

June 27, 2008

Public Comments Processing
Attn: 1024-AD70
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, Suite 222
Arlington, VA 22203

Dear Sir/Madam,

I am writing on behalf of the board and more than 350 members of the Denali Citizens Council. Our local, grassroots organization was founded in 1974 with the primary purpose of protecting the integrity of Denali National Park and Preserve. We are opposed to the proposed regulation change that would allow loaded firearms in our national parks.

The proposed rule change (RIN 1024-AD70) is unnecessary and will only serve to overburden the National Park Service. DCC believes the existing regulations work well and should remain in place. The current regulation helps convey to visitors that parks are special places managed for the protection of wildlife. In fact, there is no documented evidence to show that this regulation change is needed to ameliorate any existing safety problem (those who would so drastically change this regulation bear the burden of proving that the change is needed). There is certainly no documented problem of public safety in Denali National Park that would be improved through individual access to a loaded weapon. In fact, we argue that allowing loaded weapons to be carried by individuals in the park would create new safety threats for both park guests and park staff, would increase opportunities for poaching, and would create an additional enforcement burden for ranger staff.

The current regulation violates no right. We agree that carrying arms is a protected right, one that received additional support recently from the United States Supreme Court. However, the court's recent decision applied to the right of individuals to have hand guns **in their homes**, for self defense, in Washington, DC. In the decision, Justice Scalia stated, "Nothing in our opinion should be taken to cast doubt on longstanding prohibitions on the possession of firearms by felons and the mentally ill, or laws forbidding the carrying of firearms **in sensitive places** such as schools and government buildings, or laws imposing conditions and qualifications on the commercial sale of arms (*emphasis added*)." It is clear to our membership that the legislated purpose and long standing tradition of national parks includes them among these "**sensitive places**" in our nation. The proposed regulation change would have far reaching, negative implications for this special status of the national park system.

DCC Board

Nancy Bale
Jean Balay
Cass Ray

Jenna Hamm
Joan Frankevich
Nan Eagleson

Julia Potter, Community Organizer

Our national parks were created to preserve natural, historical and cultural treasures for the enjoyment of all. National parks provide a unique opportunity that visitors may not encounter elsewhere. They are sanctuaries where one can find solitude, unspoiled natural wilderness, and peace. National parks are also sanctuaries for animals and in some cases may provide the only viable habitat for a specific species. National parks honor the best of America's natural and cultural history. Unloading and stowing your weapon when you enter a park shows respect for our nation's heritage.

Denali National Park & Preserve is a unique place. Encompassing over six million acres, it is home to 39 species of mammals. Of the 39 mammals, Denali has five of the largest mammals in North America. The Organic Act mandates the preservation of natural and cultural resources as its fundamental purpose and highest priority. Allowing loaded weapons in Denali, or any of our national parks, goes against this fundamental purpose and would increase the risk to visitors and staff. Denali is unique in that visitors must use the bus system to access the park. Wondering if the visitor sitting next to you on the bus is carrying a concealed loaded weapon certainly takes the "enjoyment" out of a visit to this park. The regulation change could exacerbate the problem of poaching and make wildlife protection more difficult and expensive.

In Alaska, the National Park Service allows firearms for hunting in preserves and in areas where subsistence hunting is permitted under provisions of the Alaska National Interest Lands Conservation Act. The remaining national park areas restrict firearms as they are restricted in the current regulation, and we support this restriction. In Denali, some people carry firearms across the park road to Kantishna, where there is currently a legal subsistence hunt. When traveling through the park, hunters have unloaded and stowed their weapons in compliance with park rules. This has not been a problem.

Fixing a problem that does not exist (and by so doing increasing the likelihood of violence and poaching) benefits no one. Let's keep our national parks safe for wildlife and visitors alike. Protect the fundamental purpose of our national parks to preserve our natural, historical and cultural treasures for the enjoyment of all.

Sincerely,

Julia Potter
Denali Citizens Community Organizer