

# STATE OF ALASKA

WALTER J. HICKEL, GOVERNOR

## OFFICE OF THE GOVERNOR

### OFFICE OF MANAGEMENT AND BUDGET DIVISION OF GOVERNMENTAL COORDINATION

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September 15, 1992

Craig Shafer  
National Park Service  
Wildlife and Vegetation Division  
P.O. Box 37127  
Washington, D.C. 20013-7127

Dear Mr. Shafer:

The State of Alaska has reviewed the Alaska portion of the draft Damaged and Threatened National Natural Landmarks (NNL) Program for 1992. This letter represents the consolidated comments of the State's resource agencies.

Since Bogoslof Island is Alaska's only listing, our comments focus on this landmark. The State acknowledges the precipitous decline in seal lions and kittiwakes throughout the Bering Sea region. The State believes, however, that the proposed listing for Bogoslof Island is inappropriate and premature. We are primarily concerned with (1) the incorrect implication that local over-hunting is one of the causes of the declining populations, and (2) the apparent lack of current data. The State believes that NNL Threatened or Damaged listings should not proceed unless they are accompanied by accurate information and utilize the most current data available.

Page 1 of the report notes NEPA compliance and other "land use implications". A report of this nature should include more information about the general effects of Threatened or Damaged listings and should identify any site-specific impacts of individual listings. Simply assuming that these implications are minimal is not sufficient. For example, if "hunting" is identified as a contributing factor in a declining population, does this mean that the listing could be used to seek hunting restrictions? Furthermore, the portion of the report that the State received for review does not contain any recommendations. The State would be interested to learn what, if any, recommendations may accompany, or be developed as a result of, a Threatened or Damaged listing.

Comments specific to the Bogoslof Island listing follow:

Significance

In light of **regional** declining populations, the listing should indicate the relative importance of Bogoslof Island to the overall habitat range of the listed species.

Description

It is not clear if the island's total size equals 160 acres, or if the U.S. Fish and Wildlife Service (FWS) owns 160 acres and some other landowner owns some additional portion. If there are other landowners, have they been consulted? Is the entire island encompassed by the NNL designation?

Threat or Damage: Source Activities

The listing includes "hunting" as a source activity causing the decline of sea lions and kittiwakes. The State is not aware of any hunting for sea lions or sea birds on this island. The Division of Subsistence within the Alaska Department of Fish and Game is initiating a study of uses of sea lions and harbor seals and will therefore learn whether any marine mammals are harvested on or near Bogoslof Island.

Situation

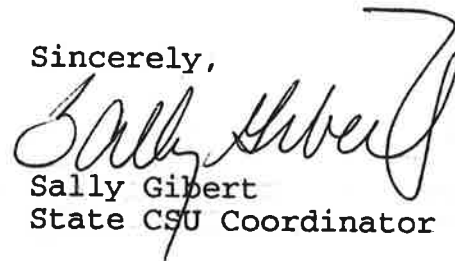
The most recent site-specific data used for this listing is 1985. More current data should be relied upon. We are troubled that the NPS has apparently not consulted with the State, the FWS, or the National Marine Fisheries Service (NMFS) to seek current information. A more recent survey by the NMFS confirmed less than 1000 sea lions on Bogoslof Island, but this decline is occurring regionally. The State is unaware of any kittiwake surveys of Bogoslof Island.

One factor that has not been addressed in the listing is the very recent volcanic activity on the island. According to sources within the FWS, a new 300 foot dome has built up during the last year. This high level of activity may or may not be contributing to local population declines or displacement.

In conclusion, the Bogoslof Island listing is inappropriate at this time. If the NPS wishes to pursue such a listing at a later date, the State suggests that current information be collected and analyzed in consultation with other state and federal agencies.

If you have any questions about these comments, or wish to be put in contact with knowledgeable state personnel, please contact this office.

Sincerely,



Sally Gibert  
State CSU Coordinator

cc:

John Morehead, Regional Director, National Park Service

Paul McLaughlin, Alaska Region NNL Coordinator, NPS

Glenn Olds, Commissioner, Department of Natural Resources

Carl Rosier, Commissioner, Department of Fish and Game

John Sandor, Commissioner, Department of Environmental  
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Frank Turpin, Commissioner, Department of Transportation and  
Public Facilities

Richard Burton, Commissioner, Department of Public Safety

John Katz, Governor's Office, Washington, D.C.

**CSU Distribution List**  
**Subject of Distribution**  
**Date**

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Terry Haynes, Department of Fish & Game, Fairbanks

Priscilla Wohl, Department of Environmental Conservation, Anchorage

Alice Iliff, Department of Natural Resources, Anchorage

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Leslie Kerr, U.S. Fish & Wildlife Service, Anchorage