

(*Ammophila arenaria*) with scattered clumps of seaside goldenrod (*Solidago semper-virens*). At our approach the bird crouched in the cover of these plants until almost stepped upon. We used this behavior pattern to capture the longspur by dropping a hand-held 12-m mist net over it.

The bird was later turned over to John Bull for verification and deposit at the American Museum of Natural History as specimen No. 811078. Upon dissection it proved to be a female with a partially ossified skull (Bull pers. comm.).

This specimen represents the first Smith's Longspur record for New York. The species occurs regularly in migration east to central Ohio, especially in the spring (Trautman and Trautman 1968, Ohio J. Sci. 68: 310). East of the Appalachians only five previous occurrences are known to me: specimens at Chester, South Carolina, 1 December 1880 and 9 February 1889 (Sprunt 1949, South Carolina bird life, Columbia, Univ. South Carolina Press); a specimen at the Stratford town dump, Fairfield County, Connecticut, 24 March 1968 (Bulmer 1969, Auk 86: 345); one seen by Douglas Kraus and other observers in the company of 100 Snow Buntings (*Plectrophenax nivalis*) and 20 Lapland Longspurs (*Calcarius lapponicus*) at Moonstone Beach, Rhode Island, 30 October 1965 (Ferren pers. comm.); and one seen in the company of Dark-eyed Juncos (*Junco hyemalis*) near Lumberton, Robeson County, North Carolina, 28 December 1946 (Rabb 1948, Auk 65: 456).—THOMAS H. DAVIS, 9446-85 Road, Woodhaven, New York 11421. Accepted 5 Jun. 75.

**Snowy Owl steals prey from Marsh Hawk.**—This note describes an incident of successful piracy by a Snowy Owl (*Nyctea scandiaca*) on a Marsh Hawk (*Circus cyaneus*) on their Massachusetts wintering grounds.

Interspecific piracy or kleptoparasitism, where one species steals prey from another, has been described within a number of avian families including the Procellariidae, Fregatidae, Accipitridae, Stercorariidae, Laridae, Turdidae, Sturnidae, and Laniidae (e.g. Bent 1921, 1922, 1937, 1938; Meinertzhagen 1959; Thomson 1964). In a number of families piracy ranks as the predominant feeding behavior, as in the jaegers (Stercorariidae) and the frigatebirds (Fregatidae). On the other hand, piracy is rare in many families. Of particular interest are the typical owls, Strigidae, which are ecologically similar to the frequently piratic Accipitridae. Within the Strigidae, successful piracy has been reported only for the Short-eared Owl (*Asio flammeus*). Reese (1973) and Bildstein and Ashby (1975) report successful piracies by Short-eared Owls on a European Kestrel (*Falco tinnunculus*) and on a Marsh Hawk. Pitelka et al. (1955) mention what may have been an unsuccessful piracy attempt by a Snowy Owl on a Glaucous Gull (*Larus hyperboreus*) in Alaska.

In contrast to the paucity of piracy records, accounts of interspecific aggression are relatively common for the Strigidae. Bent (1938) notes that the Great-horned Owl (*Bubo virginianus*) occasionally robs hawk nests and that several of the larger owls prey on smaller members of the family. Short-eared Owls have been recorded chasing Marsh Hawks (Bent 1938) and Pomarine Jaegers (Pitelka et al. 1955). Most of these examples seem to have been motivated by territorial or nest defense.

On 9 December 1974 we were watching Snowy Owls on the salt marshes of the lower Merrimack River near Newburyport, Massachusetts, 42° 50' N, 70° 84' W, one of the best places in the eastern United States to find these diurnal owls in winter. The weather was overcast with a wind of 16–24 kph from the east-southeast, and the temperature was approximately 7°C. We found our first Snowy Owl near the Plum Island airport, actually on the mainland, and watched it for 10 min (1420–1430 EST). We were not able to determine its age or sex. At 1431 the bird flew

to a corrugated metal shack near the runway. As we approached, the owl left its perch (1432) and flew directly at a brown Marsh Hawk (either female or immature) carrying a small rodent of unknown species. The owl came up under the hawk, turned on its back, and grappled very briefly for the prey, which dropped to the ground. The owl followed it while the hawk remained circling overhead and calling before flying off. The owl fed on the ground until 1435 then flew off to a nearby marsh. The behavior of the owl was very similar to that described by Reese (1973) for a piracy by a Short-eared Owl on a European Kestrel.

The Snowy Owl, like most predators, is an opportunist, taking a wide variety of prey through diverse feeding methods. In addition to the typical feeding behavior described by Watson (1957: 421) the species has been known to take ducks on the wing (Fisher 1893), to fish (Audubon 1834: 136), and to eat carrion (Bent 1938, Wiggins 1953). Piracy can thus be viewed as one in a spectrum of feeding methods that permit the Snowy Owl to utilize as many food resources as possible in an unfamiliar and often rigorous environment.

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