

**Testimony For the U.S. Army Corps of Engineers—Pittsburgh District, on the Draft
Environmental Impact Statement for Commercial Sand and Gravel Dredging**

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Good afternoon. I would like to thank the Army Corps of Engineers for this opportunity to speak on the Draft Environmental Impact Statement for Commercial Sand and Gravel Dredging.

The activity in question is the removal of sand and gravel from the bottom of the Allegheny and Ohio Rivers and what impact this activity has on the environment and the economy. The DEIS was conducted to answer questions surrounding the aggregates industry.

The study compares the environmental impacts of river dredging to how the rivers currently exist, which takes into account the lock and dam system, deforestation, mining, industrialization and urbanization. These are factors that have had a role in shaping the ecology of the rivers since colonization. The lock and dam system and other man-made modifications to the river have contributed to hydrologic alterations, sedimentation and anoxia. Industrial and municipal facilities as well as agricultural and urban runoff have contributed to toxics, nutrient loadings, sedimentation, and pathogens. Any one or all of these factors may have contributed to the loss of aquatic habitat and species. To lay blame for the perceived precarious position of aquatic life on the backs of the aggregates industry would be unwarranted.

According to the DEIS, any effects dredging may have on aquatic life can be mitigated with proper protocols. The study notes that any effects on both micro and macro invertebrates are minor and temporary. With regard to mussels, the effects are minor to common species and with a rigorous sampling protocol; the effects to uncommon mussels can be substantially mitigated. In fact, one such incidence of sampling protocol restricting a pool has already happened (Allegheny Pool 8). Therefore, as the study suggests, implementation of formal consultation with regulatory agencies will likely reduce significant adverse impacts to aquatic life; a rigorous sampling protocol should mitigate most if not all-significant adverse effects to threatened and endangered mussels.

The DEIS offered two alternatives to the river aggregates industry, which implies shutting the industry down. What would be the impact of an industry shutdown? According to a 2001 Allegheny Institute report "River Dredging: An Important Industry in Western Pennsylvania", the aggregates industry directly employs over 200 persons and generates \$35 million in revenues. Using a conservative multiplier of 2, the benefits to the region are 400 jobs and \$70 million in economic activity to the area.

This finding was substantiated by the DEIS. If the industry is shut down, the DEIS claims that the area would lose 400 jobs while 700 jobs statewide would be affected. State economic output would fall by \$40 million, personal income would fall by \$10 million and total value added would also fall by \$17 million (a total loss of \$67 million in economic activity).

If the aggregates were to be produced elsewhere and trucked into the region, there would be a major increase in aggregate prices of up to 200% or more. With a large percentage of aggregates being purchased by PennDOT and other local governments, most of this

price increase will be borne by the government and taxpayers. In the short term, there would be a delay in the completion of infrastructure projects already underway. In the long term, the cost of highway and other public projects would increase. The development or improvement of the region's infrastructure would be severely affected which would in turn deter economic development and potentially cost the region thousands of new jobs.

If aggregates were brought in from land based quarries there would be significant adverse effects to public safety resulting from the additional trucks needed to replace barge traffic. For every barge replaced, 40 trucks would be added to the highway. Replacing the barges which carry the nearly 4 million tons of aggregate, trucks would have to travel 12 million miles per year.

These trucks will cause damage to the roadways. It has been estimated that one heavily loaded rig does about 10,000 times the damage per axle than an automobile. The Maritime Administration also shows that carbon monoxide emissions per ton-mile of cargo moved by truck are 10 times greater than the ton-mile emissions created by towboats and barges. Nitrous oxide emissions per ton-mile by truck are 20 times those resulting from waterway transport.

Although no activity has a zero impact on the environment, the DEIS shows that removing aggregates from the Allegheny and Ohio Rivers represents the least cost alternative in terms of the economy and the environment. We fully support that conclusion. Thank you for your time and attention.