

Superintendent, Denali National Park and Preserve
PO Box 9
Denali National Park, AK 99755

Dear Superintendent Striker;

On behalf of the board and over 300 members of the Denali Citizens Council (DCC), I am submitting comments on the 2013 Compendium Revisions. DCC represents local, regional and national citizens with a particular interest in maintaining the natural integrity of Denali National Park and Preserve. Most of our members live and work in the communities surrounding the park, either seasonally or full time, or have visited Denali and gained an appreciation for its special character and scope. We appreciate the opportunity to comment on park planning proposals and proposed changes in the Compendium.

We generally support the revisions of the Superintendent's Compendium for Denali National Park and Preserve for the year 2013, and if there is no comment on an individual provision, you may assume that we support it. Where we have comments to add, we list the Compendium provisions in order, by number, below:

2.4(a) (2)9i) Carrying, using, or possessing weapons – we support the prohibition on possession of firearms in Federally-owned or leased buildings. With respect to “public use cabins,” we would like NPS to clarify whether the Ranger Patrol Cabins within the park are considered “public use cabins.” It is our understanding that these structures are **not** considered “public use cabins.” With respect to the East Fork cabin, we know that NPS allows certain researchers or artists-in-residence to use this cabin, but that it is not generally considered a “public use cabin.” In any case, DCC does not support the possession of firearms in these cabins.

In addition, we do not support the carrying of firearms on the public shuttle bus, unless they are unloaded and packed away. No mention of this is made in the Compendium. We assume that for the private tours operated in Denali, the concessioner likely has rules, but we are unclear as to what influence NPS might have on whether passengers on these buses are allowed to carry firearms. May we have clarification, please?

Using firearms was not specifically addressed in the Congressional legislation that allowed them to be possessed in the parks. However NPS has chosen, in the Compendium, to allow “use.” We consider this a liberalization of the actual law. We wonder, however, if target practice, for instance, is already prohibited, or use of weapons in or near campgrounds or roads. We think that it is.

DCC Board

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In addition, we suggest that NPS consider banning certain types and calibers of weapons in the Compendium. We are concerned about automatic or high-capacity weapons that might be deemed legal but are certainly inappropriate at Denali. We also hope that the allowing of firearms in the park in no way diminishes the already-existing bear-aware program and education promoting avoidance of negative encounters with large wildlife, to reduce the unfortunate impression by much of the public that, if armed with a gun, a hiker need have no more knowledge or education in bear country.

2.51 – 2.52 - First Amendment Demonstrations and Printed Material Dissemination – we support the provision allowing all areas of the park to be open for first amendment demonstrations and dissemination of printed material.

13.40 (e) – Temporary closures or restrictions in the taking of fish and wildlife-

We at DCC support NPS' closures to certain methods and means of taking predators in the Denali Preserves, to wit, we support NPS' prohibition of taking a black bear or cub with artificial light at a den site in the Preserve, we support NPS' prohibition of taking a brown bear at a bait station in the Preserve, and we support NPS' prohibition of taking wolves or coyotes from May 1 through August 9. It is our feeling that these types of activities, short of protecting life and limb, should have no allowed period at any time of year.

We are glad that NPS is refusing to bow to state of Alaska pressure to adopt the above practices, which are aimed at managing the state's wildlife for an abundance of prey species for hunters, not the NPS mandate to manage for the natural integrity/diversity of the ecosystem. The above hunting practices are not wise and not considered "fair chase" by many, AND have been prohibited for many years in the state itself. We are hoping that, as time continues, NPS will promulgate permanent regulations to prohibit the above practices, instead of continually having to rely on annual compendia.

13.902 – Cantwell Resident Zone – Although we do not oppose the current definition of the Cantwell Resident Zone, we are concerned that growth in the population of Cantwell could cause unsustainable increases in the numbers of "qualified subsistence users," if resident zone occupancy is a valid indicator of qualification. We do not think that ANILCA intended that a so-defined resident zone could, in the future, grow in population to the point where park resources are jeopardized.

We ask that monitoring of impacts from "subsistence use" as defined by this resident zone be ongoing and that, if park resources are being damaged, NPS move to re-define subsistence eligibility. We urge NPS to remain cognizant of the park's long-term goal to protect valid subsistence users while at the same time prevent unsustainable pressures on habitat and wildlife in Denali National Park.

We thank you and your staff for continuing to protect park values at Denali.

Sincerely,


Nancy Bale, DCC Board