nariidae is similar to that seen in other New World suboscines and all oscines. Woodcreeper and ovenbird genera that have intermediate or conflicting aspects in other morphological characters show a clear pterylographic pattern that can be used to place any of the genera studied in one group or the other. Pterylosis always has proved in my other studies of passerines to be an evolutionarily conservative character (Clench 1970, 1985). Therefore, because there is a striking pattern difference in the ventral tract and relatively strong differences in the degree of feathering, and because a body of other morphological data supports the traditional separation of the two groups, I suggest that they should continue to be regarded as separate families.

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## CONSERVATION COMMENTARY: Ornithology and the National Biological Survey

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Secretary of the Interior of the United States, Bruce Babbitt, created the National Biological Survey (since renamed National Biological Service; hereafter NBS) by secretarial order on 29 September 1993. In creating the new bureau, the Secretary consolidated the research, survey, and monitoring functions of seven Department of Interior bureaus, including the Fish and Wildlife Service, National Park Service, and Bureau of Land Management. The NBS mission is to work with others to provide the scientific understand-

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ing and technologies needed to manage the nation's biological resources.

The NBS has a science staff of about 1,950 employees and operates 13 science centers and more than 100 field stations. With respect to birds, the NBS is responsible for a number of programs and projects that are of fundamental importance to ornithology, ornithological institutions, and bird conservation. These include administration of the Bird Banding Laboratory in Maryland and 56 cooperative research units at universities across the country. The NBS has responsibility for implementation of key aspects of the Fish and Wildlife Conservation Act, including requirements that the Secretary of Interior monitor bird populations and study the effects of environmental change on bird populations. Accordingly, the NBS administers and analyses data from the federal Breeding Bird Survey, and staff members carry out a variety of avian research projects. As one manifestation of this research, 53 of 503 abstracts of papers presented at the 1994 AOU meeting in Missoula, Montana involved NBS personnel, including those from cooperative research units.

Although the decision to create the NBS is susceptible to second-guessing on both political and substantive grounds, consolidation of Interior's research, survey, and monitoring functions in the NBS is a reality. It also is a reality that the NBS is the subject of enormous controversy in Congress, and it serves as a symbol and "lightening rod" for political interests, which seek to weaken implementation of federal environmental regulations.

Review of recent debates in the House of Representatives during consideration of legislation to authorize NBS (Congressional Record-House, 6 and 26 October 1993) and to appropriate its funds for Fiscal Year 1995 (Congressional Record-House, 22 June 1994) is instructive both to better understand the political context in which environmental laws and issues now are being considered and because the debates raise issues of fundamental importance to ornithology and bird conservation. Substantive concerns fall in two main areas:

(1) Use of volunteers to gather data for the NBS. Criticisms are that volunteers are untrained, unqualified, and biased and that they may trespass on private land, posing as federal officials. With respect to the charge of bias, there is special concern that volunteers may be members of environmental groups, such as the National Audubon Society, whose missions include advocacy. This remark by Representative Tauzin (Congressional Record, 6 October 1993, H 7488) is illustrative: "Our complaint is that the volunteers, nonscience volunteers with a special agenda, with a partial view, are going to be part and parcel of the basis by which the survey is conducted ...."

(2) Uses of NBS data. There is concern about the ends to which NBS data are applied and with what effects. More specifically, there is concern that NBS data are being gathered to support application of the

Endangered Species Act and other environmental laws with the ultimate effect of reducing private property values, thus "taking" lands without compensation. This remark by Representative Fields (Congressional. Record, 26 October 1993, H8476-77) is illustrative: "... this new monstrosity ... will collect data that will be used to decide what lands are wet, which species are endangered, and what development, if any, will be allowed on millions of acres of private property."

The prominence of the issue of volunteers gathering NBS data is particularly troubling. The contributions to ornithology of persons who are not paid as ornithologists are substantial and of fundamental importance, particularly to such large-scale monitoring efforts as Breeding Bird Surveys as well as banding activities that take place at Monitoring Avian Productivity and Survival (MAPS) sites. Indeed, the participation of volunteers in ornithology has long been recognized by the AOU (e.g. Wing 1940, King and Bock 1978, McCrimmon and Sprunt 1978) and by cooperative programs such as Partners in Flight, the Neotropical migratory bird conservation initiative (Gill 1994). One need only peruse the American Birding Association's "Volunteer Opportunities for Birders" (Isham 1995) to appreciate the reliance on volunteers to conduct or assist avian field research and management projects.

In response to concerns from Congress, the NBS developed and adopted policy-manual guidelines on the use of volunteers, covering such issues as training and supervision. Secretary Babbitt also moved to address other issues raised in Congress: For example, Secretarial Order No. 3185 requires written permission by NBS employees and volunteers for access to private lands for new surveys. The NBS also plans to give greater emphasis to survey activities on public lands and will work to encourage more state-sponsored activities on private lands.

None of these actions, however, is likely to substantially mute criticism in Congress, because, fundamentally, the debate is about the role of government in environmental protection and wildlife conservation, particularly with respect to private property rights. An enlightening comment came from Representative Hayes (Congressional Record, 6 October 1993, H7488): "... what we are talking about today is not a scientific debate. It is policy debate. The only hidden agenda here is that the tool of science becomes a means to do national land use." Thus, it does not matter that the NBS is itself not a regulatory agency; the issue is the ends for which NBS data are used.

We believe that the fate of the NBS per se is less important than is continuation of the functions that it performs. In the long run, however, we also believe that those functions will best be served by maintaining the NBS, and we expect continued assaults on both the NBS and its functions. The stakes are high: If in the course of congressional debates over appropriations, funds for the NBS are eliminated and its functions are not restored to their original agencies, the chances of resurrecting the agency or its functions in the future are slim in the present political and fiscal climate.

Loss of the NBS or Department of Interior sponsorship of and participation in bird banding, monitoring, and research programs would be a significant blow to ornithology and especially to the conservation and management of birds. While there is potential that some of the individual functions could be sustained privately, the overall cost would be prohibitive (>\$5.7 million proposed for Fiscal Year 1996 bird-related work in the NBS) and chances of sustaining an integrated program that would serve a variety of public and private clients would be poor at best. Moreover, federal responsibilities for the protection of migratory birds date back to ratification of the migratory bird convention with Canada in 1916. Eliminating federal participation in avian research and monitoring ultimately would weaken federal commitments to management and conservation of birds.

Individual AOU members are encouraged to respond in the following ways: (1) participate in the political process, offering opinions and expertise to congressional delegations and policy makers; (2) acquaint congressional delegations and their staff members with your work, the importance of NBS-sponsored programs and functions to your work, and the importance of volunteers in ornithology; and (3) support the Ornithological Council, National Audubon Society, American Bird Conservancy (formerly the International Council for Bird Preservation in the United States) and other organizations in their efforts as advocates for federal involvement in and support of avian research, monitoring, surveys, and management.

Finally, the AOU as an institution should: (1) revisit, update, and act further on its recommendations regarding the role of ornithological societies and amateur ornithologists as developed by Gill, Mayfield, and Parkes and presented in King and Bock (1978); (2) consider how to ally itself with Society for Con-

servation Biology and organizations representing different or broader disciplines to more aggressively maintain and advance the interests of ornithology, both for the sake of the science and for the conservation of biodiversity; and (3) explore alternatives to government administration of key avian monitoring programs, such as the Breeding Bird Survey, in order to diminish reliance on institutions supported by tax dollars in a time of political change and fiscal restraint. Now may be the time to revive the concept of an American Trust for Ornithology as proposed by Gill, Mayfield, and Parkes in King and Bock (1978).

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