

June XX, 2008

Hon. Dirk Kempthorne
Secretary of the Interior
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Mr. Lyle Laverty, Assistant Secretary
Fish, Wildlife and Parks
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Kempthorne and Assistant Secretary Laverty:

We are writing to express our opposition to the proposed rule, published by the Department of Interior on April 30th, which would amend current regulations governing possession of firearms on lands administered by the National Park Service and the Fish and Wildlife Service.

The proposed rule would allow visitors to carry loaded, concealed firearms in national parks if the state where a national park unit is located permits people to carry concealed firearms in its state parks.

The explanation of the proposed rule states that it is intended to give greater effect to the principle that States have the prerogative to develop policies and set standards in many areas, including the regulation of firearms and that the rule should be amended to defer to state law.

We believe that the premise of this rationale is flawed. National parks are not state entities. They have been recognized and protected by Congress for their significance as national treasures where Americans and visitors from around the world have the opportunity to learn, explore, and take in the history and breathtaking beauty of iconic treasures, such as the Grand Canyon, Statue of Liberty, Mount Rushmore, and Gettysburg.

The proposed rule would also create a patchwork of confusion for both visitors and law enforcement officials. Some parks, such as Yellowstone National Park and Death Valley National Park, are located within multiple states and it is unclear which State's laws would apply. Furthermore, parks would need to determine how to preclude concealed guns from visitor centers and administrative buildings, since weapons are banned in federal buildings. This would require expensive signage and the installation of intrusive metal detectors and security devices that would detract from the tranquil atmosphere of our parks.

Put simply, we believe that the proposed rule seeks to address a problem that does not exist. The current regulation, which permits firearms to be possessed or transported in national parks if they are unloaded and stored, is strongly supported by current and former park rangers for its success at maintaining national parks as safe family destinations. According to the National Park Service, the probability of becoming a victim of a violent crime in a national park is less than being struck by lightning during one's lifetime. The Association of National Park Rangers and U.S. Park Rangers Lodge, Fraternal Order of Police, have stated that allowing persons to carry readily-accessible firearms would compromise this safe atmosphere.

There is no legitimate reason to overturn regulations that have served the American people and our valued natural resources so well. Therefore, we urge you to keep the current "unloaded and stored" regulation in place.

Thank you for your consideration.