



Au Sable Fish Farm History, Plans, Permit

The Grayling Fish Hatchery is an obsolete, 100 year old “flow through” facility on the East Branch of the Au Sable. It was last operated by Crawford County as a tourist attraction.

The hatchery was leased to Harrietta Hills-Grayling for 5 cents a year over 20 years. The proposal is to operate an industrial scale fish farm and increase production from under 20,000 pounds of fish per year to 300,000 pounds per year.

The DEQ pollution discharge permit issued for the facility has: dangerously high standards for phosphorus and suspended solids (fish feces and waste feed); no standards for nitrogen, ammonia, biological oxygen demand or dissolved oxygen; inadequate monitoring requirements; and inadequate protocols for escapement or disease control. No performance bond is required.

The permit is supported by the Michigan Agriculture Department, Michigan Farm Bureau, Michigan Aquaculture Association, and other agricultural interests.

The permit is opposed by many groups including Anglers of the Au Sable, Fly Fishers International, Michigan Trout Unlimited, many local chapters of TU, the Sierra Club, the Au Sable and North Branch property owners associations, and many local outdoor recreation and tourism businesses.

WATER POLLUTION – USING THE RIVER AS A SEWER

The river today – before operation of the fish farm – barely meets acceptable limits for phosphorus, and regularly falls below the minimum level for dissolved oxygen required by law. The hatchery has no wastewater treatment system in place.

At pollution levels under the permit, the facility will add about 160,000 pounds of feces and uneaten feed to the water per year, and over 1,600 pounds of phosphorus, and there will be continuous dissolved oxygen violations in the river during summer low flows. At concentrations allowed by the permit, the facility will cause phosphorus levels double the DEQ’s goals for the Au Sable Mainstream.

Installation of “quiescent zones” are only 18% effective at removing phosphorus, and 50% effective in removing suspended solids, assuming perfect monitoring and maintenance.

DEGRADATION OF THE RIVER AND ITS FISHERY

The fish farm will create harmful nutrient loading and sediment in the river.

Excessive algae growth will occur due to addition of phosphorus. This has already begun downstream from the hatchery. This will cause significant shifts in aquatic invertebrate communities, including reduced mayflies, caddis and stoneflies.

Release of fish feces will change the physical habitat in the river, including increasing concentrations of rich organic sediment, which is the perfect place for growth of the tubifex worm. That worm is the host for the Whirling Disease parasite. The risk of Whirling Disease, which is deadly to trout, will rise significantly.

Pollutants and plant growth will increase biological oxygen demand in the river. This will reduce dissolved oxygen concentrations below legal limits. Fish need sufficient oxygen levels to survive and thrive.

The overall threat of fish disease will be significantly increased by imported fish, crowded growing conditions, flow through operations, escaped fish, and sediment beds caused by suspended solids where the tubifex worm grows.

ECONOMIC DAMAGES

Harrietta Hills says the fish farm will create two full time jobs and two seasonal part time jobs, and it will keep the facility open for tourists during the summer months. But the hatchery can be kept open as a tourist attraction, with scientific and historical value and minimal environmental impact, without permitting an industrial fish farm and all the harms to the river that will come with it.

Lower water quality and harm to the fishery will generate significant reductions in property values and property tax receipts. Riverfront property is a major contributor to the Crawford County tax base.

Economic losses to recreational anglers will be \$250,000 to \$645,000 per year, and lost impacts to the regional economy will be \$1.77 to \$4.6 million per year. Water sports will also be harmed, with economic losses to recreational users of about \$420,000 per year, and to the regional economy of about \$880,000. As a result, between 26 and 50 jobs, a very conservative estimate, will be lost.

In the event of a catastrophe at the fish farm, say from a flood, the taxpayers — and not the fish farm — will wind up fixing the damage.

ANGLERS APPEAL OF THE PERMIT - WHAT WE WANT

The Anglers of the Au Sable has appealed the permit, and an administrative trial was held in 2016. It is expected that whichever party loses will appeal. Also, a law suit is pending in Crawford County Circuit Court. It will be a long and expensive battle. Here is what we are asking for:

- No adverse impact on water quality, using advanced technology such as that in use at the Platte River State Fish Hatchery,
- Protection against disease,
- No escapement,
- Strong, independent monitoring and enforcement,
- Protection against catastrophic events such as floods, and
- Financial responsibility on the operator, not the taxpayer.