INTRODUCTION

As Ronald Foresta noted in his America’s National Parks and Their Keepers, students of bureaucracy are split over the virtue of diversifying agency responsibilities. (1) The USNPS took management responsibility for seventeen national parks and twenty-two national monuments during its first year of operation in 1917. Seventy-five years later, the agency administers 357 units of the National Park System. The fifty national parks and seventy-nine national monuments constitute only 36% of the total number of USNPS units, while the two original classifications have been joined by twenty others.

Among the additional classifications is one called “National Recreation Area” (NRA). The NRA classification is a broad one and not the exclusive domain of the USNPS, as the Department of Agriculture’s Forest Service (USFS) also administers several areas. A number of the eighteen USNPS NRAs are managed under cooperative agreements with other federal, state, and local agencies.

The first NRAs to come under USNPS administration were units surrounding reservoirs. These dams had been built by the Bureau of Reclamation, which sought to relieve itself of subsequent responsibilities associated with managing recreation at these sites. Several prominent officials with the Department of the Interior (which oversees both the Bureau of Reclamation and the USNPS) supported the transfer of these responsibilities to the USNPS during the 1930s and over the following three decades. Their reasoning was
founded upon the idea that the Interior department, not Agriculture, should control the expanding federal involvement in outdoor recreation, and that the USNPS was the logical choice to be the lead agency.

This paper examines the background of a conflict between two views about the role and function of the USNPS. It will identify how a nebulous legislative mandate left open the question of what constituted appropriate expansion for the agency. A conflict over the purpose of the National Park System sprang from this vacuum and has yet to be resolved.

**WHAT IS A NATIONAL PARK?**

National parks and monuments came into being without a statutory definition as to exactly what they were. Before the USNPS was established, the designation "National Park" was applied by Congress to fifteen areas where varying levels of monumentalism, resort facilities, and local boosterism seemed to be the common denominators. Even so, national parks were not necessarily inviolable (as demonstrated by the controversy over the building of Hetch Hetchy dam within Yosemite), nor were they always inalienable (Mackinac Island National Park was given back to the state of Michigan twenty years after its establishment in 1875).

The first national monuments were created by presidential proclamation under the Antiquities Act of 1906. A definition of the designation was absent in the legislation, however, and a wide variety of national monuments soon resulted. These reservations were once described as "a piece of land either flat or rough, timbered or bare. . . . But the most clearly outstanding character of a National Monument is its complete inconsistency."(2)

Although some conservationists and legislators were concerned about it at the time, no definition for national parks or monuments was included in the 1916 USNPS organic act. The best that the legislation's authors could do was a mandate for the bureau, which took the form of an ambiguous 92-word governing sentence:

> The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.(3)

The agency's second director, Horace Albright, once said that everyone connected with the drafting of the organic legislation knew generally what a national park was, but not specifically. Frederick Law Olmsted, Jr., the author of the governing sentence, thought this problem could be mitigated by the establishment of an independent commission that would develop policy for national park areas. He knew that a bureaucracy without a clearly defined statutory direction would find it difficult to provide its managers with consistent guidelines. The hurdles of obtaining the act's passage, however, resulted in Congress deleting this provision. As a result, the USNPS was provided with enough general power to promulgate regulations and formulate policy in national parks and monuments.

As the first director of the USNPS, Stephen T. Mather attempted to provide direction for the agency through a letter that he and Albright drafted for Secretary of the Interior
Franklin K. Lane in 1918. While the letter did not define what constituted a national park, it aimed to limit the study of new parks to areas possessing “scenery of supreme and distinctive quality or some natural feature so extraordinary or unique to be of national interest and importance”(4). This was followed by a directive that “the national park system, as now constituted, should not be lowered in standard, dignity, and prestige by the inclusion of areas which express in less than the highest terms the particular class or kind of exhibit which they represent”(5).

Mather was a great promoter of parks in general and foresaw a tiered system of national, state, and local parks. To that end, he organized the first National Conference on State Parks in 1920 as a way to foster the establishment of state parks and set them up as a complement to the national parks.

Another reason why Mather took such pains in organizing the state parks was to ensure USNPS survival by broadening its base of support. These state park constituents could be useful to the USNPS in its struggle with the USFS over which agency would assume responsibility for a unified national recreation policy. The threat of transferring administration of the national parks to the Agriculture department was still very real to Mather, so he also sought ways to make the USNPS distinct from its competitor. The most promising avenue was education, which Mather saw as central to the purpose of national parks. USNPS interpretation began during the summer of 1920 at Yosemite and Yellowstone with “nature guides” who conducted field trips, gave lectures, and prepared natural history bulletins for posting in their respective parks.(6)

By 1928, Mather wished to better institutionalize interpretation within the USNPS. He borrowed a page from Olmsted and asked the Secretary of the Interior, Roy O. West, for an independent commission that would study the situation and make recommendations. When the Committee on the Study of Educational Problems in the National Parks convened later that year, it featured a number of prominent academicians. Before the group set about making recommendations for an educational program, they first considered the logical step of making a clear statement as to what constituted a national park.

THE NATIONAL PARK CONCEPT

Released in 1929, the Committee's report defined the purposes of the parks and their relationship to education in the first three “General Principles for Guidance in Study of the Educational Program”:

- National Parks must be clearly of importance to the Nation as a whole. Their support and maintenance from Federal funds can be justified only on that basis. Where the special characteristics are of less than national significance, parks should be supported by local interests.
- The distinctive or essential characteristics of national parks lie in the inspirational influence and educational value of the exceptional natural features which constitute the reason for the existence of these parks. Outdoor recreation is recognized as an important factor in national park administration, but it is not the primary purpose, and can be enjoyed through abundant opportunities furnished elsewhere. While primitive regions can not be provided to an extent sufficient for the future outdoor recreational needs of the whole people, those primitive areas
with features of especial inspirational significance and educational value should be protected in fully primitive condition as national parks.

The primary function of national park administration concerns the use of the parks for their inspirational and educational values. The effort to give complete protection to those features which characterize the parks is necessarily a correlated responsibility. That aspect of administration concerned with defining and planning the opportunities to appreciate and interpret the primary features of the parks will naturally determine in major part the program and operation of other activities, such as those concerned with transportation, housing, subsistence and recreation.

These principles were largely the product of the Committee's chairperson, John C. Merriam. Mather had been associated with Merriam for roughly a decade, since both men had been founders of the Save-the-Redwoods League in California. Merriam assumed the presidency of the Carnegie Institution of Washington, D.C., in 1920. He was probably the most influential man in the country with respect to setting the direction of scientific research for almost two decades. A paleontologist by training, Merriam's initial involvement with national parks came when he garnered foundation support for museums to be built at Yellowstone and Yosemite during the early 1920s. He once explained why educational work in the parks interested him so much:

A large part of all education is unfortunately based upon use of substitutes for realities. I can speak from early experience as professor of paleontology, having lectured for many years by use of charts, casts, and a few specimens. It seemed to me then that interest may be stimulated better pointing out the realities upon which the theory rests. . . . I came to the idea of studying National Parks because of the extraordinary opportunity for first-hand contacts with great natural phenomena. The function of educational work in parks is to give people opportunity to see great things and form their own judgments.

Not only did the national park concept embody what Merriam and the Committee thought that the parks should be, but it embraced something which Merriam labeled "nature appreciation." It was the goal of interpretation and was probably best described by Committee member Harold C. Bryant:

The dispensing of knowledge about park features was a goal important and useful, but it was hoped the park visitor could be taught to think great thoughts, could be sent home full of new ideas, actually inspired. Based on what was seen and heard a visitor could be aroused to contemplate the origin and evolution of the world we live in, the laws which control it and the interrelations of its parts . . . .

Although the national park concept was not perfectly precise, it represented a way of differentiating areas worthy of National Park System status and those appropriate for management by state and local interests. Its biggest flaw, however, was that it did not address how to handle historical areas. The Committee settled for something seemingly in contradiction to its position on natural areas. The USNPS was to illuminate "the general outline of man's career on this continent," thus placing a broad representation of history and an associated scientific preservation over the glorification of the sacred. As Foresta has pointed out, little in the way of a substantive
USNPS history policy has resulted.(10)

Historical areas were still a sideline for the agency in 1929 and the Committee could not foresee the day when over 60 percent of USNPS units could be classed as such. It was more concerned about natural areas, which were (and still are) the primary focus of the USNPS. With the national park concept embraced by Director Albright and constituent groups like the National Parks Association, the Committee was confident that their work would minimize conflicts over the use and function of the National Park System. The first test came in less than a decade.

The number of areas and responsibilities assigned to the USNPS grew dramatically from 1933 to 1937. Adherents of the national park concept had little difficulty endorsing the new USNPS role as the lead federal agency in historic preservation. Nor did they actively oppose adding historical areas formerly under War Department and District of Columbia administration to the National Park System managed by the USNPS.

What acted as a red flag to Merriam was the submittal of a draft bill by Secretary of the Interior Harold Ickes on May 28, 1934. It provided for the USNPS to coordinate the development of parks, parkways, and recreational areas at the state and local levels. After this bill was amended somewhat and became law as the Park, Parkway, and Recreation Area Study Act of June 23, 1936, Merriam wrote: “this situation is to me both discouraging and disgusting.”

Having the greatest opportunity that the world has ever presented for doing a very great work and for developing leadership in the study and appreciation of nature and the protection of natural features, the Park Service is rapidly backing away from its original position and is devoting itself to recreation, largely, I understand, because of envy of the general recreational program of the Forest Service.(11)

The envy Merriam was referring to was the almost pathological campaign Ickes had waged against the USFS throughout the 1930s. Ickes and his assistants saw the Interior department’s USNPS as the place where all federal involvement in recreation should be managed, in much the same way as the Agriculture department’s USFS sought to direct all federal undertakings in forestry.

On the eve of the Parkway Act’s passage, Congress appropriated money for a study to determine the recreational possibilities at Boulder Dam and Lake Mead. The USNPS was to conduct the study in cooperation with another agency in the Interior department, the Bureau of Reclamation. Recreational development at Lake Mead commenced as the study was being done with Civilian Conservation Corps enrollees under USNPS supervision.

A cooperative agreement between the Bureau of Reclamation and USNPS followed in 1937, which provided for the latter to assume responsibility for all recreational activities at Lake Mead. There was now a precedent for USNPS administration of recreational areas resulting from the impoundment of water from large dams.(12)

The new responsibility appeared to be willingly accepted by the USNPS director, Arno Cammerer. In his annual report for 1937, Cammerer wrote: “the value and national importance of the Boulder Dam recreational area was proved by the public use of the area during the past year and the vast scientific interest in it displayed by specialists in many fields”(13). Almost coincident with Cammerer’s annual report was
his statement published in the American Planning and Civic Annual, where he expressed the goal of the USNPS in these words:

The park concept provides a new form of land use, humanly satisfying, economically justifiable, and with far-reaching social implications. . . . While it has been given considerable impetus in this country it is still in its infancy. When it has been accorded proper recognition, the National Park System will comprise fewer lands than those devoted to forestry and agriculture but it will include those areas and structures which cannot be adequately preserved or properly used under any other category of land management. (14)

Cammerer was soon under attack by the leaders of the USNPS's traditional fifth column, the National Parks Association. They saw the USNPS straying from its original ideals and embracing lesser areas like parkways, seashores, and reservoirs. In July 1938 Cammerer requested that the NPA publish his rebuttal to the charges. This was the first time that a director had ever been subjected to the friendly fire of the agency's closest supporters. (15) It was undoubtedly a factor in Cammerer's request for reassignment to a regional director post in 1939.

The task of selecting a new director fell to the National Parks Advisory Board, chaired by Merriam. He and his colleagues wanted to put the USNPS back on what they felt was its rightful course, and in the middle of 1940 chose Newton Drury. The new director was Merriam's protege in the Save-the-Redwoods League and a builder of California's state park system. He was not Secretary Ickes' first choice, however, largely because Drury did not share the view espoused by Cammerer several years earlier.

AN ATTEMPT TO HOLD THE LINE

The rift between Drury and Ickes began with the onset of World War II, when the USNPS Washington office was moved to Chicago. Much of the Interior Building was needed by the War Department, so the USNPS stayed in Chicago until 1946. During that five-year period, the agency faced a number of threats to the parks which, for a time, made the precedent set at Lake Mead seem benign.

Pressure on the USNPS to assume a wider role in recreation was stepped up by Ickes and his assistant secretaries in early 1945. Ickes wanted the USNPS to take up the management of recreational activities at the Shasta and Friant dams in California. Drury attempted to resist by sending a memorandum to Ickes in which he stated that the USNPS policies crafted to resist the threats to the parks would be weakened because "of the impossibility of making a clear distinction in the public (and Congressional) mind between 'multiple use' areas, and the true national park areas, if both of these are administered by the National Park Service."

At Boulder Dam . . . we have had to depart from our traditional wildlife policy as to predators because of the grazing commitments that are accepted there, but not accepted in the national parks. Repeated instances of this sort would tend to break down our traditional policies in all areas under our jurisdiction. Our Service will be stronger if it can keep clear of such equivocal arrangements. (16)

Drury concluded the memo with a resounding declaration that the management of local or mass recreation (except as was provided incidentally to the main function of the USNPS) was not the concern of the agency.
One of Ickes' assistants, Michael W. Straus, drafted a reply expressing the Department's displeasure. Straus was a former commissioner of the Bureau of Reclamation and stated in his response to Drury that "adoption of the policy set forth in the National Park Service memorandum is an open abdication of an important field, which inevitably will result in a stampede by countless agencies of a greedy nature with interest in self-aggrandizement to enter the field with terrific confusion" (17).

Drury kept his allies in NPA informed of the pressure being exerted on the USNPS. In response, the NPA set out to strengthen the 1929 national park principles by attempting to categorize some units of the National Park System as "National Primeval Parks." According to a policy statement unveiled in May 1945 and published several months later, primeval parks were to be inviolate sanctuaries and of exclusively national importance. The NPA called for Congress to establish a new system of primeval parks and monuments, where there was a clear distinction between the supreme natural areas and other units (18).

Congress, however, did not act upon the NPA recommendations. Instead it granted the USNPS authority to manage recreational use in areas administered by agencies such as the Bureau of Reclamation on August 7, 1946. Several months later, the Coulee Dam National Recreation Area was established under an agreement with the Bureau of Reclamation, patterned after the Boulder Dam/Lake Mead arrangement. Although the NRA designation was now legitimized, Drury continued to resist Bureau of Reclamation proposals for additional recreation areas.

After Ickes tendered his resignation in February 1946, the Bureau of Reclamation stepped up its campaign for dams in a number of river basins throughout the west. The USNPS opposed those projects which it thought to have an adverse impact on National Park System units. Most prominent were the dams scheduled to be built within Dinosaur National Monument. Yet other projects, such as the twenty-three dams proposed for the Rogue River basin in Oregon near Crater Lake National Park, were met with equal USNPS resistance.

Drury's forced resignation came when he openly opposed the new secretary of the Interior department, Oscar Chapman, on the Dinosaur dam issue. Chapman, who had previously been one of Ickes' assistants, later conveniently changed his mind and opposed the dams once Drury was gone. As a result, subsequent USNPS directors Conrad Wirth and George Hartzog were understandably more friendly toward the idea of national recreation areas than Drury had been.

CONCLUSION

As a way of promoting the Department of Interior's supremacy in recreation, the NRA designation was less successful than Ickes and his assistants had hoped. In 1963 the secretaries of Interior and Agriculture signed the so-called Peace of the Potomac, in which the two departments pledged to cooperate with each other on proposed NRA designations affecting the future management of federal lands. This agreement effectively ended Interior's attempts to unilaterally assume administration of Forest Service land (19). The Forest Service has since used the NRA designation to ward off environmentalist proposals to establish national parks in places such as Hells Canyon (Oregon), Sawtooth (Idaho), and Smith River (California).

As Drury predicted, the NRA designation did work to blur the distinction between the superlative areas
that the USNPS traditionally managed and the lands once considered the province of state and local authorities. One outcome was apparent in the Foresta study of the early 1980s. He found the USNPS to be in a state of confusion with regard to its mission and the purpose of the National Park Service it manages. Yet federal bureaus are created to carry out the will of Congress, and often reflect the vague and sometimes contradictory direction given them. Congress has not acted to clarify the 1916 USNPS Organic Act, but it did direct the agency in 1970 to manage all areas in the National Park System in accordance with the 1916 Act and subsequent legislation. (21)

Drury's vulnerability was due to his defense of a policy governing the composition of the National Park System in a statutory vacuum. He was susceptible, as all USNPS directors have been, to the political forces which have greater latitude when prescriptive legislation is absent. As a result, the national park concept has faded from view. Vestiges of it remain in the USNPS, however, generally as the foundation for policies whose origins may be hazy to current and future employees.

REFERENCES

5. Ibid.
8. “Notes on Remarks by John C. Merriam in address to Naturalist Staff of Crater Lake National Park, Sinnott Memorial, August 6, 1932,” Merriam folder, History Files, Crater Lake National Park.
10. Foresta, p. 150.
17. Straus to Ickes, February 6, 1945, p. 698, op. cit.