

(From page 22)

arbitrary actions taken by the U.S. Forest Service (USFS) in Alaska. Specifically, Senator Stevens objected vigorously to a USFS ban on logging in certain public lands in Alaska on the pretext that this would interfere with the welfare of a certain raptor bird species which had not been listed by the USFWS for protection under the ESA or any other legislation, and was not alleged by anyone to be Threatened or Endangered. Senator Stevens spoke heatedly against such current abuses of the ESA, said that he would oppose reauthorization of the ESA without substantial amendment, and warned his (especially western-state) colleagues of future dangers from maladministration of the ESA. Along the way, he referred to the "spotted owl" controversy as a fraud on the people.

It continues to be of highest importance that the community of lepidopterists unite and take all possible action to defend its legitimate interests. I attempted, without success, to warn lepidopterists in 1976 in the pages of the News of the Lepidopterists' Society, of the dangers from government intrusion looming on the horizon. As the old saying goes: "If you fool me once, shame on you; if you fool me twice, shame on me!"

Footnotes

1. News of the Lepidopterists' Society 1995(3):73-74 and page 70.
2. Sam Sun (News of the Lepidopterists' Society 1994(2):45).
3. Bruce Griffin (News of the Lepidopterists' Society 1995(1):21).
4. Jack N. Levy (News of the Lepidopterists' Society 1995(3):71-73)
5. Bureau of Land Management (BLM)
6. Mattoni, Rudolf H.T. 1990 (1992). The Endangered El Segundo Blue Butterfly. Journal of Research on Lepidoptera 29(4):277-304.
7. El Segundo Blue (*Euphilotes bernardino allyni*), synonymous with *E. battoides allyni* (Shields, 1975).

Still More on Bonanza King Mine Canyon

by Stanley A. Gorodenski, 1530 West Wescott Drive, Phoenix, AZ 85027,
Telephone (602)492-0542

I recently rejoined the Society after many years. Through the News I have learned of the adverse extent to which federal agencies and federal and local environmental laws are affecting lepidopterists. These laws did not exist during my previous membership. They concern me greatly because the likelihood of increased regulation threatens to discourage my interests and reasons for getting back into the study of Lepidoptera. In particular, Donald W. Steffek's response to Bruce Griffin on behalf of the Fish and Wildlife Service, and Dr. Jack N. Levy's 'Perspective' were very disturbing (News of the Lepidopterists' Society, No 3, 1995).

My impression after reading Mr. Steffek's response is that the factual basis to close Bonanza King Mine Canyon to collecting is questionable. I cannot be certain of this because I have not seen all the material that influenced the decision. However, the response certainly gives this impression. For example, my impression of Mr. Griffin, after reading his article, is that of a collector with considerable experience that has something valuable to say about the impact of collecting on and the endangerment of the Martin swallowtail. Yet, Mr. Griffin's statements are dismissed as being unsubstantiated, but Dr. Levy's results appear to be treated as solid scientific fact to support FWS's action. However, the fact is that Dr. Levy himself admits his conclusions are tentative "...in part because the *validity of assumptions upon which the approach relies merits further testing*" (emphasis added):

Dr. Levy's work is valuable, because it demonstrates the extreme difficulty of coming to sound conclusions concerning the reason(s)

for the decline in the population and the impact of collecting. However, I strongly differ with the statement that future monitoring of the Martin butterfly may provide valuable insight into the effects of collecting on other butterfly species. From what I have read, it has never been established that collecting had a substantial effect on the Martin swallowtail (Dr. Levy himself says "*If* collecting had a significant impact ...", emphasis added). So how can it possibly be inferred that, should the population size change over that next few years, it would in some way be related to prior collecting activities? It does not necessarily follow that an increase in population size after protection from collecting is proof that collecting had caused the population decline. However, this appears to be the assumption made. Unless such statements and assumptions are immediately questioned, they will perpetuate and contribute to the increase in unreasonable and over-regulatory laws and enforcement.

Numerical fluctuations of butterflies occur *naturally*, and it is not always known why this happens. One example of a population fluctuation is the study by E.B. Ford on *Melitaea aurinia* ("Ecological Genetics" by E. B. Ford, page 14). A local population of this butterfly had become extremely rare for many years, and in one year it practically disappeared. Ford stated "... in the two succeeding seasons, we could find only two or three specimens by careful search throughout the day ...". A few years later the population increased so greatly that often more than one individual could be caught with a single stroke of the net. The cause of the decline was concluded to be parasitism. Had a similar

(Continued on page 21)

The Crisis in Entomology

James A. Scott, 60 Estes Street,
Lakewood, Colorado 80226-1254,
Telephone (303)233-4568

Editors' Note: Dr. Scott sent us a copy of a 15-page letter he has written to various legislators. It includes an explanation of "The Crisis in Entomology," as it relates to existing U.S. laws, butterfly collection, and butterfly conservation. It includes sections on differences between deer and insects, collecting and butterfly extinction, development and habitat loss as a cause of extinction, reasons for collecting, government harassment of entomologists, collecting bans and permitting, the Lacey Act, the Endangered Species Act, government competency to regulate entomology, Recovery Plans and insect transplanting, fixing the Endangered Species Act as applied to insects, habitat preservation, taxonomy, a new national law for study, commerce, conservation, and collection of insects, and dead insect deregulation. We regret that we are unable to print such an extensive commentary at this time, in spite of its value. Contact Dr. Scott at the above address for a copy.

Psyche-ic Revelation

by Mr. Leslie V. Smith

Years ago my predisposition to manic depression was made manifest. I took up the study of butterflies. In 1964 I discovered an aggregation of monarchs in Richmond, California and an aggregation of *Battus philenor* pupae in Rancho Cordova in 1992. Recently I found *Pieris rapae* "puddling" on the wet flower bed soil mix across the street. Then it came to me: *These assemblies of butterflies are for group therapy!* And I ought to know!

Bonanza King Mine Canyon

(Continued from page 23)

phenomenon occurred in the U.S. with a Nearctic butterfly species, under current laws FWS would undoubtedly have declared the species endangered. FWS would probably then have claimed, after subsequently monitoring its progress, that the prohibition against collecting was responsible for its survival, and perhaps as proof that collecting had caused the decline.

With regard to the Martin swallowtail, it is a big leap to go from what appears to be anecdotal reports (and, thereby, of questionable reliability) that collection pressures have at times been intense (this is a strong word but what does it actually mean?) to apparently concluding that collecting will endanger the species. I personally feel that the authority, if it actually exists, of FWS to restrict collecting because a "... butterfly *may* become threatened or endangered in the foreseeable future" (emphasis added) should be removed. This power gives FWS a free hand to *over*-regulate and go beyond the intent of the law.

Like many lepidopterists, I do not wish to cause the extinction of a species. However, the only long term solution to the problem of species endangerment is not oppressive laws that take away our freedoms, but instead the regulation of a non-Lepidoptera species population, that of *Homo sapiens*. World overpopulation has already resulted in significant habitat destruction and the potential for macro-climatic changes. The latter has the potential for being the most ominous threat to the survival of existing species. Unless *this* population is brought under control and reduced in numbers all endangered species laws and enforcement, no matter how well intentioned, will ultimately fail.

Although the Endangered Species Act can be applauded for its good intentions, it misses the mark

completely. The real problem is human habitat destruction, and this cannot be resolved by simply setting aside a small tract of land and enforcing strict laws. Further, recent research results from independent population geneticists (*Science*, October 6, 1995, pp. 31-32) indicate the effective population size necessary to maintain the evolutionary viability of a population is in the 5,000 to 10,000 range, not the 500 randomly mating individuals that have been the basis of modern day efforts to protect a species. The implications of the research results are that in the long run, current recovery efforts will fail due to the accumulation of genetic damage, and to 'mutational meltdown.'

There is no simple solution to the issue of species endangerment. This should be obvious. Human habitat destruction, effective population size, and human overpopulation are all interrelated. I feel we must strongly object to oppressive collecting laws whose actual effect is to take away our freedoms rather than saving a species. In this respect I am surprised at the split in the Society over collecting. I personally feel proponents of species conservation would better accomplish their goal by focusing their efforts on controlling and reducing world overpopulation rather than passing and enforcing collecting laws to protect the Class Insecta when a strong argument can be made, and has been made, that protection of this kind is inappropriate. In this respect I feel that proponents of collecting laws are being hypocritical. Human habitat destruction is the real issue. Rather than being concerned over their own contribution to overpopulation, being critical of the contribution of their own children, and so forth, it is easier to pass laws that restrict the activities of others.