

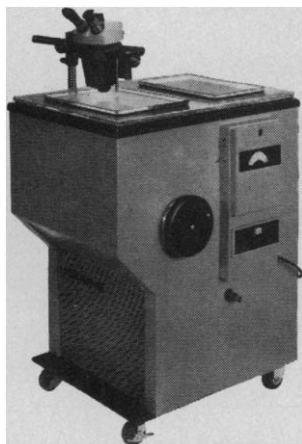
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LETTERS

Peregrine Falcon Protection

I note in the article "Bird lovers and bureaucrats at loggerheads over peregrine falcon" by Nicholas Wade (News and Comment, 10 Mar., p. 1053) that the drafter of Executive Order 11987 on exotic species has stated that the order was meant to apply to species, not to subspecies. However, if one takes the viewpoint that subspecies, even poorly marked ones, can be considered as incipient species, and therefore possess genetic diversity worth protecting, there is good reason for the U.S. Fish and Wildlife Service to interpret the Executive Order in such a way that its definition of species is consistent with the definition of species given in the Endangered Species Act of 1973, namely, "any subspecies . . . and any other group . . . of the same species or smaller taxa in common spatial arrangement that interbreed when mature."

There are at least two examples among birds where introductions of a subspecies into the range of a second subspecies has caused near or complete obliteration of the stated characteristics of the endemic form. The Seychelles turtle dove *Streptopelia picturata rostrata*, a well-marked insular race, was swamped out of existence by *S. p. picturata*, introduced to the Seychelles from Madagascar by 1867. The Italian partridge *Perdix perdix italica* is close to extinction because of genetic swamping from partridges of several other subspecies that are raised on game farms in Italy and released regularly into the dwindling area occupied by *italica*.

The possibility that peregrine *Falco peregrinus* stock from European subspecies, which has been released in the eastern United States in the recent absence of an indigenous breeding population, will mate with and dilute or swamp indigenous populations of peregrines is remote but still quite real. Furthermore, examples can easily be suggested, particularly among island populations, where the introduction of exotic subspecies would quickly spell disaster for endemic subspecies. The Executive Order would prevent such situations by also prohibiting the possibility of release in the United States of exotic species or subspecies close to extinction in their native habitat as a last-chance effort to provide a suitable habitat, a measure which, although thus far attempted only in captive or semicaptive situations, may become more appealing as various habitats around the world are increasingly disrupted and as active manipulation of spe-

cies populations becomes more widely accepted and is tested.

The Fish and Wildlife Service needs a provision to waive the prohibition on release of exotics on a case-by-case basis, after it determines that the risk to indigenous populations is sufficiently remote and that conservation objectives of the species as a whole are better served by such introduction. Because the taxonomic validity of some peregrine subspecies is highly questionable, as Wade points out, determination of the status of peregrines on a geographical (state-by-state) basis would clearly serve the needs of peregrine conservation in this country better than the subspecies basis currently employed. A similar course has recently been taken by the Fish and Wildlife Service for the bald eagle *Haliaeetus leucocephalus* for the same reason.

A realistic approach the Fish and Wildlife Service might take would be to propose as threatened all populations of the peregrine worldwide, excepting populations from certain states or regions which would remain endangered. These moves would permit continuation of federal support for programs like Cade's and at the same time give a clear indication of where priorities for management and protection of this species should lie. Thus, work to produce a new peregrine population in the eastern United States would be seen to have value primarily in developing techniques applicable to managing endangered populations in the western United States.

WARREN B. KING

*International Council for Bird
Preservation, Smithsonian Institution,
Washington, D.C. 20560*

In his article concerning the peregrine falcon, Wade quotes U.S. Fish and Wildlife Service associate director Keith Schreiner as saying, "The question is whether I should be involved in establishing a new species in an area where the native species has become extinct."

Since the entire controversy over the introduction of peregrines involves *subspecies* of the peregrine falcon, and has nothing whatsoever to do with "establishing a new species," it would be most unfortunate if an administrative decision based on a misconception prevailed in this matter.

JOHN DAVIS
F. STEPHEN DOBSON
WALTER KOENIG
JULIA KJELGAARD
PAMELA WILLIAMS

*Hastings Reservation, University of
California, Star Route Box No. 80,
Carmel Valley 93924*