

(≤ 3 sec) and characterized by short, flightless hops toward any bird entering the defended area. It was impossible to determine whether the intruders were seeking nectar or insects as the territorial oriole quickly chased them away. During 2 h of observation on each morning of 18, 19, and 20 February aggression toward hummingbirds was most common, with 71 attacks against the Cinnamon Hummingbird (*Amazilia rutila*) and a combined total of 20 against the Fork-tailed Emerald (*Chlorostilbon canivetii*), Blue-vented Hummingbird (*Amazilia saucerrottei*), and Plain-capped Starthroat (*Helimaster constanti*). The Cinnamon Hummingbird figure is high because an individual of this species defended a feeding territory intersecting that of the oriole, and both birds used the inflorescences in this area of overlap. Rufous-naped Wrens (*Campylorhynchus rufinucha*) elicited 21 chases, Yellow Warblers (*Dendroica petechia*) and Tennessee Warblers (*Vermivora peregrina*) four each, the Flame-headed Oriole (*Icterus pustulatus*) two, and the Western Tanager (*Piranga ludoviciana*) eight. Rufous-naped Wrens always visited *Combretum* in groups of three or four and appeared to be the most difficult visitor for the oriole to repel.

MacArthur (1972, *Geographical ecology*, New York, Harper & Row, pp. 203-204) suggested that avian winter visitors to the tropics exert a strong influence on the food supply and may produce local food shortages. Aggression between visiting and resident species at floral resources such as those described here and by Emlen (1973, *Wilson Bull.* 85: 71) could be indicative of such conditions. Emlen (op. cit.) attributed the tenacity of aggressive interactions between wintering warblers at a nectar resource on Bahama to a "maladaptive over-extension of a mild territorial dominance," based on the subjective impression that food resources were abundant, hence territoriality was unwarranted. I suggest that the feeding territoriality in migrant birds as shown here and by Emlen is an indication of competition for food and that flexibility of aggressive behavior in these species is adaptive. The fact that some primarily insectivorous birds are able to express facultative territoriality at nectar resources has importance in understanding dominance and diversity in avian communities.

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First specimen of Ground Dove from Wisconsin.—The A.O.U. Check-list (1957) shows the Scaly-breasted or common Ground Dove, *Columbina passerina*, as casual or accidental in some northern states such as Iowa, Virginia, Maryland, Pennsylvania, New Jersey, and New York, and more recent accounts report this species in Indiana (Graber 1962), Ontario, Canada (Goodwin 1969), and Massachusetts (Howe 1974). Only one hypothetical observation exists for Wisconsin (Maurin 1967).

The present specimen (MPM 19806) was found dead at a bird feeder in Fox Point, Milwaukee County, Wisconsin, on 15 October 1973 and brought to the Milwaukee Public Museum by Mrs. Mary E. Decker, an active local birdwatcher. The bird had evidently flown into some undetermined object and broken its neck; it was still warm when recovered. The dove proved by gonadal examination to be a female, but the degree of skull ossification was not observed. It had adult plumage. Dimensions: wing chord 88.9, tail 63.5, culmen 12.7 mm.

The plumage shows no wear nor any other suggestion of recent confinement,

but molt after escape might make wild status determination difficult. A check with the Milwaukee County Zoo showed that this species had not been exhibited there in recent years. Pet stores were not checked as it seems unlikely that Ground Doves would be available for sale. The many records well north of the breeding range and the absence of anything to suggest recent captivity make it likely that this was a wild bird and a new record for Wisconsin.

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Mortality of Magellanic Penguins in Argentina.—In the austral winter of 1972, I noted that many Black-browed Albatrosses (*Diomedea melanophris*) and other seabirds near the mouth of the Rio de la Plata, Argentina, were oiled. For the most part oiling seemed superficial and was confined to small patches on the underparts, although on some birds the extent of oiling was sufficient to impair thermoregulation. Farther south, on the Valdes Peninsula, Chubut Province, large numbers of moderately to heavily oiled Magellanic Penguins (*Spheniscus magellanicus*) were found dead on the beaches of Golfo San José (Jehl et al. 1973, Bull. Brit. Ornithol. Club 93(2): 56) and at Punta Norte. These casual observations suggested that oiling might be a significant cause of seabird mortality in Argentina. Additional data gathered in 1973 support that view.

During field studies near Rio Grande, Tierra del Fuego, Argentina in late October and early November 1973, I found the remains of many species including Black-necked Swan (*Cygnus melanocoryphus*), Flightless Steamer-Duck (*Tachyeres pteneres*), cormorants (*Phalacrocorax albiventer*, *P. atriceps*, *P. olivaceus*, and *P. magellanicus*), Kelp Gull (*Larus dominicanus*), Black-browed Albatross, and Southern Fulmar (*Fulmarus glacialisoides*) on local beaches. But by far the commonest remains were of Magellanic Penguins. Pelts of 16 of 17 corpses that were examined closely were heavily coated with oil and several birds were completely covered; the remaining bird had been shot. Rio Grande is approximately 160 km south of the nearest penguin colony. Oil was found on some of the other species, particularly cormorants, but its severity and incidence was much less than in the penguins. In brief visits to Punta Delgada in the Strait of Magellan on 21 October and 14 November I found five fresh penguin carcasses, all with moderate to heavy oiling.

Oiling was also noted at Punta Tombo, Argentina, in late November 1973. The Magellanic Penguin colony there, perhaps the largest in Argentina, has been esti-