

*Washington Island Sportsman's Club  
1635 Detroit Harbor Road  
Washington Island, WI 54246*

Mr. Charles W. Traxler  
Acting Regional Director for FWS Region 3  
5600 American Boulevard West, Suite 990  
Bloomington, Minnesota, 55437-1458

March 27, 2023

Dear Mr. Traxler,

The American people have been telling the United States Fish and Wildlife Service (USFWS or FWS) for years, to change policy regarding Pilot Island. Our desire has been to recover and restore local fisheries, reclaim the Island's contaminated soil, restore polluted waters, rid the area of stink that invades our homes when the wind blows, encourage heritage tourism at this Cultural Resource site, allow safe access to three adjacent shipwrecks for divers, and allow people to experience a national maritime treasure that has been in operation since 1858. Today the public is demanding the change they have been seeking for years.

There has been overwhelming support whether it is through the attached Resolution 2023-20 signed by the Door County Board of Supervisors asking for restoration of local fisheries and environment, and removal of the birds, to letters sent by the Town of Washington in 2019, Town of Liberty Grove in 2020 or through our surveys of our leaders, and our citizens letters, requesting the same. The Washington Island Sportsman's Club in 2022 has now made the same request again and still no consideration for change from FWS. We are the "American People," you claim to represent and are telling you to change.

FWS's mission is to be stewards of the habitat, fish, and wildlife in the Green Bay National Wildlife Refuge (GBNWR) on behalf of the "American People!" The overwhelming support of 30,000 permanent residents should make it quite clear they want change and change that is beneficial to the County growth and welfare...especially as the local population balloons to 250,000 when the summer population settles in. How can you continue to ignore the outcries from the very people you are supposed to support? In addition, there are nearly 500 signatures on the [savepilotisland.com](http://savepilotisland.com) online petition. The petition not only represents year around residents in Door County, but summer people from all over the country seeking change to current Pilot Island management policy and its resulting impacts on the greater Door County community.

The opposition FWS is experiencing today over their management of Pilot Island is not something new. Citizens' complaints about the loss of local fisheries, ecology, and wildlife have persisted since creation and implementation of FWS policy. FWS denied there was a problem with contamination on the Island or in our waters so our Sportsman's Club contacted the University of Wisconsin at Oshkosh and asked them to determine if there was pollution. They performed a study of the local waters and found extremely high levels of E.coli around Pilot Island and stated the waters were "not safe for humans". Recreational users are stunned by the impacts they see happening, especially to the Island's historic value, and the decimation of the Island itself. The bottom line is the fisherman, divers, snorkelers, swimmers, and kayakers can no longer safely enjoy the waters near Pilot Island.

As far back as 1977, the Wisconsin Department of Natural Resources. (WDNR) proposed the idea of a "Grand Traverse Islands State Park." At that time FWS encouraged the WDNR to use Pilot Island as a colonial nesting site for cormorants, well before cormorants began nesting on the Island in 1992. Using the Island for its current purpose has always been a FWS plan and now policy. The recommendation was made prior to any specific National Environmental Protection Act (NEPA) Environmental Impact Statements (EIS) being performed. In 2007 FWS used the excuse that Pilot Island had cormorants in residence to justify their reason for acquisition and to enact policy.

In establishing policy FWS used a generic Environmental Assessment (EA) study unrelated to Pilot Island and failed to address the existing and future potential impacts from the significant number of colonial birds on the local environment. We no longer accept the Environmental Analyses (EA) used as justification for the current use of Pilot Island habitat as they are insufficient, irrelevant and negligent in proper assessment of impacts. The analyses was not specific enough to address the impacts caused by the tremendous number of birds in the area on local fisheries. Each summer, for 182 days, Pilot Island alone entertains well over 10,000 fish-eating colonial nesting birds, all cormorants, pelicans and gulls.

Pilot Island is clearly no longer a well-balanced environment. The immediate fisheries, a cultural resource are gone, adjacent fisheries severely impacted, the ecosystem is damaged, and the native wildlife and vegetation have been destroyed. FWS has failed "due diligence" in assessing the environmental impacts caused by FWS policy of unlimited birds on Pilot Island. We are requesting immediate assessments of impact to local fisheries as a result of the FWS estimated 1,111 tons of fish consumed by cormorants alone on Pilot Island. Federal law was not adhered to in this regard in establishment of refuge policy creation and subsequent re-approvals to date.

Cormorants are opportunistic predators and will eat whatever is in abundance at the time. They forage on the easy targets, especially during spawning season. Wisconsin State protected Critical Spawning Habitat areas exist within the geographic area of FWS policy impact: Detroit Harbor State Natural Area, and Mink River Estuary. Additionally, FWS in their *Field Notes Entry* made the following comment reinforcing existence of additional spawning areas: "Areas surrounding Plum and Pilot Island contain resources significant to a number of fish species. Smallmouth bass (*Micropterus dolomieu*) are common in the surrounding rocky shallows, particularly on the north and west sides of the island. This area was no doubt also historically important to spawning lake trout (*Salvelinus namaycush*), lake sturgeon (*Acipenser fulvescens*), and lake whitefish (*Coregonus culpeformis*)." Since establishment of FWS policy of unlimited avian fish-eating predators on Pilot Island, precipitous declines in all local fisheries have been noted and our requests for assistance and even acknowledgment of impacts have been ignored.

FWS rationale of Zebra and Quagga mussels being the culprit for historic collapse of Lake Michigan fisheries further reinforce the need for the Service to justify impacts of predation on the remaining survivors by colonial fish-eaters. FWS is responsible to the public to thoroughly understand the fish population declines, especially in areas that were once teeming with large varieties of fish and no cormorants/pelicans! We expect a "Service" called Fish and Wildlife to expend whatever it takes to do the correct environmental analysis on Pilot Island and the Northern Door County area to justify existence of significant predation on severely impacted local fisheries.

Now, lets' address the historic value of Pilot Island. Sites and structures of "Significant Cultural Resource" are highlighted as needing additional EA/due diligence prior to enactment of policy. Pilot Island plays a significant role in the Maritime history of the area. The lighthouse, fog signal building and dock are in worse condition today than when FWS acquired the Island in 2007. Neglect over time is the primary cause with cumulative impacts of acidic guano coming in a close second. Leaky roofs,

leaky towers, spalling brick due to lack of gutters it all adds up when issues go unaddressed for years...and just get worse.

To help you better understand historic value, many communities realized that there was an unexpected economic force behind preservation. "The act helped foster heritage tourism, attracting visitors who wanted to experience the past in ways that no book or documentary could match. The distinctive character of old architecture and historic districts became a powerful draw for town and city-dwellers alike, and antidote to anonymous suburbs and strip malls." Our National Park Service couldn't say it any better.

In regards to these Cultural Resources the "American People" in Door County want the following for Pilot Island:

- 1) Remove the cormorants, pelicans and gulls
- 2) Remove the cormorant guano, and replace with fertile soil, flora, and trees and return it to its original state by restoring and maintaining the fisheries, wildlife and environment that once existed.
- 3) Preserve and restore the Lighthouse Keepers Building to its original state
- 4) Reconstruct the Fog Signal Building to its original state
- 5) Build a dock and boat channel so visitors can safely access and enjoy the complete experience the island has to offer

It is a tall task and will take years to complete, but it can be done. After all this mess didn't happen overnight and it won't be repaired overnight. The American People understand the benefits and the legacy Pilot Island can leave for future generations. There is nothing in their direction to FWS that is not doable. It is just a matter of FWS understanding what the "American People" want and executing their request as good stewards of Pilot Island, the GBNWR. The Washington Island Sportsman's Club and Door County stand firm in their expressed desire to change Pilot Island and strike a balance by preserving/restoring the fisheries, water quality, flora and fauna and historic value. Pilot Island's Lighthouse is a unique asset. No one wants it to become just a memory. We must heal the environment, the fisheries, the historical building, the dock, the air, the water and bring Pilot Island back to life for all to enjoy.

Sincerely,



Martin Andersen  
President  
Washington Island Sportsman's Club

c.c. Deb Haaland  
Martha Williams  
Pauline Meyer



**DOOR COUNTY**

**Resolution No. 2023-20**  
**REQUESTING THE U.S. FISH & WILDLIFE SERVICE REMEDIATE AND REMOVE**  
**FUTURE NEGATIVE IMPACT OF BIRDS RESIDING ON PILOT ISLAND**

TO THE DOOR COUNTY BOARD OF SUPERVISORS:

ROLL CALL Board Members	Aye	Nay	Exc.
AUSTAD	X		
BEARDSLEY	X		
BULTMAN	X		
CHOMEAU		X	
D. ENGLEBERT	X		
R. ENGLEBERT	X		
ENIGL			X
FISHER			X
GAUGER	X		
GUNNLAUGSSON	X		
HEIM PETER	X		
KALMS	X		
LIENAU	X		
MILLER	X		
MORKIN		X	
NORTON	X		
ROBILLARD	X		
RUSNAK	X		
THAYSE			X
VOGEL	X		
ZETTEL	X		

**BOARD ACTION**

Vote Required: Majority Vote of a Quorum

Motion to Approve: Adopted  Defeated

1st Gunnlaugsson  
2nd R. Englebert

Yes: 16 No: 2 Exc: 3

Reviewed by: [Signature], Corp. Counsel

Reviewed by: [Signature], Administrator

**FISCAL IMPACT:** There is no fiscal impact associated with the adoption of this resolution. STW

**Certification:**

I, Jill M. Lau, Clerk of Door County, hereby certify that the above is a true and correct copy of a resolution that was adopted on the 24th day of February, 2023 by the Door County Board of Supervisors.

[Signature]  
Jill M. Lau  
County Clerk, Door County

1 WHEREAS, The Washington Island Sportsman's Club has requested the U.S. Fish and Wildlife  
2 Service (FWS) to change the use of Pilot Island solely as a colonial bird sanctuary to an island  
3 that benefits the public's best interest and considers local and environmental and ecological impacts; and  
4  
5 WHEREAS, The Town of Washington and Town of Liberty Grove have sent letters to FWS about the  
6 issues associated with the use of Pilot Island as a colonial nesting bird site; and  
7  
8 WHEREAS, FWS has failed to satisfactorily address concerns about environmental impacts, impacts  
9 to local fisheries, impacts to local wildlife and impacts to recreational activities; and  
10  
11 WHEREAS, In 2021 there were 9,765 Pilot Island cormorants eating an average of 1.25 lbs. of fish a  
12 day (12,210 lbs. per day). This equates to the cormorants reducing our local fisheries through predation  
13 by approximately 1,111 tons (2,222,000 lbs.) of fish each year (over 182 days). To understand how  
14 many fish this is, let's assume that each car going to the ferry would hold 200 lbs. of fish in the  
15 trunk. You would need 11,111 cars to carry the fish. If each car was 15 feet long, the line of cars would  
16 span 31.56 miles if cars were bumper-to-bumper (FWS numbers were used in the fish calculations), and  
17  
18 WHEREAS, The fish spawning grounds that once thrived in the Pilot Island waters no longer exist  
19 due to cormorant predation and the water quality issues from the bird guano; and  
20  
21 WHEREAS, The E. coli levels near and around Pilot Island, as determined by the University of  
22 Wisconsin-Oshkosh and the Environmental and Innovation Research Center (ERIC), have made the  
23 waters surrounding Pilot Island unfit for fishing, swimming, snorkeling, kayaking, and diving; and  
24  
25 WHEREAS, Testing will be performed in 2023 to determine if guano has infiltrated the Forest, J.E.  
26 Gilmore, and A.P. Nichols shipwrecks (National Register of Historical Places #92000103) to  
27 ensure divers will be safe in the potentially polluted waters; and  
28  
29 WHEREAS, The historic value of the active Lighthouse (built 1858) and Fog Signal Building on Pilot  
30 Island (National Register of Historic Places #83004279) have been severely compromised since FWS  
31 acquired the Island in 2007; and  
32  
33 WHEREAS, Tourists and visitors often ask, "what is that island that looks like it has been bombed."  
34 Then, a local resident or ferry worker will explain the devastation that birds have had on Pilot Island.  
35 Tourists, local residents, fisherman and boaters have complained about the smell emanating from Pilot  
36 Island, as far away as Detroit Harbor on Washington Island and the Town of Liberty Grove; and  
37  
38 NOW, THEREFORE BE IT RESOLVED, the Door County Board of Supervisors strongly disapproves  
39 of the current use of Pilot Island as a colonial bird rookery, and asks that approval be given to the U.S.  
40 Fish and Wildlife Service to the restore the local environment, wildlife, fisheries and historical structures,  
41 removing the problems on Pilot Island that impact the surrounding Door County communities and its  
42 citizens, and  
43  
44 BE IT FURTHER RESOLVED, the Door County Clerk shall transmit a copy of this resolution to  
45 Martha Williams, Director of Fish and Wildlife, 1849 C Street, NW, Washington DC 20240.

SUBMITTED BY: ADMINISTRATIVE COMMITTEE

[Signature] David Liengu, Chairperson  
[Signature] David Englebert  
[Signature] Daniel Austad

[Signature] Elizabeth Gauger  
[Signature] Nancy Robillard  
[Signature] Todd Thaysse

[Signature] David Enigl