

Mr. Moss. Mr. Secretary, are you charging that Dr. Uhler has engaged in statistical manipulations?

Mr. BLACK. Dr. Uhler didn't make any statistical remarks. The Bureau office—

Mr. Moss. Are you charging that your Bureau of Sport Fisheries engaged in statistical manipulations?

Mr. BLACK. I think that statistics can be very misleading. And I think it can be demonstrated at this point that they are.

Mr. Moss. That isn't what you said. You said statistical manipulations. I regard that as a charge that your subordinate agencies have engaged in that practice. Is that what you want this record to reflect?

Mr. BLACK. Our subordinate agencies are very vigorous in protecting the interests that they deem within their particular parameter.

Mr. Moss. Is it your allegation that they have engaged in statistical manipulation?

Mr. BLACK. That was my testimony.

Mr. Moss. All right. I just wanted it to be clear.

Mr. BLACK. I extend the remarks a little further, because the principal reliance of the Bureau to the corps in 1964 is on estimates of waterfowl use, and it concludes that an average of some 5,000 birds use the general area each year.

Now, I think that average statistics can be very dangerous and very misleading. I think that they are in this case. The average figure over a 5-year period includes one estimate of over 11,000. And it is followed by one of 900-and-some in the immediately succeeding year. So you take the 5-year picture with the exception of the abnormally high and low year, and it is one of consistent decline based on these figures. We can do a lot with these figures. But the average for the last 3 years of that period, for example, if average means anything—and this is what was put forward—was closer to 2,000 than the 5,000 presented as an overall population estimate. I don't think that the differences in these numbers are all that significant. And I don't mean to make a great point of whether or not 2,000 ducks are any less worth saving than 5,000, or vice versa. I am only pointing out that these annual census figures and Christmas counts are a very, very hit-and-miss proposition.

So I don't want the record—

Mr. Moss. Of course, we have got Dr. Gottschalk's statement of yesterday that on one occasion he observed over 50,000 ducks in the half-mile above Wilson Bridge and the half-mile below Wilson Bridge.

Mr. BLACK. If we ground those figures into the average, it would certainly give us a spectacular result too, which I don't think—I am only questioning the use of average figures.

Mr. Moss. Mr. Secretary, would you for the purpose of the record state your qualifications in the field of ecology or wildlife?

Mr. BLACK. I have no special training or qualifications in the field of ecology or wildlife. And I did not pretend to in this case. This is why I wanted to make it abundantly clear that I did read and study and was influenced by the work of the responsible technical Bureaus. The only point that I want to make is that it is a large step from the technical operation, from the technical study and work that they do as naturalists and wildlife experts, to conclusions that are essentially policy. conclusions, dealing with precedents, with "nibbling," and the rest of it. And I don't question Dr. Uhler's report to the extent of reflecting on