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December 20, 1993

Mark Schroeder
National Park Service
2525 Gambell Street, Room 107
Anchorage, Alaska 99503

Dear Mr. Schroeder:

The State of Alaska has reviewed the Bogoslof Island National Natural Landmark Section 8 description concerning the island complex's "Damaged" listing. This letter represents the consolidated comments of the State's resource agencies.

The State appreciates that the National Park Service (NPS) has worked with the U.S. Fish and Wildlife Service (FWS) to improve the narrative description of the Bogoslof Island National Natural Landmark. However, an appropriate rationale for designating the site as "Damaged" has not been presented which satisfies the NPS criteria contained in the report's introduction.

The island complex is already protectively managed by the FWS as part of the Alaska Peninsula National Wildlife Refuge. There are no human-caused uses of the island that are contributing to the decline of the Steller sea lion or Red-legged Kittiwake. Volcanic activity may conceivably have a local effect, but such effects cannot be controlled through management. Furthermore, this activity represents the natural unstable environment of this landmark.

In addition, the National Marine Fisheries Service has implemented measures which further protect the Steller sea lion rookery on Bogoslof Island as well as extensive surrounding off-shore areas. These actions include:

- * Designation of critical habitat for the seal lion rookery, a 3,000 foot terrestrial zone adjacent to the rookery, a 20 nautical mile zone extending seaward from the rookery, and an overlapping and extensive special aquatic feeding zone.

- * Prohibition of vessel entry within 3 nautical miles of Steller sea lion rookeries west of 150 degrees W. longitude, which includes Bogoslof Island.
- * Prohibition of year-around trawling within 10 nautical miles of Steller seal lion rookeries in the Bering Sea/Aleutian groundfish fishery management plan.

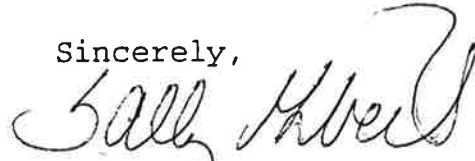
These relevant protective designations are not recognized in the current description and further illustrate that a "Damaged" listing offers little additional functional significance. Also, the description of Bogoslof Island, while improved, still over-emphasizes possible human-caused factors in population declines, and fails to mention possible natural factors other than local volcanic activity.

A "Damaged" listing for the Bogoslof Island NNL incorrectly implies that there are site-specific habitat deficiencies which are linked to the decline of the listed species. The species declines are unquestioned, but the status and management of Bogoslof Island are not contributing factors.

In conclusion, Bogoslof Island does not meet the NPS criteria for Damaged or Threatened as listed in the introduction of the Section 8 Report. The State therefore recommends that Bogoslof Island be removed from the "Damaged" listing of National Natural Landmarks.

Thank you for the opportunity to review this document. If you have any questions, please feel free to contact me at 561-6131.

Sincerely,



Sally Gibert
State CSU Coordinator

cc:

John Morehead, Regional Director, NPS
Harry Noah, Commissioner, Department of Natural Resources
Carl Rosier, Commissioner, Department of Fish and Game
John Sandor, Commissioner, Department of Environmental
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Bruce Campbell, Commissioner, Department of Transportation and
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Richard Burton, Commissioner, Department of Public Safety
John Katz, Governor's Office, Washington, D.C.