the skis and tracks had traveled) with a large mound of snow between them. The drag that the YPCo. used did not eliminate these deep grooves and mounds,<sup>86</sup> a situation that made travel difficult for the smaller snowmobiles.<sup>87</sup> Furthermore, Anderson stated later that “we found we were starting to have injuries because ... we did not groom roads ... and the roads just used to be terrible,” due to the increased numbers of snowmobiles entering the Park.<sup>88</sup> Clearly, there were many problems with Park snow roads at that time.

Consequently, Chief Park Ranger Harold Estey, after attending the 1970 International Snowmobile Congress in Duluth, Minnesota, wrote Anderson that “snowmobile routes, particularly between West Yellowstone and Old Faithful and between Mammoth and Old Faithful, will have to receive tread maintenance.”<sup>89</sup> By February 1970, the NPS was considering “tailoring our snow-covered roads for winter

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<sup>85</sup> Bill Hape (former Assistant Chief of Maintenance for the NPS), interview by author, telephone interview, Gardiner, MT, Nov. 13, 1997.

<sup>86</sup> Bill Hape, IN Yellowstone National Park, *Winter Information, 1977* (Unpublished green folder in Vertical Files, YNP Research Library, YNP, WY), no page number.

<sup>87</sup> Jerry Mernin (former Snake River District Ranger), interview by author, personal interview, Bozeman, MT, Nov. 11, 1997.

<sup>88</sup> Jack Anderson, “Interview with Jack Anderson, former Park Superintendent,” interview by Robert Haraden and Alan Mebane, June 12, 1975, IN Drawer 3, Tape 75-3: YNP Research Library, YNP, WY.

<sup>89</sup> Harold Estey (Chief Park Ranger) to Superintendent, Feb. 16, 1970, IN Box A-35, File A40: “Conferences & Meetings 1970,” YNP Archives, YNP, WY.

use beginning next winter. With the type of use we are getting and the fact that we do invite this type of use, we are certainly going to have to consider making it safe for the visitor to come into the Park on [snow]machines.”<sup>90</sup>

Grooming the roads was the solution, as recorded by Anderson:

We made a determination that we should expend some funds and experiment a little bit with road grooming. ...Once we started that, then the whole program started to explode and travel increased perceptibly ...The increase in use just came automatically, almost simply because we had started grooming. It made the [park] unit safe, gave a pleasant trip, and yet it gave access into the Park. You know what happened after that.<sup>91</sup>

Indeed we do. Anderson decided to groom the roads to make them safe and comfortable for snowmobiles. Because maintaining the road for the increasing numbers of snowmobilers was not the responsibility of the YPCo., the NPS took it over.<sup>92</sup> To do that, Park administrators purchased a “mobile planer,” an attachment made by the Thiokol Company for its over-snow equipment, and had it ready to use by February 3, 1971.<sup>93</sup> That winter the NPS spent 264 person days on road grooming for oversnow

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<sup>90</sup> Jack Anderson to George F. Bagley, Feb. 26, 1970, IN Box A-36, File D30: “Roads & Trails 1970,” YNP Archives, YNP, WY.

<sup>91</sup> Jack Anderson, “Interview with Jack Anderson, former Park Superintendent,” interview by Robert Haraden and Alan Mebane, June 12, 1975, IN Drawer 3, Tape 75-3, YNP Research Library, YNP, WY. In developing his grooming program, Anderson may have conferred with the Bombardier Corporation, a snowmobile manufacturer in Duluth, Minnesota. The document entitled “Snoplan—A Trail Development and Maintenance Program,” by Jack Armstrong, the U.S. Snoplan Coordinator of Bombardier Corp. in Duluth, MN (1971) discusses the “Snoplan” developed by Bombardier to groom roads in Yellowstone, Minnesota, and Michigan, with the stated objective of providing a safe environment for snowmobilers and to lessen environmental impact, presumably by confining snowmobiles to the groomed roads and restricting their off-road movements. I have not seen a copy of the original document, but rather only a summary of it by former Yellowstone Planning Office Ranger Kate Scott, so I am unable to discern whether Anderson actually did confer with Bombardier.

<sup>92</sup> Bob Jones (former Reservations Manager for YPCo.), interview by author, telephone conversation, Moab, Utah, Nov. 17, 1997.

<sup>93</sup> Staff Meeting Minutes for Feb. 2, 1971, IN Box A-37, File A40: “Conferences and Meetings, 1971” YNP Archives, YNP, WY p. 3. While numerous other sources mention 1970 as the year road grooming began (such as Linda

travel,<sup>94</sup> grooming the following roads: 1) South Entrance to West Thumb; 2) West Yellowstone to Old Faithful, and 3) West Yellowstone to Canyon and Mammoth.<sup>95</sup> Hence, Yellowstone's administrators began their grooming program by targeting the more heavily used roads on the west side of the Park, although the roads on the east side of the Park remained open to snowmobiles in an ungroomed condition.

Beginning this grooming program was something entirely new for Anderson and the NPS. Hence, Anderson frequently corresponded with snowmobile clubs, especially in the upper Midwest, for advice on the mechanics of snow grooming.<sup>96</sup> Chief Ranger Estey's attendance at the International Snowmobile Congress in Duluth probably facilitated this correspondence. Perhaps this assistance from the snowmobile industry is the "cooperation" referred to by Anderson when he stated: "We've had the cooperation of not only the national but also the international snowmobile associations. We've had the cooperation of the industry itself and, of course, the industry recognized Yellowstone as the leader in winter recreation."<sup>97</sup>

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Paganelli, "The Historical Development of Winter Visitor Use at Yellowstone National Park," YNP Research Library Vertical Files, 1980), this is the earliest mention that I could find of it. With 264 person days (53 weeks) of work listed as the number of days spent on grooming that winter, it is likely that the NPS began grooming in December, 1970. Since Paganelli does not cite her source, and because I can not find an original source with a 1970 date on it, I chose to adhere to the Feb., 1971 date.

<sup>94</sup> Gary Everhart to Director, Midwest Region, Nov. 8, 1971, IN Box A-47, File A6423: "Park Management 1971; Park Activity Standards," YNP Archives, YNP, WY.

<sup>95</sup> Robert E. Sellers (Acting Chief Park Ranger) to Gene Bryan (Wyoming Travel Commission), Dec. 20, 1971, IN Box L-36, File L3427: "Recreation Activities: Winter Sports," YNP Archives, YNP, WY.

<sup>96</sup> Bill Hape (former Assistant Chief of Maintenance for the NPS), interview by author, telephone interview, Gardiner, MT, Nov. 13, 1997. There is no extant correspondence between Anderson or Hape and the snowmobile groups.

<sup>97</sup> Jack Anderson, "Interview with Jack Anderson, former Park Superintendent," interview by Robert Haraden, and Alan Mebane, June 12, 1975, IN Drawer 3, Tape 75-3: YNP Research Library, YNP, WY.

Indeed, Yellowstone quickly became the leader in NPS snowmobile recreation. As Anderson indicated, the number of snowmobiles entering Yellowstone jumped in the next two winters, thanks to his efforts to provide a comfortable, safe, family experience. Snowmobile visitation increased by 5,822 from the winter of 1970-71 to 1971-72 (a 48% increase), and again by 9,390 by the following winter (a 51% increase) (Table 4, Chapter 2 has more detailed visitation information). Anderson looked forward to snowmobile visitation increasing,<sup>98</sup> which is precisely what happened, helping to cement his compromise into place.

#### The Final Step: Opening Old Faithful Snowlodge

Attempts by the Yellowstone Park Company to open the Snowlodge began with the company's letter to Superintendent McLaughlin in 1966 to open the "Old Faithful Motor Hotel."<sup>99</sup> McLaughlin responded by requesting that the YPCo. officials meet with him directly to discuss the matter.<sup>100</sup> Whether they ever did is unclear, but it is likely given the fact that at the congressional hearing in Jackson that summer, McLaughlin stated that if the YPCo. opened any facilities at Old Faithful for winter visitors, it would be the Campers Cabin building (probably the same building as the "Motor Hotel"), since it was partly winterized. If fully winterized, this building could provide accommodations

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<sup>98</sup> Dale Nuss (former Park Ranger, Yellowstone), interview by author, personal interview, Bridger Canyon, MT, Nov. 11, 1997.

<sup>99</sup> Ronald R. Beaumont to John S. McLaughlin, April 5, 1966 IN Box C-4, File C38: "Concessioner Contracts & Permits," YNP Archives, YNP, WY.

<sup>100</sup> John McLaughlin S. (Superintendent) to Art Bazata (General Manager, YPCo), April 12, 1966, IN Box C-4, File C38: "Concessioner Contracts & Permits," YNP Archives, YNP, WY.

and meals for 100 people.<sup>101</sup>

At this point, the idea was apparently shelved, for there seems to be no other information regarding it until 1971. In the meantime, however, it remained in the back of YPCo.'s mind while they opened another hotel in Yellowstone for winter visitation—the “Mammoth Motor Inn” (now known as the Mammoth Hot Springs Hotel). Because visitation was increasing, and the hotel was (and is) located on a plowed road, the Yellowstone Park Company opened it for the winter 1966-67 season.<sup>102</sup> Additionally, the YPCo. began snowcoach tours from Mammoth in 1966, so it logically needed an open facility in that area.<sup>103</sup> While it stayed open for a total of four consecutive winters, the hotel never made much money, probably because it was not located in the interior of Yellowstone, where most winter visitors were. Rather, it was located in the lower-elevation, northern part of the Park, where the plowed road first turned into the snowmobile road. Additionally, it was twenty more miles from it to Old Faithful than it was from the hotels in West Yellowstone to Old Faithful—hence, the hotels in West drew more business (this remains the situation for the Mammoth Hot Springs Hotel today). So, by 1970 the YPCo. had decided to close the facility.<sup>104</sup> TWA Services, who

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<sup>101</sup> Department of the Interior, National Park Service, *Hearings Before a Subcommittee of the Committee on Appropriations, United States Senate, on Winter Operation of Roads in Yellowstone National Park*, Ninetieth Congress, Second Session, 1968, p. 13.

<sup>102</sup> *Superintendent's Monthly Narrative Report for December 1966*, YNP Research Library, YNP, WY, p. 11.

<sup>103</sup> Dale Nuss (former Park Ranger, Yellowstone), interview by author, personal interview, Bridger Canyon, MT, Nov. 11, 1997.

<sup>104</sup> John D. Amerman to Jack Anderson, Aug. 19, 1970, IN Box C-24, File “Concessions Bldgs,” YNP Archives, YNP, WY.

replaced the YPCo. in 1979, would reopen the hotel in 1982 (see Chapter 3).

While it was open, the “Mammoth Motor Inn” offered pay-by-the-hour snowmobile trips departing from Tower Junction to Tower Falls and from the Upper Terrace Drive to Swan Lake Flats. The YPCo. offered such tours via snowmobile rather than snowcoach.<sup>105</sup> These were no more successful than the hotel was at that time.

With visitation increasing, especially to the ever-popular Old Faithful, both NPS and YPCo. officials began to consider opening a hotel there in winter. Around 1969, they began to discuss opening a lodge at Old Faithful in winter. Initially the officials were discussing just opening a food service facility to serve the increasing numbers of visitors, but eventually expanded the idea to include some simple lodging.<sup>106</sup> Demand for some form of lodging and meal service at Old Faithful was obvious;<sup>107</sup> in fact, the NPS reported that an increasing number of snowmobilers were using the heated restrooms at Old Faithful to eat and *sleep* in, since in the 1960’s there was no other place to do so at Old Faithful (or for that matter, to relieve oneself).<sup>108</sup> Furthermore, Chief Ranger Estey, again just back from Duluth, stated that “minimum concessioner services consisting of shelter, gas and oil, and sanitary facilities ... should be available at Old Faithful.”<sup>109</sup> By

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<sup>105</sup> John S. McLaughlin to Art Bazata, Oct. 17, 1966, IN Box C-4, File C38: “Concessionaire Contracts & Permits,” YNP Archives, YNP, WY.

<sup>106</sup> Bob Jones (former Reservations Manager for YPCo.), interview by author, telephone conversation, Moab, Utah, Nov. 17, 1997.

<sup>107</sup> Bill Hapè (former Assistant Chief of Maintenance for the NPS), interview by author, telephone interview, Gardiner, MT, Nov. 13, 1997.

<sup>108</sup> “Winter Oversnow Vehicle Operations”—Minutes of March 18, 1968 meeting IN Box N-115, File L3427: “Winter Sports—Oversnow Vehicle Use,” YNP Archives, YNP, WY.

<sup>109</sup> Harold Estey (Chief Park Ranger) to Superintendent, Feb. 16, 1970, IN Box A-35, File A40: “Conferences &

the next summer, the YPCo. was “seriously considering opening facilities at Old Faithful this winter.”<sup>110</sup>

On December 17, 1971, the Old Faithful Snowlodge opened for its first winter season. Open through March 19, 1972, the Snowlodge featured “simple, pleasant and comfortable lodging spiced with hearty western food and beverage and nature’s grandest winter display. ... Single, twin and triple rooms are available. All are convenient to centrally located bath facilities.”<sup>111</sup> It was the Campers Cabin building with a new name,<sup>112</sup> with 34 rooms without bath available to the public. The rooms were actually rooms used in summer by the employees of the Campers Cabin facility. The company chose this building because it was one of their newer buildings at Old Faithful, and it was already winterized. Although they discussed opening all or part of Old Faithful Inn, they did not follow through on this idea because the Inn would have needed extensive renovation and winterizing.<sup>113</sup> Heating the Inn would have been next to impossible, with its 80-foot-high non-insulated ceiling.

The YPCo. offered several tour packages at the Snowlodge as well as snowshoeing,

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Meetings 1970,” YNP Archives, YNP, WY.

<sup>110</sup> Staff Meeting Minutes for July 20, 1971, IN Box A-37, File A40: “Conferences & Meetings, 1971,” YNP Archives, YNP, WY.

<sup>111</sup> “Yellowstone Snowtime Adventures,” promotional brochure for Old Faithful Snowlodge for its first season, 1971-72, located at Chief Executive’s Office, AmFac Parks & Resorts, Mammoth Hot Springs, YNP, WY.

<sup>112</sup> Yellowstone National Park, *Winter Information, 1977* (Unpublished green folder in Vertical Files, YNP Research Library, YNP, WY), no page number.

<sup>113</sup> Bob Jones (former Reservations Manager for YPCo.), interview by author, telephone conversation, Moab, Utah, Nov. 17, 1997.

ski touring, and snowcoach tours.<sup>114</sup> The Snowlodge and its tours were clearly popular, as the concessionaire still offers these services today.

### Promoting the Snowmobile Policy

After the crucial policy meeting in March 1968, Anderson realized he would have to promote the new winter policy to get it to work. As he later said,

We did the best thing ... try and develop a ... viable winter program. So, we went ... to ... the International [Snowmobile Industry Association], and we talked to the manufacturers to try and [sic] encourage them to come in to West Yellowstone and here. We drew some people in who had high public visibility—Lowell Thomas was one.<sup>115</sup>

Clearly, Anderson promoted his new program as best he could. It is uncertain, however, just what he meant by talking with the manufacturers and encouraging them to come in to the Park and West Yellowstone. Of the seven associates of Anderson's that I interviewed, none could say conclusively what Anderson meant by this remark.<sup>116</sup> It is safe to say, however, that he promoted the snowmobile use of Yellowstone—at a very critical time for the snowmobile industry. In the late 1960's, there were more than one hundred snowmobile manufacturers, who were attempting to develop a market for their

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<sup>114</sup> "Yellowstone Snowtime Adventures," promotional brochure for Old Faithful Snowlodge for its first season, 1971-72, located at Chief Executive's Office, AmFac Parks & Resorts, Mammoth Hot Springs, YNP, WY.

<sup>115</sup> Jack Anderson, "Interview with Jack Anderson, former Park Superintendent," interview by Robert Haraden and Alan Mebane, June 12, 1975, IN Drawer 3, Tape 75-3: YNP Research Library, YNP, WY.

<sup>116</sup> Mary Meagher (research biologist, Yellowstone), interview by author, telephone interview, Gardiner, MT, Nov. 3, 1997; Bob Haraden (former Assistant Superintendent of Yellowstone), interview by author, personal interview, Bozeman, MT, Nov. 11, 1997; Harold Estey, interview by author, telephone interview, Norfolk, NE, Nov. 12, 1997; Terry Danforth, interview by author, personal interview, Bozeman, MT, Nov. 20, 1997; and author's interviews with Hape, Nov. 13, 1997; Mernin, Nov. 11, 1997; and Nuss, Nov. 11, 1997.

products in the west.<sup>117</sup> To do that, they were subsidizing the snowmobile industry in West Yellowstone by assisting the fledgling snowmobile rentals by making snowmobiles available through low-priced leases. Anderson may have seen a mutually beneficial agreement with the snowmobile industry: by opening Yellowstone to snowmobile visitation, he could get the politicians off his back while the industry could simultaneously achieve its objective of developing the western snowmobile market. Indeed, by 1972 the snowmobile manufacturers were leasing their machines to several West Yellowstone motel owners, who in turn rented them to winter visitors; by 1983 the town had 71 snowmobile-related businesses, including 29 motels, where there had been no motels open in winter in 1966.<sup>118</sup> By encouraging the struggling snowmobile industry just when it needed that encouragement, Anderson got the politicians off his back and the snowmobile industry “took off.”

As he also mentioned, Anderson publicized the new winter policy by inviting reporters and by writing newspaper articles about Yellowstone in winter. For example, Lowell Thomas, a well-known radio commentator, visited Yellowstone in winter during this time period and gave several nation-wide radio addresses about his visit to the Park in winter.<sup>119</sup> In another example, Anderson wrote an article promoting a visit to

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<sup>117</sup> Darcy L. Fawcett, “Colonial Status: The Search for Independence in West Yellowstone, Montana” (Professional Paper submitted to Montana State University), Dec. 17, 1993, p. 21.

<sup>118</sup> *Ibid.*, p. 23, 27.

<sup>119</sup> Jack Anderson to Lowell Thomas, March 17, 1969, IN Box A-158, File A3821: “Public Relations 1969 (Individuals),” YNP Archives, YNP, WY.

Yellowstone in winter, stating “each year more folks are coming to see the Park during what used to be the ‘closed’ season but closed no more.”<sup>120</sup>

Anderson also promoted Yellowstone’s winter program by permitting another demonstration snowmobile trip, this time around the Park’s Grand Loop (with the exception of the road from Tower Falls to Mammoth, which was plowed for automobile use). A group of 28 men and women sponsored by the Big Sky Snowriders, a snowmobile group out of Livingston, Montana, took three days to complete the 182-mile ride, camping out in the Park along the way.<sup>121</sup> Their trip was precedent setting in that it was the first such circumnavigation of all the Park roads in one trip. This tour provided the model for the Lower Loop tour that has since become very popular: driving one’s snowmobile to the Lower Loop and circumnavigating it in one day, a trip of at least 130 miles. Because the road from Canyon to Tower Falls is no longer open to snowmobiles, due to the avalanche danger on Dunraven Pass, traveling the entire Grand Loop in winter is no longer possible, so the Lower Loop suffices for today’s visitors.

Finally, Park officials cooperated with the Wyoming State Highway Department in a survey of 24,000 summer visitors. One of the questions of the survey found that 24% of those visitors had taken a winter vacation in the last five years. Of that number, only 5.9% went snowmobiling while anywhere between 20 and 69% observed wildlife, went

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<sup>120</sup> Jack Anderson to Fred Martin (Editor of the *Park County News*), Dec. 29, 1969, IN Box A-158, File A3815: “Public Relations 1969 (Federal, State & Local Agencies),” YNP Archives, YNP, WY.

<sup>121</sup> “Snowriders to Tour Yellowstone’s Loop,” *The Billings Gazette*, Billings, MT, Jan. 25, 1967.

sightseeing, photographed, or went skiing.<sup>122</sup> Even though the survey indicated little interest in snowmobiling, Yellowstone's administrators promoted it as the means of accomplishing the other activities in the Park's snowbound interior. They had, after all, developed a policy.

### Development of Regulations

Yellowstone's administrators had developed most of their snowmobile regulations before Anderson arrived. Hence, the presence of existing regulations made it that much easier for them to formally adopt their snowmobile policy in 1968. Regulations came about in the following manner.

Promotion of snowmobiling by residents of West Yellowstone meant the Park administrators soon had to develop regulations for their use in the Park. As already discussed, the first visits to Yellowstone by snowplane, snowcoach, and snowmobile all entered from West Yellowstone. By the late 1960's, the town had embraced the snowmobile as its ticket to a year-round economy. In March 1966 West Yellowstone held its first "Snowmobile Roundup." A "roundup" was a weekend gathering of snowmobile owners and their machines. The town organized activities of various kinds for the snowmobilers, including races, jumps, and rides. One of the rides was a day-trip into Yellowstone, with participants riding round-trip from West Yellowstone to Old

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<sup>122</sup> Wyoming State Highway Department, "Yellowstone National Park Travel Study 1967," IN Box A-252, File A88: "Travel Studies & Statistics 1969—Campground Survey," YNP Archives, YNP, WY.

Faithful and back.<sup>123</sup>

By the next year, the annual roundup attracted about 325 snowmobiles. While that number is only about one-fifth the number of snowmobile rentals available in West today (not including several thousand more that show up for today's snowmobile roundups!), at that time administrators considered it a tremendous number. Consequently, when a large percentage of that 325 entered Yellowstone in one day for a tour to Old Faithful and back, they illustrated the problems (in an early form) that would eventually arise from increased numbers of snowmobile visits.

Park Ranger Pete Thompson, on patrol in the West Entrance area during the second roundup, observed many problems with that large a number of snowmobiles, including off-road travel, physical alterations to snowmobiles that increased their power and associated noise levels, driving at night with inoperative headlights, litter, and racing.<sup>124</sup> Rangers at the next park staff meeting seconded Thompson's concerns, stating that "the Park does not have enough control of these snowmobiles. More manpower and better regulations will have to be developed."<sup>125</sup> Superintendent McLaughlin expressed these concerns to the Regional Director at the same time, stating "we do not, in all instances, have proper regulations to legally enforce our ground rules ... the snowmobiling activity

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<sup>123</sup> Pete Thompson to Chief Park Ranger through West District Ranger, March 21, 1967 IN Box A-32, File A88: "Oversnow Vehicle Travel," YNP Archives, YNP, WY.

<sup>124</sup> Ibid.

<sup>125</sup> Minutes of March 23, 1967 Staff Meeting, IN Box A-226, File A40: "Staff Meeting Minutes 1967—Yellowstone," YNP Archives, YNP, WY.

should be patrolled and policed more than we have been able to do.”<sup>126</sup>

Concern for improved regulations reached the Director of the National Park Service. Writing for his boss, NPS Assistant Director Edward Howell sent Yellowstone a list of guidelines under which snowmobiles could be permitted into national parks. The list reflected much of what Yellowstone was doing already, indicating that the *national* policy of the NPS may have been based in large part on Yellowstone’s policy. The national policy included the following:

- 1) The use of the mechanized over-the-snow equipment is a compatible winter use and should be encouraged within the framework of the Code of Federal Regulations and the basic National Park Service Act;
- 2) The visitor use of over-the snow vehicles shall be confined primarily to roads open to the use of motor vehicles during the time of year when snow is not on the roads. This may include fire or administrative roads open only to government vehicles in the spring, summer and fall. ...
- 3) The established public roads ... should be adequately marked or described by a map available to the general public so no misunderstanding can arise as to the limit of road use; ...
- 4) The individual area should develop a special permit to be issued without charge to the operator of oversnow equipment. ... Ordinarily this permit would be issued for trips of overnight or longer with self-registry boxes used for day use. The permit should include such items as the proposed itinerary and emergency supplies to be carried.<sup>127</sup>

The NPS in Yellowstone issued “Regulations Governing Winter Activities” shortly thereafter. In addition to the above guidelines probably taken from Yellowstone by the Director, the Yellowstone regulations also included the following:

- 1) A snowmobile shall at all times be equipped with a muffler in good working

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<sup>126</sup> John S. McLaughlin to Regional Director, Western Region, March 20, 1967, IN Box A-32, File A88: “Oversnow Vehicle Travel,” YNP Archives, YNP, WY.

<sup>127</sup> Assistant Director to All Regional Directors, May 26, 1967, IN Box H-41, File L3427: “Recreation Activities 1967: Winter Sports, Oversnow Vehicles,” YNP Archives, YNP, WY.

order to prevent excessive or unusual noise and annoying smoke. No person shall use a muffler cut-out, bypass, or similar device upon a snowmobile [these alterations increase the already high levels of noise].

- 2) A snowmobile shall be equipped with a forward-facing white headlight and a red taillight. These lights must be lighted [at appropriate times].
- 3) No person under the age of 16 shall operate a snowmobile unless under the direct supervision of a person 21 years of age or older...
- 4) Racing and other competitive uses are prohibited. ...
- 5) The maximum speed limit is 45 m.p.h.<sup>128</sup>

To make it as easy as possible for the snowmobilers to learn and abide by the regulations, Yellowstone's administrators developed and issued a two-sided sheet explaining the regulations in an easy-to-read, cartoon-like style. The cartoon, in addition to the above regulations, clearly told snowmobilers not to feed, tease, molest or chase wildlife, and to observe them from a distance.<sup>129</sup>

Although these were good attempts to regulate snowmobiles and to protect park resources, the escalating snowmobile use would soon challenge their effectiveness. For example, the noise that snowmobiles emitted continued to plague park managers, and still does. Additionally, concerns over wildlife harassment and impacts intensified shortly after the regulations were issued, and continue to this day. For the time being, however, Yellowstone administrators thought they had adequate regulations written to protect park resources. The exploding use of the next few years would call that assumption into question—leaving open the question of whether any amount of regulations would ever

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<sup>128</sup> "Regulations Governing Winter Activities," appended to Jack K. Anderson to Regional Director, December 8, 1970, IN Box L-33, File L34: "Recreation Activities," YNP Archives, YNP, WY (no page number).

<sup>129</sup> "Yellowstone National Park Snowmobile Regulations," appended to Jack K. Anderson to Regional Director, December 8, 1970, IN Box L-33, File L34: "Recreation Activities," YNP Archives, YNP, WY.

keep Yellowstone's priceless resources from harm by so many snowmobiles.

### Chapter Conclusion

Yellowstone's administrators, then, allowed snowmobiles into the Park for three reasons:

- 1) to get the public off their back by allowing some form of motorized access to the Park in winter;
- 2) to adhere to the pressure from National Park Service directors and MISSION 66 by dispersing visitation throughout the year; and
- 3) to allow the public to see and experience the Park in winter.

The most immediate reason was the first one; the earliest reason, the last one. By 1971, Superintendent Anderson had an official policy allowing snowmachines virtually unlimited use of Yellowstone's roads in the winter. The existence of the necessary regulations made the adoption of the snowmobile program that much easier. And finally, Anderson cemented its policy in place by promoting it publicly, providing comfortable snowmobile roads, and opening a place to stay overnight within the Park.

At the time snowmobiles must have seemed relatively benign, despite their high level of noise. Administrators felt that snowmobiles were to winter as automobiles were to summer. Hence, they did not feel it necessary to examine the environmental side effects of the things. Nor could any reasonable person likely have foreseen just how much snowmobile visitation would grow. Hence, we cannot significantly fault these people for implementing the snowmobile program. In fact, at the time, the Park's managers felt that opening the Park to snowmobiles carried fewer impacts than plowing

the roads would have. Hence, in allowing snowmobiles into Yellowstone, Anderson and his staff probably were motivated to act in the Park's best interest and in the best interest of the NPS.

While Anderson may have been acting in the Park's best interest at this time, he soon began to make some decisions that question whether he continued to act in the best interest of the park as regards its snowmobile policy. Between 1968 and 1975, his subordinates and the general public raised many concerns regarding snowmobiles that Anderson nearly always overruled. Anderson's conscientious attempt to protect the Park disappeared, as he refused to reconsider his decision to promote snowmobile visitation. The next chapter shall chronicle these concerns and Anderson's response to them.

## CHAPTER 2: DEFENDING THE NEW SNOWMOBILE POLICY: 1967-77

*We sometimes hear individuals say snowmobile operation in the Park infringes upon the intrinsic majesty of the area, or threatens the wilderness characteristics of the Park. I'd have to say they are wrong.*

Jack Anderson, 1977.<sup>1</sup>

Once Yellowstone's administrators began grooming the roads for snowmobiles and began providing overnight accommodations for winter visitors at Old Faithful, visitation increased exponentially. The increased numbers of snowmobiles in the park began to illustrate many of the problems that they could bring to Yellowstone, and some of Yellowstone's staff members raised concerns about these problems to the superintendent. Rather than investigating these concerns, Anderson seemed to ignore them. While he was a conscientious administrator of the park in most ways, Anderson personally liked snowmobiling, and evidently allowed his love of the activity to blind him to the problems it brought upon his park. His actions facilitated a dramatic increase in snowmobile visitation to Yellowstone in the years to come. This chapter will examine the concerns raised by Yellowstone's rangers and the public, Anderson's responses to those concerns, and the responses of other national park administrators toward snowmobile use in their parks.

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<sup>1</sup> Jack Anderson, "Transcript of Conversation, Jack Anderson and Derrick Crandall," interview by Derrick Crandall, April 1, 1977 IN "Current Stuff" Section, *Snowmobile Briefing Book Vol. 1*, YNP Research Library, p. 5.

## Noise

It is easy to understand why snowmobile noise would be one of the most common complaints raised about them. Even today, the machines are amazingly loud: at a distance of 50 feet with a full throttle, the typical snowmobile emits 70-80 decibels of noise on the A scale (dB(A))—equivalent to the noise put out by a freight train. Snowmobiles manufactured before 1970 were much worse, often emitting over 100 dB(A) at the same distance—almost as loud as a jet taking off!<sup>2</sup> Because they are powered by “two-stroke,” or “two-cycle,” engines, manufacturers cannot reduce their engine noise below about 70 dB(A).<sup>3</sup> As long as the two-cycle snowmobile is used in Yellowstone, there will be significant snowmobile noise.

Park Ranger Pete Thompson was among the first to express concern over the noise levels of the snowmachines in 1967. He wrote that “the noise level on these machines is incredible.” He noted that he could hear machines at the races at West Yellowstone from Seven Mile Bridge, about 5-6 air miles from West Yellowstone on March 19. Finally he noted that when a machine fitted with an expansion chamber, a device that allowed for increased combustion and concomitant noise, passed within twenty feet, its noise was “actually painful to the eardrum.”<sup>4</sup>

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<sup>2</sup> “Noise Facts and Acoustic Terms,” from the “Current Stuff” Section of the *Snowmobile Briefing Book Vol. 1*, YNP Research Library, YNP, WY.

<sup>3</sup> Cowl Industries Limited, *A Study of the Feasibility of Reducing Snowmobile Noise* (Ottawa: Information Canada, 1973), 7.

<sup>4</sup> Pete Thompson to Chief Park Ranger through West District Ranger, March 21, 1967, IN Box A-32, File A88: “Oversnow Vehicle Travel,” YNP Archives, YNP, WY.

Two years later Ranger Douglas J. Riley discussed the different ways that snowmobilers modified their engines to enhance power, which nearly always resulted in their being much louder than they already were. He further noted that the majority of the visiting public supported the NPS's noise restrictions (at the time, 86 dB(A) at a distance of 50 feet, at or near full throttle).<sup>5</sup> A year later Ranger James Fox noted that to enforce the noise restriction, some sort of monitoring device would be needed—that “it would be difficult (and painful) to listen to each machine individually to determine the maximum noise level attainable before admitting the individual.”<sup>6</sup> Park administrators would not heed Fox's call for monitoring devices until the mid-1990's (see Chapter 5).

In 1972, the NPS restricted snowmobiles entering national parks to those emitting less than 82 dB(A) at 50 feet, at or near full throttle.<sup>7</sup> Eventually, with the “quieter” models developed after 1973, the NPS further restricted the models allowed in national parks to those 1973-75 models that emitted 82 decibels or less at or near full-throttle at a distance of 50 feet, and post-1975 models that emitted 78 decibels or less under the same conditions.<sup>8</sup>

As mentioned above, these restrictions still allow some very noisy machines into the

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<sup>5</sup> Douglas J. Riley to West Sub-District Ranger, March 17, 1969, IN Box N-115, File L3427: “Winter Sports Oversnow Vehicle Use,” YNP Archives, YNP, WY.

<sup>6</sup> James E. Fox to West District Ranger, May 3, 1970, IN Box A-36, File L34: “Recreation Activities—1970,” YNP Archives, YNP, WY.

<sup>7</sup> C. L. Hanner (Acting Superintendent, Yellowstone) to Director, Midwest Region, June 14, 1972, IN Box N-118, File “Historical Backcountry Correspondence,” YNP Archives, YNP, WY.

<sup>8</sup> 36 CFR Chapter 1, § 2.18 (d)(1).

Park. In fact, even today, with relatively “quiet” snowmobiles being used in the Park, I have personally heard them on a number of occasions and in a number of places from as far as 10 miles from the closest road (see Table 10, Chapter 4 for a detailed listing of such places). Sub-district Ranger Les Inafuku reports hearing them even farther away—15 or 20 *miles* from the nearest road.<sup>9</sup>

But did Anderson really care? While he was superintendent, Anderson wrote that “it appears that the noise factor has little effect on the wildlife, but I think everyone pretty well agrees that it is a very disturbing factor for those who are attempting to enjoy the peace and quiet of the winter wilderness.”<sup>10</sup> After he retired from public service, however, Anderson revealed what may be his true feelings on the noise matter in an interview with Derrick Crandall of the Snowmobile Safety and Certification Committee:

ski-tourers may say, ‘well, I wish I did not have to live with those machines off in the distance.’ *All it takes is a pair of earplugs to stop that real quick....* Most of the complaints we received [from skiers] were really baseless. ... It is ludicrous to hear, ‘we want a quiet experience, away from snowmobiles,’ when the individual needs only to go another 100 yards to have a totally quiet experience (emphasis added).<sup>11</sup>

Anderson’s statements to Crandall regarding the noise of snowmobiles reveal a careless disregard for the concerns of the public, for the intrinsic values of a wilderness park such as Yellowstone, and especially for one of the main motivations that bring

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<sup>9</sup> Les Inafuku (Subdistrict Ranger, Yellowstone), interview by author, Old Faithful, WY, July 15, 1997. Inafuku heard snowmobiles south of the Southeast Arm of Yellowstone Lake; the nearest road is on the north and west shores of the lake at about 15 miles distant.

<sup>10</sup> Jack Anderson to Paul McCrary, Midwest Region, Dec. 2, 1969, IN Box L-42, File L3427: “Recreation Activities 1969—Winter Sports (Oversnow Vehicle Use),” YNP Archives, YNP, WY.

<sup>11</sup> Jack Anderson, “Transcript of Conversation, Jack Anderson and Derrick Crandall,” interview by Derrick Crandall, April 1, 1977 IN “Current Stuff” Section, *Snowmobile Briefing Book Vol. 1*, YNP Research Library, p. 6.

people to the national parks—to escape the noise of our culture. They reveal the fact that he did not ski much, being a heavy man who regularly snowmobiled in the Park,<sup>12</sup> and hence that he probably had little idea that snowmobile noise traveled much farther than only 100 yards (in contrast, Glacier National Park administrators eliminated snowmobiles in the 1970's largely because of the noise they emit (a topic to which this chapter will later return)).

### Impacts on the Park's Wildlife and Vegetation

Of equal concern to many rangers and visitors were the potential adverse effects of snowmobiles on the Park's wildlife and vegetation. Ranger Douglas Riley, again: "We have had many complaints of snowmobilers chasing the elk and buffalo. In addition to this, they have crushed or broken many young pine trees."<sup>13</sup> Ranger James Fox, again: "The possible effects of unrestricted snowmobile operations upon wintering wildlife are the following: (1) keeping wildlife from feeding areas; (2) compacting snow over forage, making it unavailable; and (3) chasing or other direct harassment of animals."<sup>14</sup> Finally, an idea of the extent of this problem is evident from another report by Resource Management Specialist Edmund Bucknall a year later:

Recent reports from the West Entrance have indicated an alarming trend in harassment of elk by snowmobiles. The combination of noise and offroad operation

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<sup>12</sup> Jerry Mernin (former Snake River District Ranger, Yellowstone), interview by author, personal interview, Bozeman, MT, Nov. 11, 1997.

<sup>13</sup> Douglas J. Riley to West Sub-District Ranger, March 17, 1969, IN Box N-115, File L3427: "Winter Sports Oversnow Vehicle Use," YNP Archives, YNP, WY.

<sup>14</sup> James E. Fox to West District Ranger, May 3, 1970, IN Box A-36, File L34: "Recreation Activities—1970," YNP Archives, YNP, WY.

of these machines is causing serious disturbance all through the Madison valley winter range. Constant patrolling has had little effect in reducing this disturbance. ... Disturbance at this critical winter period might easily mean losing the delicate balance that regulates this herd.<sup>15</sup>

Chief Park Ranger Harold Estey responded to Bucknall that “we must have documented and factual evidence to substantiate claims that a particular human use is destroying the ecological balance. Second and third hand reports used to support an *emotionally derived opinion* adds [sic] up to no more than an impression” (emphasis added).<sup>16</sup> Anderson criticized the wildlife and vegetative complaints in general as “emotionalism” and stated that “they have never been supported by fact.”<sup>17</sup>

But did Estey or Anderson have their own program of meaningful scientific research disproving these claims? According to Jack Anderson, he and his staff were indeed engaged in “research” into the effects of snowmobiles on the Park’s natural resources: “We found that animals become conditioned to noise, particularly those in the Park. ... [E]lk, bison, moose, even the fawns [sic], wouldn’t move away unless a machine was stopped and a person started walking. As long as it was a machine, there was no impact of any nature that we could find.” He also stated that he had two biologists looking for evidence of adverse vegetation impacts for three years; they never found any impacts<sup>18</sup>

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<sup>15</sup> Resource Management Specialist to Chief Park Ranger, March 16, 1970, IN Box A-36, File L34: “Recreation Activities 1970,” YNP Archives, YNP, WY.

<sup>16</sup> Harold Estey to Superintendent, March 31, 1970, IN Box A-36, File L34: “Recreation Activities 1970,” YNP Archives, YNP, WY.

<sup>17</sup> Jack Anderson, “Transcript of Conversation, Jack Anderson and Derrick Crandall,” interview by Derrick Crandall, April 1, 1977 IN “Current Stuff” Section, *Snowmobile Briefing Book Vol. 1*, YNP Research Library, p. 6.

<sup>18</sup> *Ibid.*, pp. 2-3.

and “we are carefully studying the possible detrimental influence of the smaller snowmachines on park resources.”<sup>19</sup>

In contrast, the only research that I could find from Anderson’s time period on the effects of snowmobiles on park wildlife was buried in a report on elk management by Glen Cole published in 1983. In that report Cole said:

My field observations suggested that the elk that used areas near roads became habituated to snowmobiles. ... Displacements of these animals were mostly confined to the road plus surprisingly short distances. ... In contrast, persons walking, skiing, snowshoeing or driving snowmobiles off regularly traveled roads (especially toward animals) displaced elk from their feeding and resting areas at comparatively long distances.<sup>20</sup>

Clearly, Cole’s statements are only anecdotal in nature and not a scientific study. Nevertheless, Anderson evidently used them as scientific fact, even while criticizing the complaints of others as “never supported by fact.” Additionally, Cole noted that, in order to prove that there were no long-term impacts, “studies will need to be carried out over a longer period of time,”<sup>21</sup> something neither Anderson nor his next two successors ever did.<sup>22</sup> Cole also found clear evidence that snowmobile use in the Park did displace wildlife, something Anderson neglected to mention or consider.<sup>23</sup> Finally, outside

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<sup>19</sup> Jack Anderson to Wells B. Lange, Feb. 19, 1971, IN Box N-118, File “Historical Backcountry Correspondence,” YNP Archives, YNP, WY.

<sup>20</sup> Glen Cole, “A Naturally Regulated Elk Population,” *Proceedings of the Symposium on Natural Regulation of Wildlife Populations* (Vancouver, B.C., 1983), 77.

<sup>21</sup> *Ibid.*

<sup>22</sup> Glen Cole, (former research biologist, Yellowstone), interview by author, telephone interview, International Falls, MN, Nov. 15, 1997.

<sup>23</sup> In my research at the Yellowstone National Park Archives, I could find no mention by Anderson of the effects on wildlife that Cole found in his research.

research into the effects of snowmobiles on wildlife was readily available by the early 1970's,<sup>24</sup> yet was apparently not sought out by Anderson or Cole.

Acting superintendent Vern Hennesay probably admitted the truth in stating: “we have not set up a specific research study to determine possible damage to plant and animal life resulting from oversnow vehicles”<sup>25</sup> (note that Cole’s snowmobile research was incidental to his larger study on natural regulation of elk). Similarly, Acting Chief Park Ranger Rick T. Anderson admitted to an inquiring colleague that “we can give you no definite information on the detrimental effect [sic] to wildlife or [sic] the off-road use of snowmobiles, nor can we direct you to a source of such information,” in 1971.<sup>26</sup>

If Anderson had not adopted snowmobiling as his personal obsession,<sup>27</sup> he might have found merit in some of the complaints. Indeed, when Keith Aune of Montana State University in Bozeman investigated the effects of winter recreationists on Yellowstone’s wildlife in 1980, he found many wildlife impacts associated with snowmobiles, including displacement of wildlife from areas near the snowmobile trails, inhibition of wildlife movement across trails by snowmobile traffic, harassment of wildlife, and displacement

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<sup>24</sup> For example, the bibliography of Texas Agricultural Experiment Station, *Off-Road Recreation Vehicles, A Research Summary 1969-1975* (Texas A&M University System, College Station), 1976, lists 175 citations of works discussing the ecological effects of off-road snowmobiles dating from 1974 or before.

<sup>25</sup> Vernon E. Hennesay to Hon. Joseph B. Schieffelin, July 10, 1970, IN Box L-33, File L34: “Recreation Activities,” YNP Archives, YNP, WY.

<sup>26</sup> Rick T. Anderson (Acting Chief Park Ranger) to Richard C. Warren (Anchorage Ranger District, USFS), IN Box N-118, File “Historical Backcountry Correspondence,” YNP Archives, YNP, WY.

<sup>27</sup> In my interviews with Anderson’s colleagues, all of the following mentioned Anderson’s love for the activity of snowmobiling: Joe Halladay (former Ranger Naturalist, Yellowstone), interview by author, personal interview, Belgrade, MT, May 29, 1997.; and author’s personal interviews with Meagher, Nov. 3, 1997, Nuss, Nov. 11, 1997, and Mernin, Nov. 11, 1997.

of wildlife by both snowmobilers and skiers.<sup>28</sup> But, Anderson did not commission a study—and Aune’s was done ten years later. Instead, Anderson used anecdotal evidence to back up his claim that snowmobiles did not impact the Park’s wildlife or vegetation and failed to do more comprehensive research.

And that is unfortunate. As Ranger James Fox prophetically said, “The long-range environmental impact of snowmobiles is unknown. Possibly the harmful effects of snow machines, like those of DDT, may take many years to become manifest.”<sup>29</sup> How right he was; just ten years later bison had already learned to use the roads to move from one feeding area to another,<sup>30</sup> and would grow sizably in population for the next fifteen years by saving energy moving around on the snowmobile trails.<sup>31</sup> Anderson’s failure to examine the potential effects of snowmobiles in his park would come back to plague Yellowstone’s administrators in the 1980’s and 1990’s as a major problem.

### Air Pollution from Snowmobiles

Snowmobiles, being powered by two-cycle engines which mix oil with gas for combustion, are “extremely, extremely dirty compared to anything else; snowmobiles are the worst there is,” according to Charles Emmett of the California Air Resources

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<sup>28</sup> Aune, Keith, “Impact of Winter Recreationists on Wildlife in a Portion of Yellowstone National Park, Wyoming” (Master’s Thesis, Montana State University, Bozeman), 1981, p. ix.

<sup>29</sup> James E. Fox to West District Ranger, May 3, 1970, IN Box A-36, File L34: “Recreation Activities—1970,” YNP Archives, YNP, WY.

<sup>30</sup> John Townsley (Superintendent) to Christine Berry, Feb. 23, 1981, IN Box A-222, File A3615: “Complaints 1981: About Service & Personnel,” YNP Archives, YNP, WY.

<sup>31</sup> Mary Meagher, *Winter Recreation-induced Changes in Bison Numbers and Distribution in Yellowstone National Park*, (Unpublished report submitted to the NPS, YNP, WY), 1993, p. 2.

Board in 1994.<sup>32</sup> This was as true in the early 1970's as it is today. While air pollution at the West Entrance is a major problem today, it was not as big a concern in the early 1970's. Even so, Ranger Fox wrote:

A great deal of exhaust smoke is produced by most snowmobiles. Probably an automobile emitting as much smoke as many snowmobiles do would not be admitted to the Park in the summer. The smoke produced by a single snowmobile is not highly noxious; however when many machines enter the Park in a single day, a foul-smelling blue pall of smoke hangs over the entrance for most of the morning.<sup>33</sup>

He also warned that the Park administration must keep in mind the burgeoning popularity of snowmobiling, so they should expect a concomitant increase of impacts on the Park environment.<sup>34</sup>

With the majority of snowmobilers traveling to Old Faithful for the day, air quality began to deteriorate there as well. Air pollution became severe enough that Dr. Vincent J. Schaefer had to move his sensitive meteorological studies from Old Faithful to Norris Geyser Basin, where there was cleaner air for his studies.<sup>35</sup>

The only statement by Anderson in the historical record that I could find is that, even though air quality at Old Faithful had worsened, "conditions have not, however, reached uncomfortable proportions for breathing."<sup>36</sup> His remark indicates that even if

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<sup>32</sup> Scott McMillion, "Yellowstone in Winter," *Bozeman Daily Chronicle*, Bozeman, MT, Jan. 9, 1994.

<sup>33</sup> James E. Fox to West District Ranger, May 3, 1970, IN Box A-36, File L34: "Recreation Activities—1970," YNP Archives, YNP, WY.

<sup>34</sup> *Ibid.*

<sup>35</sup> Jack Anderson to Director, Midwest Region, April 15, 1971, IN Box L-36, File L3427: "Recreation Activities: Winter Sports," YNP Archives, YNP, WY.

<sup>36</sup> *Ibid.*

this was a problem at the time, he was not concerned about it (after all, it is not uncomfortable for healthy individuals to breathe polluted air). It would become a major problem by the early 1990's, when Yellowstone began to violate Clean Air Act standards at the West Entrance.

### The National Environmental Policy Act

By the early 1970's, citizens of the U.S. were becoming increasingly conscious of the environment around them and of their effects on it. Congress was debating and passing several key pieces of national environmental legislation, such as the National Environmental Policy Act (NEPA) and the Clean Air Act. In hindsight, it is not too surprising that Anderson's staff and the public raised their concerns at the same time. What is surprising, though, is that Anderson seemed immune to the rising environmental consciousness of the public as regards snowmobiles. Anderson himself summed up his feelings—his emotionalism—about the environmental impacts of snowmobiles well when he said snowmobiling is “a great experience and a great sport, one of the cleanest types of recreation I know,”<sup>37</sup> and “We feel that a winter experience in Yellowstone on oversnow equipment is much more compatible with the environment [than an experience via automobile].”<sup>38</sup> It is likely that, since Anderson liked snowmobiling personally, he was

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<sup>37</sup> Jack Anderson, “Transcript of Conversation, Jack Anderson and Derrick Crandall,” interview by Derrick Crandall, April 1, 1977 IN “Current Stuff” Section, *Snowmobile Briefing Book Vol. 1*, YNP Research Library, pp. 11 and 5, respectively.

<sup>38</sup> Jack Anderson to Betty Sable (Secretary, Wyoming State Snowmobile Association), May 22, 1970, IN Box A-36, File D30: “Roads & Trails 1970,” YNP Archives, YNP, WY.

letting his love of the activity blind him to its real problems.

On January 1, 1970, President Nixon signed the National Environmental Policy Act into law. Surprisingly brief, the law stipulated the following:

- all agencies of the Federal Government shall—  
Include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on—
- (i) the environmental impact of the proposed action,
  - (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,
  - (iii) alternatives to the proposed action,
  - (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and
  - (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.<sup>39</sup>

The law took effect immediately, and ushered in a completely new era of Federal environmental accountability.

The procedures for complying with NEPA were defined by the Council on Environmental Quality (CEQ). As defined by the CEQ, "Major Federal actions ... include new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by federal agencies; new or revised agency rules, regulations, plans, policies, or procedure; and legislative proposals."<sup>40</sup> The CEQ required that the federal government perform an Environmental Assessment (EA) or Environmental Impact Statement (EIS) on the proposed action, including actions that

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<sup>39</sup> 42 U.S.C.A. § 4321 et seq., Public Law 91-190 (1970).

<sup>40</sup> 40 CFR Chapter V, § 1500 et seq.

are precedent setting or controversial in nature.<sup>41</sup> An EA is a brief look at the environmental consequences of the proposed action, and is usually done for federal actions that are relatively minor in nature, but still subject to NEPA, such as closing a five-mile road. An EIS, in comparison, is a detailed, hard look at all the possible environmental effects of an action, and is usually done for large projects such as the construction of a dam. In the preparation of the EA or EIS, NEPA requires the federal agency to develop and analyze the potential effects of a range of proposed alternatives, including a “no action” alternative.<sup>42</sup> In that way, the federal government may compare the environmental effects of various proposed actions and thereby choose the alternative with least impact. Additionally, the government is required to accept public input as a part of the environmental analysis.

As applied to Yellowstone, the law probably covered two of Anderson’s actions in the early part of the 1970’s: his decision to groom the snowmobile roads on a regular basis, and his decision to permit the Yellowstone Park Company to open the Old Faithful Snowlodge. Both of these actions could be reasonably interpreted as “major federal actions” as defined by the above legislation, and hence Anderson probably should have prepared at least an EA, if not a full EIS, on these actions. By preparing such documents, the NPS in Yellowstone would have examined the environmental impacts, adverse and long-term environmental effects, and alternatives to the proposed actions—or

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<sup>41</sup> 40 CFR Chapter V, § 1508.27.

<sup>42</sup> 40 CFR Chapter V, § 1500 et seq.

in other words, most of the potential impacts discussed above as raised by his employees and the general public.

Anderson did not prepare any such document for either decision. In scouring the archives at Yellowstone National Park, I found absolutely no mention of any EA or EIS on snowmobile trail grooming or the opening of Old Faithful Snowlodge. Additionally, not one of the seven persons who worked with Anderson whom I interviewed could recall any form of EA or EIS regarding the decision to groom roads or to open the Snowlodge; nor could they recall any formal public hearings.<sup>43</sup> The first environmental analysis of any kind—an EA—was not released until 1990, nineteen years after the NPS began grooming trails and opened the Snowlodge. That EA was cursory in nature (see Chapter 4), and made no significant changes to the trail grooming program. It was not until 1997 that Yellowstone's administrators finally committed to a detailed EIS, and only because they were forced to do so by a lawsuit (see Chapter 5).

Why did Anderson fail to do environmental analysis on either action? There is no indication in the historical record whatsoever, nor could any of the persons I interviewed tell me definitively. An educated guess, based on the way Anderson responded to complaints about snowmobiles, is that he may have believed neither action was a major federal action, and hence did not require NEPA analysis. Indeed, the implications of

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<sup>43</sup> Author's interviews with Meagher, Nov. 3, 1997; Hape, Nov. 13, 1997; Mernin, Nov. 11, 1997; Haraden, Nov. 11, 1997; Nuss, Nov. 11, 1997; Estey, Nov. 12, 1997; and Danforth, Nov. 20, 1997. Nuss, Hape and Mernin all guessed that Anderson held meetings in the surrounding communities of Cody, Jackson, and West Yellowstone, though none could say positively that he did, nor what they covered or the formality of them.

NEPA were anything but obvious until its scope was clarified in a series of landmark lawsuits later in the 1970's. Hence, Anderson probably did not realize that these two actions needed to conform with NEPA. Furthermore, bison biologist Mary Meagher states that so little information was known about snowmobiles at the time that an EA would have been difficult or impossible to do; and besides, Yellowstone's administrators at that time had their hands full with other ground-breaking actions such as the prescribed fire plan and the decision to restrict bears to natural foods.<sup>44</sup> Whatever the reason, Anderson did not do an EA or an EIS. However, these reasons cannot sufficiently explain his failure to instigate an EA, as other national parks did do Environmental Assessments on snowmobiling in their parks in the 1970's, as this chapter details later.

#### Executive Order 11644

Responding to public pressure to control the explosion of off-road vehicles (ORV's) on federal lands in the 1970's, President Nixon issued an executive order ("EO") to create a unified federal policy for their use in 1972. Entitled "Use of Off-Road Vehicles on the Public Lands," the EO supposedly ensured "that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands ... and to minimize conflicts among the various uses of those lands." Under this EO, which carried the full force of law, agency heads were instructed to issue ORV regulations that

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<sup>44</sup> Mary Meagher (research biologist, Yellowstone), interview by author, telephone interview, Gardiner, MT, Nov. 3, 1997.

ensured that ORV trails and areas

shall be located—

- (1) to minimize damage to soil, watershed, vegetation, or other resources of the public lands.
- (2) to minimize harassment of wildlife or significant disruption of wildlife habitats.
- (3) to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, ... taking into account noise and other factors.
- (4) in areas of the National Park system ... only if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values.<sup>45</sup>

In addition to mentioning all of the concerns raised by Anderson's staff and the public, note that the EO also specifically directs agency heads to minimize conflicts between users and to consider natural, aesthetic, and scenic values within the national park system.

Anderson's response to the executive order was (by this time) predictable. On May 7, 1974, he published his response in the *Federal Register*: to designate all of Yellowstone's interior routes as official snowmobile routes. He did state, however, that "we have been guided by the criteria in sections 3 and 4 of E.O. 11644."<sup>46</sup>

Anderson evidently did not even consider the soil, watershed, vegetation, or wildlife concerns of sections 1 and 2 of the EO. Anderson's manner of taking into account the noise criteria of section 3 was to recommend that the skiers either wear earplugs or leave the snowmobile areas. Finally, regarding the natural, aesthetic, and scenic criteria of

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<sup>45</sup> Executive Order 11644, February 8, 1972, 42 U.S.C.A. § 4321.

<sup>46</sup> 39 FR 16151, May 7, 1974.

Section 4 (which are clearly vague and arguable), Anderson felt that the Park and its nature, aesthetics, and scenery could not be seen by most people without the use of snowmobile in winter, so therefore they did not degrade those resources—they were a “necessary evil.” This is evident from the following statement by Anderson: “I think one of the things the snowmobile did was to finally let people see what a great experience it is to get out in the wintertime and really see the Park.”<sup>47</sup>

Anderson clearly saw things from the snowmobiler’s point of view, choosing to ignore what environmental impacts snowmobiles had (and have) because they enabled the rider to experience the Park in winter. Moreover, Anderson’s response to the EO indicates how powerful one superintendent can be in dictating the policies of a national park.

In contrast to Anderson’s policy, when a superintendent set his/her biases aside and took the time to listen to the public, the result was sometimes far different. The fate of the snowmobile in Glacier National Park in northern Montana is a good illustration of this.

#### Glacier National Park and Snowmobiles

Glacier National Park is a spectacular mountain paradise in northern Montana. Created early in the twentieth century, the Park is to mountains as Yellowstone is to geysers. Being the closest large, old park to Yellowstone (older and much larger than

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<sup>47</sup> Jack Anderson, “Transcript of Conversation, Jack Anderson and Derrick Crandall,” interview by Derrick Crandall, April 1, 1977 IN “Current Stuff” Section, *Snowmobile Briefing Book Vol. 1*, YNP Research Library, p. 5.

Grand Teton just to the south of Yellowstone), managers in Glacier and Yellowstone look more often to each other for management guidance and comparison than to the managers of other parks.

Anderson issued his response to Nixon's Executive Order on May 7, 1974. Just over one month later, the Acting Regional Director of the NPS sent all superintendents within the Rocky Mountain Region (which includes both Yellowstone and Glacier) a memorandum suggesting that the Superintendent prepare an environmental assessment in order to comply with EO 11644.<sup>48</sup> It is hard to believe that the Regional Director's timing, just one month after Anderson's May 7 response in the *Federal Register*, was mere coincidence. Most likely, the Regional Director was tacitly admonishing Yellowstone while also instructing other national parks on proper compliance with the EO. Despite the memorandum, Yellowstone did not do an EA.

By the winter of 1971, as many as 1,393 persons visited Glacier by snowmobile, but their numbers varied widely from year to year, as Table 4 illustrates. Snowmobiles were allowed on all the unplowed roads in Glacier at that time, with the exception of the Going-to-the-Sun Road from Lake McDonald over Logan Pass to the Jackson-Glacier Overlook; a total of 110 miles of roads were open to them.

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<sup>48</sup> Acting Regional Director to Superintendents, Rocky Mountain Region, June 21, 1974, IN "Snowmobile EA" Box, Glacier National Park Archives, Glacier National Park (GNP), MT.

Table 4. Snowmobile Visitation in Glacier National Park, 1967-74.<sup>49</sup>

Year	Number of snowmobiles
1967	153
1968	307
1969	571
1970	979
1971	1,393
1972	877
1973	502
1974	528

In comparison, during the winter of 1972-73 a total of 877 skiers and snowshoers visited Glacier. That number rose to 2,998 two winters later.<sup>50</sup>

Once the Acting Regional Director issued his memorandum in 1974, Glacier's administrators, in contrast to Yellowstone's, adhered to the memorandum, and hence, the EO, by performing an Environmental Assessment on snowmobiles in Glacier in 1974-75. In the EA, Glacier's administrators discussed many actual and potential problems associated with snowmobile use, many echoing the concerns of Yellowstone rangers as regarded snowmobiles there:

- 1) The longest discussion within the EA regards snowmobile impacts upon winter wildlife. The assessment's authors noted that:
  - A) Wildlife poaching has already occurred in the Park using snowmobiles;
  - B) Snowmobile disturbances cause wildlife to lose body weight and increase their susceptibility to disease;
  - C) Deer used snowmobile tracks to move from one area to another;
  - D) Park staff observed elk both maintaining a ½-mile buffer zone between

<sup>49</sup> Glacier National Park, *Environmental Assessment: Proposed Oversnow Vehicle Use at Glacier National Park, Montana*, 1975, "Snowmobile EA" Box, Glacier National Park Archives, GNP, MT, p. 4.

<sup>50</sup>Ibid.

- themselves and snowmobile areas and also running from snowmobiles;
- E) Compaction of snow by snowmobiles displaces snow-roosting birds and small mammals;
  - F) Winter stress determines population levels for many, if not most wildlife species in Glacier.
- 1) Snowmobile noise disturbs the aesthetic experience of the snowshoer or skier.
  - 2) Snowmobiles damage both exposed and sub-nivean (below the snow surface) vegetation, both through mechanical damage and through the reduction of sub-nivean temperatures through snow compaction (which reduces the amount of insulating air in the snowpack);
  - 3) Snowmobile air emissions linger on still days and are offensive to skiers, snowshoers, *and wildlife*;
  - 4) Snowmobile use, while enabling the old, very young, and physically handicapped to visit the Park, conflicts with other park users;
  - 5) Snowmobiles, by compacting the snow on the roads, would make spring plowing more difficult. Snowmobiles could also damage the road surface in areas where it is blown bare;
  - 6) If snowmobile use were to greatly increase, maintenance of the snowmobile trails would be necessary to smooth the roller-coaster surface; and
  - 7) The space for solitude and quiet are a valuable resource, and snowmobiles consume that space.<sup>51</sup>

Once the draft EA was complete, Glacier's administrators held two public meetings in November 1974 to seek public input regarding the EA. The meetings were held in West Glacier and Cut Bank, Montana. Eighty-seven people attended the West Glacier meeting; their comments generally favored closure.<sup>52</sup> Most comments in this meeting regarded the effects of snowmobiles on park wildlife, vegetative damage, noise, and aesthetics.<sup>53</sup> Over fifty people attended the Cut Bank meeting, and most were generally

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<sup>51</sup> *Ibid.*, pp. 9-16.

<sup>52</sup> Nathaniel P. Reed (Assistant Secretary for Fish and Wildlife and Parks) to Honorable John Melcher (U.S. House of Representatives), March 17, 1976 IN "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>53</sup> Glacier National Park, *Environmental Assessment: Proposed Oversnow Vehicle Use at Glacier National Park, Montana.*, 1975, "Snowmobile EA" Box, Glacier National Park Archives, GNP, MT, p. 18.

in favor of continued snowmobile use.<sup>54</sup>

Glacier's administrators then revised the EA to reflect the public input, and opened the EA for written public comments. During this public comment period, they received 438 letters and 976 names on petitions against snowmobiling, and only 22 letters and 691 names on petitions in favor of snowmobiling.<sup>55</sup> Of the written comments opposing snowmobiles, 121 mentioned wildlife impacts, 125 mentioned noise concerns, 65 mentioned skier/snowmobile conflicts, 28 mentioned air pollution, 38 mentioned vegetation damage, and 51 mentioned aesthetics in general.<sup>56</sup>

With public opinion seemingly overwhelmingly opposed to snowmobiles in the Park, Superintendent Phillip Iversen eliminated snowmobiles from Glacier entirely on October 2, 1975.<sup>57</sup> Glacier's Wilderness Specialist Robert Morey eloquently states the main reason for Glacier's decision:

If one factor was dominate [sic] in determining whether or not snowmobile use would be discontinued it involve[d] the identification [of] solitude and peace and tranquillity as resource[s] identified with Glacier National Park during the winter. ... A different atmosphere prevails within this precipitous mountain country. ... It is disruption of this resource that the use of snowmobiles causes that results in them [sic] being objectionable. ... Needless to say, snowmachine traffic in the [park's] valleys does become a very dominate [sic] and disturbing factor to those seeking quiet and solitude. *This was the primary element that swayed the decision in favor of not continuing public use of snowmobiles [emphasis added].*<sup>58</sup>

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<sup>54</sup> Nathaniel P. Reed (Assistant Secretary for Fish and Wildlife and Parks) to Honorable John Melcher (U.S. House of Representatives), March 17, 1976 IN "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>55</sup> "Snowmobiling in Glacier National Park," Briefing Statement, 1985, NPS, GNP, MT.

<sup>56</sup> Glacier National Park, *Environmental Assessment: Proposed Oversnow Vehicle Use at Glacier National Park, Montana.*, 1975, p. 19, IN "Snowmobile EA" Box, GNP Archives, GNP, MT.

<sup>57</sup> "Closure of Snowmobile Routes," Public Notice, Oct. 2, 1975, IN "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>58</sup> C. Robert Morey (Wilderness Specialist), Talk given to the Montana Snowmobile Association at Lewistown,

Another important factor cited by Iversen was that snowmobile use was declining, while ski and snowshoe use were rapidly increasing. Because snowmobile use is incompatible with skier/snowshoer use, Iversen opted in favor of the more popular ski and snowshoe use.<sup>59</sup>

This was not the end of the story, though. U.S. Congressman Melcher of Montana, responding to snowmobile constituents upset over the closure of the Park to snowmobiles, demanded a reconsideration of the NPS's decision. In his notes, Glacier Superintendent Phillip Iversen suggested to the Congressman's staff that perhaps the snowmobile interests were "asleep at the switch," as they had had their chance for input in the earlier public meetings and comment periods during the draft EA process.<sup>60</sup> Iversen also expressed his concern that the anti-snowmobile public would feel that the NPS was indecisive and vacillating on the matter of snowmobiles. Eventually, Melcher and Iversen agreed to hold two further public meetings to verify that the Park had properly considered all information on the subject.<sup>61</sup>

The NPS held the second round of public meetings in Kalispell, Montana, on May 25, 1976, and in Great Falls, Montana, on May 27, 1976. Superintendent Iversen began

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Montana., Feb. 14, 1976, "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>59</sup> Closure of Snowmobile Routes," Public Notice, Oct. 2, 1975, IN "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>60</sup> Phillip Iversen, Superintendent's Notes to the Files, Subject: Snowmobile Ban, March 15, 1976, "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>61</sup> "Snowmobiling in Glacier National Park," Briefing Statement, 1985, NPS, GNP, MT.

the meetings by noting that “in National Parks, prior to the establishment of snowmobile routes, *the burden of proof is on the Secretary of the Interior to prove no adverse effects on natural, aesthetic, or scenic values* [of the national parks],” (emphasis added)<sup>62</sup> citing section 4 of EO 11644 as his authority for this burden of proof.<sup>63</sup> In making this assertion, Iversen directly contradicted Anderson’s policy, which was to place the burden of proof upon those who brought the complaint against snowmobiles.

At the meetings in Kalispell and Great Falls, Glacier officials handed out questionnaires and accepted written comments from citizens expressing their opinions on snowmobile use in Glacier. Table 5 summarizes the comments:

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<sup>62</sup> Introduction by Superintendent Iversen, Public Meetings on Snowmobiles, May 25, 1976, IN “Snowmobile Comments” Box, GNP Archives, GNP, MT.

<sup>63</sup> “Iversen Sends Recommendation On Snowmobile Policy to Denver,” *Hungry Horse News*, (Hungry Horse, MT), Aug. 5, 1976.

Table 5. Summary of comments regarding snowmobile use in Glacier National Park, May/June, 1976.<sup>64</sup>

	In Favor of Snowmobiles in Glacier	Opposed to Snowmobiles in Glacier
Kalispell Public Meeting	101	94
Great Falls Public Meeting	94	22
Individual Letters Received	148	337
Group Letters Received	22	12
Names on Petition Received	2275	2712
<b>TOTAL</b>	<b>2668</b>	<b>3248</b>

Note: Numbers do not add to total numbers on original document from Glacier; no explanation is given.

Clearly, those opposed to snowmobiles outnumbered those in favor of snowmobiles in Glacier. In his briefing statement, Superintendent Iversen stated that

Over 90% of the comments opposed to snowmobile use related that concern to silence, tranquillity, or in other words, aesthetics. Because aesthetics are an emotion, a feeling, it is impossible to quantify [sic]. However, it is a very valid concern, and the National Parks represent, above all other values, an emotion, a feeling, which Americans can obtain only in a handful of other natural scenic places.<sup>65</sup>

Again, Iversen directly contradicted Anderson by stating that emotions and feelings are legitimate concerns in national parks. In contrast, while Anderson derided the emotional feelings of those who complained against his snowmobile policy, he appears to have based Yellowstone's pro-snowmobile policy on his own feelings regarding

<sup>64</sup> Compiled from "Snowmobiling in Glacier National Park," Briefing Statement, 1985, NPS, GNP, MT.

<sup>65</sup> "Iversen Sends Recommendation On Snowmobile Policy to Denver," *Hungry Horse News*, (Hungry Horse, MT), Aug. 5, 1976.

snowmobiles.

So, Iversen and his staff “stuck to their guns,” and kept the Park closed to snowmobiles. In one final act of public faith, though, they chose to reinforce public confidence in their decision-making process by selecting four citizens to review the public input and confirm the accuracy of their analysis. They appointed two persons representing snowmobile interests: Richard Kullberg, President of the North Montana Outdoor Recreational Vehicle Association and Lee Downes, former President of the Flathead Snowmobilers. To complement them, they appointed two persons representing environmental interests: Tom Horobik, President of the Montana Wilderness Association and Eugene Albert, representative of the National Parks and Conservation Association, Flathead Coalition, and Sierra Club. After reviewing the letters, tapes, petitions, and data gathered by the Glacier officials, the group of four confirmed their decision and commended them for having done an outstanding job in compiling the data in as fair and unbiased a manner as possible.<sup>66</sup>

The NPS in Glacier was finally able to publish its notice of closure of all snowmobile routes in the Federal Register dated April 28, 1977.<sup>67</sup> After nearly three years of work, Glacier’s administrators returned winter’s peace and tranquillity to their park.

Glacier and Yellowstone did communicate somewhat on their disparate policies,

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<sup>66</sup> “Snowmobiling in Glacier National Park,” Briefing Statement, 1985, NPS, GNP, MT.

<sup>67</sup> Ibid.

however futilely. Richard Munro of Glacier wrote Yellowstone on November 25, 1974, requesting any studies that the NPS there may have conducted on the effects of snowmobiles on their winter wildlife. Munro assumed that Yellowstone administrators had done an EA, and requested a copy of that as well.<sup>68</sup> He evidently received no response from Yellowstone's administrators, though—a tacit acknowledgment that they had not done an EA or any wildlife studies.

Later, Superintendent Iversen of Glacier discussed by telephone with Assistant Superintendent Haraden of Yellowstone the development of a joint statement to clarify the disparate policies on snowmobiles of the two parks.<sup>69</sup> No such statement, though, was ever issued. Rather, Superintendent Townsley (Haraden's superior and Anderson's successor) preferred to defer to the NPS's Rocky Mountain Regional Office for direction in reconciling the conflicting snowmobile policies of the two parks. He recognized that the management policies, enabling legislation and natural area guidelines for the two parks were similar and a better theme reconciling the differences in snowmobile policies was needed.<sup>70</sup> The response of the regional office was the ineffective statement that "Each park is unique, and the pressures, use patterns, and suitability of such use must be considered only in the context of the individual park."<sup>71</sup> Or, in other words, the

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<sup>68</sup> Richard J. Munro to Superintendent, Yellowstone, Nov. 25, 1974, IN "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>69</sup> Phillip Iversen, "Superintendent's Notes to the Files, Subject: Snowmobile Ban," Feb. 4, 1976, IN "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>70</sup> C. Robert Morey (Wilderness Specialist), Talk given to the Montana Snowmobile Association at Lewistown, Montana., Feb. 14, 1976, "Snowmobile Comments" Box, GNP Archives, GNP, MT.

<sup>71</sup> "Snowmobile Use," Regional Position Paper, 1976, IN "Snowmobile Comments" Box, GNP Archives, GNP, MT.

disparate policies were acceptable, even though Yellowstone had not performed an EA.

Incidentally, Haraden later became superintendent of Glacier National Park. In my interview with him, he stated that he was glad there were no snowmobiles there, but echoed the Regional Director in justifying the differences between the two parks' policies. He also stated that when James Watt became the new Secretary of the Interior in 1981, Montana snowmobile enthusiasts pressured Glacier to overturn its decision. Haraden told them that if they had new information to merit that overturn, he would consider it. Privately, he expected them to come forth with such, and to advocate opening the Park to snowmobiles one weekend per month. However, they never recontacted him, so the Park remains closed to snowmobiles.<sup>72</sup>

In summary, the NPS in Glacier spent two years in a conscientious, unbiased effort to comply with Nixon's executive order. Public pressure, despite snowmobiler complaints to the contrary, was clearly in favor of eliminating snowmachines from the Park. In making their decision, Glacier's administrators directly contradicted Yellowstone's by:

- 1) placing the burden of proof on Park administrators to prove that snowmobiles would not impact the individual Park;
- 2) holding public hearings, and following the will of the public;
- 3) valuing the Park's silence enough to eliminate snowmobiles on that key point;
- 4) admitting that snowmobiles affected wildlife, pack the snow very hard on the roads (making plowing difficult), pollute the air, and create visitor conflicts, and using all of these as reasons to eliminate them; and
- 5) accepting, and promoting, the role of emotions in managing a park.

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<sup>72</sup> Bob Haraden (former Assistant Superintendent of Yellowstone), interview by author, personal interview, Bozeman, MT, Nov. 11, 1997.

Yellowstone, by contrast, was dominated by an individual clearly biased in favor of snowmobiles and unwilling to listen to the will of the general public, which may have been opposed to snowmobiles there as well (though we will never know, since Anderson held no formal public hearings at that time<sup>73</sup>). The consequences of two park superintendents' actions are fairly clear now that twenty years have passed. Glacier is a quiet, peaceful winter retreat from a noisy world while the large numbers of snowmobiles entering Yellowstone are accompanied by most of the problems that Glacier's administrators cited in banning snowmobiles from their park.

#### Other National Parks and Snowmobiles

At the same time that administrators in Glacier and Yellowstone were determining their snowmobile policies, many other national parks in the snowbelt states were wrestling with their snowmobile policies as well. Administrators in many other parks also eliminated snowmobiles by listening to the public input they received when they did environmental analyses or held public hearings. Examples detailed below include Yosemite, Sequoia/Kings Canyon, Lassen, Grand Canyon, and Rocky Mountain National Parks.

Yosemite National Park in California provides the first comparison to Yellowstone. While snowmobiles never were permitted in Yosemite, its administrators responded to Nixon's Executive Order by retaining the prohibition. Shortly thereafter, they held

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<sup>73</sup> None of Anderson's associates that I interviewed could recall formal public meetings.

public hearings on the proposed General Management Plan (GMP) for Yosemite. At some of those meetings, snowmobile enthusiasts challenged their decision to retain the ban on snowmobiles.<sup>74</sup> However, the administrators, after extensive public meetings and a thorough public review regarding the GMP, found that over 80% of the comments received from the public regarding the GMP were opposed to snowmobile use in the Park.<sup>75</sup> The Sierra Snowmobiling Club challenged Yosemite's decision in court the next year,<sup>76</sup> but lost in U.S. District Court on November 25, 1975.<sup>77</sup> Snowmobiles are still prohibited from the Park, which is used heavily by cross-country skiers.

To the south of Yosemite, Sequoia/Kings Canyon National Parks (managed as one park) proposed at some time in the mid-1970's to open ten miles of the Mineral King area for snowmobiling. "This proposal went to public meetings for review and the consensus of the public was against establishing the routes by about two to one."<sup>78</sup> Consequently, the parks' administrators retained the ban on snowmobiles in these two southern Sierra parks. Again, snowmobiling is still prohibited within these two southern Sierra parks.

To the north of Yosemite, administrators at Lassen Volcanic National Park made a similar decision in 1974. In 1981, snowmobile advocates made a strong push to overturn

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<sup>74</sup> John Good (former Assistant Superintendent of Yosemite), interview by author, telephone interview, Mammoth, WY, Nov. 13, 1997.

<sup>75</sup> "Demonstration Urges Reopening Parks to Snowmobiles," *National Parks* 55(6): 23-24, June, 1981.

<sup>76</sup> "Court Decision Expected In Yosemite Snowmobile Case," *The Fresno Bee*, Fresno, CA, Nov. 9, 1975.

<sup>77</sup> "Acreages—Snowmobile Area," *Snowmobile Briefing Book, Vol. I*, unpublished black binder at YNP Research Library, YNP, WY, circa 1978.

<sup>78</sup> Ibid.

the decisions against snowmobiles in all four California national parks (as Chapter 3 details, this was probably part of an effort by Interior Secretary James Watt to open other national parks to snowmobiles). The effort focused on Lassen, probably because it is not as well known as its cohorts to the south. So, Lassen's administrators performed an EA on snowmobile use in Lassen in 1981. Additionally, they opened up a 19-mile stretch of the Park roads for the first week of each winter month from January to March, 1982-84, in order to evaluate the environmental and sociological impacts of establishing snowmobile routes in areas already heavily used by cross country skiers. Skiers outnumbered snowmobilers during the first winter by an 8-to-1 ratio (667 to 84); a 12-to-1 ratio (744 to 62) the second winter; and an 82-to-1 ratio (575 to 7) the last winter. Written comments opposed to snowmobiling in the park outnumbered those in favor of it by a 7-to-1 ratio (2,810 to 391).<sup>79</sup> Needless to say, in 1985, the NPS upheld its ban on snowmobiles in Lassen.<sup>80</sup>

Grand Canyon National Park saw a limited amount of snowmobiling on its north rim, and eliminated such use in 1974 based on Executive Order 11644.<sup>81</sup> Whether its administrators held any public hearings or did an EA is unclear.

Finally, administrators at Rocky Mountain National Park also did an EA in

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<sup>79</sup> Acting Regional Director, Western Region, to Director, National Park Service, Sept. 13, 1985, IN Lassen National Park files, Mineral, CA.

<sup>80</sup> "Finding of No Significant Impact, Snowmobile Use, Lassen Volcanic National Park," Sept. 30, 1985, IN Lassen National Park files, Mineral, CA.

<sup>81</sup> Acting Regional Director, Western Region, to Director, National Park Service, Sept. 13, 1985, IN Lassen National Park files, Mineral, CA.

response to the EO on snowmobiling, but concluded in the EA that snowmobiling on the west side of the Park would continue to be acceptable.<sup>82</sup> Extensive snowmobiling has developed in the last seven years, with the Park receiving around 24,000 snowmobiles per season on the west side in the last four winter seasons.<sup>83</sup> No snowmobiling was, or is still, allowed on the east side of the Park, which is much more accessible from the populous Denver/Front Range area. The park's administrators, like those of Glacier, again did an EA, even though they did allow snowmobiles.

So, administrators in at least four other national parks adhered to the EO by performing Environmental Assessments and/or holding public hearings on the topic of snowmobiles in their parks, and adhering to the will of the public. These administrators, then, and probably those in other national parks, adhered to the law as best they could.

Anderson expressed his opinion of these park superintendents who, in some cases, went to extraordinary lengths to discern the public opinion and the impact of snowmobiles on their parks (whatever the result), in the following:

I'm a little upset with some of my fellow superintendents. I sometimes think they are getting lazy when they want to ban snowmobiles simply because they are motor-powered vehicles. ...[T]hey just don't want to get involved because it sets up a debate and ... creates work for land managers. He'd [sic] much prefer to sit back and rest in the traditionally quiet parts of the year.<sup>84</sup>

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<sup>82</sup> Roger Contor (Superintendent of Rocky Mountain National Park) to Honorable William S. Moorhead (U.S. House of Representatives), Feb. 19, 1976, IN "Snowmobile Comments" Box, Glacier National Park Archives, GNP, WY.

<sup>83</sup> Jim Richardson (West District Ranger), interview by author, telephone interview, Rocky Mountain National Park, CO, Oct. 31, 1997.

<sup>84</sup> Jack Anderson, "Transcript of Conversation, Jack Anderson and Derrick Crandall," interview by Derrick Crandall, April 1, 1977 IN "Current Stuff" Section, *Snowmobile Briefing Book Vol. 1*, YNP Research Library, pp. 5-7.

Who's lazy here: the superintendents who held public meetings and performed environmental analyses, or the one that instead thrust his personal opinion on the Park without the meetings or analyses?

That is the extent to which Anderson considered the policies of other national parks toward snowmobiles. While he willingly sent other national parks, if they inquired, information about his snowmobile program,<sup>85</sup> there is no evidence that he ever consulted other national park managers regarding their views about and policies governing snowmobiles in the national parks.

It should be noted that Yellowstone today is not the only national park to allow significant numbers of snowmobiles. Table 6 lists the four parks with the highest numbers of visiting snowmobiles:

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<sup>85</sup> Three examples are Voyageurs National Park in Minnesota, (Alan Mebane to Project Manager, Voyageurs, Nov. 8, 1974, IN Box L-36, File L30: "Land & River Use General"); Lassen Volcanic National Park in California (Harold Estey to Superintendent, Lassen, Nov. 29, 1967, IN Box A-32, File A88: "Oversnow Vehicle Travel"); and Grand Canyon National Park in Arizona (Robert E. Sellers to Chief Park Ranger, Grand Canyon, Dec. 2, 1969, IN Box L-42, File L3427: "Recreation Activities 1969—Winter Sports (Oversnow Vehicle Use)"), ALL at YNP Archives, YNP, WY. There are at least three other national parks that Yellowstone administrators also sent information on their snowmobile program to.

Table 6. The four national parks with highest numbers of snowmobile visitors.

National Park, State	Maximum # of Snowmobiles per winter
Yellowstone	91,000
Voyageurs, Minnesota	30,000 <sup>86</sup>
Rocky Mountain, Colorado	24,000
Grand Teton, Wyoming	4,750 <sup>87</sup>

Note that Yellowstone allows as many as 32,000 more snowmobiles than the other three parks do, combined. In my survey of all U.S. national parks regarding snowmobile use, I found no other national parks that allow more than 500 snowmobiles per winter.<sup>88</sup> With such a large difference, it is safe to say that Yellowstone allows more snowmobiles than all other national parks combined. This incredibly high level of snowmobile use makes one wonder if Yellowstone ever gave any serious consideration to the potential for such visitation to reach this level of use.

### Exploding Use & Projections of the Future

With the advent of the private snowmobile and an administration willing to do almost anything to encourage its use in Yellowstone, snowmobile use of the Park boomed during the late 1960's and early 1970's. Table 7 illustrates the increase in

<sup>86</sup> Personal communication with Barbara J. West, Jan.17, 1997, Voyageurs National Park, MN. In a promotional brochure West enclosed with her letter to me, Voyageurs is advertised as the "undiscovered Yellowstone."

<sup>87</sup> Personal communication with Jack Neckels, Superintendent, Nov. 4, 1997, Grand Teton National Park, WY.

<sup>88</sup> I conducted the survey in January, 1997, and received responses from the following national parks: North Cascades, Olympic, Mt. Rainier, Crater Lake, Lassen, Yosemite, Sequoia/Kings Canyon, Zion, Bryce Canyon, Grand Canyon, Great Basin, Grand Teton, Glacier, Rocky Mountain, Denali, and Voyageurs.

visitation during this time period.

Table 7. Winter Visitation to Yellowstone National Park, 1967-73<sup>89</sup>

Year	Visitation type	Concessioner Snow-coaches	Private Machines	Total for Season	Percent Increase over Previous Year
1966-67	Machines	349	1,544	1,893	n/a
	People	3,045	2,173	5,218	96.0%
1967-68	Machines	748	2,352	3,100	63.8%
	People	4,359	3,425	7,784	49.2%
1968-69	Machines	728	4,726	5,454	75.9%
	People	4,249	6,076	10,325	32.6%
1969-70	Machines	504	8,206	8,710	59.7%
	People	4,238	10,978	15,216	47.4%
1970-71	Machines	625	11,614	12,239	40.5%
	People	5,241	14,188	19,429	27.7%
1971-72	Machines	679	17,436	18,115	48.0%
	People	5,529	20,271	25,800	32.8%
1972-73	Machines	602	26,826	27,428	51.4%
	People	3,846	31,771	35,620	38.1%
1973-74	Machines	698	30,513	31,211	13.8%
	People	4,425	35,655	40,080	12.5%
1974-75	Machines	776	26,400	27,176	-12.9%
	People	5,537	30,763	36,300	-9.4%

It is possible to make several observations based on Table 7. Most obvious is the tremendous increase in both numbers of snowmachines and visitors during this time period, until the last year, when visitation dropped, probably due to the national energy

<sup>89</sup> Summary Record of Snowmobile Use, Yellowstone National Park, 1966 through April, 1978, IN Box K-57, File "Winter Activities," YNP Archives, YNP, WY.

crisis in 1973-75. However, while the number of snowcoaches entering Yellowstone increased by “only” 222% over the six-year period, the number of snowmobiles entering Yellowstone multiplied by a factor of 19.8 or a 1,976% increase (based on the difference between 1966-67 and the peak year of 1973-74). Note also that the increase in numbers of snowmobiles from 1971-73 was more than that of all the previous years combined—an increase largely facilitated by the decision of Yellowstone’s administrators to regularly groom their roads in 1971. In summary, visitor use of the Park in winter exploded during this time period, largely because private snowmobiles became available and because the park’s administrators began to groom the roads for the comfort of the visitor.

Yellowstone’s administrators paid careful attention to the growth in visitation, as Ranger James Fox said succinctly: “The key word in snowmobile use within the Park ... is growth.”<sup>90</sup> Chief Park Ranger Harold Estey was more elaborate, but still clear, in stating “the interest, participation, and activities associated with snowmobiling continue to rapidly grow, and this tremendous growth continues to amaze nearly all persons ...one thing seems to be certain and that is the number of persons engaged in snowmobiling will continue to double each year for at least the next two years.”<sup>91</sup> As Table 7 shows, Estey was not too far from the mark.

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<sup>90</sup> James E. Fox to West District Ranger, May 3, 1970, IN Box A-36, File L34: “Recreation Activities 1970,” YNP Archives, YNP, WY.

<sup>91</sup> Chief Park Ranger Harold Estey to Superintendent, June 2, 1969, IN Box A-32, File A88: “Oversnow Vehicle Travel,” YNP Archives, YNP, WY.

In response to the growth in visitation, Park administrators seemed to again feel helpless, evidenced by the comment in the Staff Meeting Minutes for November 23, 1971: "We are unable to do much to counter these increased uses."<sup>92</sup> While they could not do much about events and trends outside of the Park, they did, and do, have exclusive control over the Park. Further, they did help facilitate this increase by beginning the grooming program. In fact, Anderson himself said it best, "The increase in use just came automatically almost simply because we had started grooming."<sup>93</sup> While they may have felt helpless to counter the galloping increases, they nevertheless did their part in facilitating them.

Yellowstone's administrators, however, were only selectively helpless, as they did counter increased uses in other management areas. For example, to control exploding use of the Park's backcountry, administrators restricted backcountry overnight use to about 300 campsites per night in the same time period. Perhaps administrators felt helpless because their boss Anderson looked forward to snowmobiling to increase in the Park.<sup>94</sup> And perhaps Anderson's enthusiasm for the machines explains the lack of long-range planning for the snowmobile program at this time. In fact, it was not until 1990 that park administrators began to do some long-range planning on their snowmobile program (see

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<sup>92</sup> Staff Meeting Minutes for Nov. 23, 1971, IN Box A-37, File A40: "Conferences & Meetings 1971," YNP Archives, YNP, WY.

<sup>93</sup> Jack Anderson, "Interview with Jack Anderson, former Park Superintendent," interview by Robert Haraden and Alan Mebane, June 12, 1975, IN Drawer 3, Tape 75-3, YNP Research Library, YNP, WY.

<sup>94</sup> Dale Nuss (former Park Ranger, Yellowstone), interview by author, personal interview, Bridger Canyon, MT, Nov. 11, 1997.

chapter 4).

### Chapter Conclusion

Jack Anderson served as Yellowstone's superintendent from 1967 to 1975. Once he formalized and instituted the snowmobile program, he adopted that as his personal mission. His zeal for the program blinded him to the environmental consequences of his actions, leading him to pass off the concerns of his staff regarding the noise, wildlife and vegetation impacts, and air pollution of snowmobiles as baseless and emotional. Likewise, he neglected to perform any environmental analysis on his decision to groom the roads and open the Snowlodge, and did not respond to Nixon's Executive Order as he should have. Finally, Anderson showed a careless disregard for the sincere concerns and actions of his fellow park superintendents.

Had Anderson taken the time to examine the concerns his employees raised and/or the actions of his fellow superintendents, he might have realized the environmental problems that existed at the time and/or grew to be very serious by the 1990's. Moreover, an EA or EIS on his actions might have more clearly demonstrated the potential for growth that snowmobiling in Yellowstone had—and the increased problems resulting from that increased growth. Had he listened to the concerns of his employees and visitors, he might have realized how far out of line he was already, and how destructive his policies would prove themselves to be.

But as regards snowmobiles in Yellowstone, Anderson did no environmental

review, did not listen to his staff or hold public hearings, and paid no attention to his fellow superintendents. He did open the Park, began grooming the trails, opened the Snowlodge, and publicized his new policy, because he “liked snowmobiling personally.”<sup>95</sup> For his efforts, the International Snowmobile Industry Association (ISIA) awarded him their First International Award of Merit in 1973, recognizing his “enlightened leadership and sincere dedication to the improvement and advancement of snowmobiling in the United States.”<sup>96</sup> It is questionable whether his leadership as regards snowmobiles was “enlightened,” but otherwise, the ISIA could not have said it better.

In this way, one man started the world’s first, most respected national park on its way to allowing more snowmobiles than all other national parks combined. While his succeeding superintendent, John Townsley, would encourage snowmobiling in Yellowstone as well, recent park administrators have, for the most part, been left to deal with the problems of snowmobiling that Anderson would have discovered had he cared to do so. Anderson had numerous opportunities to evaluate his new policy, yet consistently failed to do so.

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<sup>95</sup> Joe Halladay (former Ranger Naturalist, Yellowstone), interview by author, personal interview, Belgrade, MT, May 29, 1997.; and author’s personal interviews Meagher, Nov. 3, 1997, Nuss, Nov. 11, 1997, and Mernin, Nov. 11, 1997.

<sup>96</sup> Michael Frome, *Regreening the National Parks* (Tucson: University of Arizona Press, 1992), 197-98. The quote is taken directly from the award, which a park ranger recently rediscovered in a dusty closet at Mammoth Hot Springs, Yellowstone.

### CHAPTER 3: EXPANDING THE SNOWMOBILE POLICY: 1972-83

*Our present [snowmobile] philosophy is ... a non-working monster that is virtually unworkable without a great deal more money and manpower. The snowmobiling is snowballing faster than we can plan or fund for it.*

Richard (Terry) Danforth, 1974.<sup>1</sup>

Anderson's successor, John Townsley, adopted the promotion of winter in Yellowstone with almost as much zeal as Anderson. From 1972-83, he (and Anderson) further developed Yellowstone's new snowmobile policy in a series of actions. By 1977, they had expanded the road-grooming program to cover all interior park roads and to mollify all local interests. The increasing traffic on the roads made warming huts and an information program necessary. Increasing traffic also led to expansion of the number of rooms offered for overnight accommodation at the Snowlodge, as well as the reopening of the Mammoth Hot Springs Hotel in 1982. The park's winter program had become so popular that, by 1981, they and surrounding constituents were able to defend the winter program successfully from possible shutdown by Interior Secretary James Watt in 1981-82.

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<sup>1</sup> Richard T. Danforth (West Yellowstone Sub-district Ranger) to Superintendent, Aug. 12, 1974, IN Box N-115, File L3427: "Winter Sports Oversnow Vehicle Use," YNP Archives, YNP, WY.

### John Townsley's Snowmobile Policy Affirmation

Jack Anderson retired from the Superintendency of Yellowstone in June, 1975 and died in Ashland, Oregon, in 1985 of a heart attack.<sup>2</sup> Replacing him in August, 1975 was John Townsley. Townsley was the son of a ranger in Yosemite National Park, and spent his career working his way up through the NPS. He transferred to Yellowstone from the National Capital Parks in Washington, D.C.<sup>3</sup>

Gary Everhardt, assistant superintendent under Anderson, had, by this time, been promoted to the Director of the National Park Service in Washington, D.C. Everhardt, fondly supporting Yellowstone's snowmobile policy, directed Townsley to continue expanding the Park's snowmobile program. Townsley internalized Everhardt's directive as a personal conviction, believing that all people should see Yellowstone in winter.<sup>4</sup> In fact, by 1977, Townsley's efforts to promote the snowmobile use of Yellowstone earned him the distinction of serving on a special task force of the NPS to develop a service-wide policy on public use of snowmobiles in national parks.<sup>5</sup> The task force essentially

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<sup>2</sup> "Former Yellowstone Superintendent Anderson Dies," NPS Press Release dated Nov. 5, 1985, IN Box W-171, File K34: "Press Releases," YNP Archives, YNP, WY.

<sup>3</sup> "Yellowstone Park chief dies of cancer," *Bozeman Daily Chronicle*, Sept. 21, 1982.

<sup>4</sup> Author's interviews with Halladay, May 29, 1997., Meagher, Nov. 3, 1997 and Mernin, Nov. 11, 1997.

<sup>5</sup> *1977 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, p. 37. The task force most likely convened in response to President Carter's Executive Order 11989, which strengthened Executive Order 11644, regulating the use of Off-Road Vehicles (ORV's) on public lands. Widespread fear-mongering in the snowmobile industry before Carter issued his EO led many to believe he would eliminate snowmobiles from public lands altogether. In response, the International Snowmobile Industry Association wrote him and organized a campaign to distinguish snowmobiles from other ORV's, based on the fact that snowmobiles contacted snow, not ground, and therefore, to go easy on the snowmobiles ("Total ban on off-road vehicles not intended," *Billings Gazette*, March 29, 1977). Carter's EO, though, did not flatly eliminate them, and has been interpreted by the courts as lacking regulatory teeth (*Sierra Club v. Clark*, 756 F. 2d 1276).

affirmed what Yellowstone administrators already believed—that the snowmobile was as appropriate to national parks in winter as the automobile was in summer. Townsley himself said it best: “I see the snowmobile in Yellowstone as a way of traveling within the Park to see, to enjoy, to understand, and to appreciate the extraordinary animal and thermal resources that are here[. This] is the essence of my feeling about snowmobiling in Yellowstone.”<sup>6</sup> This policy became the official position of the National Park Service in Yellowstone towards snowmobile use there.<sup>7</sup>

Like Anderson, Townsley too promoted the winter experience in Yellowstone. He advertised his snowmobile program by regularly offering and giving tours of the Park in winter via snowmobile to local, regional and national politicians.<sup>8</sup> Such tours included the Montana congressional delegation to the U.S. Senate and House, the Senate and House budget committees, and the Secretary and Under Secretary of the Interior.<sup>9</sup>

While he promoted the snowmobile experience, Townsley did have the sense to deny a person permission to “jump a snowmobile over the geyser [Old Faithful] while it is emitting water and steam.”<sup>10</sup> In more revealing instances of what Townsley and his

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<sup>6</sup> John Townsley to Rosemary Johnston, Feb. 18, 1977, IN Box A-189, File A40: “Conferences & Meetings—1977 General,” YNP Archives, YNP, WY.

<sup>7</sup> “The Oversnow Vehicle in Yellowstone National Park,” talk presented by John Townsley at the Montana Snowmobile Association Annual Meeting in Fairmont Hot Springs, Feb. 5, 1977. The same text is included as the “Position Statement” in *Snowmobile Briefing Book Volume 1*, black binder at the YNP Research Library, YNP, WY.

<sup>8</sup> Joe Halladay (former Ranger Naturalist, Yellowstone), interview by author, personal interview, Belgrade, MT, May 29, 1997.

<sup>9</sup> Secretary (of the Interior—James Watt) to John Townsley, Dec. 31, 1981, AND Under Secretary to John Townsley, Jan. 11, 1982, IN Box A-1: Correspondence to and from John Townsley, YNP Archives, YNP, WY.

<sup>10</sup> Jerry R. Phillips (Acting Chief Park Ranger) to William M. Kirkpatrick, Jr. (Attorney at Law), Jan. 24, 1977, IN Box W-129, File W46: “General Regulations ’75, ’76, ’77,” YNP Archives, YNP, WY.

staff deemed to be appropriate in Yellowstone, they denied permission to parties wishing to take dog teams into the Park in winter.<sup>11</sup> Clearly, motorized vehicles were the preferred means of travel within Yellowstone in winter, as long as they were not used for Evil Knieval-type stunts.

In 1975, snowmobile advocates sought greater access to the Park by advocating that the Park's administrators lower the minimum age for snowmobile operation from sixteen years of age to twelve, or even eight, years. The park responded that "we are convinced that some modification of our existing regulation could be made that would enable responsible parents to provide the degree of supervision and direct control of their youngsters necessary for them to safely operate an oversnow vehicle within Yellowstone."<sup>12</sup> Attentive to the needs of the snowmobilers they welcomed, Yellowstone administrators had, by the end of that year, changed their regulations to allow 12-to-16-year-olds to operate snowmobiles in Yellowstone when under the direct supervision of a parent or guardian 21 years of age or older and always within 50 yards of the parent or guardian.<sup>13</sup> With the exploding snowmobile numbers of the 1980's and 1990's, Yellowstone's administrators would revoke this rule for safety reasons and as a small means of controlling the numbers of entering snowmobiles in the 1990's.

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<sup>11</sup> Robert E. Sellers (Acting Chief Park Ranger) to Randy Camper, Nov. 7, 1975, AND Harold J. Estey (Chief Park Ranger), to Cameron A. Daggett, March 4, 1976, IN Box W-129, File W46: "General Regulations '75, '76, '77," YNP Archives, YNP, WY.

<sup>12</sup> Robert E. Sellers (Acting Chief Park Ranger) to W. C. Shields (British Columbia Snow Vehicle Association), May 30, 1975, IN Box W-129, File W42: "Special Regulations 1973-75," YNP Archives, YNP, WY.

<sup>13</sup> *1975 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY.

By adopting Yellowstone's snowmobile program as his personal passion and promoting it as he did, Townsley further cemented the Park's novel program into place. While actions such as giving tours to persons of power and reducing the legal snowmobile driving age exemplified Townsley's commitment, he took several larger actions that intensified snowmobile use from 1975 to 1982.

#### Expanding the Winter Involvement of the National Park Service in Yellowstone

As discussed earlier, Yellowstone administrators began the road grooming program in 1971 by grooming only the more heavily-traveled roads on the west side of the Park. Because fewer snowmobilers traveled the roads on the east side of the Park—from Canyon to Lake and on to West Thumb—administrators did not groom these roads as regularly. By 1973, however, they were grooming all roads on an as-needed basis.<sup>14</sup>

The East Entrance route over 8,500-foot Sylvan Pass, however, presented a unique set of hazards. While the pass is not the highest road in the Park (Dunraven Pass is 300 feet higher), it does have an area of steep, rocky, avalanche-prone slopes right at the pass. Avalanches occur so regularly that trees are unable to grow on the slopes. Despite its obvious hazards, though, commercial representatives in Cody, the nearest community to the East Entrance, were by 1971 urging the YPCo. to provide the East Entrance with regularly-scheduled snowcoach service similar to what the other entrances had, and by

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<sup>14</sup> Linda Paganelli, "The Historical Development of Winter Visitor Use at Yellowstone National Park," 1980, YNP Research Library Vertical Files, YNP, WY, p. 20. Note that Paganelli does not provide a source for this claim, and I could not find a source to confirm her claim. Consequently, it should be used with some caution.

implication, that the Park's maintenance department put more work into maintaining the East Entrance route to make such a service possible.<sup>15</sup> Park officials responded that keeping the road open would involve a great deal of planning, money and staffing.<sup>16</sup> By 1976, though, they were maintaining it on an as-needed basis, which mainly meant dislodging new snowfall with a 105 mm. gun, and then spending up to three days clearing the triggered avalanche and grooming the road. With such a schedule, and with the severe storms that happen periodically in winter, the road could be closed altogether for several days.<sup>17</sup> Further, between such storms the road was probably not groomed at all, due to its low level of use.

This casual method of grooming evidently was not satisfactory to the merchants of Cody, since they complained that the frequent closings meant it was impossible to plan an outing in Yellowstone more than one or two days in advance, making any business ventures dependent upon a road that was regularly open difficult or impossible to develop. Since the other entrances were all maintained regularly (the others have much less avalanche danger), the merchants in West Yellowstone, Montana, and Jackson, Wyoming had an "unfair advantage." Hence, the Cody Country Snowmobile Association called upon the Park to maintain the East Entrance on the same regular

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<sup>15</sup> Henry J. Dais (Manager, Cody Country Chamber of Commerce) to John Amerman (General Manager, YPCo.), March 19, 1971, IN Box L-36, File L3427: "Recreation Activities, Winter Sports," YNP Archives, YNP, WY.

<sup>16</sup> John D. Amerman to Henry J. Dais, April 7, 1971, IN Box L-36, File L3427: "Recreation Activities, Winter Sports," YNP Archives, YNP, WY.

<sup>17</sup> Jim Miller, "Are there snowmobiles in Cody's economic future?," *Cody Enterprise*, Cody, WY, Feb. 4, 1976.

schedule that the other gates were maintained.<sup>18</sup>

The pressure worked, since the Park administrators soon purchased a new Thiokol-type grooming machine and stationed it at the East Entrance for the 1976-77 winter season. Additionally, they replaced the 105 mm. gun with a new 75 mm. snow-gun for shooting and dislodging avalanches at Sylvan Pass. The new, smaller gun's shells cost only 5% of what the larger gun's shells did, and were almost entirely biodegradable.<sup>19</sup> Hence, with a less expensive gun to use, and a grooming machine stationed at the gate, Park administrators began regular grooming of the East Entrance road, mollifying the commercial interests in Cody and further facilitating snowmobile visitation.

In addition to expanding the grooming program in the above manner, Townsley also expanded it by making it more efficient. He accomplished this by moving the four grooming machines stationed at Mammoth to the interior of the Park, where they could be used more efficiently, not spending as much time "deadheading" (traveling directly to a location in the park without grooming enroute) as they had before. Additionally, he moved the East Entrance machine to Lake (a year or two after it was stationed at the East Gate), where it could be used to regularly groom the Lake-area roads as well as the East Entrance.<sup>20</sup> Eventually, the machines were located at the following places: two machines at Madison to serve the heavily traveled West Yellowstone to Old Faithful route; one at

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<sup>18</sup> Ibid.

<sup>19</sup> Jim Miller, "Park buys equipment: Sylvan stays open for snowmobiles," *Cody Enterprise*, Cody, WY, Sept. 29, 1976.

<sup>20</sup> Joe Halladay (former Ranger Naturalist, Yellowstone), interview by author, personal interview, Belgrade, MT, May 29, 1997.

Mammoth to groom the road from there to Canyon; one at Lake to groom the roads in that area; and the last at Grant Village to groom the roads in the southern part of the Park.<sup>21</sup> In addition to relocating the grooming machines, Townsley also improved the efficiency of the grooming program by altering the grooming schedule. By directing his staff to groom in the evening, they could use the falling evening temperatures to produce more durable snow roads, since the snow hardens, or “sets” as the temperature falls. Previously they had groomed by day, when the snow is softer, which produced a snow road more easily disturbed by snowmobilers.<sup>22</sup>

With increased numbers of winter visitors, Yellowstone’s administrators found that they needed to provide for the physical needs of those visitors. Hence, in the winter of 1976-77, the administrators installed warming huts at Canyon and at Madison. Warming huts were buildings that served as “welcome relief to the cold snowmobilers and cross-country skiers,” as they contained wood stoves and, within a few years, fast food service.<sup>23</sup> Because the warming hut at Madison was initially a three-sided shelter open to the elements on the fourth side, the administrators replaced it in 1982 with a 12 X 60 foot trailer similar to the one at Canyon. This trailer had a hot food-vending service included at one end.<sup>24</sup> These two warming huts are still in place today, and are

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<sup>21</sup> Lynn H. Thompson (Regional Director of the NPS) to Honorable Hubert H. Humphrey (U.S. Senator), April 8, 1976 (Draft), IN Box D-78, File D30: “Roads & Trails,” YNP Archives, YNP, WY.

<sup>22</sup> Joe Halladay (former Ranger Naturalist, Yellowstone), interview by author, personal interview, Belgrade, MT, May 29, 1997.

<sup>23</sup> *1977 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, pp. 11 and 16.

<sup>24</sup> *1983 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, p. 13.

complemented by additional warming huts at West Thumb Geyser Basin, Fishing Bridge, Old Faithful, Indian Creek, and Mammoth Hot Springs/Upper Terraces (these others lack food services).

Administrators also found that they needed to provide information to the expanding group of winter visitors. By 1971 (probably occasioned by the opening of the Snowlodge), the administrators had opened the visitor center at Old Faithful to assist those visiting that area with their questions.<sup>25</sup> Furthermore, administrators found their new warming huts to be natural places to disseminate information. Hence, beginning in the first winter of the warming hut existence, the Division of Interpretation of the NPS stationed naturalists at the Canyon and Madison warming huts to talk to the snowmobilers and disperse information. This information program is still offered today, although the staffing levels have fluctuated, and the program has occasionally expanded to include the Fishing Bridge and West Thumb warming huts. Finally, Yellowstone's administrators staffed an information center in West Yellowstone from 1977 to 1981 to provide information to winter visitors before they headed into the Park.<sup>26</sup> This information center was resurrected in 1995, albeit in a different building and on a year-round basis.

Yellowstone's administrators instituted this winter information program, like much

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<sup>25</sup> Joe Halladay (former Ranger Naturalist, Yellowstone), interview by author, personal interview, Belgrade, MT, May 29, 1997. Note that park administrators opened the new visitor center at Old Faithful for winter service before they formally dedicated it in summer, 1972.

<sup>26</sup> *1977 Annual Report of the Superintendent, Yellowstone National Park*, pp. 11 and 16.

of their winter operation, at the cost of their summer program. While Congress has occasionally allocated additional funds expressly for Yellowstone's winter program, the administrators have more often "had to cut into [their] summer operation" to make the winter program possible.<sup>27</sup>

Townsley, then, further cemented Yellowstone's snowmobile program into place by expanding the grooming program and its efficiency, and by providing the warming huts and visitor information services, sometimes to the detriment of the summer program. He further expanded Yellowstone's winter operation by expanding the concessionaire's involvement.

#### Expanding Concessionaire Involvement

Along with expanding the involvement of the NPS in the winter operation, Townsley also directed the YPCo. to expand their involvement by enlarging the Old Faithful Snowlodge and by reopening the Mammoth Hot Springs Hotel.

When the Snowlodge first opened for winter visitation, the only rooms available were rooms that doubled as employee dorm rooms. The rooms were very simple and lacked private baths, making it necessary for the guest to walk down the hall to use communal showers and toilets. While these rooms, no matter how simple, were better than sleeping on the public restroom floor as people had been doing, the company must have felt the demand for rooms with a private bath. Accordingly, in 1973, the company

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<sup>27</sup> *Annual Report of the Superintendent, 1978*, YNP Research Library, YNP, WY, p. 13.

winterized twenty cabins with private bathrooms behind the Snowlodge and opened them for use in the 1973-74 winter season.<sup>28</sup>

Six years later the company again expanded its operation at Old Faithful Snowlodge. In the winter of 1979-80, TWA Services, which took over the main park concession from YPCo. in 1979, opened the Obsidian Employee Dorm as “Snowshoe Lodge,” immediately behind the Snowlodge. Snowshoe Lodge had rooms with bath, and was partly inhabited by employees during the first few years of its operation.<sup>29</sup> With the opening of Snowshoe Lodge and the cabins, the company now had approximately 100 rooms for rent per night. The current Snowlodge is still the same size.

The commitment begun by Anderson and expanded by Townsley continues today with the Snowlodge and its 20 cabins and Snowshoe Lodge. AmFac Parks & Resorts, the current park concessionaire (since 1979, the main park concessionaire has traded hands four times; AmFac is the most recent owner of that concessionaire) is, however, currently constructing a new Snowlodge to replace the existing one. After 25 years of operating a building that was never intended for its existing use, and was architecturally out of place in the Old Faithful historic district, the company is constructing the new Snowlodge, per NPS directive, at the cost of about \$8 million. The new building will be completely winterized, and will complement the other largely wooden buildings at Old

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<sup>28</sup> *1973 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, p. 2; AND “Snowtime in Yellowstone and Yellowstone Country, Winter Season 1973-74,” brochure advertising the winter season, AmFac Parks & Resorts Executive Offices, YNP, WY.

<sup>29</sup> Personal communication with Jean McCreight, Executive Secretary for AmFac Parks & Resorts, Nov. 3, 1997, Mammoth Hot Springs, WY.

Faithful.

Efforts to provide accommodations for winter visitors did not stop at Old Faithful, however. In 1982, Townsley directed that TWA Services reopen the Mammoth Hot Springs Hotel for winter use due to the increased popularity of winter activities, despite the company's reluctance to do so based on its unsuccessful record in the 1960's.<sup>30</sup> The hotel opened with guest rooms in Aspen Lodge (another summer employee dorm) and the hotel itself, as well as the dining room. The hotel offered snowcoach tours, snowmobile rentals, cross-country ski rentals, and sleigh rides.<sup>31</sup> The company dropped the sleigh rides a few years later when the horses pulling the sleigh escaped control and crashed into a parked Porsche, "totaling" it.<sup>32</sup> The Mammoth Hotel, unlike the Snowlodge, and reminiscent of its 1960's performance, was not an instant success, attesting to the validity of the concessionaire's reluctance. However, by its third season in the 1980's, the hotel managed to become marginally profitable.<sup>33</sup> AmFac Parks and Resorts continues to operate the hotel and its snowcoach, snowmobile, and skier services today, even though it continues to be only marginally profitable (at best).

According to Mary Meagher, "Townsley wouldn't have been about to do an EA" on

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<sup>30</sup> Mary Meagher (research biologist, Yellowstone), interview by author, telephone interview, Gardiner, MT, Nov. 3, 1997.

<sup>31</sup> *1982 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, pp. 6-7.

<sup>32</sup> Mary Meagher (research biologist, Yellowstone), interview by author, telephone interview, Gardiner, MT, Nov. 3, 1997.

<sup>33</sup> *Ibid.*, AND *1984 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, p. 6.

the environmental effects of opening the Mammoth Hot Springs Hotel, because, by the time he and TWA Services decided to open it, Townsley was ill with cancer, making it difficult to get ideas through to him.<sup>34</sup> Confirming Meagher, I can find no record of any environmental analysis done on the effects of opening the Mammoth Hotel.

By expanding the Snowlodge and opening the Mammoth Hotel, Yellowstone's administrators and Park concessionaire directors became ever more committed to the winter program. Townsley's efforts to expand the winter program "paid off" through increased visitation during most of this time period. By 1981, the program was so popular that over 100,000 people were visiting the Park in the winter (see Table 8)—popular enough, in fact, to stave off a major threat to it from the new Secretary of the Interior.

#### Playland Threatened by Watt

Table 8 illustrates the growing visitation during the 1974-83 period.

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<sup>34</sup> Mary Meagher (research biologist, Yellowstone), interview by author, telephone interview, Gardiner, MT, Nov. 3, 1997.

Table 8. Winter Visitation to Yellowstone National Park, 1974-83.<sup>35</sup>

Winter (Dec. 1-March 31)	Total Number of Visitors
1974-75	69,729
1975-76	63,807
1976-77	56,432
1977-78	93,548
1978-79	93,649
1979-80	111,926
1980-81	94,413
1981-82	104,915
1982-83	71,563

Note: Total numbers of visitors are greatly increased over previous years because these numbers include automobile passengers touring the road from Mammoth to Cooke City, while Tables 2, 3, and 7 include only visitors entering via snowmachine.

Clearly, the program initiated by Anderson and affirmed by Townsley was “bearing fruit,” as thousands of Americans began to visit and spend money in and around Yellowstone during its once-closed period.

In 1980, Ronald Reagan was elected President of the United States. Pursuing an agenda that favored big business over environmental protection, Reagan appointed his friend James Watt to the position of Secretary of the Interior. Once he assumed his position, Watt did his best to gut the funding and protections of the national park system. He sliced Yellowstone’s budget, and proposed closing the Park in winter, as a means of saving money.<sup>36</sup>

The public revolted against Watt’s idea by writing numerous letters to Yellowstone

<sup>35</sup> Source is “Seasonal Visitation Statistics,” flyer available from the Visitor Services Office, NPS, YNP, WY.

<sup>36</sup> Pat Williams (former U.S. Representative of Montana), interview by author, personal interview, Missoula, MT, April 22, 1997.

administrators urging them to keep the Park open in winter. Administrators received at least eighty letters from individuals, ten letters from snowmobile organizations, and one petition with 41 signatures, all urging Townsley to keep the Park open in winter.<sup>37</sup> Townsley responded by deciding to keep the Park open in winter, but with some reductions in road grooming services on the east side of the Park and reductions in the numbers of seasonal rangers and naturalists available.<sup>38</sup>

The Wyoming and Montana congressional delegations responded to the public revolt as well, urging Watt to keep the Park open in winter. They even arranged a visit for Secretary Watt and his family to Yellowstone that winter. From Dec. 19-21, 1981, Watt, his wife, one of his sons; Under Secretary Donald Hodel, his wife and son; Senator Malcolm Wallop (R-WY); Congressman Dick Cheney (R-WY); Congressman Larry Craig (R-ID); Senator Steve Symms (R-ID) and wife; and Governors Ed Hirschler and Ted Schwinden of Wyoming and Montana, respectively, all took a red-carpet tour of Yellowstone courtesy of the NPS. The group began with dinner at Superintendent Townsley's house on the evening of Dec. 19, then toured most of the Park's roads by snowmobile the next day, spending the night at Old Faithful. They finished at the South Entrance on Dec. 21.<sup>39</sup> According to former U.S. Representative Pat Williams, Watt was

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<sup>37</sup> Compiled from Box A-112, File A36: "Protest letters re: Winter Closing of 1981," YNP Archives, YNP, WY.

<sup>38</sup> "Winter Opening Scheduled for Yellowstone National Park," Press Release dated Aug. 18, 1981, IN Box A-112, File A36: "Protest letters re: Winter Closing of 1981," YNP Archives, YNP, WY.

<sup>39</sup> *1981 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, p. 69.

convinced by his trip to keep Yellowstone open.<sup>40</sup> There is no further record of any closure challenge to the winter program in the 1980's.<sup>41</sup>

It is clear that Townsley did his best to keep the Park open. In light of the problems that snowmobiles have since been found to present to park management, today's park managers would probably have viewed Watt's challenge as a golden opportunity to get rid of a problem without being the scapegoats: by using Watt's initiative, they could have eliminated snowmobiles from Yellowstone and diverted the criticism from local affected interests onto him. But Townsley, being fond of snowmobiling in Yellowstone, did not avail himself of that opportunity.<sup>42</sup>

#### Chapter Conclusion

Townsley demonstrated through his actions and personal statements that his views regarding snowmobiles in Yellowstone were similar to Anderson's. He, like Anderson, personally adopted the snowmobile program of Yellowstone as his pet crusade. He expanded the commitment of the NPS to snowmobiling by expanding the grooming program, opening several warming huts, and expanding the winter naturalist program. Furthermore, he expanded the concessionaire involvement by expanding the Old

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<sup>40</sup> Pat Williams (former U.S. Representative of Montana), interview by author, personal interview, Missoula, MT, April 22, 1997.

<sup>41</sup> Evidently, though, Watt found his snowmobile tour of Yellowstone so enjoyable that he next directed his energies to opening other national parks to snowmobiles, such as Lassen Volcanic National Park in California ("Watt Gets Snowmobiles into Lassen Volcanic," *National Parks* 56(3/4): 34).

<sup>42</sup> Mary Meagher (research biologist, Yellowstone), interview by author, telephone interview, Gardiner, MT, Nov. 3, 1997.

Faithful Snowlodge and reopening the Mammoth Hot Springs Hotel. Finally, Townsley piloted his snowmobile program through its only major challenge to date, an effort by James Watt to shut it down.

For his efforts, the International Snowmobile Industry Association (ISIA) awarded its International Award of Merit in 1981 to Townsley—the same award that Anderson won. In presenting Townsley with his award, ISIA Chairman M. B. Doyle stated that

while others believe parks should go into hibernation in winter, John Townsley operates under a management philosophy which actively seeks to welcome people to this special season. ... Snowmobilers, local tourism industry leaders and other governmental officials ...recognize his personal commitment to bringing persons enjoying a variety of outdoor winter activities into harmony with each other and the Park resource they are experiencing.<sup>43</sup>

The Director of the NPS, Russell Dickenson (who replaced Everhardt), commended Townsley for his efforts “to see ... that the resources of Yellowstone National Park are able to be enjoyed by visitors at all times of the year. The award you are to receive ... demonstrates the international importance of America’s first national park and of the work in which you are engaged.”<sup>44</sup> Townsley had indeed succeeded in following Everhart’s directive to bring Yellowstone out of hibernation.

Townsley was not able to gloat in his success for long. On September 19, 1982, he lost a year long battle with cancer, dying at age 55.<sup>45</sup> Within a year Robert (Bob) Barbee

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<sup>43</sup> “National Park Service Official Receives International Award,” ISIA Press Release dated May 3, 1981, IN Box A-1, File: “Correspondence to & from John Townsley,” YNP Archives, YNP, WY.

<sup>44</sup> Director to John Townsley, April 7, 1981, IN Box A-1, File: “Correspondence to & from John Townsley,” YNP Archives, YNP, WY.

<sup>45</sup> “Yellowstone Park chief dies of cancer,” *Bozeman Daily Chronicle*, Sept. 21, 1982.

would take over as superintendent of Yellowstone. He would see snowmobile use dramatically escalate again, and would initiate the first investigation into the environmental effects of snowmobiling in Yellowstone. However inadequate that look was, it was long overdue.

## CHAPTER 4: A PERIOD OF TRANSITION: 1983-92

*Generally, the Park Service has promoted non-mechanized and contemplative forms of park use. ... Snowmobiles certainly have some negative impacts on wintering wildlife, although we feel the effects are minimal.*

Bob Barbee, 1987<sup>1</sup>

In 1983, Robert Barbee arrived from Redwood National Park in California to assume the superintendency of Yellowstone. Responding to the continuously increasing winter visitation, Barbee embarked upon the first comprehensive examination of Yellowstone's winter policy. He began by questioning the merits of the Park's winter program but retreated to the status quo by affirming it in the Winter Use Plan for Yellowstone issued in 1990. However, he inserted two key caveats within the Plan that would compel park managers to take a more comprehensive look at winter visitation. Hence, because Barbee echoed his two previous superintendents in affirming the Park's snowmobile policy but began tentatively to question that policy, he became a transition superintendent, eventually ushering in the first attempt to examine comprehensively winter use in Yellowstone.

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<sup>1</sup> Robert D. Barbee to David Bates, March 16, 1987, IN Box W-173, File A36: "Complaints," YNP Archives, YNP, WY.

## Business as Usual, 1983-92

While the development of the first Winter Use Plan for Yellowstone dominated snowmobile policy development during Barbee's tenure in Yellowstone (as the rest of this chapter details), business as usual was occurring. For example, visitation was increasing as it had since the late 1960's, as Table 9 illustrates.

Table 9. Winter Visitation to Yellowstone National Park, 1983-92.<sup>2</sup>

Winter Season	Visitation
1983-84	70,385
1984-85	77,679
1985-86	93,971
1986-87	89,615
1987-88	100,105
1988-89	96,304
1989-90	118,017
1990-91	103,539
1991-92	117,410
1992-93	140,617

Clearly, by the end of Barbee's tenure in Yellowstone (1993), visitation regularly exceeded 100,000 visitors per winter.

By this time the community of West Yellowstone was alive all winter with the buzzing noise and malodor of the financially lucrative snowmobile. Numerous snowmobile rentals existed in West Yellowstone, dependent not only on the attraction of

<sup>2</sup> Source is "Seasonal Visitation Statistics," flyer available from Visitor Services Office, National Park Service, YNP, WY.

snowmobiling through the Park but also on the availability of snowmobile trails and “play areas” on the national forests that abut the town to the west, north, and south. For West Yellowstone, “the winter economy *is* the snowmobile” (emphasis in original), as stated by Dean Nelson, president of the First Security Bank of West Yellowstone in 1966. Nelson’s statement, true in 1966, was even more true by the 1980’s, at which time a total of 71 snowmobile-related businesses were open in West Yellowstone in winter.<sup>3</sup>

By the 1980’s, the “Snowmobile Roundup” was a major event in West Yellowstone, drawing snowmobile enthusiasts from all over the U.S. and Canada for a week of snowmobile races and fun. To enable the enthusiasts to visit Yellowstone Park, the West Yellowstone Chamber of Commerce asked Superintendent Barbee in 1985 to keep the snowmobile road from West to Old Faithful open for an additional week in March. Extending the season of lucrative winter earnings had obvious financial benefits for the snowmobile-dependent businesses in West Yellowstone. By then the merchants in West Yellowstone had gained considerable political influence, convincing Montana Representative Pat Williams to send a note to Yellowstone supporting their request.<sup>4</sup> Barbee, under obvious pressure, accommodated them, stating “we are pleased to inform you that we will delay plowing for one week,” but that “we will not undertake a snow hauling effort of any substantial degree to maintain a snowmobiling surface.”<sup>5</sup> Evidently,

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<sup>3</sup> Darcy L. Fawcett, “Colonial Status: The Search for Independence in West Yellowstone, Montana” (Professional Paper submitted to Montana State University), Dec. 17, 1993, p. 27.

<sup>4</sup> Robert D. Barbee to Honorable Pat Williams, Nov. 8, 1985, IN Box W-169, File A38: “Public Relations,” YNP Archives, YNP, WY.

<sup>5</sup> Robert D. Barbee to Marge Wanner (President, West Yellowstone Chamber of Commerce), Nov. 8, 1985, IN Box W-

the Chamber had asked him to battle nature for their financial profit by covering the spots on the roads that melted out earliest in spring with snow hauled in from elsewhere. Clearly, snowmobiling was big money and hence, big power, by this time, and Barbee accommodated them as best he could, supporting the existing policy. Nevertheless, Barbee also began the first comprehensive look at winter visitation shortly after he arrived.

### Planning for the First Winter Use Plan

Visitation of 100,000 was not unusual during Barbee's tenure; in fact, the Park had seen that many visitors per winter twice before he arrived in 1983. Coming from Redwood National Park in California, Barbee accepted the snowmobile use of Yellowstone as a given, even though he personally did not like the use of snowmobiles in a national park. However, due to the promotion of winter use in Yellowstone by the press, the snowmobile industry, the previous park superintendents, and the park concessionaire, snowmobile use of Yellowstone again began to escalate sharply. The improvements in snowmobile reliability made by manufacturers in the 1980's certainly contributed to the increase as well.<sup>6</sup>

Because Barbee and the other park administrators became alarmed over this increase in visitation, they began the first effort to deal with the ever-increasing numbers of

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169, File A38: "Public Relations," YNP Archives, YNP, WY.

<sup>6</sup> Robert Barbee, interview by author, telephone interview, Anchorage, AK, Jan. 14, 1998.

snowmobiles and winter use in general by initiating the preparation of the first Winter Use Plan for Yellowstone in 1983.<sup>7</sup> He stated his reasons as follows: “the winter use study ... was in recognition of the growing use of Yellowstone National Park in the winter, and for an approach to use by environmental concerns.”<sup>8</sup> Exactly what the “approach to use by environmental concerns” meant is unclear, but it was probably intended to motivate a closer look at the environmental impact of snowmobiles and winter use upon the Park. Basically, then the purpose of the Winter Use Plan was to address the growth in visitation in an orderly and comprehensive manner,<sup>9</sup> including a look at the environmental effects of snowmobiling. A subtle admonishment of the random, haphazard-type growth in winter visitation and policy by his predecessors is present in his statements and actions.

Barbee and his staff met on January 26, 1984, to initiate discussion about, and planning for, the Winter Use Plan. At that meeting, he and his staff debated the following questions:

- 1) Is the purpose of Yellowstone only to provide the visitor an opportunity to experience and appreciate the natural and historic values present here, or should we also provide some purely recreational activities?
- 2) In what areas of the Park can visitor use be permitted without adverse impact on wildlife?
- 3) In what areas of the Park should facilities be opened in winter?
- 4) What types of access can and should be provided to developed areas that are open in

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<sup>7</sup> *1983 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, p. 56.

<sup>8</sup> Minutes of 1984 Spring Meeting between YNP Concessionaires and the NPS, IN Box W-169, File A40: “Conferences and Meetings,” YNP Archives, YNP, WY.

<sup>9</sup> Robert Barbee to Sherry Funke, March 20, 1985, IN Box W-169, File A3615: “Complaints (NPS),” YNP Archives, YNP, WY.

winter?

- 5) What staffing levels will be needed as winter use expands?<sup>10</sup>

It is clear that park managers accepted the current level of visitor use as well as future increases, which is understandable in light of the fact that increasing winter use in the Park was by this time well established. In the first draft of the winter use plan, this assumption is clear:

The use of snowmobiles and other oversnow vehicles is considered to be the only feasible and safe method of travel in the interior of the Park during the winter season. Frequent severe storms, heavy snows, and bitter temperatures preclude the possibility of safely operating wheeled vehicles within the Park from approximately Nov. 1 until April 1. Snowmobiling, however, is not to be considered as a recreational activity in itself, but rather as a means of transportation in the winter.<sup>11</sup>

It is amazing that the Park administrators still used the winter severity argument as a justification to refrain from plowing, when plowing equipment was well-developed by this time and in use in many areas around the west during similarly severe winter weather. It is additionally surprising because snowmobile accidents occur regularly—probably as regularly as automobile accidents occur in summer (and would occur in winter). Nevertheless, park managers stuck to the winter severity argument and embarked upon the creation of the Winter Use Plan with the “overriding theme that a winter visit to Yellowstone should be unique” (probably meaning that it would be made

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<sup>10</sup> Addendum to: Superintendent to Division chiefs, District Rangers, Area Rangers, District Naturalists, Maintenance Area Foreman, Feb. 6, 1984, IN Box N-150, File N4615: “Social and Economic Sciences 1984,” YNP Archives, YNP, WY.

<sup>11</sup> “Draft Winter Use Plan,” Sept. 16, 1984, IN Box N-150, File N4615: “Social and Economic Sciences 1984,” YNP Archives, YNP, WY.

possible by oversnow vehicles)<sup>12</sup> while at the same time preserving park resources for the enjoyment of future generations. The Plan was to address

- 1) zoning the Park to address sensitive wildlife areas
- 2) appropriate levels of use, including limits on and types of overnight accommodations
- 3) user fees
- 4) recreational and commercial activities appropriate in the winter
- 5) visitor protection, safety and information
- 6) “shoulder season” operation (spring and fall operation).<sup>13</sup>

In March 1986, park staff reviewed the first rough draft of the plan, and many found it to be too detailed and restrictive. Hence, the staff gave the Plan “a major rewrite,” an action that is not surprising given the plan’s groundbreaking nature (though the Plan would later be criticized for being too vague<sup>14</sup>). Not only was the Plan the first of its kind for Yellowstone, but it had “national significance since ‘all eyes are on Yellowstone’ to see how we deal with winter use.”<sup>15</sup>

Progress on the Plan stalled at this point for over a year, as the administrators found their hands full with the controversy regarding their efforts to close the Fishing Bridge area.<sup>16</sup> Being shelved for more than a year gave them time to reconsider their plans. By the end of 1987, they had decided to break their planning efforts down into two phases:

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<sup>12</sup> *Superintendent’s Annual Report 1985—Yellowstone National Park*, YNP Research Library, YNP, WY, p. 36

<sup>13</sup> Ibid. These priorities are also reflected in “Winter Use Plan Underway for Yellowstone,” Press Release dated March 6, 1985, IN Box W-171, File K34: “Press Releases,” YNP Archives, YNP, WY.

<sup>14</sup> United States Department of the Interior/National Park Service, *Winter Use Plan/Environmental Assessment (“WUPEA”)*, p. 109.

<sup>15</sup> *Superintendent’s Annual Report 1985—Yellowstone National Park*, YNP Research Library, YNP, WY, p. 36.

<sup>16</sup> *1986 Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, p. 37. This report contains information about the Fishing Bridge controversy, as do many other documents at the archives.

Phase 1) A report summarizing existing management policies and needs that “will prescribe the perpetuation of the current levels of winter use for the next few years as traditional and appropriate;” and Phase 2) The Winter Use Plan and Environmental Assessment, “a comprehensive design level document that proposes alternative solutions for everything from Snowlodge improvements to research and monitoring efforts to improvements in circulation.”<sup>17</sup>

The park administrators essentially adhered to their plan, issuing the *Existing Winter Use Management Guidelines, Inventory, and Needs* in March, 1989 (Phase 1), and the *Winter Use Plan Environmental Assessment* (“WUPEA”) in November, 1990 (Phase 2). There was one major change, however—they expanded the *Winter Use Plan* to include winter use in Grand Teton National Park and the John D. Rockefeller Memorial Parkway to the south of Yellowstone because the state of Wyoming proposed the Continental Divide Snowmobile Trail (“CDST”), a 370-mile long-distance snowmobile trail that would connect Yellowstone and Grand Teton to the town of Lander, Wyoming. If constructed, the trail would involve a new off-road snowmobile trail in Grand Teton National Park, an action that was a major departure from normal NPS policy. To address concerns regarding this departure, and because winter use in Yellowstone was integrally related to that in its neighboring areas to the south, the NPS Regional Director expanded the scope of the Winter Use Plan to include those two

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<sup>17</sup> 1987 *Annual Report of the Superintendent, Yellowstone National Park*, YNP Research Library, YNP, WY, p. 22.

parks.<sup>18</sup>

Phase 1: *Existing Winter Use Management Guidelines, Inventory, and Needs*

As promised, the *Existing Winter Use* report summarized the Park's existing, scattered policies regarding winter visitation into one document, 85 pages long. It was intended to provide "the necessary foundation for the Park's systematic planning approach toward winter use." The document summarized the following:

- 1) NPS Legislation and policy regarding visitor use of Yellowstone and national parks in general (three pages);
- 2) Existing management goals for the NPS in Yellowstone (six pages);
- 3) Existing NPS management policies as regards winter in Yellowstone (eight pages);
- 4) Current winter operation, deficiencies and potential needs (eight pages); and
- 5) The purpose and need for a winter use plan (four pages).<sup>19</sup>

This document is significant for several reasons. First, it was the first acknowledgment by the Park administrators that their predecessors developed the snowmobile program without examining its known or potential environmental impacts. This is evident in the following statements: "Most importantly, as winter use increased, environmental impacts of increasing winter use were not being adequately assessed;"<sup>20</sup> "Prior to the start of the winter use planning effort, Yellowstone had no ongoing research projects aimed specifically at identifying the current and potential impacts of winter use;"<sup>21</sup> and "the wildlife and other resources do not receive the high level of

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<sup>18</sup> *Annual Report of the Superintendent, Yellowstone National Park, 1989*, YNP Research Library, YNP, WY, p. 55.

<sup>19</sup> National Park Service, *Existing Winter Use Management Guidelines, Inventory, and Needs, Yellowstone National Park, March, 1989* ([n.p.]: [n.p.], 1989), 3-6, 12-45.

<sup>20</sup> *Ibid.*, p. 1.

<sup>21</sup> *Ibid.*, p. 36.

protection and management they need.”<sup>22</sup> The Yellowstone administrators very clearly affirmed here that previous superintendents developed the snowmobile policy without examining it as critically as they should have.

Second, as discussed already, the Winter Use Plan was the first compendium of NPS regulations and policies regarding winter in Yellowstone: “This document is a compilation of existing winter use policies and plans that are currently providing direction to Yellowstone’s managers.”<sup>23</sup> In other words, the administrators here admitted that the previous management of the Park in winter was rather haphazard.

Third, it was the first time that Yellowstone’s administrators publicly admitted that the only way that the winter program existed was by depriving the much larger summer program of already needed funds: “Because funding has never been received for carrying out necessary winter operations, the current program must be financed by diverting money from the Park’s summer operation.”<sup>24</sup>

Finally, even though the administrators had just admitted that their predecessors were negligent in developing the winter program thus far, inherent within the document was an assumption that the status quo in winter in Yellowstone was acceptable. For example, the document exhaustively lists the equipment, staffing, and supplies necessary for a complete, well-rounded program that would adequately serve the number of people

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<sup>22</sup> Ibid., p. 35.

<sup>23</sup> Ibid., p. 1.

<sup>24</sup> Ibid., p. 34.

visiting Yellowstone at the time. Never does it make the suggestion that, given the chronic difficulty of obtaining necessary funding from the government and the lack of information of the environmental impacts of snowmobiles, they should perhaps limit visitation. While the document does state that “no future development will be permitted for winter use until adequate research has been completed to determine levels of use that could be sustained without adverse environmental impacts,”<sup>25</sup> the document does not suggest that visitation should be curtailed—or even held at then-current levels—until proper funding and services become available.

In summary, the *Existing Winter Use* takes the first look at winter visitation, the policies, goals, and needs of the NPS regarding it, and the environmental impacts of winter visitation. It was not a hard look, but rather a soft glance—a hesitant affirmation of the current program. Most importantly, it was a confession by park administrators that they had ignored their financial and environmental responsibilities in developing the winter program. Given this confession, one would expect that the winter use plan issued the following year would address the concerns raised in the *Existing Winter Use* document. Unfortunately, that was not to be the case.

#### Phase 2: *Winter Use Plan Environmental Assessment*

Once the *Existing Winter Use* report was issued, Yellowstone administrators began concerted efforts to issue the Winter Use Plan. Throughout 1989, they actively sought

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<sup>25</sup> Ibid., p. 12.

public comment on the proposed *Winter Use Plan Environmental Assessment*. In the first public comment period, they received 250 public comments on the issues that respondents felt the WUPEA should summarize. In addition to these responses, administrators held six public meetings in the Yellowstone area to identify concerns. In the second public comment period they sought input regarding the proposed alternatives, and received another 675 responses from the public regarding them.<sup>26</sup> This is the first time that the Park administrators formally sought public input regarding winter use—input that was arguably long overdue (especially as compared to other national parks such as Glacier, which had sought public input in the 1970's).

In June 1990, the Park administrators released the *Draft Winter Use Plan Environmental Assessment*. They distributed an estimated 1,800 copies to interested persons and interest groups. After receiving about 450 letters with comments regarding the plan, they issued the final *Winter Use Plan Environmental Assessment* in November 1990. Superintendent Barbee recommended the *Winter Use Plan* for approval, and Acting Regional Director Richard A. Strait approved it on Nov. 9, 1990.<sup>27</sup> Strait also issued a Finding of No Significant Impact (“FONSI”) on that date, making the WUPEA official.<sup>28</sup>

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<sup>26</sup> *Annual Report of the Superintendent, Yellowstone National Park, 1989*, YNP Research Library, YNP, WY, p. 56.

<sup>27</sup> United States Department of the Interior/National Park Service, *Winter Use Plan Environmental Assessment*, frontispiece.

<sup>28</sup> “Finding of No Significant Impact, Winter Use Plan, Yellowstone National Park, Grand Teton National Park, and John D. Rockefeller, Jr. Memorial Parkway,” Nov. 9, 1990, Planning Office Files, NPS, YNP, WY.

Stating that the “intent of The Plan was to preserve and emphasize the national park experience of viewing scenery, geothermal features, and wildlife during the winter season,” the Winter Use Plan offered “a spectrum of visitor activities, including snowmobiling, cross-country skiing, and snow coach tours,” as well as “a range of opportunities for experiencing quiet and solitude.”<sup>29</sup> The document analyzed four different alternatives:

- 1) “The Plan,” essentially an affirmation of current use with more of an effort on the behalf of the NPS to minimize the environmental effects of winter use;
- 2) Alternative A: Decreased use of the Parks with greater emphasis on restoring and maintaining natural quiet;
- 3) Alternative B: Increased use of the Parks with greater emphasis on social visitor experiences; and
- 4) Alternative C: No action, which in this case meant a continuation of the status quo, with no effort taken to implement new park policies or develop new facilities.<sup>30</sup>

Barbee and Strait chose “The Plan,” which was a collection of nineteen different management objectives that would provide general guidance in managing the Parks in winter. The most significant of the 19 objectives are:

- 1) Preserve and emphasize the national park experience, as stated above. This objective divided the Parks into three zones: A) The wilderness zone, which was the wilderness or proposed wilderness of the Parks; B) the developed zone, which was the road and hotel areas; and C) the natural zone, a buffer between the developed zone and the wilderness zone.
- 2) Accommodate modest levels of use forecast for the next ten years, and establish a process for managing future increases in winter use.
- 3) Protect wildlife from unacceptable impacts cause by winter visitor use.
- 4) Allow persons using the proposed Continental Divide Snowmobile Trail (“CDST”) to travel through the Parks on a trail that is consistent with NPS management policies. (This is probably the most significant of all the objectives, as it was

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<sup>29</sup> United States Department of the Interior/National Park Service, *Winter Use Plan Environmental Assessment*, p. iii.

<sup>30</sup> *Ibid.*, pp. 32-83.

- considered by some to be a major departure from normal NPS policies, and was quite controversial.<sup>31)</sup>
- 5) Provide opportunities for snowmachine uses that promote the desired visitor experience, protect park resources, and comply with the NPS snowmobile policy.
  - 6) Provide snow coach service to visitors as an alternative to snowmobile and ski access to the interior.
  - 7) Reduce noise levels while allowing snowmachine access to park features and developed areas.
  - 8) Encourage nonmechanized forms of travel, such as ski touring, snowshoeing, and hiking, that allow visitors to leave the plowed roads, snow roads, and developed areas and to experience the extensive opportunities for quiet and solitude.<sup>32</sup>

With the exception of the CDST objective, most of these objectives simply formalized the existing program, while stating its limits. In summary, “The Plan” merely took the existing situation, acknowledged that as acceptable, and prescribed very loose boundaries for it.

The *Winter Use Plan* is significant in that Park administrators finally formalized their winter program. Importantly, “The Plan” prescribed that administrators would initiate the “Visitor Use Management” (“VUM”) process if either of the following events occurred: 1) The forecasted use levels were reached; or 2) the CDST was opened. The VUM Process is a formalized process to manage “visitor use to protect park resources and the quality of the visitor experience”<sup>33</sup> (see Chapter 5 for a more detailed explanation

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<sup>31</sup> Despite its precedent-setting nature, the NPS in Grand Teton went along with Wyoming’s plans and built the CDST through their land, without doing a specific EA or EIS on this action. Evidently, the NPS considered the environmental analysis on the CDST in the *WUPEA* as sufficient, even though it measured up to only about one full page (p. 60), and sporadic mention between pages 61 and 70. The lack of extensive discussion regarding the CDST was mentioned by many different people, as recorded in the *WUPEA* (pp. 86, 99-103). Their failure to examine the CDST more comprehensively may result in a lawsuit against them by the Fund for Animals (personal communication with D. J. Schubert of Meyer & Glitzenstein, July 11, 1997, Washington, D.C.).

<sup>32</sup> *WUPEA*, pp. 32-48.

<sup>33</sup> *Ibid.*, p. 34.

of the VUM Process). Hence, “The Plan” was the first significant attempt by Park administrators to control and eventually limit winter visitation in Yellowstone.

While park managers deserve commendation for finally attempting to formalize their winter program, they deserve criticism for several aspects of “The Plan,” some quite serious. These criticisms follow.

First, visitation reached “The Plan’s” forecasted use levels in only a third of the time that the authors expected, drawing into question the accuracy of their predictions. They derived their predictions of future use by examining visitation trends for all three parks for the past eight years. While they noted that visitor use levels for all three parks increased 22% between 1982 and 1990, they predicted that visitor use over the next ten years would increase no more than 17% (their maximum prediction) over 1989-90 levels. Their average projection of increase for the next ten years was only +9%, while their lowest projection of visitation increase for the next ten years was only +2%. The authors justified such lowered projections by assuming “that winter use growth rates will level off somewhat over the next ten years. General experience in *other parks* indicates that rapid growth is usually followed by periods of leveling” (emphasis added).<sup>34</sup> Given the long history of large increases in winter use in Yellowstone<sup>35</sup>—as opposed to “other parks”—it seems that the authors were foolishly chiding themselves into believing—or hoping—that visitation would soon level off.

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<sup>34</sup> Ibid., p. 20-21.

<sup>35</sup> “Seasonal Visitation Statistics,” flyer available from the Visitor Services Office, NPS, YNP, WY.

Second, the authors of “The Plan” seemed to use the VUM Process as a scapegoat, allowing them to avoid committing themselves to serious decisions or predictions. For example, they stated that “in the future, specific management strategies for sensitive [wildlife] areas will be determined through ... the visitor use management process.”<sup>36</sup> Yellowstone’s administrators had already delayed such important actions long enough; delaying them further was not responsible. In another example, the authors stated that “winter use levels ... will not significantly exceed those prescribed in this plan until the visitor use management process is implemented and verifies that additional management actions will not adversely affect park resources.”<sup>37</sup> In reality, winter use levels exceeded those in “The Plan” in only three years, before park managers even thought to begin the VUM process, contradicting the planners’ statement that the VUM Process would ensure that such increases would not adversely affect park resources.

Third, the plan’s consideration of the environmental impacts associated with motorized use of Yellowstone in winter was as limited as that of Anderson and Townsley. This acceptance of the status quo was in obvious conflict with the NPS mission to leave its resources unimpaired. For example, while the authors stated that “snowmachine exhaust emissions would continue and potentially increase,” they also knew that “air quality *would* remain within the class 1 standards” for national parks

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<sup>36</sup> Ibid., p. 39.

<sup>37</sup> Ibid., p. 39.

(emphasis added).<sup>38</sup> Park managers had no reliable air quality data at this point, so their statement here was completely unfounded. Indeed, research in only five years would demonstrate violations of Class 1 standards in the Park, at the West Entrance.<sup>39</sup>

Fourth, the authors of “The Plan” also glossed over the potential effects of winter use on wildlife, particularly bison. While they noted that “many animals travel on snow roads because it is easier than moving through deep snow,” an action that “frequently causes conflicts with snowmachine traffic on park roads,”<sup>40</sup> they felt confident that “no substantial adverse effects on wildlife would be expected under “The Plan” or any of the alternatives.”<sup>41</sup> The authors, to their credit, did make an effort to examine existing research on the effects of snowmobiles and skiers on wildlife. They noted that some research has indicated effects, while other research has not indicated any adverse effects on wildlife from snowmobiles, and chose to believe the latter group of research, rather than embarking on specific research to determine what the truth was for Yellowstone.<sup>42</sup> Hence, the authors were both selective in the research they cited, ignoring that which demonstrated adverse effects of both snowmobilers and skiers (including Aune’s research done in Yellowstone<sup>43</sup>), and also deficient in promoting research to study the effects of

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<sup>38</sup> Ibid., p. 61.

<sup>39</sup> “Ambient Air Quality Study Results,” flyer available from the Planning Office, NPS, YNP, WY.

<sup>40</sup> Ibid., p. 2.

<sup>41</sup> Ibid. p. iv.

<sup>42</sup> Ibid., p. 63.

<sup>43</sup> Keith Aune, “Impact of Winter Recreationists on Wildlife in a Portion of Yellowstone National Park, Wyoming,” Master’s Thesis, Montana State University, 1981, p. ix.

snowmobiles and skiers on the Park's wildlife. The slaughter of 1,084 bison in 1997 (see Chapter 5) would demonstrate that such research would have been timely, and that recreational use by snowmobiles could result in large ungulate mortality. The authors, in fact, noted that bison populations are "generally increasing,"<sup>44</sup> and that they traveled on the snow roads—two clues that the bison population may have been increasing unnaturally, that it was vulnerable to crashing, and that some research was certainly needed.

Fifth, the authors stated that "outstanding and abundant opportunities for quiet and solitude will be preserved in th[e wilderness] zone," and that "greater opportunities for quiet and solitude will exist in winter than exist in summer in the natural zone."<sup>45</sup> Evidently, these authors had no idea how far snowmobile noise could travel into the wilderness zone, let alone the natural zone. The data in Table 10 makes one wonder if they did any skiing in the zones in question near snowmobile areas, or talked to staff members who did, to see how far snowmobile noise traveled.

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<sup>44</sup> Ibid., p. 10.

<sup>45</sup> Ibid., p. 33.

Table 10. Locations and distances in Yellowstone at which snowmobile noise has been heard.<sup>46</sup>

Year	Place	Distance from Road	Distance inside "wilderness zone"
1995	Indian Creek Ski Trail	4 Miles	2 Miles
1997	Fir Ridge	6 Miles	4 Miles
1994	Summit Lake	7 Miles	6 Miles
1994	Mallard Lake	3 Miles	2 Miles
1994	Cowan Meadows	7 Miles	5 Miles
1994	Shoshone Geyser Basin	9 Miles	8 Miles
1994	Heart Lake	6 Miles	5 Miles
1996	Mt. Washburn	4 Miles	3 Miles
1980's <sup>47</sup>	South of the South -east Arm of Yellowstone Lake	15-20 Miles	8 Miles

Note: Distances are approximate *straight-line* distances.

Clearly, snowmobile noise easily travels into the "Wilderness" zone. Furthermore, there seem to be no areas within the natural zones as depicted in "The Plan" that are free of snowmobile noise; other than those in the northern part of Yellowstone, where snowmobiles are not allowed. Additionally, my experience of ten years in Yellowstone contradicts their statement that silence is easier to find in the natural zone in winter than it is in summer, since snowmobile noise generally travels further than that of automobiles, despite the greater numbers of cars than snowmobiles. Finally, the authors did not recognize that few skiers have the physical stamina to ski the necessary distances

<sup>46</sup> Compiled from my personal experiences in Yellowstone from 1994-97.

<sup>47</sup> Les Inafuku (Subdistrict Ranger, Yellowstone), interview by author, personal interview, Old Faithful, WY, July 15, 1997.

beyond the natural zone into the wilderness zone to find true quiet. As illustrated above, even skiing twenty miles is not always adequate to escape the pervasive noise of snowmobiles. Clearly, as my recent experiences and Inafuku's experience of the invasive sound of snowmobiles during the winter in Yellowstone indicate, Yellowstone administrators did not make "a range of opportunities for experiencing quiet ... available,"<sup>48</sup> as they stated they would do in The Plan.

Finally, and most seriously, Yellowstone administrators, in choosing The Plan, apparently ignored the will of the public. As noted in the *WUPEA*, the administrators received the following letters:

- 1) A total of 450 letters: 70 from agencies and organizations and 380 from individuals.
- 2) Of the 450, about 80 identical or very similar letters were generated by flyers sent out by interested organizations. These letters supported elements of Alternative A (Reduced Use), such as opposing the roadway proposal for the CDST and instead supported hauling snowmobiles traveling the CDST by trailer through Grand Teton. This group of letters went beyond simply supporting Alternative A, though, by requesting additional environmental analysis of the following: a) the entire 370-mile CDST; b) the VUM process; and c) the Snowlodge, and other structural improvements proposed by The Plan. In general this group of commentators felt that even Alternative A was too environmentally destructive, calling for more environmental protection.
- 3) About 20 form letters supporting Alternative B (Increased use); and
- 4) "Of the remaining letters, 21 percent supported the proposal, 44 percent supported alternative A [reduce use], 35 percent supported alternative B [increased use], and none supported alternative C [no action]. These percentages do not include the 100 letters summarized above."<sup>49</sup>

Notice that, as broken down in the *WUPEA*, the leading plurality was in favor of

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<sup>48</sup> *WUPEA*, p. iii.

<sup>49</sup> *Ibid.*, pp. 85-86.

reducing use, not in favor of “The Plan.” In fact, “The Plan” was supported by the smallest plurality (other than the “no action” alternative). In spite of the fact that the largest plurality favored reduced use, and an additional 80 persons favored more stringent environmental analysis and/or reduced use, Park administrators chose to go with the status quo in the form of “The Plan.”

Examining the figures presented in the *WUPEA* more carefully, Table 11 presents the figures in a different light:

Table 11. Summary of comments, *Winter Use Plan Environmental Assessment*.<sup>50</sup>

Description of Comments	Number of Comments	Percentage of Total Comments
Letters favoring more environmental analysis; Even Alt. A is not good enough	80 (see note)	17.8
Individuals in favor of Alternative A	154	34.2
TOTAL in favor of Alt. A or better	234	<u>52.0%</u>
Form Letters in favor of Alt. B.	20	4.4
Individuals in favor of Alt. B.	123	27.3
TOTAL in favor of Alt. B.	153	<u>31.7%</u>
TOTAL in favor of “The Plan”	73	<u>16.3%</u>
TOTAL in favor of either “The Plan” or increased use (Alt. B)	226	<u>48.0%</u>

Note: One can probably assume that if the group of 80 commentators were not satisfied with the environmental protections of the most environmentally benign choice—Alternative A (reducing use), that these same people would probably not be in favor of “The Plan” or Alternative B (increased use).

<sup>50</sup> Ibid., as reanalyzed by the author.

From examining the figures more closely as above, it is clear that a simple majority (52%) of the respondents were in favor of Alternative A, reducing the winter use of the three parks, or going beyond that to take an even more detailed look at the consequences of winter use on the Park. In contrast, only a minority of respondents were in favor of Alternative B, increasing visitor use, or “The Plan.” Yet, Park administrators chose to go with the *minority*, evidently ignoring the *majority’s* call to reduce use and more comprehensively examine its environmental impacts. In my interview with him, Superintendent Barbee could not explain this discrepancy.<sup>51</sup>

Thus, for the first time in history, twenty-two years after Jack Anderson formalized snowmobile policy in Yellowstone, the public in 1990 had a chance to tell Park administrators what they thought was appropriate for the Park(s) in winter. A full fifteen years after the public told the NPS elsewhere to eliminate the snowmobile from other parks like Yosemite, Glacier, and Sequoia, the public gave the NPS in Yellowstone a similar message: restrict snowmobile use, and study the environmental impacts more intensively. Yet, Yellowstone’s administrators evidently ignored the will of the public, instead twisting the figures to maintain the ever-expanding winter use of the Yellowstone-area parks. Giving no justification for their decision to go with the minority, administrators went back to their safety blanket of keeping the snowmobile in Yellowstone. While NEPA gives public officials the latitude to choose options that the

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<sup>51</sup> Robert Barbee, interview with author, telephone interview, Anchorage, AK, Jan. 14, 1998.

public does not favor, doing so can arguably be viewed by the public as a violation of their trust. It appears that administrators in Yellowstone, after ignoring the will of the public for at least 20 years, violated the public trust and ignored the will of the public.<sup>52</sup>

In summary, the Winter Use Plan was no revolution in the winter management of Yellowstone. Although the Park administrators began with high goals of *finally* examining the adverse environmental impacts of winter use in Yellowstone, they instead failed to examine the known environmental impacts, failed to do the research to find out what the unknown impacts were, failed to listen to the public, and failed to realistically predict future use. With “all eyes on Yellowstone” to see how they dealt with winter use, they instead hid their heads in the sand—or snow, as the case was.

### Chapter Conclusion

In condoning Yellowstone’s long-standing policy of allowing snowmobile use of the Park without examining its environmental consequences, Superintendent Barbee gave himself the same reputation as his two predecessors—that of a superintendent willing to allow snowmobiles into the Park despite their known and unknown effects. Despite the fact that he acknowledged that his predecessors had fallen short in their responsibility to examine the environmental impacts of snowmachines on the Park before they allowed

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<sup>52</sup> In my discussions with some of the persons involved with the writing of the *WUPEA*, I got the sense that there was considerable political maneuvering occurring behind the scene while the authors were writing the *WUPEA*. Those person(s), however, requested anonymity. Consequently, I do not feel as though I have recorded the full history of the *WUPEA* and its writing, although I have written the best account of its history from the information available to me.

them in, Barbee failed to fulfill his responsibility as well. He did, however, begin to question the snowmobile policy, and inserted two key conditions that would trigger the VUM Process if they came to pass. Consequently, Barbee became a transition superintendent. He continued to condone the use of snowmobiles in Yellowstone, but did set the Park on the road to questioning its snowmobile policy and the policy's effects on the Park.

Since he left Yellowstone, Barbee has evidently had time to reflect on the appropriateness of snowmobiles in national parks. In my telephone interview with him on January 14, 1998, he stated that, as regional director of the National Park Service in Alaska, he is now in the process of publishing regulations to ban snowmobiles from Denali National Park. As one of his reasons for this decision, he stated "we don't want Denali to become a Yellowstone."<sup>53</sup> Clearly, although he allowed winter use to continue, he left Yellowstone with the knowledge that the Park's winter situation was less than desirable.

By issuing the Winter Use Plan, Barbee lost another golden opportunity to slow the growth of the snowmobile snowball. Soon it would come time to "pay the piper," though. In just three years, more increases in visitation would force Yellowstone administrators to begin the VUM process. And, in just seven years, the citizens of American would, via a lawsuit, finally force Yellowstone administrators to do what they

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<sup>53</sup> Ibid.

should have done in the early 1970's: take a long, hard look at winter use in the Park.

The next chapter will chronicle these events.

## CHAPTER 5: HARD QUESTIONS AND SMALL CHANGES: 1993-97

*We have begun – something is happening – there is reason for hope.*

Winter Visitor Use Management Work Plan, 1993.<sup>1</sup>

*Snowmobiling is a wondrous, spiritual experience...WE WANT OUR FAIR  
SHARE!!*

Terri Willsen, 1997.<sup>2</sup>

Shortly before he left Yellowstone in 1994 to go to the NPS Alaska Regional Office, Superintendent Barbee initiated the Visitor Use Management Process—the first serious look at Yellowstone’s winter program. When he left Yellowstone, Mike Finley from Yosemite National Park replaced him. Having already taken a hard look at Yosemite’s exploding visitation and having instituted the first daily visitation limits in Yosemite Valley,<sup>3</sup> Finley embarked upon the same hard look and possible visitation restrictions on winter use in Yellowstone. Even though he may have been dragged into such actions by some key events in the late 1990’s, Finley may be instigating a revolution in the Park’s snowmobile policy—a revolution arguably long overdue. Although Finley may give his

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<sup>1</sup> “Winter Visitor Use Management Work Plan, Yellowstone and Grand Teton National Parks, John D. Rockefeller Jr., Memorial Parkway, Nov., 1993,” Planning Office Files, NPS, YNP, WY, p. 20.

<sup>2</sup> Terri Willsen to Deborah Austin (Chair, GYCC), no date, one of over 20 form letters received by the Planning Office in response to the publication of the *Winter Visitor Use Management: A Multi-Agency Assessment*, in April, 1997.

<sup>3</sup> Todd Wilkinson, “Snowed Under: the roar of snowmobiles in many national parks has replaced the solitude and quiet that once defined the winter landscape,” *National Parks* 69(1-2): pp. 32-36, Jan./Feb. 1995.

employees reason for hope, he has yet to undertake any significant changes in the Park's winter use policy.

#### The Visitor Use Management Process: How It Began and What It Is

During the winter of 1992-93, just before Barbee left Yellowstone, visitation left the 100,000-person level to levels that Park administrators had never before seen nor expected to see prior to the year 2000 (though their earlier predictions were suspect, as Chapter 4 detailed). Table 12 lists these large increases.

Table 12. Winter Visitation to Yellowstone National Park, 1991-97.<sup>4</sup>

Winter Season	Visitation
1991-92	117,410
1992-93	140,617
1993-94	143,523
1994-95	139,810
1995-96	119,539
1996-97	114,000

The 1990 *Winter Use Plan* stipulated that, should visitation to all three parks (Yellowstone, Grand Teton, and the Rockefeller Parkway) exceed its maximum prediction of 143,500 before the year 2000, then the administrators of these three parks would be compelled to initiate the VUM process.<sup>5</sup> Clearly, with visitation in

<sup>4</sup> "Seasonal Visitation Statistics," flyer available from the Visitor Services Office, NPS, YNP, WY.

<sup>5</sup> *WUPEA*, p. 21.

Yellowstone *alone* closely approaching that mark in the winter of 1992-93, park managers realized that the first trigger for the VUM Process had been tripped.<sup>6</sup>

The *Winter Use Plan* also stipulated that if the Continental Divide Snowmobile Trail (CDST) became operational, park managers would have to begin the VUM process as well.<sup>7</sup> In the winter of 1992-93, the CDST became operational, with snowmobilers hauling their snowmobiles via trailer through Grand Teton National Park to access the trail at either end of that park. Hence, the other VUM trigger was tripped in the same winter as well.<sup>8</sup> By the winter of 1994-95, Grand Teton administrators had opened the CDST itself through Grand Teton National Park, enabling snowmobilers to travel directly from the Togwotee Pass area through Teton Park to Yellowstone without ever leaving a groomed snowmobile trail.<sup>9</sup>

So, the NPS began the Visitor Use Management Process in 1993. Visitor Use Management is

a process of identifying goals (or desired futures), looking at existing conditions, identifying discrepancies between the two, and laying out a plan of action to bring the two closer together. [It] is a way to ensure that a high quality visitor experience is maintained, park resources are protected, and the necessary infrastructure and staff are in place to support acceptable levels of winter use.<sup>10</sup>

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<sup>6</sup> *Superintendent's Annual Report, Yellowstone National Park, 1993*, YNP Research Library, YNP, WY, p. 66.

<sup>7</sup> *WUPEA*, p. 21.

<sup>8</sup> "Frequently Received Comments and Questions," *Winter Visitor Use Management* (A newsletter published irregularly by the NPS, YNP, as part of the VUM process), January, 1996, p. 3.

<sup>9</sup> Greater Yellowstone Winter Visitor Use Management Working Group, *Winter Visitor Use Management: A Multi-Agency Assessment* ([n.p.]: Greater Yellowstone Coordinating Committee, Greater Yellowstone Area, April, 1997), 6.

<sup>10</sup> "Winter Visitor Use Management Overview," Unpublished Paper IN "VUM Speech" File, Planning Office Files, NPS, YNP, WY, January, 1995.

The VUM Process is based on the “Visitor Experience and Resource Protection (“VERP”) Process,<sup>11</sup> developed by National Park Service planners, managers, and researchers to identify and manage carrying capacity in areas of the national park system. The NPS developed the VERP process to comply with the 1978 General Authorities Act, which required park managers to identify carrying capacities for national park areas, and implement means of adhering to those carrying capacities. As developed by the NPS, the VERP Process is a nine-step process of segregating the Park into various zones of front- or back-country experience, discerning what park managers and visitors expect to experience in each zone, and modifying the management of the Park to adhere to the desired experience for each zone. For example, administrators in Arches National Park in Utah used the VERP Process in the early 1990’s to manage visitation while protecting park resources and values. Using advanced computer technology, they created a set of pictures of the same park feature, such as Landscape Arch, with varying numbers of visitors inserted in the picture—from none to over 150. By asking park visitors to rate each of the 16 pictures of Landscape Arch on a sliding scale of acceptability, managers could discern that visitors found up to 30 people in the scene acceptable. Based on that finding, they reduced the size of the parking lot for Landscape Arch to accommodate the appropriate number of vehicles to restrict the visitation there to 30 people or less at any given time.<sup>12</sup>

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<sup>11</sup> Ibid.

<sup>12</sup> Robert E. Manning, et al, “The Visitor Experience and Resource Protection (VERP) Process: The Application of Carrying Capacity to Arches National Park,” *The George Wright Forum, A Journal of Cultural and Natural Park and*

Park Managers in Yellowstone and Grand Teton Parks state that they took the VERP Process and modified it to suit their needs.<sup>13</sup> Based on their record of activities and decisions in the next four years, there were few significant differences between the VERP Process and the VUM Process.

#### VUM in Action in the Yellowstone Area

In 1993, NPS staff from Yellowstone and Grand Teton National Parks “began working together to apply the concept of visitor use management to winter use.”<sup>14</sup> By November 1993, they had produced a work plan listing the tasks that they needed to do in order to “fully implement the Winter Use Plan.”<sup>15</sup> In this statement, the NPS staff clearly admitted that they had never fully implemented the WUP. This statement further illustrates that even the NPS administrators, who authored the WUP, were not satisfied with it or (at least initially) committed to its implementation.

It appears as though Park administrators are now more committed to the VUM Process, as exemplified by the extensive list of both short- and long-term tasks identified in the work plan. The long list of tasks is based on the *Winter Use Plan* of 1990, with the evident intent of actually enforcing or implementing it. For each task, NPS staff

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*Reserves* 12(3): 1995, pp. 45-54.

<sup>13</sup> “Winter Visitor Use Management Overview,” Unpublished Paper IN “VUM Speech” File, Planning Office Files, NPS, YNP, WY, January 1995.

<sup>14</sup> *Ibid.*

<sup>15</sup> *Winter Visitor Use Management Work Plan*, approved by Robert Barbee and Neckels, Jack (Superintendents of Yellowstone and Grand Teton, respectively), unpublished document in the Planning Office Files, YNP, WY, Nov., 1993, p. 1.

identified the person responsible for its implementation. For example, Table 13 lists some of the short- and long-term tasks identified by the work plan, and persons responsible for their implementation:

Table 13. Selected tasks of the VUM team, November 1993.<sup>16</sup>

TASK	PERSON(S) RESPONSIBLE
Establish baseline data on impacts of winter use to wildlife, geothermal areas and air and water quality	Chief Resource Managers
Take necessary actions to avoid impacts to resources, including air-quality monitoring	Superintendents
Identify resource and visitor conflict areas where use restrictions are needed	Chief Resource Managers
Establish long-term monitoring strategy for impacts on resources	Chief Resource Managers
Implement measures to ensure resources are not adversely affected	Chief Maintenance & Resource Managers
Reduce noise from snowmachines	Chief Ranger
Close Potholes area in Tetons	Superintendent, GTNP
Investigate feasibility of restricting snowmobile operators to those with valid drivers' licenses	Chief Rangers of GTNP and Yellowstone

Notice that the majority of these tasks involve resource protection and monitoring tasks that the Winter Use Plan had called for back in 1990. Yet, here they are, three years later and still not implemented. The presence of these important tasks in the VUM work plan confirms that the Winter Use Plan had not been fully followed or implemented.

<sup>16</sup> Ibid., pp. 4, 10-12.

Shortly after the November Work Plan was issued, the Greater Yellowstone Coordinating Committee (an already existing consortium of superintendents of Yellowstone and Teton Parks and supervisors of national forests surrounding Yellowstone) “agreed that the national forests in the Greater Yellowstone Area should also participate in the winter visitor use management planning,”<sup>17</sup> recognizing that the problems being experienced by the Parks were also common to the surrounding national forests.<sup>18</sup> From 1994 onward, staff from six of the national forests surrounding Yellowstone have cooperated in the VUM process: Gallatin, Targhee, Custer, Shoshone, Bridger-Teton, and Beaverhead-Deerlodge.<sup>19</sup>

The VUM team (the group of over 20 persons from all three parks and all six national forests responsible for coordination the VUM Process) had a better record of success in implementing these tasks than NPS administrators did in following the 1990 *WUPEA*. By 1995, the VUM team had accomplished or begun work on most of its tasks, including those listed in Table 13.

The first accomplishment came in 1993, when Yellowstone administrators announced that all persons driving a snowmobile must possess a valid driver’s license or learning permit, a reversal of the 1975 decision to permit 12- to 16-year-olds to drive a

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<sup>17</sup> *Superintendent's Annual Report, Yellowstone National Park, 1994*, YNP Research Library, YNP, WY, p. 56.

<sup>18</sup> “Greater Yellowstone Winter Visitor Use Management: Summary of the Visitor Use Management Process,” unpublished paper IN “VUM Speech” File, Planning Office Files, NPS, YNP, WY, August/Sept., 1995.

<sup>19</sup> Greater Yellowstone Winter Visitor Use Management Working Group, *Winter Visitor Use Management: A Multi-Agency Assessment*, p. 1.

snowmobile when supervised by a parent or guardian. Administrators cited their own data showing that 12- to 16-year-old drivers constituted only 5% of the Park's snowmobile operators, yet were involved in 16% of the snowmobile accidents in the Park.<sup>20</sup> Although they had good reason for this restriction, the fact that they did it all illustrates how much the snowmobile situation and associated management had changed since Anderson's days. Now, instead of welcoming snowmobiles with open arms, as Anderson did, the administrators began searching for ways to begin getting a handle on the nearly uncontrolled winter situation.

Between 1994 and 1997, administrators in Grand Teton National Park closed the Potholes area to off-road snowmobiling,<sup>21</sup> although they have yet to formalize this closure by publicizing it in the *Federal Register*.<sup>22</sup> Thus ended the *only* off-trail use of snowmobiles allowed anywhere in the entire national park system. Also that year, Yellowstone managers met with snowmobile manufacturers to discuss noise and air quality concerns, and placed decibel meters at the Park entrances, using them to turn away machines that were too loud. Finally, twenty years after Park administrators put the first noise restrictions in place, they began to make a more serious effort at enforcing them.

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<sup>20</sup> "Yellowstone National Park to Require Driver's License for Snowmobile Operators," Press Release dated Nov. 9, 1993, IN Box W-182, File L3427: "Winter Sports, 1992," YNP Archives, YNP, WY.

<sup>21</sup> Personal communication with Jack Neckels, Superintendent of Grand Teton National Park, Nov. 4, 1997, Grand Teton National Park, WY.

<sup>22</sup> Personal communication with John Sacklin, Chief Park Planner, NPS, Nov. 14, 1997, Mammoth Hot Springs, WY.

The VUM team staff initiated searches for literature detailing the impacts of winter use on wildlife and other resources in 1994.<sup>23</sup> This literature search culminated in a 141-page report listing 575 citations about wildlife and the effects of humans and off road vehicles on them; many of the citations were annotated.<sup>24</sup> Two years later James and E. Caslick selected the citations most relevant to Yellowstone's situation and added more citations (again often annotated) that they themselves had found to produce a 586-citation bibliography for the NPS.<sup>25</sup> At long last, Park administrators put effort into researching the environmental effects of snowmobiles. In so doing, they received a lot to consider. Caslick began by reprimanding Yellowstone's managers: "Snowmobile-polluted snow and its effects on wildlife, fish, and other aquatic organisms have not been investigated in Yellowstone, although published accounts elsewhere began at least 24 years ago ...This seems to be another topic that should have been researched here long ago, particularly since we probably experience a higher intensity of snowmobile use than anywhere else."<sup>26</sup>

Caslick went on to state:

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<sup>23</sup> "Winter Visitor Use Management Accomplishments," Unpublished Paper IN "VUM Speech" File, Planning Office Files, NPS, YNP, WY, Jan. 27, 1995.

<sup>24</sup> Larry E. Bennett, "A Review of Potential Effects of Winter Recreation on Wildlife in Grand Teton and Yellowstone National Parks: A Bibliographic Data Base" (Final Report to the NPS, Planning Office Files, YNP, WY), 1995, 141 pp.

<sup>25</sup> J. and E. Caslick, "Selected Literature Citations from Bennett 1995 and New Citations from Caslick 1997 on Winter Recreation Effects on Wildlife," Appendix II (73 pp.) of James Caslick, "Impacts of Winter Recreation on Wildlife in Yellowstone National Park: A Literature Review and Recommendations" (unpublished report submitted to the Branches of Planning and Compliance, Natural Resources, and Resources Management and Visitor Protection), Planning Office Files, NPS, YNP, WY, 1997.

<sup>26</sup> *Ibid.*, p. 3.

In regard to wildlife in Yellowstone, I conclude from my literature review that the most pressing VUM issue is snowmobiling – not snowmobiling in general, but snowmobiling in and near thermally-affected wildlife habitats that are known to be unique and of critical value to wildlife in winter. This value to Yellowstone wildlife is not conjecture; it has been widely recognized and published about for many years ... From my literature review, I conclude that there is now ample documentation to administratively close these thermally-influenced winter habitats, prohibiting winter use by private and commercial snowmachines, skiers, snowshoers, and hikers.<sup>27</sup>

Caslick concluded by recommending that the Park administrators “promptly initiate preparation of an Environmental Impact Statement (EIS) on Winter Visitor Use in Yellowstone. In the EIS, include alternatives of ‘no snowmobiling’ as well as ... consideration of alternative modes of transport for winter visitor enjoyment of park resources.”<sup>28</sup>

At long last, Yellowstone’s administrators searched the literature for information on the effects of snowmobiles on natural resources, and received both an admonishment from the responsible independent researcher and many pages of recommendations. Unfortunately, they would not commit to the EIS recommended by Caslick until a wildlife group filed a lawsuit against them in 1997, as detailed at the end of this chapter. Nor have they yet closed any of the thermally-influenced wildlife habitats or instituted any restrictions on the numbers of snowmobiles entering the Park.

While the VUM team was accomplishing its immediate tasks and acquiring much data, it was also making progress on the four main elements of VUM Planning

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<sup>27</sup> Ibid., p. 6.

<sup>28</sup> Ibid., p. 9.

(identifying goals and concerns, looking at existing conditions, identifying discrepancies between the two, and laying out a plan of action to bring the two closer together). By 1996, the VUM team came up with the following goals for winter in the Yellowstone area, all once again generally supportive of existing winter recreation in that area:

- 1) Visitors have a full range of winter use experiences and settings, from highly developed to primitive, appropriately distributed across the greater Yellowstone area;
- 2) The NPS and U.S. Forest Service (“USFS”) must protect areas of cultural and natural significance from winter visitor use impacts;
- 3) Visitors have enough information to choose the experience they desire;
- 4) All public and private agencies and businesses concerned be partners in contributing and supporting these goals;
- 5) The NPS and USFS provide high-quality facilities;
- 6) The NPS and USFS minimize conflicts among user groups;
- 7) Agencies share a coordinated data base with which to make decisions;
- 8) Visitors know how to participate safely in winter use activities without damaging resources or themselves;
- 9) Reduce snowmobile noise and emissions;
- 10) Agencies manage winter use with ecosystem-wide implications in mind and work cooperatively.<sup>29</sup>

At the same time, the VUM team identified the existing concerns or issues:

- 1) **Overcrowding:** Existing facilities are often crowded, especially in stormy weather;
- 2) **Visitor Conflicts:** Some visitors want silence and solitude, while others want a social experience;
- 3) **Safety:** Heavy use and warm weather make groomed trails rough and unsafe to travel;
- 4) **Gasoline:** Supplies in Yellowstone are limited and unable to satisfy demand;
- 5) **Community Expectations:** Communities assume unlimited growth in winter visitation, despite problems with existing levels of use;
- 6) **Resource Damage:** Winter use may be damaging wildlife, geothermal, air and silence resources;
- 7) **Decreased Access:** Snowplowing to private property is displacing skiers and snowmobilers in areas outside of the Park;
- 8) **Visitor Behavior:** Some visitors trespass into wilderness areas, act inappropriately

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<sup>29</sup> “Winter Use Goals,” *Winter Visitor use Management*, January, 1996, p. 2.

- toward others and wildlife, and risk their safety; and
- 9) **Operational Concerns:** Sewage and solid waste facilities are overwhelmed in the Park interior; funding for the NPS winter program is inadequate.<sup>30</sup>

In the next two years, the NPS would hear the public largely echo these concerns through written and verbal comments. Table 14 illustrates this by summarizing the public's concerns:

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<sup>30</sup> Compiled from "Greater Yellowstone Winter Visitor Use Management—Winter Use Issues," unpublished paper IN "VUM Speech" File, Planning Office Files, NPS, YNP, WY, Jan., 1995, AND "Winter Use Concerns," *Winter Visitor Use Management*, January, 1996, p. 1-2.

Table 14. Summary of selected comments regarding winter use of Yellowstone, 1993-96.<sup>31</sup>

	1993-94 letters	1994-95 letters	1995-96 letters	Public Mtgs.	<i>National Parks</i> letters	TW Survey	1995 Visitor Survey
Total Comments	300 total comments during these three years			114 letters + 1,250 comments	691	598	1,132
Crowding	60	23	14	~50	93	several	43
Noise pollution	81	104	14	72	461	several	43
Air pollu- tion from snow- mobiles	67	63	19	77	294	several	65
Wildlife im- pacts from snowmo's	23	117	13	71	498	several	15
Lack of solitude	9	61	4	32	271	several	3
Ban or limit snow- mobiles				63		123	
Keep snow- mobiles in parks	6	42		13		61	
Conflicts between users				37		several	

<sup>31</sup>Compiled from the following sources: 1993-94, 1994-95, and 1995-96 letters were all sent by individuals independently to the NPS at Mammoth and are summarized in *Winter Visitor Use Management: A Multi-Agency Assessment*, as were the *National Parks* comments (sent by readers of that magazine in response to an article by Todd Wilkinson entitled "Snowed Under," (*National Parks* Jan./Feb. 1995) and the TW Survey comments, compiled from questionnaires mailed by TW to guests of the winter of 1993/94. The Public Meeting comments were recorded by the NPS at a series of public meetings from Feb. 29, 1996 to May 9, 1996 in the following places: West Yellowstone, MT, Jackson, WY; Bozeman, MT; Dubois, WY; Cody, WY; Billings, MT; Gardiner, MT; and Rexburg, ID, and are summarized in "Summary of Comments, February through May, 1996," *Winter Visitor Use Management*, Fall, 1996. The 1995 Visitor Survey Comments were recorded by Margaret Littlejohn in *Visitor Services Project, Yellowstone National Park Visitor Study, Report 75* (University of Idaho, Moscow, ID), January, 1996.

Notice that when the surveys asked visitors whether they felt snowmobiles were appropriate in the two national parks, at least twice as many said “No” as said “Yes,” echoing what the public had told the Park administrators when they prepared the *Winter Use Plan/EA* in 1990.

With both goals and issues identified, the VUM team turned its attention to existing conditions. They published their findings on these in 1997 as the *Winter Visitor Use Management: A Multi-Agency Assessment*. The team summarized the goals, issues and concerns, and public comments as listed above, and comprehensively listed the Existing Conditions in Yellowstone and the surrounding area. These reflected and detailed, in large part, the issues and concerns identified earlier; the reader is referred to the report for the detailed listing of existing conditions.<sup>32</sup>

Next, the report identified discrepancies between the goals and the existing conditions by mapping Yellowstone and the surrounding area into twelve different “potential opportunity areas.” These are zones in which visitors typically pursue one type of activity, such as snowmobiling on groomed roads or skiing in the backcountry.<sup>33</sup> By examining the current activity within each zone and comparing that with the desired activity in them, report authors found numerous inconsistencies and conflicts in

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<sup>32</sup> Greater Yellowstone Winter Visitor Use Management Working Group, *Winter Visitor Use Management: A Multi-Agency Assessment* ([n.p.]: Greater Yellowstone Coordinating Committee, April, 1997).

<sup>33</sup> Greater Yellowstone Winter Visitor Use Management Working Group, *Winter Visitor Use Management: A Multi-Agency Assessment*, pp. 24-25.

Yellowstone. For example, they stated that there were “multiple conflicts” and a “high level of conflict” in the road corridor from West Yellowstone to Old Faithful, at the West Entrance, and at Old Faithful, and a “moderate level of conflict” in the Canyon area. Conflicts and impacts include wildlife harassment, overwhelming numbers of snowmobiles during peak periods, snowmobile/skier conflicts, snowcoach/snowmobile conflicts; excessive noise and exhaust fumes, long lines at the entrance station and elsewhere, and possible geothermal impacts.<sup>34</sup> These findings probably surprised few experienced Yellowstone personnel.

Finally, the report recommended a brief plan of action. The report stated “a careful analysis is needed for each of the oversnow, motorized road segments in the Park to evaluate such considerations as the visitor experiences being offered; resource concerns (for example, the relationship of the winter roads to bison movement); safety, including avalanche danger; adjacent land issues ...; facility capacity and operational concerns; budget limitations; and conflict minimization.”<sup>35</sup>

In so stating, the authors “backed off” from any major decision or analysis. However, they were correct in stating that a careful analysis is long overdue and needed for the Yellowstone areas of conflict. Additionally, they listed a spectrum of options for their analyses that Yellowstone administrators would consider, including:

- 1) Continue the current mix of snowmobiles and snowcoaches, with implementation of carrying capacities;

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<sup>34</sup> Ibid., p. 62.

<sup>35</sup> Ibid., pp. 35-36.

- 2) Increase facilities to encourage visitors to use other areas of the Park;
- 3) Attempt to disperse use through advertising other areas;
- 4) Plow the road from West Yellowstone to Old Faithful;
- 5) “Require all snowmachines to meet strict, but reasonable emissions and noise standards;”
- 6) Require all winter users to be part of a guided tour to help provide better information and interpretation;
- 7) “Allow snowcoaches only to use park roads in the winter to address air quality and noise concerns, provide a mode of transportation that does not overwhelm the Park setting, and increase the level of information and interpretation about the resources;”
- 8) “Close certain road segments to oversnow vehicle traffic to protect bison or address safety issues;” and
- 9) “Close all park roads to oversnow vehicle traffic to protect bison.”<sup>36</sup>

Note that all of these options would institute significant changes in the winter situation, some of them practically revolutionary. Administrators are finally considering real reform in Yellowstone—but have yet to make any revolutions.

Evidently such consideration is more than just talk, as the following piece of a memorandum from Chief Park Planner John Sacklin to Superintendent Finley illustrates:

Most of the [VUM] group believes that the following three alternatives represent a good range of solutions to the winter visitor use management issues in Yellowstone National Park.

\* *Limit motorized winter oversnow access to snowcoaches only. Restrict private snowcoaches.* We would return to the fundamental reasons why people come to Yellowstone in the winter: to enjoy and experience the spectacular scenery, wildlife, thermal features, and solitude. The means of accessing these features would no longer overwhelm the experience. ... Nearly all conflicts between users would be eliminated.

\* *Limit motorized winter oversnow access to guided tours (both snowcoach and snowmobile) only.* Private snowmobiles would be allowed, but only as part of tours. Use would be limited by the number of tours permitted to enter the Park ... Most conflicts between users would remain. ...

\* *Limit overall winter use and establish a reservation system (combined with first come-*

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<sup>36</sup> Ibid., pp. 33-34.

*first serve) for all winter users. All current winter uses would be allowed; however, the numbers of visitors per day would be limited.*<sup>37</sup>

While these three options will not all result in the elimination of snowmobiles, all of them will indeed limit visitation, arguably a major accomplishment—if enacted.

Yellowstone administrators are also embarking on research into the effects of snowmobile trails on the Park's bison in particular, having recently approved at least thirteen different research projects involving bison and/or their use of groomed snowmobile trails.<sup>38</sup>

Clearly, the VUM team has made substantial progress on its list of tasks and on the four main steps of the VUM Process. After more than twenty years of unlimited snowmobiling in Yellowstone, unlimited resource impacts, very limited knowledge of snowmobile impacts, and limited control over the winter situation, the Park administrators are evidently finally considering true reform. They are considering limitations to the use of snowmobiles in Yellowstone, some of them quite restrictive limitations. They are recognizing that snowmobiles do impact the Park's treasured resources. They are embarking on research to discern some of those resource impacts. In effect, they are attempting to exert some real control over the Park that they manage. However, they have yet to make any significant changes or decisions regarding winter use of Yellowstone.

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<sup>37</sup> John A. Sacklin to Superintendent, Sept. 19, 1995, IN Planning Office Files, File: "Yellowstone Alternatives," NPS, YNP, WY.

<sup>38</sup> Tami Blackford, "Research and Researchers in Yellowstone," *The Buffalo Chip* (A Resource Management newsletter published by the Yellowstone Center for Resources, YNP, WY), August/Sept. 1997, pp. 19-20.

Additionally, the VUM authors acknowledge that the Winter Use Plan really only affirmed the status quo, making no major changes. Consequently, the VUM process is the first significant attempt to examine the environmental and social consequences of unlimited snowmobile use of Yellowstone. Moreover, it is the first acknowledgment that such concerns, long raised by the public, are indeed valid. Again, though, park managers have yet to institute any such changes.

While park managers deserve commendation for these long-overdue actions, their work on proper winter visitor use management has only begun. Frustrated with persistent foot-dragging by Yellowstone administrators, and their earlier policy of ignoring the environmental effects of snowmobiling, a pair of wildlife groups filed suit against the NPS in Yellowstone regarding their lax snowmobile policy in 1997.

#### The Winter of 1996-97 and Public Backlash

In the winter of 1996-97, almost half of Yellowstone's bison perished. Not only did that winter bring much heavier-than-normal snow levels (as much as twice normal levels), but it also brought a week of *rain* to Yellowstone, even at its higher elevations—an unusual winter event. The rain fell around New Year's Day. Later in January, colder temperatures returned, freezing the rain in the snowpack into a layer of ice as much as a foot thick. Subsequent snowfall buried the ice within the snowpack, where it remained for the rest of the winter.<sup>39</sup>

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<sup>39</sup> Doug Peacock, "The Yellowstone Massacre," *Audubon* 99(3) 42.

Bison are ordinarily capable of moving as much as three feet of snow aside to access the buried grass for their sustenance. They are especially well adapted for this, using their massive heads as snowplows to move the snow to the side. Yet, even the largest bulls, which can weigh over 2,000 pounds, could not cope with the ice layer in the snowpack that winter. Consequently, bison began leaving the park (some via the snowmobile trails) searching for lower pastures lacking that layer of ice. In January and February of 1997, the only such places that existed were outside of Yellowstone Park, in the West Yellowstone and Gardiner, Montana areas. So, bison began leaving the Park in record numbers.<sup>40</sup>

Bison in Yellowstone carry brucellosis, a disease that causes them no harm, but causes cattle to abort fetuses. Montana and Wyoming ranchers in the past twenty or thirty years have collectively spent millions of dollars eradicating this disease from their herds. Because their efforts at eradication were successful, the Animal and Plant Health Inspection Service (“APHIS”) of the U.S. Government has awarded both states a special “brucellosis-free” status, which allows ranchers in these states to ship cattle out of state without quarantining them for brucellosis verification, a time-consuming and expensive process. APHIS carefully supervises the brucellosis status of each state, and the states zealously guard their brucellosis-free status. When bison leave the Park in winter, they sometimes range onto private land used to ranch cattle in the summer. However, most of

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<sup>40</sup> Ibid.

the landowners remove their cattle in winter. With the cattle gone while bison are there, and with the very low survivability of the *Brucella* organism (the cause of brucellosis) in the cold winter weather, the possibility of bison transmitting this disease to cattle is extremely small, and has never been documented. Nevertheless, with bison leaving the Park, APHIS has threatened to revoke Montana's brucellosis-free status. Consequently, representatives of the state of Montana, APHIS, and Yellowstone developed an interim bison management plan to cope with the bison that leave the Park. The plan is rather simple, calling for the state of Montana and Yellowstone administrators to capture and kill most departing bison. The state then shoots and kills, or captures and sends to slaughter, any bison that leave the park, with some exceptions in certain areas.<sup>41</sup>

During the winter of 1996-97, the state of Montana shot and killed most bison that left Yellowstone, or captured and sent them to slaughterhouses. By winter's end, the state had killed 1,084 bison. This may have been the largest such slaughter of bison since they were eliminated from the Great Plains in southeastern Montana in 1884. Additionally, about another 400 bison died of natural causes (starvation, mainly) inside Yellowstone, due to the severe winter. In total, almost half of Yellowstone's bison perished that winter.<sup>42</sup>

To save the lives of bison that winter, the NPS attempted to haze bison back into

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<sup>41</sup> Ibid.

<sup>42</sup> Ibid., p. 41.

the Park, an effort that was largely unsuccessful, since bison are very difficult to herd.<sup>43</sup> What was successful was capturing the bison, holding them in corrals, and feeding them there until the spring thaw enabled bison to go back into Yellowstone. Such holding and feeding efforts were a major departure from NPS policy, and were implemented exclusively to limit Montana's brutality.<sup>44</sup>

The controversy regarding the situation last winter was long and bitter, reaching the highest levels of the NPS, Department of the Interior, Montana state government, and APHIS/Department of Agriculture. At the date of this writing, the agencies have still not agreed on a plan that would limit the deaths of bison.<sup>45</sup> There is considerable public frustration with the inability of the agencies to craft a humane solution to this problem. For example, the National Wildlife Federation sponsored an information booth for two months in summer, 1997, to inform the public about the situation and to advocate for their solution, which is to capture exiting bison and ship them, alive, to Native Americans who desire them on their reservation—over forty tribes from all over the U.S. would like Yellowstone bison sent to them.<sup>46</sup> Another expression of citizen dissatisfaction occurred at a public meeting in Gardiner on March 23, 1997. Bison rights advocate Delyla Wilson of Bozeman threw a bucketful of bison guts salvaged from the

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<sup>43</sup> Attesting to the veracity of the local saying: "You can herd a bison anywhere it wants to go."

<sup>44</sup> Peacock, "The Yellowstone Massacre," p. 48.

<sup>45</sup> Jeanne-Marie Souvigny, "Yellowstone Park: Speedway or Sanctuary?" *Greater Yellowstone Report* (Fall, 1997), p. 7.

<sup>46</sup> National Wildlife Federation, "National Wildlife Federation & Native Americans Join Forces," *Time for You to Speak Out: Stop the Destruction of Your Buffalo* (Flyer distributed by NWF at its booth in Yellowstone in summer, 1997, available from NWF, Northern Rockies Resource Center, 240 N. Higgins, Missoula, MT 59802), p. 1.

Gardiner killing field at the officials of the above-mentioned agencies, including Montana Governor Marc Racicot, Senator Max Baucus, Senator Conrad Burns, and Secretary of Agriculture Dan Glickman.<sup>47</sup>

Yellowstone administrators certainly share a small portion of the responsibility for the bison slaughter by grooming snowmobile trails, which facilitate the higher numbers of bison and their exit from the Park. Hence, Meyer and Glitzenstein, a law firm in Washington, D.C. representing the Fund for Animals and Biodiversity Legal Foundation (“BLF”) (two national wildlife advocacy organizations) notified Yellowstone on January 24, 1997, of its intent to sue the NPS regarding its violations of NEPA and the Endangered Species Act in connection with winter use activities in Yellowstone.<sup>48</sup> The BLF had originally given the NPS a letter of intent to sue in May 1996,<sup>49</sup> but had not followed up on it, until the January letter to Yellowstone. Most likely, the appalling bison killings reinvigorated BLF’s desire to file its suit, for Meyer and Glitzenstein, in their letter, noted that “bison are now being killed by NPS employees and other government officials in record numbers,” and consequently, “we request that the NPS commit to a schedule for compliance with NEPA.”<sup>50</sup>

The heart of Meyer’s and Glitzenstein’s letter was their demand that the NPS

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<sup>47</sup> Jim Angell, “Racicot, ag chief talk bison,” *Missoulian*, March 24, 1997.

<sup>48</sup> Howard B. Crystal and Eric R. Glitzenstein (both of Meyer & Glitzenstein), to Bruce Babbitt, Roger Kennedy, Jack Neckels, Michael Finley, and John Rogers (all of the Dept. of the Interior or NPS), Jan. 24, 1997, Yellowstone National Park files, YNP, WY.

<sup>49</sup> Michael Milstein, “Environmentalists want snowmobiles barred from Park,” *Billings Gazette*, May 11, 1996.

<sup>50</sup> Crystal and Glitzenstein to Babbitt et al., Jan. 24, 1997, Yellowstone National Park files, YNP, WY.

prepare an Environmental Impact Statement (EIS) on the effects of winter use, specifically snowmobile trail grooming, on the resources of Yellowstone and Grand Teton National Parks. They specifically alleged that winter use in Yellowstone and Grand Teton

has a number of adverse environmental impacts which have never been properly addressed [recall Caslick's similar statement]...:

- 1) the extent to which animals and plants ... and their habitats are adversely affected by winter use activities, and in particular, by snowmobiles and groomed snowmobile trails;
- 2) the extent to which species' population dynamics, distribution, and movements are artificially altered due to the mobility afforded through use of groomed snowmobile trails, and the effects these altered populations have on Park vegetation, wildlife, and ecological processes;
- 3) the impact of winter use activities on the Parks' air and water quality, and compliance with the Clean Air Act ... and Clean Water Act ...; and
- 4) the impact of winter use activities on the winter visitor experience in these Parks ... One particularly salient example of these impacts is bison use of the groomed snowmobile trails.<sup>51</sup>

Meyer and Glitzenstein requested that the EIS address all of these issues. They went on to allege that "the 1990 EA did not adequately address any of these issues. However, even if it had, supplemental NEPA analysis would nonetheless be required" because substantial changes in winter use have occurred (the large increases in visitation since 1990) and substantial new information regarding winter use has come to light (the information on bison used of groomed snowmobile roads).<sup>52</sup>

In addition to demanding examination of the above impacts, Meyer and Glitzenstein

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<sup>51</sup> Ibid.

<sup>52</sup> Ibid.

also demanded that the EIS comply with the National Park Service Organic Act, the Act which established Yellowstone National Park, the NPS's own regulations and guidance, and Executive Orders 11644 and 11989. Finally, they asked that the NPS comply with Section 7 of the Endangered Species Act by formally consulting with the U.S. Fish and Wildlife Service regarding the effects of winter use activities on the Park's grizzly bears and gray wolves, both of which are threatened species residing in the Park.

Meyer and Glitzenstein concluded their letter ("the January letter") by stating "unless the NPS will commit to these measures within the next 30 days, we will have no choice but to pursue compliance with legal requirements in federal court."<sup>53</sup>

Meyer and Glitzenstein followed up their intent to sue with another letter on February 12, 1997, to all potential defendants. The letter included a 49-page report they wrote summarizing the impacts of winter use on park wildlife, air quality, and park users, and the alleged violations of the NPS in regards to the laws listed above.<sup>54</sup> The evident intent of this report was to explain these things in greater detail than the January letter did.

Superintendent Finley never responded to the January letter,<sup>55</sup> so Meyer and

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<sup>53</sup> Ibid.

<sup>54</sup> D. J. Schubert to Glickman, Dombeck, Salwasser, and Estill (all high-ranking U.S.F.S or Dept. of Ag. Personnel), and Schubert to Babbitt, Kennedy, Finley, Neckels, and Rogers (all high-ranking NPS, Dept. of Interior, or USFWS personnel), both dated Feb. 12, 1997. The 49-page report is: D. J. Schubert, "Adverse Effects of Trail Grooming and Snowmobile Use on Winter Use Management in the Greater Yellowstone Area with a Special Emphasis on Yellowstone National Park" (Unpublished report submitted to NPS), February, 1997. All of these are available from the NPS, YNP, WY, or Meyer & Glitzenstein, 1601 Connecticut Avenue, N.W., Suite 450, Washington, D.C. 20009-1035.

<sup>55</sup> Personal communication with John Sacklin, Chief Park Planner, NPS, Nov. 14, 1997, Mammoth Hot Springs, WY.

Glitzenstein filed suit on May 20, 1997 in U.S. District Court in the District of Columbia. By this time the Predator Project of Bozeman, Montana, the Ecology Center of Missoula, Montana, and five different individuals had joined the suit as plaintiffs. In their complaint, the plaintiffs prayed for the same relief that Meyer and Glitzenstein had in their January letter to the NPS in Yellowstone.<sup>56</sup>

Over the summer, a snowmobile advocacy group formed in Dubois, Wyoming to fight the lawsuit against Meyer and Glitzenstein, hoping to keep the treasured snowmobile trails open.<sup>57</sup> By October, both this group and the Blue Ribbon Coalition of Pocatello, Idaho (another snowmobile group) had filed motions to intervene, hoping to join the side of the NPS in defending the status quo in Yellowstone. However, in late October, Judge Emmett Sullivan ruled that these two groups would not be allowed to join.<sup>58</sup>

On September 23, 1997, Meyer and Glitzenstein settled its suit with the NPS out of court. In the settlement, the NPS agreed to do the following:

- 1) Prepare a comprehensive Environmental Impact Statement addressing a full range of alternatives for all types of winter use, including snowmobiling and trail grooming, in Yellowstone and considering the effects of those alternatives on the Park's environments. The NPS shall begin the EIS process by scoping for relevant concerns by April 1, 1998, shall have the draft EIS issued on or before August 1, 1999, and shall have the final EIS completed by Sept. 1, 2000;
- 2) Request the U.S.F.S. to participate in preparation of the EIS as a cooperating agency;

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<sup>56</sup> Case Number 1:97CV01126, U.S. District Court for the District of Columbia, Judge Emmett Sullivan, Deck Type Civil General, May 20, 1997.

<sup>57</sup> Angus M. Thuermer, Jr., "Charges fly as more join park lawsuit," *Jackson Hole News*, Jackson, WY, August 27, 1997.

<sup>58</sup> Scott McMillion, "Judge upholds Yellowstone winter-use settlement," *Bozeman Daily Chronicle*, Bozeman, MT, Oct. 28, 1997.

- 3) Continue existing winter activities;
- 4) Refrain from building any winter use facilities other than a warming hut at Norris, replacement warming huts at Madison and Canyon, and replacement underground fuel storage tanks at Old Faithful;
- 5) Prepare a Biological Assessment and request formal consultation with the USFWS regarding the impacts of winter use activities on grizzly bears and wolves;
- 6) Prepare an EA with the proposed action of closing one or more road segments to winter visitor use in order to study the effects of groomed snowmobile trails on bison; the preferred alternative must be closing the road from Fishing Bridge to Canyon on January 10, 1998 and possibly for the next two winters as well; and
- 7) Pay the plaintiffs \$11,000 for attorney fees and other expenses.<sup>59</sup>

On October 27, 1997, Judge Sullivan approved the settlement, and denied the snowmobile groups permission to join the suit.<sup>60</sup>

On January 16, 1998, Yellowstone administrators completed the most immediate of the settlement points, number six. In their Environmental Assessment on the closure of fourteen miles of snowmobile trail in Yellowstone, Yellowstone administrators decided against closing any snowmobile trails for the next three winters. Instead of the closures, administrators “will instead expand ‘research and monitoring’ of bison movements and their use of the roads for three winters,” and decide after three winters whether any closures are necessary to protect the park’s bison.<sup>61</sup> Perhaps the visits of Wyoming Congressman Craig Thomas and Montana Congressman Conrad Burns just the week before influenced the park to refrain from any closures. After his visit, Thomas stated

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<sup>59</sup> Settlement Agreement, *The Fund for Animals, et al., v. Bruce Babbitt et al.*, Civil No. 97-1126 (EGS), Sept. 23, 1997, U.S. District Court, District of Columbia; Planning Office files, NPS, YNP, WY.

<sup>60</sup> Scott McMillion, “Judge upholds Yellowstone winter-use settlement,” *Bozeman Daily Chronicle*, Bozeman, MT, Oct. 28, 1997.

<sup>61</sup> Scott McMillion, “Road closure put on hold,” *Bozeman Daily Chronicle*, Jan. 17, 1998.

“We don’t think there is justification for the closure and, frankly, my trip reinforced that.”<sup>62</sup> As Andrea Lococo and D. J. Schubert of the Fund for Animals said, (respectively) the NPS’s “decision demonstrates that the Park Service is far more interested in pacifying politicians and in continuing to keep the public visitation turnstiles spinning,” and “the Park Service has decided that managing Yellowstone like it were Disneyland is more important than complying with federal law.”<sup>63</sup>

Thus, twenty-six years after Yellowstone’s administrators began grooming snowmobile trails, a lawsuit from the public at last compelled them to take a hard look at the environmental effects of snowmobiles, as well as other forms of winter recreation, on the Park. However, the first actions of Yellowstone administrators to comply with the lawsuit settlement leave much to be desired, raising the question as to whether that hard look will accomplish any significant changes.

### Chapter Conclusion

When Mike Finley arrived, many of the NPS staff felt that at last Yellowstone had a superintendent who might change things, especially uncontrolled winter visitation.<sup>64</sup> Beginning with the VUM Process, and culminating in the commitment to do an EIS, Finley is now beginning to take a hard look at the adverse effects of snowmobiles, and winter recreation in general, on the Park.

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<sup>62</sup> “Sen. Thomas: Snowmobile trail closures not justified,” *Bozeman Daily Chronicle*, Jan. 15, 1998.

<sup>63</sup> *Ibid.*

<sup>64</sup> Personal experience, Yellowstone National Park, 1994.

While Yellowstone's administrators have committed to the EIS, only time will tell if they decide to make any major changes. The recent decision to refrain from closing a snowmobile trail indicates that Yellowstone administrators may not have the will to attempt major reform in the Park. The citizens shall have to continue to be vigilant in holding Yellowstone's administrators responsible for their actions as they go about the EIS.

Time will also tell whether local and national politicians will allow them to make that decision, whatever it may be. The economic and political powers of the snowmobile advocates are extremely strong and able to overcome significant public opposition to snowmobiles in Yellowstone (such as recorded in the 1990 Winter Use Plan). For example, less than two weeks after Judge Emmett approved the settlement, Senator Conrad Burns of Montana, a staunch defender of motorized use of national parks at all expense, introduced a bill in Congress that would compel the NPS to remain open to snowmobiles for winter, expand the length of the season, and require Park managers to work with gateway communities on issues that affect their pocketbook.<sup>65</sup> It will be interesting to see if Burns' bill goes anywhere.

One of the lessons learned from the 1990 *Winter Use Plan* is that; in order to significantly change the winter situation, Yellowstone's administrators will need to have exhaustive amounts of data to prove that change is necessary, and to overcome the

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<sup>65</sup> Scott McMillion, "Burns has plan for park," *Bozeman Daily Chronicle*, Bozeman, MT, Nov. 8, 1997.

political pressure to continue allowing unlimited numbers of snowmobile into the Park.<sup>66</sup> Many concerned individuals hope that the Park's administrators use the EIS and the VUM Process to provide that data and to make the right decision, one that will stick.

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<sup>66</sup> Bill Shreier (Former Assistant Planner for Yellowstone), interview by author, telephone interview, Bryce Canyon National Park, Utah, Nov. 17, 1997.

## CONCLUSION

Yellowstone's snowmobile policy owes its existence to five different superintendents from the 1960's to today.

Beginning in the early 1960's, John McLaughlin encouraged snowmobile use as a way of dispersing visitation throughout the year, in accordance with the MISSION 66 program. Additionally, McLaughlin followed the dominant theme throughout the national parks in this period of national park history: encouraging visitation.

Jack Anderson arrived in Yellowstone in 1967 and served through 1975. During his tenure, he formally adopted the snowmobile policy of Yellowstone National Park as a way of satisfying local pressure to plow Yellowstone's roads in winter. Anderson also encouraged snowmobile use as a means of enabling visitors to see and experience Yellowstone at that spectacular time of year. Finally, Anderson eventually adopted a personal agenda of promoting snowmobiles in the Park because he loved the machines and the activities that they enabled him to do. Even though Anderson would probably be appalled at the modern situation in Yellowstone, he remains the person most responsible for opening Yellowstone to snowmobiles.

John Townsley, Anderson's successor, continued Anderson's policy of promoting snowmobile visitation because he, too, personally liked the machines, to the point of being a crusader for their use. Townsley wanted all people to experience the Park in

winter, and the snowmobile was the means to that end. Pressure from his superiors and from local interests drove Townsley to expand services, as it had driven his predecessor to open the Park in the first place.

Bob Barbee arrived in Yellowstone in 1983 to find winter use again increasing exponentially, and reacted by taking the first steps toward regulating the machines and their impact on the Park. Nevertheless, he both tolerated the use of snowmobiles in the Park, and also promoted their use, as Townsley and Anderson had, though not as zealously. By accepting snowmobile use in the park, yet beginning to regulate it and examine its impacts upon the Park, Barbee's was a superintendency of transition to a more critical and possibly protective superintendent.

Mike Finley, reacting to yet more increases in visitation and a lawsuit, has taken a more critical look at the effects of snowmobiles upon the Park. He has admitted that many of the concerns regarding winter visitation are valid—that there are problems with winter use in Yellowstone. Having begun some serious research into those problems, he has yet to make any significant changes.

Except for Mr. Finley, these Yellowstone administrators gave no serious attention to the potential environmental impacts of snowmobile/winter visitor use until the Visitor Use Management Process began in 1993, nor did they comply with the National Environmental Policy Act until 1990—and even then, only marginally so. Generally they adhered to their personal feelings and anecdotal evidence that snowmobiles had fewer environmental impacts than the automobile did. Not until long after information about

the negative effects of snowmobiles became widely known did Yellowstone administrators even begin to take the hard look that they were required to take. Likewise, when Yellowstone's administrators gave consideration to the potential for tremendous increase in snowmobile visitation, they either felt helpless to control it or relied upon misleading figures to support their decisions. Finally, Yellowstone administrators did not consider the policies of other national parks toward snowmobiles, until recently. Rather than investigating the motives of the other parks in eliminating snowmobiles, and doing the same in Yellowstone, Yellowstone's administrators instead wanted other parks to come in line with their pro-snowmobile policy. NPS administrators in Yellowstone also never sought public opinion regarding snowmobile use in the Park, and ignored it when they did seek it, in contrast to the efforts made by other park superintendents to discern public opinion and adhere to it.

In conclusion, Yellowstone National Park had several superintendents from the 1960's to the 1980's who allowed snowmobiles into the Park to satisfy their own desires, to allow the public to view the spectacular scenery of the Park in winter, and to mollify local politicians and citizens. In their zealous rush to allow snowmobiles, however, the superintendents neglected to examine their environmental effects, potential for increased numbers, and treatment in other national parks. By neglecting their important responsibilities, the superintendents have allowed snowmobiles to dominate and adversely affect the Park as they do today.

## APPENDIX

National Parks have meant different things to Americans at different times in their history. Originally they were seen as pleasuring grounds, often for the wealthy only. By the middle of this century, Americans viewed them not only as pleasuring grounds, but also as a form of Disney World, where they could feed bears and manipulate nature to their desired end. By the 1960's the meaning of national parks had begun to change to be that of a natural sanctuary in which we could allow nature to run its course as much as possible.

Since then, America has become much more urbanized. With that urbanization, Americans have lost much of their former free time, as well as quiet, relaxing places to spend time in. As well, the country has acquired more and more control over nature, gradually losing ever more of its truly wild places.

It is for these reasons that Joseph Sax, in *Mountains Without Handrails*, argues that the highest purpose of national parks today is as places to escape the noise and pervasive influence of our society. They are places to contemplate, to meditate, and to be inspired by nature:

Save some places explicitly for what has been called ... reflective or contemplative recreation. Indeed, try to encourage more of such recreation, and for that reason try to accommodate conventional demands ... at other places. Moreover, make some effort to discourage the use of public lands for those forms of recreation that are the most consumptive of the resources, and that rest principally on the inclination toward power and dominion.<sup>1</sup>

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<sup>1</sup> Joseph L. Sax, *Mountains Without Handrails* (Ann Arbor: University of Michigan Press, 1980), 105.

I would add to Sax's brilliant call to park managers and Americans another reason to save them: that they are places to touch the wildness present in nature, and thereby learn who we are. For example, by realizing that there is an animal out there that can kill us (grizzly bears), we learn humility, and learn our place in the world.

Sax may have been thinking directly of snowmobiles when he wrote his book, for they are a form of recreation that is consumptive of natural resources and they do rest on the inclination toward power and dominion over nature. As such, snowmobiles do not belong in our national parks. And so, I join Sax in calling on the NPS to get rid of them entirely; eliminate them from our national parks. Return to the Parks their natural, awesome quiet. Make the Parks even better places to reflect and contemplate, to touch wildness and find out who we are.

#### My Specific Recommendations for Yellowstone

I first recommend that Park administrators complete the studies on bison use of the groomed roadways in the Park. If the studies confirm that bison do use the groomed roadways to a significant degree, then I recommend that Park administrators:

- 1) Close the roads on the east side of the Park to all motorized use: from Canyon to West Thumb and to the East Entrance; and
- 2) Restrict visitation on all other roads within Yellowstone to snowcoaches only.

If the studies conclude that bison use of groomed roadways is not significant, then:

- 1) Restrict the roads on the east and south sides of the Park, from Canyon to the East Entrance, Fishing Bridge to the South Entrance, and Old Faithful to the South Entrance, to snowcoaches only; and
- 2) Plow the roads on the west side of the Park, from Mammoth Hot Springs to Old Faithful and West Yellowstone to Canyon, and open them to public transportation only—twelve-passenger vans or buses.

As reasons for these recommendations I list the following set of advantages they both offer:

- 1) Snowcoaches and buses are both much cleaner than snowmobiles.
- 2) Both are much quieter than snowmobiles.
- 3) Continuing use of snowcoaches in some part of the Park preserves a unique, but relatively benign experience for visitors.
- 4) Both options promote public transportation over private transportation, conserving fossil fuels and setting a good example to the public.
- 5) With a captive audience on the snowcoaches and/or buses, the NPS can force the public to listen to its educational message, which typically emphasizes preservation.
- 6) With either snowcoaches or buses, the NPS could limit overall park visitation to the number of seats available on the vehicles.
- 7) Likewise, the NPS could protect its precious resources better, because the professional drivers of such vehicles would generally respect the Park resources more than some snowmobilers do.
- 8) With drivers trained to drive on Yellowstone's winter roads, the public would generally be safer than they are now with the hundreds of snowmobilers on the roads.
- 9) Because the NPS would not have to groom as many roads or patrol them as much, they would save a considerable amount of money.
- 10) Buses and, to a lesser extent, snowcoaches, would be more affordable to more park visitors.
- 11) Through scheduling, the NPS could both stagger the entering times of the buses or coaches, reducing crowding impacts, and could offer improved skier/hiker shuttles.

Either option would have some drawbacks. Following I list these drawbacks, and

offer responses to them:

- 1) Probably the single greatest drawback is that under either option, bison would probably continue to use the groomed roads or plowed roads. However, bison will continue to leave the Park near Gardiner on their own natural trails; hence, even closing the entire park will not fully solve this problem. Furthermore, with the strident snowmobile advocates present in the surrounding communities, closing the entire park is politically impossible. Hence, it will be difficult enough to implement either of the above options. However, since either option above is a significant improvement over the current situation, let us advocate for them and recognize that we will always have bison exiting the Park, and shall have to develop means of coping with this regardless of what we do in the winter. This is not meant to divert attention from the current problems; rather, it is a way of saying that, given the current situation, let us take what steps we can to improve it.
- 2) Purchasing many new snowcoaches and/or buses will be expensive, with the costs most likely borne by AmFac Parks & Resorts, the current park concessionaire. By waiting until the bison research is done, we will wait long enough to begin a new contract with the company, and can then require them to purchase the equipment under that new contract. The company will more easily be persuaded to buy buses, since they can use them in summer and thereby realize income on them nearly year-round.
- 3) West Yellowstone is undoubtedly going to loudly criticize these proposals, since they stand to lose large amounts of money, or so they think. In her 1995 study, however, Littlejohn discovered that snowcoach passengers spend an average of \$100 more than snowmobilers on their stay in the Yellowstone area.<sup>2</sup> Clearly, then, West merchants could make more money under this proposal. Furthermore, merchants in West Yellowstone will someday have to understand that the Park is not here for their economic benefit.
- 4) Some argue that eliminating snowmobiles from the Park will displace them to surrounding areas, and that snowmobile use on the National Forest will correspondingly increase. This argument is spurious, because if the activity of snowmobiling is all that draws such persons to the Yellowstone area, then they do not belong in Yellowstone in the first place.
- 5) Some will argue that restricting visitors to public transportation will reduce their freedom of choice. While this reduction can be minimized through flexible or staggered schedules, it is time to recognize that some individual sacrifices for the common good will be necessary.

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<sup>2</sup> Margaret Littlejohn, *Visitor Services Project: Yellowstone National Park Visitor Study, Report 75* (University of Idaho, Moscow), 1996, p. A-5.

It is time—it is past due—to eliminate the snowmobile from Yellowstone, and to allow all citizens to experience the awesome beauty, silence, and wildlife of Yellowstone more completely. In that way, we will find a place worthy of its name, Wonderland: a place to reflect, contemplate, touch wildness, and learn who we are.

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