

Circle No. 278 on Readers' Service Card

the justification for pesticide cancellations. The only rational decisionmaking process is one which will balance costs versus benefits and utilize scientific data as a basis for pesticide policy.

It was with this goal in mind that Congress passed legislation amending the Federal Insecticide, Fungicide, and Rodenticide Act to require EPA to prepare and file statements on the impact of pesticide decisions on the agricultural economy, the supplies of food and fiber, and consumer food prices. Since this requirement can only act to benefit all Americans, it would seem to refute Carter's implication that Congress bowed to the agricultural lobby. It is more likely that special interest groups have had an undue influence on the three EPA lawyers, who admit turning to environmental groups for guidance and assistance in their policy-making efforts. The transfer of pesticide decisions back to the OPP should rectify this problem by putting the decisions back in the hands of scientists, who will base their decisions on scientific evidence rather than emotionalism.

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In response to the suggestion that I have engaged in "journalistic sensationalism." I merely point out that the resignation of the three attorneys—made in protest at what they perceived to be a bad turn in EPA policy—was in fact highly unusual, or, if you will, "sensational." Furthermore, I said quite plainly that the merits of their criticism of the organizational and policy changes at EPA must be judged later in light of how well or badly these changes work out in practice.

By insisting that I should have described the dilemma inherent in pesticide regulation, Engler really seems to mean that I should have emphasized how difficult it is for scientists in the Office of Pesticide Programs (OPP) to arrive at judgments on which regulatory decisions can be based. He shows little interest in the other horn of the regulatory dilemmathe necessity of protecting people and the environment from possibly harmful chemicals, even though the evidence as to their effects may be incomplete or ambiguous. When this dilemma is not squarely faced, the result is regulatory paralysis.

Baize speaks highly of Edwin Johnson, the current head of the OPP, and seems to imply that my article puts him in a bad light. The fact is, Johnson, whose predecessor was transferred for failing to deliver, was only mentioned in order to point out that Administrator

Russell E. Train has told him that the OPP is now on its mettle to "move ahead aggressively."

Baize also refers to my "implication that Congress bowed to the agricultural lobby." What I wrote was that, at the urging of chemical industry and agricultural interests, the House of Representatives came within only a few votes of adopting an amendment that would have gutted the Federal Insecticide, Fungicide, and Rodenticide Act by giving the Secretary of Agriculture an effective veto over the EPA administrator's decisions.—Luther J. Carter

ESCA Systems

I wish to commend Arthur L. Robinson for the comprehensive nature of his article "Surface analysis: Multiple techniques for monolayers" (Research News, 26 Mar., p. 1255). However, there are some errors in the section on electron spectroscopy for chemical analysis (ESCA). Robinson notes that prices for ESCA instruments range from about \$110,000 to more than \$350,000 for our most complex machine. Much as we at AEI would like to be able to charge \$350,000 for an ESCA system, we do appreciate that this is a highly competitive world and that such a price would severely limit our sales.

In fact our basic working ESCA system is priced at less than \$100,000, and our most complicated system, including every available accessory, costs approximately \$230,000.

One of the main accessories for an ESCA machine is the ultraviolet source; while Robinson singles out two other manufacturers as the only suppliers of this accessory, we have been a supplier for some years.

Finally, the availability of a monochromatic source on the AEI machine is a point of sufficient uniqueness to warrant some comment.

B. E. P. BEESTON

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Protection of Archeological Sites

I would like to clarify a statement made by Rhodes W. Fairbridge in his article "Shellfish-eating Preceramic Indians in coastal Brazil" (30 Jan., p. 353). Fairbridge states that "although shell middens are theoretically protected by law in both Brazil and the United States,



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almost nothing is done to enforce it." In the United States, archeological sites, including shell middens, are provided a measure of protection by a variety of federal and state laws and regulations, the most important of which, at the federal level, are the Antiquities Act of 1906, the Historic Sites Act of 1935, the National Historic Preservation Act of 1966, the National Environmental Policy Act of 1969, Executive Order 11593, and the Archeological and Historic Preservation Act of 1974.

Only sites located on federal lands are provided any total statutory protection. Unlike more recent laws which emphasize protection of sites from land development actions by federal agencies, the Antiquities Act, as well as many state and local laws, is aimed at preventing the indiscriminate excavation and sale of antiquities from public properties by unauthorized individuals. It is true that enforcement of the Antiquities Act has been difficult because of the vast extent of public lands; however, it has been our experience that vandalism of archeological sites has been most severe in the western portion of the United States. Rock art is particularly vulnerable to vandalism, as are midden sites, from which artifacts are stolen for collections. and small surface sites which are destroyed by off-road recreational vehicles. Shell middens are probably the least vandalized type of archeological site on public lands.

All of the recent historic preservation laws have emphasized identification, protection, and enhancement of those cultural resources in this country which are subject to adverse effects by federal or federally assisted projects. These laws have created the basis of a system whereby early planning affords substantial protection to archeological sites, as well as to other cultural resources. Compliance by federal agencies is still imperfect but is steadily improving.

It is primarily through the coordination and cooperation of federal, state, and local planning and preservation programs that these national laws can be fully implemented to provide better protection for our cultural heritage.

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Wilson's notes on the protection offered to midden sites on federal lands are helpful, though unfortunately a little late. In many cases, along our East Coast the middens were exploited for lime by the farmers in pre-Revolutionary days. At that time, however, I do not think the

term "vandalism" would have been appropriate, but rather, "the exploitation of nature's bounty.'

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Degu Colony Available

We have developed a breeding colony of the Chilean hystricognathous rodent Octodon degus for biomedical research. The degu is a rat-sized rodent related to the guinea pig; it is easily maintained and handled in the laboratory and breeds readily. The gestation period is 90 days, and the mean litter size is six pups. The degu has two thymus glands and often develops cataracts.

Approximately 300 production animals are maintained as a closed, randombred colony. In addition, we have established an inbreeding program and maintain a foundation colony of some 200 animals produced by strict sibling matings. Some lines in the inbreeding program have reached the fourth generation. All animals are pedigreed.

The Animal Resources Branch of the National Institutes of Health has elected to terminate support for the colony, and we are anxious to distribute these animals to interested investigators before the colony is destroyed. There is no charge for the animals, but we ask recipients to pay for shipment.

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Disclaimer

In his review (29 Aug. 1975, p. 712) of Primate Aggression, Territoriality, and Xenophobia (1), to which I contributed a chapter, Glenn Hausfater attributes to me the "conclusion" that "quantitative data on any aspect of monkey aggression is lacking despite many hours of observation by many different field workers." Nowhere in my contribution to that volume did I make such a statement, nor have I ever believed it.

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References

R. Holloway, Ed., Primate Aggression, Ter-ritoriality, and Xenophobia (Academic Press, New York, 1974).