



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Natural Resources**  
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7<sup>th</sup> Avenue, Suite 1430  
Anchorage, AK 99501-3561  
Main: 907.269-8690  
Fax: 907-269-5673

March 7, 2025

Denali National Park & Preserve  
Attention: Brooke Merrell  
Superintendent  
PO Box 9  
Denali Park, AK 99755

Submitted online at Planning, Environment & Public Comment (PEPC) website and via email

Re: 2025 Denali National Park & Preserve Superintendent's Compendium Changes

Dear Ms. Merrell,

The State of Alaska (State) reviewed the proposed changes to the 2025 Denali National Park and Preserve (Denali NPP) Superintendent's Compendium. The proposed changes modify conditions for food storage, clarify bicycle use in the Denali NPP, and update exceptions to regulations for non-commercial property storage. We appreciate the discussion of compendium changes on February 6, and we are providing information to follow up on topics we flagged that day. The comments below incorporate input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

**Food Storage Distance Change**

The proposed change in the Denali NPP Compendium would require food to be stored 100 yards from campsites, instead of the current 100 feet. Food is already required to be stored in bear resistant containers (BRC) in these areas (according to the existing Compendium: **2.10(d) Food storage: designated areas and methods**). This proposed revision to the regulation is excessive, unnecessary, and represents over-regulation that will negatively impact visitor experience without demonstrably improving bear safety.

Primary concerns are as follows:

- **Excessive Distance:** 100 yards is a significant increase from 100 feet. This distance presents practical challenges for backpackers utilizing the Bermuda Triangle cooking strategy to keep bears away from the campsite, particularly in challenging terrain with limited availability of nearby flatland or at riverside campsites. Retrieving food becomes a time-consuming and potentially hazardous undertaking, especially in inclement weather or during periods of low visibility. This increased travel also increases the potential for human-wildlife encounters as visitors may not be able to keep an eye on their BRC with the greater distance requirements.
- **Over-Regulation:** The current 100-foot rule has proven effective in minimizing bear-human conflicts. There is no compelling evidence to suggest that increasing the distance to 100 yards will significantly improve safety. Similar to the 2 and 4 person quotas for

some of these backcountry areas, this appears to be regulation for the sake of regulation, placing an undue burden on visitors without a clear and justifiable benefit.

- **Inconsistency with Other Parks:** Many other state and national parks with significant bear populations successfully manage food storage with similar or less stringent regulations to the current Denali NPP rule. The proposed Denali NPP rule is not consistent with all other Alaska backcountry park units that all share the compendium requirement for use of a BRC or 100 feet standard:<sup>1</sup>

Throughout the park, all food (except legally taken game) and beverages, food and beverage containers, garbage, harvested fish and equipment used to cook or store food must be stored in a bear resistant container (BRC) or secured—

- Within a hard-sided building;
- Within lockable and hard sided section of a vehicle, vessel, or aircraft; or
- By caching a minimum of 100 feet from camp and suspending at least 10 feet above the ground and 4 feet horizontally from a post, tree trunk or other object on a line or branch that will not support a bear's weight.

Adopting a 100-yard requirement sets Denali NPP apart with an unnecessarily restrictive policy, potentially discouraging visitors, particularly Alaskans.

- **Addressing the Real Issue:** The stated rationale for this change appears to be linked to resolving discrepancies with existing video messaging that incorrectly states 100 yards.

Denali NPP's online information presents the 100-yard distance requirement as guidance, along with the recommendation to make noise while hiking to alert bears of your presence.

Keep the following in mind: Make noise while hiking to alert bears of your presence. Use Bear Resistant Food Containers and store them 100 yards (meters) from cooking areas and tent sites.<sup>2</sup>

Just as we would not support a proposal from the park to convert the recommendation to make noise as you hike to regulation, we do not support extending the recommendation for a 100-yard distance moving to regulation.

We could support acknowledgement of the recommendation for a 100-yard distance requirement for cooking areas. This aligns with ADF&G guidance:

**Don't sleep where you eat and cook.** Moving off 100 yards or more is helpful.<sup>3</sup>

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<sup>1</sup> See <https://www.nps.gov/locations/alaska/current-compendiums.htm> for Bering Land Bridge National Preserve, Gates of the Arctic National Park and Preserve (NPP), Glacier Bay NPP, Glacier Bay NPP, Katmai NPP (including Aniakchak National Monument and Preserve, and Alagnak Wild River), Klondike Gold Rush National Historical Park, Lake Clark NPP, Western Arctic National Parklands (Cape Krusenstern National Monument, Kobuk Valley National Park, Noatak National Preserve), Wrangell-St. Elias NPP, and Yukon-Charley Rivers National Preserve. Kenai Fjord National Park is the only exception with no BRC distance requirement.

<sup>2</sup> <https://uploads.alaska.org/maps/denali-national-park-backcountry-guide-and-map.pdf> accessed 3/7/25

<sup>3</sup> Coexisting with Bears: Managing Bear Attractants:  
<https://www.adfg.alaska.gov/index.cfm?adfg=livingwithbears.bearharmony> Accessed 3/7/25

Changing the regulation to match a video statement is a poor justification for such a significant policy shift. The park should correct its video messaging, or retain it as a recommendation, rather than impose an impractical and burdensome regulation on visitors. The focus should be on educating visitors about proper food storage techniques, not simply increasing the required distance. Improved education and consistent messaging are far more likely to have a positive impact than an arbitrary distance change.

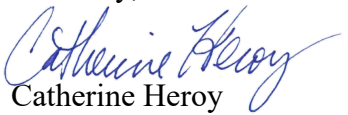
- **Conflict with Regulatory Principles:** This proposed regulation appears to contradict the spirit and intent of Secretarial Order 3421, "Achieving Prosperity Through Deregulation." This order emphasizes the need to minimize regulatory burdens and streamline processes. This new regulation adds a significant burden on park visitors without a clearly demonstrated need. Furthermore, it seems to disregard the principle of balancing costs and benefits. The increased burden on visitors (time, effort, potential safety concerns) does not appear to be justified by any commensurate increase in bear safety. While a formal "1-in-10-out" or "1-in-many-out" analysis might not be strictly required for this type of rule change, the principle of minimizing regulatory burden should still be considered. This proposed rule clearly adds a new layer of complexity and burden without a clear justification.

We urge the park to reconsider this proposal. The current 100-foot regulation, coupled with robust educational efforts, is sufficient to ensure visitor safety and protect wildlife. This proposed change is not based on sound wildlife management principles and will only serve to inconvenience visitors, especially families and less technically advanced groups, and potentially detract from or prevent their experience in Denali National Park. It also conflicts with the acknowledged direction that ANILCA calls for "non-traditional parkland management".<sup>4</sup>

### Closing

Thank you for the opportunity to review and comment on this proposed Compendium change. Please contact me at (907)269-0880 or by email at [catherine.heroy@alaska.gov](mailto:catherine.heroy@alaska.gov) to coordinate any follow up discussions.

Sincerely,

  
Catherine Heroy  
Federal Program Manager

Email cc: David Olson, Chief Ranger

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<sup>4</sup> The National Park Service and the Alaska National Interest Lands Conservation Act of 1980: Administrative History, G. Frank Williss, September 1985. Foreword. Accessed at [National Park Service: Alaska National Interest Lands Conservation Act of 1980 \(Foreword\)](#), 3/3/2025.