

fore is a negligible source of mortality to bird populations.

Given this, why are scientific collectors being treated so harshly? The suggestion I hear most frequently is that scientists simply are very convenient targets. We are not politically powerful, but we are visible, readily located, and we carefully record and even publish our activities. For those federal officials more concerned with producing a list of convictions for trivial violations than with genuinely protecting bird populations, the temptation apparently is too great.

This is a truly unfortunate situation. The personal and professional lives of scientists are being needlessly damaged. Avian biologists are rapidly being alienated from the Fish and Wildlife Service, which they have traditionally aided to a large degree in its conservation efforts. This is also despite the fact that these enforcement activities are the responsibility of one particular division of the USFWS and not, for example, that of our colleagues employed as research biologists by that agency.

Biologists certainly do not, and should not, expect to be immune from reasonable enforcement of sensible collecting regulations. It is dismaying, however, that the limited resources of the Fish and Wildlife Service are being diverted from what should be the primary targets of federal law enforcement, such as the illegal importation and commercial trade in exotic birds. (The U.S. is the world's largest importer of wild birds. Such commercial trade, for example, presents a major threat

of extinction for 22 species of parrots [American Ornithologists' Union, Bird Trade Subcommittee 1991]). It clearly is vital for wildlife protection, for scientific research, and for humane justice that federal officials reorient and re-emphasize the priorities of the Law Enforcement Division of the Fish and Wildlife Service toward such real threats to bird populations and away from essentially innocuous infractions by scientists.

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## LETTER TO THE EDITOR

Dear Colleagues,

On November 14, 1991, the U.S. Fish and Wildlife Service asked for public comments concerning various federal regulations including those covering general permits issued by the agency (Fed. Reg. 66, No. 220). Numerous comments were received and the review process is still ongoing. As the review continues, it is apparent that a number of academic and professional groups are continuing to seek modifications in the current permit procedures and regulations (Science 258: 396-397, 1992). This, however, does not mean that we can in any sense relax our attention to the details of our permits at this time. Often, we are prone to take extreme care in keeping our records accurate and up-to-date for the particular scientific questions we are interested in, but give our permit-required records only minimal attention. Some of this behavior may be attributed to our assuming that since we shared similar goals with federal agencies concerned with conservation and preservation of birds and habitats that we would not be considered under the same umbrella of accountability as feather merchants and illegal im-

porters of rare species of birds for profit. This is not the case. In view of that fact, placing blame on one party or another will not resolve our present problems, but abiding by all the conditions and requirements of our federal permits will certainly place us in a much stronger position to negotiate changes in these regulations. As the list of potential violators grows, we certainly are not going to be viewed as expert and credible spokespersons in these negotiations for change.

The penalties for illegal collecting activities and inaccurate bookkeeping are potentially severe, to say the least. I am not a lawyer so I am not prepared to be specific, but professional careers can be destroyed, savings accounts can be wiped out, and even jail terms imposed, by what we may have considered as trivial events in the past. It is not worth taking the chance to collect or hold individuals or species not covered by our permits. Nor can we afford to jeopardize the education and careers of students and employees under our direction by promoting such activities. Just as Watergate and Irangate eventually came to light, we can also have our own "Birdgate" if we are not careful and forthright in the use of our permits.

Recent publicity about some of our colleagues alludes to the fact that the U.S. Fish and Wildlife Service continues to prosecute offenders no matter what their profession or position. Thus, we can no longer be cavalier about our collecting activities, our permits, and our reporting practices. Since in some cases we even helped write the very laws in question, it should follow that our level of accountability should be the same, if not greater, than those of feather merchants and illegal importers who serve only to exploit the world's bird populations.

We often use the excuse that our permits are vague and non-specific in the hopes that this will somehow get us out of any scrap with the law. We can all forget that because, even if we feel such is the case, it is our responsibility to get our permits in order, and in writing! Nothing less is acceptable under the present conditions.

By this time you may be asking, why is Balda writing this letter? I have just endured a three month investigation by the U.S. Fish and Wildlife Service and the process was not a pretty one. Everything I have stated above is real, and not worth the personal and profes-

sional grief that such an investigation brings. My scientific career could have been terminated, as well as the careers of my graduate students and co-workers, and my laboratory closed. Scientific permits are serious business and need to be so regarded.

It is also obvious that we need to establish a better relationship with the U.S. Fish and Wildlife Service as the environmental crisis deepens and wildlife and their habitats are being destroyed at an alarming rate. This crisis needs the attention of all parties. Thus, birds and their habitats are not well served when an adversarial relationship exists between interested and committed parties. Sincerely yours,

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