I am indebted to Emmet R. Blake for information on the second Peruvian specimen, which is in the collection of the Field Museum, Chicago. A typical adult male *buckleyi*, it was collected on 15 September 1968 by Peter Hocking at the headwaters of the Río Cacazú, Dept. Pasco, at an altitude of about 6000 ft (1830 m). This specimen extends the range of *buckleyi* about 100 km south of the Pachitea record.

These two records provide further confirmation of what is suggested by all the other Andean records, that L. elegans is limited to a narrow belt along the eastern base of the Andes. There is no obvious reason why a bird that inhabits tropical forest at only 350 m should not extend much more widely over the lowland Amazonian forest, as do most of the birds that occur at this altitude in the tropical zone of eastern Peru and Ecuador at the foot of the Andes; so that one wonders whether L. elegans may undertake a seasonal migration to higher altitudes, perhaps to breed. This suggestion is perhaps supported by the fact that the Chicago specimen, from a considerably higher altitude, was collected on a date that should fall within the local breeding season. Unfortunately the altitude of Pindo in Ecuador, at which Buckley collected the remarkable nestlings described and figured by Sclater and Salvin (1880, Proc. Zool. Soc. London, pl. 16), is not known.

It should be mentioned that Hellmayr (1929, Catalogue of birds of the Americas, part 6, Field Mus. Nat. Hist., Zool. Ser., Publ. 266: 96) was mistaken when he wrote that *buckleyi* was known only from two females and two nestlings. He treated *buckleyi* as a distinct species, noting: "Until the male is discovered, the proper status of this form cannot be ascertained." The specimen from Quijos, Ecuador, which he includes in his citations, is in fact a male, and its examination would have made it clear that *buckleyi* and *elegans* should be treated as conspecific. It exactly matches the description of the adult male given by Norton et al. (loc. cit.), except that the throat and center of the breast are quite without any black markings.— D. W. SNOW, *Sub-department of Ornithology, British Museum (Natural History)*, *Tring, Hertfordshire, England*. Accepted 3 May 74.

Aggression between Great Black-Backed Gulls and Bald Eagles.—While working in Placentia Bay, Newfoundland $(47^{\circ} 30', 54^{\circ} 00')$ during the summer of 1973, I watched interactions on four occasions between Great Black-backed Gulls, *Larus marinus*, and Bald Eagles, *Haliaeetus leucocephalus*. The hundreds of islands in Placentia Bay support many nesting colonies of Great Black-backed Gulls, and I estimated the Bald Eagle population to be in excess of 100 birds. Considering these numbers, some contacts between these two marine scavengers must be unavoidable, perhaps even common. All four incidents I saw involved aggression between the two species. Two occurred on feeding beaches, one in a gull nesting colony, and another on a lookout rock.

On 11 May at 0630 I saw two adult eagles perched on rocks by a stream near Sandy Point, Long Harbor, feeding on the spawning smelt *Osmarus mordax*. I watched the two for 15 min from a distance of 100 m as they fed, undisturbed. A single Great Black-backed Gull began circling overhead at a height of approximately 100 m. After a minute the diameter of the circling pattern diminished and the gull began to come lower. A series of dive attacks ensued, bringing the gull to within distances varying between 3 to 10 m from the eagles. It made several attacks each minute for approximately 8 min. Feeding behavior of the eagles was disrupted by the initial attack and they began making frequent short flights from rock to rock along the shore as the attacks continued. These low, short flights became more extended until the pair was 150 m from the initial feeding site. The gull continued its diving attacks until the pair of eagles began an extended flight at an elevation of 50–75 m. The gull pursued, flying above and behind, until the view of the birds was obstructed by the fog approximately 500 m from the initial feeding site. After about 10 min several Herring Gulls, *Larus argentatus*, and a Great Black-backed Gull arrived on the feeding site.

The second confrontation was on 18 May at 1500 in Haystack Harbor on Long Island. Several Herring Gulls and Great Black-backed Gulls were feeding on caplin, *Mallotus villosus*. An adult Bald Eagle was circling at a height of several hundred meters, somewhat inland from the feeding gulls. The eagle continued circling for several minutes, gradually moving nearer the shoreline toward the gulls and began decreasing elevation. When it was approximately 100 m inland from the shore, a Great Black-backed Gull appeared and began diving at the eagle. After a brief period, no longer than 2 min, the eagle began to fly higher and move inland. The gull then discontinued its attacks. The eagle circled about 500 m inland for approximately 15 min after the attacks; I saw nothing of the gull after the attack.

The third incident occurred just before dusk on 27 May when we were returning by boat to Little Southern Harbor. Just beyond the mouth of the harbor an adult eagle perched on a rock that extended about 0.5 m above the water and was approximately 50 m from the nearest shore. I watched the eagle for several minutes as the boat moved past his position, and I noticed a Great Black-backed Gull flying about 10 m above the water directly toward the eagle. When the gull was 50 m away, the eagle took flight and flew past several small islands in the mouth of the harbor. The gull continued its flight directly toward the rock and landed on it.

The final interaction between these species occurred over a Great Black-backed Gull nesting colony on Blue Point, Red Island at 1100 on 5 June. I first noticed an immature Bald Eagle, with no visible white showing, circling over a nearby cove. It gradually changed direction and moved south toward Blue Point with its slightly over 700 Great Black-backed Gull nests. As the eagle flew over the colony at an elevation of 150 m, two gulls attacked, both diving constantly for a period of 2 or 3 min. During the attack, the eagle lost elevation, made short, evasive dives and began a direct flight path to the southwest. Although there were many birds in the nearby air space, no other gulls joined the attack. The attacks persisted until the eagle moved away from the colony and over the open ocean.

Each of these exchanges was characterized by an absence of aggressive activity and withdrawal by the eagle following initial attacks by the gull. Several possibilities could account for this outcome: Because of the eagle's greater flight speed, a successful strategy for coping with the gull's attack is simply to outdistance them. Such withdrawal is particularly successful when the harassment by the gull is site specific. As the competition appears to be for specific resources, the aggression can be terminated by one of the two species leaving the visual territory. Why the eagle is the subordinate competitor is not entirely clear. In the situations I watched the relatively greater maneuverability of the gull apparently gave it a competitive advantage at this level of harassment.

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