Appendix 2

SAM GRAVES
6TH DISTRICT, MISSOURI

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WASHINGTON, DC 20515
(202) 225-7041

11724 NW PLAZA CIRCLE, SUITE 900
KANSAS CITY, MO 64153
(816) 792-3076

411 JULES STREET, ROOM 111
ST. JOSEPH, MO 64501
(816) 749-0800

906 BROADWAY, P.O. BOX 304
HANNIBAL, MO 63401
(573) 221-3400

Congress of the United States
House of Representatives
Washington, DC 20515-2506

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers --Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor:

Please accept our comments in the matter of the Holliday Sand & Gravel, LLC (Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment of the river by 79 percent. We believe that the company's three facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are vital to the economic development of the region, and that any further tonnage reductions would harm jobs, construction and the region's economy.

Holliday supports hundreds of union and non-union construction employees in the Kansas City metropolitan area. The unions representing Holliday's organized employees include: Operating Engineers Local 101 and Laborers Local 663 and 1290. The construction industry has not fully recovered from the recession, and we support Holliday's requested volumes of dredging to avoid losing hundreds of construction materials jobs, which would be harmful to the local economy. Additionally, the economic impact of each of these jobs should be multiplied by nine to understand the total employment impact from the loss of family purchasing power and related industry job loss. These jobs represent millions of dollars in payroll for the local economy.

Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available, infrastructure projects would be halted (highways, bridges and buildings). In addition, there is concern in the construction community that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precast concrete products and asphalt.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and we ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Sincerely,

Sam Graves

PRINTED ON RECYCLED PAPER

VICKY HARTZLER
4TH DISTRICT, MISSOURI

COMMITTEE ON ARMED SERVICES
CHAIRWOMAN, SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS

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House of Representatives
Washington, DC 20515–2504

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WASHINGTON, D.C. 20515
(202) 225–2876

2415 CARTER LANE, SUITE 4
COLUMBIA, MO 65201
(573) 442–9311

1909 NORTH COMMERCIAL STREET
HARRISONVILLE, MO 64701
(816) 884–3411

219 NORTH ADAMS AVENUE
LEBANON, MO 65536
(417) 532–5582

April 6, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers - Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor,

Please accept this letter in support of Holliday Sand & Gravel, LCC for the renewed Missouri River Dredge Permit.

It is my understanding that the company's three facilities in the Kansas City, Missouri area will provide for vital economic development in the region. As a result, such development enables jobs for union and non-union construction employees. Holliday is known as a key producer of sand in their construction communities. For this reason, I enthusiastically support the company's three facilities that are located on the Missouri River in the Kansas City metropolitan area and St. Joseph, Missouri.

I ask that you allow the Holliday dredging company the opportunity to continue their operations with the approval of the Missouri River Dredge Permit. Thank you for your thoughtful consideration of this matter.

Sincerely,

Vicky

Vicky Hartzler
Member of Congress

cc:
Missouri Department of Natural Resources
Attn: Stacia Bax, wpsc401@cert@dnr.mo.gov
PO Box 176,
Jefferson City, MO 65102

Kansas Department of Health & Environment
Bureau of Water – Watershed Management Section
Attn: Scott Satterhwaite, ssatterhwaite@kdheks.gov
1000 SW Jackson St., Ste. 420
Topeka, KS 66612-1367

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EMANUEL CLEAVER, II
FIFTH DISTRICT, MISSOURI

FINANCIAL SERVICES COMMITTEE
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http://WWW.HOUSE.GOV/CLEAVER

TWITTER.COM/REPCLEAVER

FACEBOOK.COM/EMANUELCLEAVER II

Congress of the United States
House of Representatives

April 2, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor:

I am writing in the matter of the Holliday Sand & Gravel, LLC (Holliday) request for a renewed Missouri River Dredge Permit. The company's three facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are significant to the economic development of the region.

Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph and supports hundreds of union and non-union construction employees in the Kansas City metropolitan area. The unions representing Holliday's organized employees include: Operating Engineers Local #101 and Heavy Construction Laborers' Local #663. Additionally, the economic impact of each of these jobs should be multiplied by nine (9) to understand the total employment impact. These jobs represent millions of dollars in payroll for our local economy.

River bed degradation, particularly in the Kansas City reach of the Missouri River, is a serious issue, and I am confident that the Missouri River Degradation Study will provide the collective river stakeholders solutions to alleviating the erosion and protecting public infrastructure. I urge you to use any available flexibility on the proposed permit levels among the applicable river segments, such that will continue to support the dredging industry while maintaining balance among the various river interests.

Sincerely,

Emanuel Cleaver, II
Member of Congress

PLEASE REPLY TO:

☐ 2335 RAYBURN HOB
WASHINGTON, DC 20515
(202) 225-4535 (PHONE)
(202) 225-4403 (FAX)

☐ 101 WEST 31ST STREET
KANSAS CITY, MO 64108
(816) 842-4545 (PHONE)
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☐ 211 WEST MAPLE AVENUE
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JACK L. BAINBRIDGE
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SECRETARY-TREASURER

Heavy Construction Laborers' Local No. 663

AFFILIATED WITH THE AFL-CIO

KANSAS CITY OFFICE
7820 PROSPECT
KANSAS CITY, MO 64132
PHONE: 816-444-0062
FAX: 816-822-9906
www.lu663.com

15

CLEVER OFFICE
P.O. BOX 233
505 SOUTH WALNUT
CLEVER, MO 65631
PHONE: 417-743-3222
FAX: 417-743-2955

April 3, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers-Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear. Mr. Sailor:

Please accept this letter in support of the matter of the Holliday Sand & Gravel, LLC (Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment of the river by 79 percent. We believe that the company's three facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are vital to the economic development of the region, and that any further tonnage reductions would harm jobs, construction and the region's economy. Our comments are on behalf of the members of Heavy Construction Laborers' Local #663.

Holliday supports hundreds of union and construction employees in the Kansas City metropolitan area. In addition to our union, Local #663, Holliday's organized employees include: Operating Engineers Local 101. The construction industry has not fully recovered from the recession, and we support Holliday's requested volumes of dredging to avoid losing hundreds of construction materials jobs, which would be harmful to the local economy. Additionally, the economic impact of each of these jobs should be multiplied by nine (9) times to understand the total employment impact from the loss of family purchasing power and related construction industry job loss. These jobs represent millions of dollars in payroll for the local and regional economy.

Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available, infrastructure projects will be halted (i.e. highways, bridges and buildings). In addition, there is concern in the construction community that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precise concrete products and asphalt.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and we ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Sincerely,

Jack Bainbridge
Business Manager

The Heavy Constructors Association
of The Greater Kansas City Area

April 8, 2015

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Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Mr. Sailor:

The following comments are submitted to your office in the matter concerning Holliday Sand & Gravel, LLC's (Holliday) request for a renewed Missouri River Dredge Permit. We have been given to understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers reduced Holliday's allowable dredging volume in the Kansas City segment of the river by 79 percent. The Heavy Constructors Association believe that the company's three facilities, (located on the Missouri River in the Greater Kansas City Area and St. Joseph), are vital to the economic vitality of our region. Rejection of the permit application or further reductions of volume would have negative impacts on construction costs, jobs and our area's economy.

Holliday supports many union and non-union construction employees in the Kansas City metropolitan area. The unions representing Holliday's organized employees include: Operating Engineers Local 101 and Laborers Local 663 and 1290. The Greater Kansas City Area's construction industry has not fully recovered from the recent recession. Holliday's requested volumes of dredging on the Missouri River would provide the necessary amounts of sand that would directly support construction materials jobs and indirectly support construction jobs in the broader market providing a stimulus to the Kansas City and St. Joseph economies.

Holliday is the key producer of sand for the construction market in the Kansas City metropolitan area and St. Joseph. If sufficient local sand is not available, replacement materials would need to be transported into the area, increasing costs of area infrastructure projects such as highways, bridges commercial buildings and housing developments. To say that we have concerns with this development would be an understatement. Further reduction or outright elimination of river dredging in the three previously mentioned locations will produce undesired economic results.

With the Kansas City and St. Joseph's construction markets dependent on quality, economical sand from the Missouri River, we ask for your favorable consideration of Holliday's dredging permit and that it be permitted at the higher volume than at present.

Sincerely,

Edward R. DeSoignie
Executive Director
Heavy Constructors Association of Greater Kansas City

1100 Walnut • Suite 2950 • Town Pavilion • Kansas City, Missouri 64106
(816) 753-6443 • FAX (816) 753-1239 • E-MAIL: info@heavyconstructors.org • www.heavyconstructors.org

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www.midwestblock.com
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Fax: 573.635.2644

April 3, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Sand Dredging Permits

Gentlemen:

This letter is in response to your Public Notice dated March 13, 2015, regarding permits requested by Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Dredgers."

Commercial sand dredgers provide the majority of sand material for the construction industry. The sand goes into concrete that provides our roads, bridges, sidewalks, homes, driveways, etc. in the State of Missouri and parts of Kansas. Missouri River sand is of high quality and important to the construction trades.

Dredging has taken place on the Missouri River long before the Corps developed the Bank Stabilization and Navigation Project. The dredging interests have generally complied with permit requirements previously issued by the Corps of Engineers in previous permits.

The permits provide for an accommodation of the endangered pallid sturgeon. The Dredgers present no other impacts to any other endangered or threatened species on the River.

The Dredgers provide a source of employment and pay taxes in their respective communities. They participate in their local communities, providing donations and other contributions to civic betterment.

The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,

Darryl Winegar
President

cc: Missouri Department of Natural Resources
PO Box 76
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water - Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

March 31, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

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The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,

cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

COMANCHE CONSTRUCTION, INC.
P.O. Box 14158 • Shawnee Mission, KS 66285-4158 (913) 782-2980 • Fax 782-6165

April 6, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, Mo. 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, Mo. 63103

Re Missouri River Commercial Dredging Permits

Gentlemen:

This letter is in response to your Public Notice dated March 13, 2015, regarding permits requested by Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Dredgers."

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COMANCHE CONSTRUCTION, INC.
P.O. Box 14158 • Shawnee Mission, KS 66285-4158 (913) 782-2980 • Fax 782-6165

Very truly yours,

Joe Ritz
Vice President

cc: Missouri Department of Natural Resources
Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water- Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

Missouri Concrete Association, Inc.

101 E. High Street, P.O. Box 392, Jefferson City, Missouri 65102
(573) 635-6271 • FAX: (573) 636-9749 • www.moconcrete.com

RANDY J. SCHERR, Executive Director

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Heathwood Oil Company
Kansas City, Kansas

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DARRELL ANTHONY
Sutton Trucking
Archie, Missouri

April 6, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor:

Please accept our comments in the matter of the Holliday Sand & Gravel, LLC (Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment of the river by 79 percent. We believe that the company's three facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are vital to the economic development of the region, and that any further tonnage reductions would harm jobs, construction and the region's economy.

Holliday is the key producer of sand for the production of concrete in the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available, infrastructure projects would be halted (highways, bridges and buildings). In addition, there is concern in the construction community that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete and precast concrete products.

Holliday supports hundreds of union and non-union construction employees in the Kansas City metropolitan area. The unions representing Holliday's organized employees include: Operating Engineers Local 101 and Laborers Local 663 and 1290. The construction industry has not fully recovered from the recession, and we support Holliday's requested volumes of dredging to avoid losing hundreds of construction materials jobs, which would be harmful to the local economy. Additionally, the economic impact of each of these jobs should be multiplied by nine to understand the total employment impact from the loss of family purchasing power and related industry job loss. These jobs represent millions of dollars in payroll for the local economy.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and we ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Respectfully,

Randy J. Scherr,
Executive Director

April 6, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Sand Dredging Permits

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Dredging has taken place on the Missouri River long before the Corps developed the Bank Stabilization and Navigation Project. The dredging interests have generally complied with permit requirements previously issued by the Corps of Engineers in previous permits.

The permits provide for an accommodation of the endangered pallid sturgeon. The Dredgers present no other impacts to any other endangered or threatened species on the River.

The Dredgers provide a source of employment and pay taxes in their respective communities. They participate in their local communities, providing donations and other contributions to civic betterment.

The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,

Jason Luebbering
Cole County Industries

Sailor, Matthew NWK

From:	Richard Geekie [rfgeekie@gmail.com]
Sent:	Friday, April 03, 2015 11:36 AM
To:	Sailor, Matthew NWK
Cc:	MDNR MVS External Stakeholder; ssatterthwaite@kdheks.gov; Mike Odell; David Williams; BHall@nhcweb.com
Subject:	[EXTERNAL] Comments on dredging permit applications of Holliday Sand and Gravel
Attachments:	Dredging and Channel degr Missouri River.pptx
Categories:	Red Category

Dear Mr. Sailor:

Mike Odell asked me to submit the attached PPT summarizing some of my observations from my studies of the Missouri River. This is a somewhat abbreviated presentation because I did not want to make the PPT too long and also I just wanted to suggest that if dredging has an impact on channel degradation, the process is complicated.

The conclusions that that I have come to, and not all are presented in this PPT are the following:

1) that dredging does not cause a nick point and therefore does not cause head cutting. A preliminary investigation demonstrated this, however, the "test period" was only about two weeks. Further investigation over a longer period is required to confirm this result during extended periods of dredging.

2) the constriction of the floodplain at river mile (RM) 374.1 (I-435 Bridge) and also the constriction of the floodplain on the south end of the airport have caused most of the degradation.

3) It may be possible that dredging has contributed to channel degradation in the KC reach during the drought of 2000 to May 2007 because little bed-material load was coming from upstream.

4) The channel degradation in KC reach has appeared to stop since about 2007 (the end of the drought) and the channel upstream and downstream of the Kansas River has rebounded, that is, aggradation has occurred, even during significant amounts dredging in the KC reach.

5) The sills upstream of the I-435 Bridge may also have and still contribute to head cutting upstream of the Bridge.

The attached PPT has not been vetted by sediment transport experts and has not been peer reviewed. This PPT is derived from tow write-ups that I have been developing on dredging and channel degradation.

If you have any questions, please let me know.

Regards,

Richard
Richard F. Geekie, P.E., M.ASCE
13904 W. 69th Terrace
Shawnee, KS 66216
913-669-3370 (M)
rfgeekie@gmail.com

The correlation between dredging and degradation of the Missouri River channel in the Kansas City reach

The Kansas City reach is between River miles (RM) 340 and 410

Richard F. Geekie, P.E., M.ASCE
April 2015

Summary:

1) Channel degradation has been greatest in the Kansas City reach, approximately RM 340-410.
2) Corps-measured low-water surface profiles (75%) indicate that the channel bed has degraded significantly before 1974.
2) These low-flow measurements indicate that the channel in the Kansas City reach has been recovering (aggradation) since about 2006.
3) Significant dredging occurred after 2006.
4) A drought as measured by Kansas City gage discharge occurred from 2000 to May 2007; this drought appears to be correlated with increased or accelerated degradation at KC.
5) The end of the drought in early May 2007 appears to coincide with beginning of aggradation in the KC reach.
6) There are two slopes to the Kansas City channel: a steepening upstream above about RM 374 and flattening below about RM 374; these changes in water-surface slopes indicate degradation.
7) The water-surface slope above RM 374 begins to decrease in 2008 while the slope below RM 374 begins to increase.
8) There is the possibility that large dredging amounts during a drought or low flow (low bed-material load from upstream) might result in head cutting.

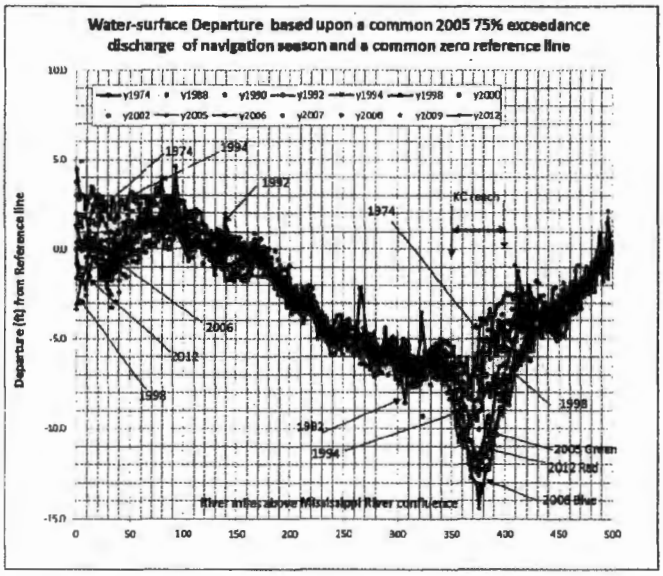

Figure 1 - A measure of channel degradation from the departure of 2005 75% water-surface profiles from common reference line shown as "0.0" on vertical axis

1) The greatest departures (degradation) from the reference line in the ***above figure 1*** are between RM 340 and 410.
2) There are also large departures (degradation) above RM 410 and below RM 340.
3) There are changes in slope of the departure "curves" at about RM 340 and above RM 420.
4) These changes of slope may be due to different degradation processes.
5) Notice the movement upstream of the low point from RM 366 to 374 between 1974 to 2006.

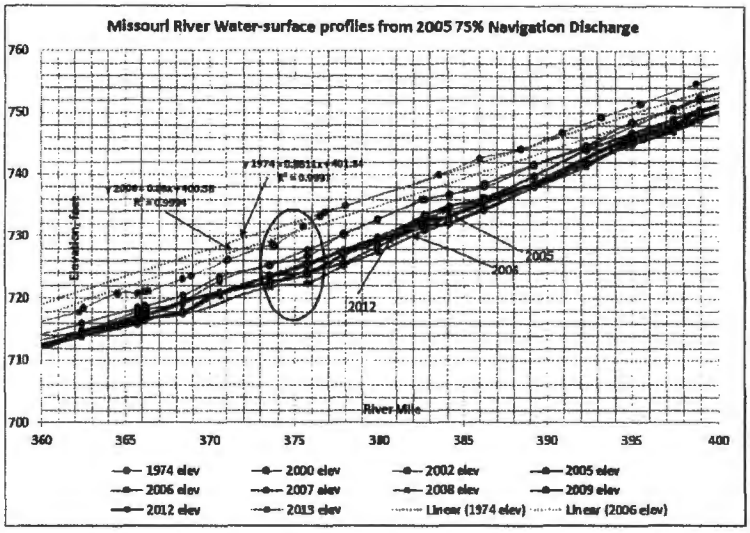

Figure 2 - Selected Low-flow water-surface profiles. Profiles after 2006 have shifted above the 2006 profile indicating channel recovery or aggradation.

A possible cause of the beginning of degradation in Kansas City reach: a nick point and head cutting at river mile 374 and constricted floodplain just below Kansas River, between Broadway Bridge and I-35 Bridge (1450 feet floodplain width).

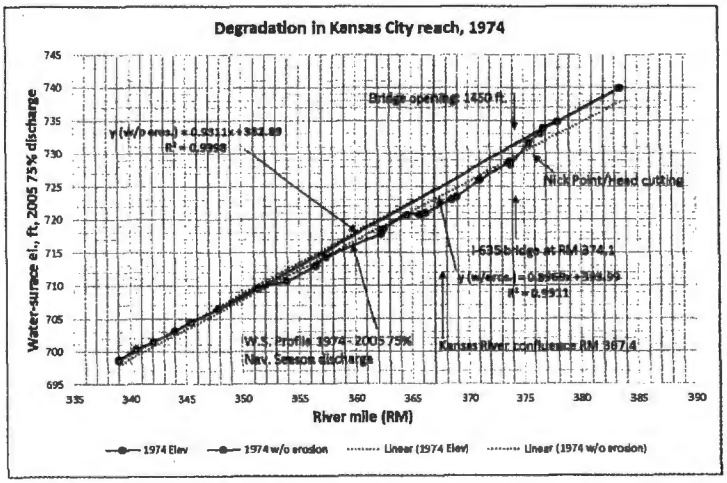

Figure 3 – Floodplain constriction at RM 374.1 and adjacent to Downtown Airport, RM 366.1 to RM 364.6

Head cutting is a process that can explain the steeping of the upstream slope, above RM 366 or RM 374 and flattening of the downstream slope. It is also possible in this case that sills above RM 383 are too high.

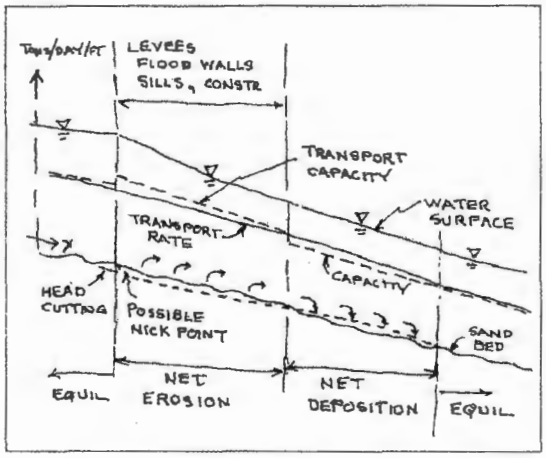

Figure 4 – Process of head cutting

Table 1 - Water-surface slopes of Missouri River below Rulo, NE (2005 75% discharge of the navigation season) Source: slopes calculated from KCD, USACE data contained in a spreadsheet

	feet per mile					
Year	498.1 -28.2	150-350	293-366	366-448	410-454	454-498
1974	0.88	0.87	0.89	0.94	0.88	0.94
1988	0.88	0.86	0.88	0.94	0.90	0.96
1990	0.88	0.86	0.87	0.95	0.92	0.96
1992	0.89	0.86	0.89	0.95	0.91	0.96
1994	0.88	0.87	0.85	0.96	0.86	0.98
1998	0.88	0.89	0.85	0.97	0.92	1.00
2000	0.88	0.86	0.85	0.97	0.89	0.97
2002	0.88	0.86	0.83	0.98	0.91	0.99
2005	n/a		0.82	1.00	0.94	1.00
2006	0.88	0.87	0.83	1.03	0.95	0.97
2007	n/a			1.02	0.94	1.00
2008	0.88	0.86	0.84	1.02	0.89	1.00
2009	0.88	0.86	0.83	1.01	0.91	0.99
2012	0.88	0.86	0.84	1.00	0.92	1.03
2013	n/a		0.83	1.00	0.93	1.01

Low-flow water-surface slopes above RM 374 have increased from 1974 to about 2008 while water-surface slopes between RM 340 – 366 and RM 340 – 374 have decreased from 1974 and 2008. These trends reverse after 2008.

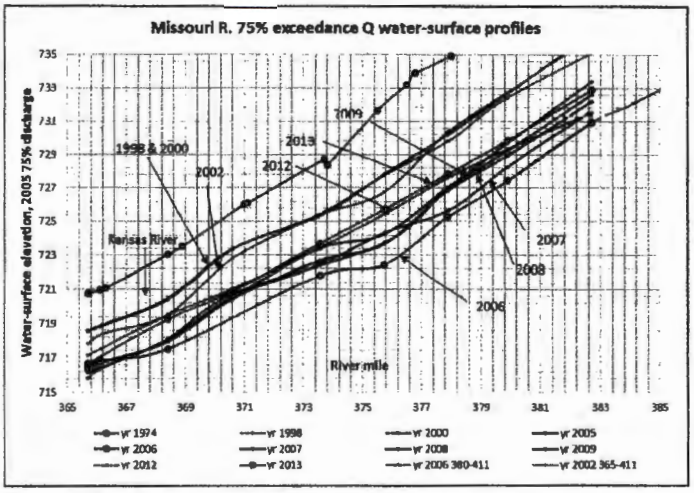

Figure 5 - Low-flow water-surface profiles have shifted up above the 2006 water-surface profile beginning in 2007, indicating deposition has occurred after 2006 for all profiles.

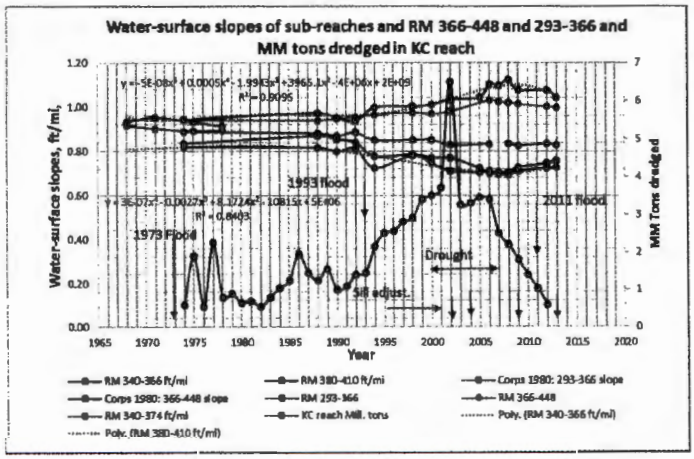

Figure 6 – Correlation between dredging in Kansas City reach and channel slopes

The slope of RM 380-410 begins to decrease or stabilize after 2007 while the slope of RM 340-366 (= RM 340-374) begins to increase or stabilize after 2007. These changes in slopes indicate deposition. Dredging in 2008 is about 2.4 MM tons.

Figure 6:
Between 1995 and 2001, there is significant increase in dredging but no change in the sub-reach slopes of RM 340-366 and RM 380-410.

After 2006, there appears to be some deposition in lower sub-reach and upper sub-reach as the dredging decreases. However, the precipitous decrease in annual dredging between 2006 and 2011 does not appear to correlate very well with the small changes of the two sub-reaches.

The drought ended in early May 2007 which suggests that the bed-material load increased which would offset any effects of dredging on channel degradation.

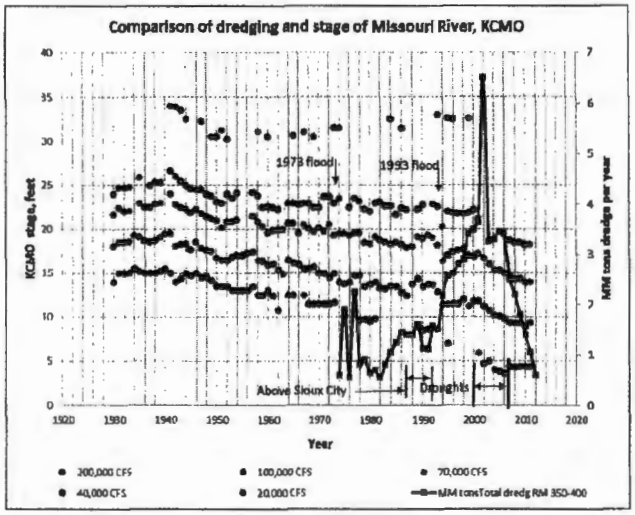

Figure 7 – Correlation between dredging and channel recovery after drought (2000-May 2007) Kansas City gage stage begins to stabilize in 2007. Dredging was above 2.0 MM tons from 2007 through 2009.

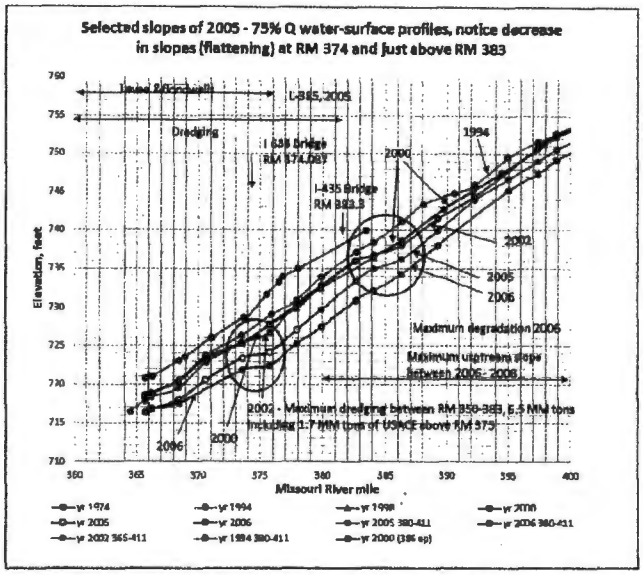

Figure 8 – Flattening of 75% water-surface profile at RM 374.1 (I-635 Bridge)

Possible causes (processes) of slope "flattening" in Figure 8 (RM 374 and RM 383) along with increasing of water-surface slopes and lowering of upstream low-flow water-surface profiles

1. Error in surveying such as incorrect bench mark elevation.

2. Scour hole downstream of dredging pit (hole) and head cutting from downstream scour hole, starting in 2002. There was no dredging above RM 383, however, the flattening at this location may be the result of deposition at RM 382.7 between 1998 and 2000. Again, the drought began in 2000 and ended in May 2007.

3. Sills and dikes upstream of I-635 and I-435 bridges confined flow more frequently over time resulting in increases bed shear more frequently. For example, the 2011 flood was contained within the Kansas City reach channel.

4. Drought was from 2000 through early May of 2007. The West Consultants L-385 report says that degradation appears to occur during low flow and aggradation appears to occurs during high flow.

Conclusions:

1) Dredging in a large sand-bed river with a small profile gradient does not cause head cutting, at least from the upstream edge of the dredge hole (pit). This was not discussed explicitly in this presentation. The Missouri River has a profile gradient of less than 1.0 foot per mile.

2) Figures 6 and 7 suggest that dredging is not correlated that well with channel degradation in the Kansas City reach, except perhaps during extended drought conditions. See discharge records at Kansas City gage between 2000 and 2007.
3) Dredging in the Kansas City reach below the Kansas River could be increased to about 2.0 MM tons per Year.

RECEIVED
REGULATORY BRANCH
2015 APR -7 AM 9:07

April 2, 2015

SENT VIA E-mail to: **matthew.c.sailor@usace.army.mil**

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits
Holiday Sand & Gravel

Dear Mr. Sailor:

I work in the construction materials industry. I am writing concerning Holliday Sand & Gravel, LLC's (Holliday) request for a renewed Missouri River Dredge Permit.

My understanding is that, during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment of the Missouri River by almost eighty percent (80%). I believe that Holliday's three (3) facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are vital to the economic development of the region, and that any further tonnage reductions would harm jobs, construction and the region's economy, particularly as the region's construction industry recovers from the recession experienced in recent years.

Holliday supports hundreds of union and non-union construction employees in the Kansas City metropolitan area. The unions representing Holliday's organized employees include: Operating Engineers Local 101 and Laborers Local 663. The area's construction industry has not fully recovered from the recession. I support Holliday's requested volumes of dredging to avoid losing hundreds of more construction materials jobs, a result which would cause further harm to the local economy. My understanding is such jobs have a multiplier effect on the local economy of about nine times their individual payroll compensation. These jobs currently represent millions of dollars in payroll for the local economy. Their loss certainly will cause hardships on the individual families affected. But, such a loss also will cause a further loss of jobs in related industries like construction, road paving and ready mix concrete. So, the total economic impact to our area will be very significant.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River. Holliday is the key producer of sand for the Kansas

City metropolitan area and St. Joseph. If sufficient sand is not available, necessary infrastructure projects likely will be delayed or cancelled. Members of the construction community also are concerned that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precast concrete products and asphalt.

I respectfully request that Holliday's dredging be allowed to continue at the levels requested in its permit application, if not more.

Sincerely,

Gary Church

Cc:
Missouri Department of Natural Resources
Attn: Stacia Bax
Wpsc401cert@dnr.mo.gov
PO Box 176
Jefferson City, MO 65102

Kansas Department of Health & Environment
Bureau of Water – Watershed Management Section
Attn: Scott Satterthwaite
ssatterthwaite@kdheks.gov
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Holliday
SAND AND GRAVEL COMPANY
9660 LEGLER ROAD
PH: (913) 492-5920 LENEXA, KS 66219-1291 FAX (913) 438-0200

April 2, 2015

VIA EMAIL TRANSMISSION

Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers--Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, Missouri 64106

Re: Missouri River Dredge Permit NWK-2011-00363

Dear Matt:

Please accept the following comments from Holliday Sand & Gravel Company ("Holliday") on our request for renewal of our Missouri River commercial dredging permit. We believe our comments will serve to inform interested parties that Holliday's River dredging, as requested in its U.S. Army Corps of Engineers ("USACE") permit application, is sustainable and critical to the infrastructure of greater Kansas City (KC) and as such is clearly in the public's interest.

Critical Demand for Sand

As construction in KC ramps up, the demand for sand is projected to soon exceed all available sources. As you know, concerns about bed degradation have reduced the volume of sand that Holliday can dredge in the Kansas City Segment of the Missouri River, up to 79% less. Much of the reduction has been supplemented in river segments upstream and downstream of KC. Regardless, we are predicting an annually increasing shortfall of tonnage beginning in 2015 as construction in the region ramps up. At this time there is no reliable alternate source for this growing shortfall of quality concrete sand that should begin this year.

Progress on Evaluating and Addressing Degradation

Holliday continues to participate in and help fund the Missouri River Degradation Study that seeks to determine the impacts, causes and solutions to bed degradation. However, the bed computer model that is a significant element of the Degradation Study remains incomplete and flawed; accordingly, Holliday agrees with the USACE's decision not to include the preliminary draft results of the model as part of the agency's evaluation of applications in this current permit cycle.[1] In the meantime, as the Degradation Study continues, changes have already occurred that suggest reduced degradation: the KC area river dike structures that intentionally cause scouring of the bed and preserve the navigation channel were lowered by the Corps thus decreasing the scouring effect, KC area dredging tonnages were significantly reduced, and dredge limits were imposed in five-mile reaches, moving dredge locations further from KC. Unfortunately, a once in a lifetime reservoir discharge event occurred in 2011 and has set back the progress from these significant changes.

Nevertheless, we are encouraged by the bed recovery that is evident from the recent river surveys, showing an increase in water surface elevations since 2009 from River Mile 280-390. Comparison of river cross-section surveys completed in 2009, 2012, and 2013 by the USACE indicate that the channel bed of the Missouri River has actually aggraded (material has deposited) from River Mile 325 to RM 370. This information was presented by the USACE at the February 9, 2015 meeting - see *2015 Annual Missouri River Dredgers Update Meeting*. This reach of river includes where Holliday has been dredging sand for construction materials over the same time period. Though it is a small improvement, it is significant considering the high flows and scour that occurred during the record 2011 scour event.

Data also presented shows the average slope line of the construction reference plane water surface profile has increased approximately 0.5 feet through this reach over this same time period. This bed aggradation represents approximately 2.5 to 3.0 MTons of bed material deposition in this reach over this 3 to 4 year time period from 2009 to 2013. We believe much of this bed recovery actually occurred after the high flow event in 2011, although cross section surveys are not detailed enough to confirm this hypothesis. In summary we note that both channel bed and associated water surface elevations have increased in this reach with a combination of ongoing dredging by Holliday within the regulatory limits and an extremely high flow event in 2011.

Isn't Dredging the Problem?

It's not that simple - there's plenty of sand in the Missouri River and it's constantly being replenished from upstream reaches. Reducing dredging is not the answer to bed degradation.

The US Geological Survey (USGS) measures suspended bed material sediment discharge on the Missouri River at Kansas City and summarized annual bed material sediment loads in their report *Characteristics of Sediment Data and Annual Suspended Sediment Loads and Yields for Selected Lower Missouri River Mainstem and Tributary Stations, 1976-2008*. For the time period from 1995 through 2006 (years that included an extreme drought) the **USGS reported that approximately 11.7 million tons per year of bed material sediment (very fine sand or coarser material) was transported by the Missouri River through Kansas City.** This quantity of sediment load is at least 10 times greater than the bed material sediment

[1] The USACE officially took this position during the agency's annual meeting with the Missouri River dredgers on February 9, 2015. If the USACE changes course during its processing of Holliday's permit application, Holliday hereby incorporates by reference into this comment letter the numerous submittals we have made to the USACE critiquing the model's development and implementation, including without limitation, Holliday's letters from January 30, 2015, November 20, 2014, and September 24, 2014.

dredged by Holliday on an annual basis since 2009, indicating that the sediment inflow to this reach adequately replenishes the bed material sediments extracted through ongoing dredging operations.

Is River Dredging really necessary?

Years of operational experience by Holliday support our conclusion that river dredging is by far the most economical and efficient method for obtaining sand in KC. In our experience, there is no reliable or economical alternative available for concrete sand produced by Missouri River dredging. Holliday also has determined that the average annual savings to the cost of KC area construction from Missouri River sand dredging is likely in excess of ten million dollars every year as compared to other sources of aggregate such as pit mining. This is in contrast to the determination of the USACE when the current Missouri River dredge permits were issued in 2011. Indeed, the authors of the Missouri River Commercial Dredging Environmental Impact Statement ("EIS") completed for the issuance of the revised permits in 2011concluded that land based pits could fully replace the shortfall from the reductions in Missouri River dredging. Based on our experience operating a Missouri River floodplain pit, we know that the excess fines and clays that must be removed increase costs and stifle the production of quality concrete sand which accounts for 75% of the demand in KC.

As it turns out, pits have not developed into a viable alternate source for concrete sand, though they have helped supply finer sand products and gravel. When the current Missouri River dredge permits were issued in 2011, Holliday made comments requesting another 800,000 tons in the Waverly segment (downstream of KC), stating:

> *"There are not sufficient alternate sources of sand in the Kansas City Segment."*

This amount was not approved for the 2011 permits, and the USACE response stated:

> *"The USACE has received letters from the Master's Dredging Company and Missouri Sand Company LLC (see letters in Appendix A) rebutting this assertion and providing credible information about existing and planned sand mining operation with ample reserves of sand that meets the requirements and can fulfill the market needs now and in the future."*[2]

Holliday can now say that since 2011 the two operational and one planned land sand pits have not developed into viable sources of concrete sand. As we predicted, the two existing pits have had serious deposit problems and will not be able to meet the shortfall of quality concrete sand needed to replace the reduction in Holliday's permit in the Kansas City segment, and to a greater extent, the increased demand we are now experiencing as the economy improves.[3]

What was an educated and experience based prediction in 2011 has now become established fact. A land based pit sand deposit in the ground does not guarantee a reliable, quality product. Because of geology and economics, Missouri River sand pits continue to be very difficult to operate, and are not going to supply the increased regional demand for concrete sand.

---

[2] Commercial Sand and Gravel Dredging on the Lower Missouri River
Record of Decision, March 2011, Section 4, Alternative Analysis, page 3-37,38

[3] Holliday in fact operated one of these pits for many years before selling it.

Meeting the Increasing Demand for Construction Sand

To prevent shortages and significant negative economic impacts to the region's construction industry during the next five year permit cycle, Holliday has requested that its existing tonnage allocations be preserved for the Kansas City and St. Joseph segments, and that its tonnage allocation in the Waverly Segment (downstream of the Blue River) be ramped up 10% each year to meet our projected increase in construction market demand. If the demand is not there, the increased quota in the Waverly Segment will not need to be dredged. Holliday is not requesting any increase in dredging in the KC or St. Joseph segments.

The Waverly Segment of the Missouri River has been aggrading, has very limited structural risk, and will in no way contribute to any potential degradation impacts upstream in the Kansas City Segment. Based on the recent stream bed surveys, we have calculated a net deposition of approximately 1.1MM tons in the upper Waverly Segment, between River Miles 345 to 357, from the time period 2009 to 2013 (0.75 feet average aggradation multiplied by 500 foot width between tips of dikes, by 12 miles long by 90 lbs/ft^3 is approximately 1.1 million tons of sediment aggradation). Considering the historic 2011 scouring event, this clearly shows a stable and aggrading reach.

Providing this additional tonnage allocation to Holliday is also consistent with the analyses contained in the *Missouri River Commercial Dredging EIS* and decisions outlined in the USACE accompanying Record of Decision. To protect from increased demand from the construction industry, Holliday had requested additional tonnage in the stable to aggrading Waverly Segment in its comments on the Final EIS. The USACE response stated:

> *"The USACE cannot increase the annual limit in the Waverly segment because the Final EIS (USACE 2011) did not consider an alternative with a higher annual extraction limit. However, in the next permit cycle the USACE may be able to increase the annual extraction limit in the Waverly segment if the segment continues to be stable or aggrading under Alternative B during the next five years.*[4]

It is now the next permit cycle and the Waverly segment continues to be stable AND is aggrading, thereby qualifying for additional dredging greater than the USACE's Alternative B criteria. The significant economic benefit of removing a small portion of the sand flowing past Kansas City is clearly in the public's interest, and reasonable amounts of Missouri River dredging remain very much necessary to meet the demand for construction materials in the KC Metro. With the existing close monitoring and adaptive management, as much dredging as possible should be allowed to continue that does not have a determinable, detrimental impact on bed degradation. Holliday's requested tonnage serves the needs of our area while being consistent with the USACE's permit application review criteria as applied to Missouri River commercial dredging.

Thank you for your time and consideration, and for including these comments in the record as support for reissuing NWK-2011-00363 with the requested revised dredging tonnage in the Waverly segment.

---

[4] Commercial Sand and Gravel Dredging on the Lower Missouri River Record of Decision, March 2011, Section 4, Alternative Analysis, page 3-41

Sincerely yours,

Holliday Sand & Gravel Company

Mike Odell

Vice President - Operations

CC:

Stacia Bax
wpsc401cert@dnr.mo.gov
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102
Scott Satterthwaite
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Kansas Department of Health and Environment
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Olathe, Kansas

Liberty, Missouri

Lee's Summit, Missouri

April 2, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th Str., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Mr. Sailor,

Please consider my comments in the matter of the request for a renewed Missouri River Dredge Permit by Holliday Sand & Gravel, LLC. It is my understanding that Holliday's dredging volume in the Kansas City segment of the river was reduced by 79 percent in 2010. While a 79% reduction in anything is extreme, the effect of this reduction in sand volume on our local construction industry may have been mitigated by the "Great Recession" that had us by the throat at that time. In fact, with hindsight I can accurately say that 2010 was when the recession reached its nadir for the local construction industry. Our production output that year represented a 50 percent reduction compared to 2006. That is not the case in 2015.

Since the spring of 2012, the KC construction market has grown robustly. For all intents and purposes, Kansas City is a "one horse town" when it comes to having a reliable, high quality sand supplier—that supplier being Holliday Sand. Nothing beats using local materials, especially when that local source delivers an economical and quality product. Our concrete production demand is up by more than 50% since 2010. We employ 230 people and supply concrete to residential, commercial, and local roads/highway projects. A dearth in the supply of sand is worrisome, to say the least.

By my last count, there are at least 12 ready-mix concrete suppliers serving the Greater Kansas City Metropolitan market. As a representative of that industry (and a board member of both the Kansas Ready-Mix Concrete Association and National Ready-Mix Concrete Association), I implore you to consider allowing Holliday Sand & Gravel to dredge the Kansas City segment of the Missouri River at the greatest levels possible.

Thank you for your consideration in this matter.

Sincerely,

Steve McDonald
Pres/CEO
Geiger Ready-Mix Co., Inc.

March 31, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Sand Dredging Permits

Gentlemen:

This letter is in response to your Public Notice dated March 13, 2015, regarding permits requested by Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Dredgers."

Commercial sand dredgers provide the majority of sand material for the construction industry. The sand goes into concrete that provides our roads, bridges, sidewalks, homes, driveways, etc. in the State of Missouri and parts of Kansas. Missouri River sand is of high quality and important to the construction trades.

Dredging has taken place on the Missouri River long before the Corps developed the Bank Stabilization and Navigation Project. The dredging interests have generally complied with permit requirements previously issued by the Corps of Engineers in previous permits.

The permits provide for an accommodation of the endangered pallid sturgeon. The Dredgers present no other impacts to any other endangered or threatened species on the River.

The Dredgers provide a source of employment and pay taxes in their respective communities. They participate in their local communities, providing donations and other contributions to civic betterment.

The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,

V.P. Material Resources - Pace Construction Co.

cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

March 31, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

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Very truly yours,

cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

March 31, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

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Very truly yours,

Con Agg of Mo. CLC.

cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

March 31, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Sand Dredging Permits

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Very truly yours,

Con Agg of MO

cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
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April 3, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

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Gentlemen:

This letter is in response to your Public Notice dated March 13, 2015, regarding permits requested by Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Dredgers."

Commercial sand dredgers provide the majority of sand material for the construction industry. The sand goes into concrete that provides our roads, bridges, sidewalks, homes, driveways, etc. in the State of Missouri and parts of Kansas. Missouri River sand is of high quality and important to the construction trades.

Dredging has taken place on the Missouri River long before the Corps developed the Bank Stabilization and Navigation Project. The dredging interests have generally complied with permit requirements previously issued by the Corps of Engineers in previous permits.

The permits provide for an accommodation of the endangered pallid sturgeon. The Dredgers present no other impacts to any other endangered or threatened species on the River.

The Dredgers provide a source of employment and pay taxes in their respective communities. They participate in their local communities, providing donations and other contributions to civic betterment.

The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,

Darryl Winegar
President

cc: Missouri Department of Natural Resources
PO Box 76
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water - Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

March 31, 2015

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2015 APR -6 PM 4:28

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Sand Dredging Permits

Gentlemen:

This letter is in response to your Public Notice dated March 13, 2015, regarding permits requested by Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Dredgers."

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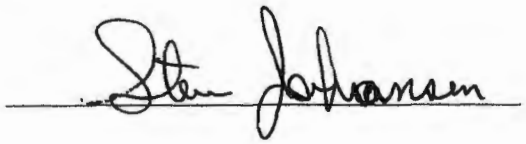
The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,



cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

MoDOT

105 West Capitol Avenue
P.O. Box 270
Jefferson City, Missouri 65102

Missouri Department of Transportation

573.751.2551

David B. Nichols, Director

Fax: 573.751.6555

1.888.ASK MODOT (275.6636)

March 30, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers, Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, Missouri 64106-2896

CC:

Missouri Department of Natural Resources
Water Pollution Control Program
P.O. Box 176
Jefferson City, Missouri 65102

Kansas Department of Health and Environment
Bureau of Water - - Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, Kansas 66612-1367

Dear Mr. Sailor

This letter is in response to the request for comment on the public notice regarding Missouri River Commercial Dredgers issued March 13, 2015.

Scouring of bed material from around bridge foundations is the leading cause of bridge failures in the United States and scour mitigation to protect bridge foundations is a major expense to state departments of transportation including MoDOT.

To promote the health of Missouri's infrastructure and safety to the travelling public, MoDOT requests that dredging not be allowed within 1000 feet of any bridge pier or abutment as opposed to the 500 foot limit stated in paragraph "j" of Appendix 1: Past Permit Special Conditions.

Sincerely,

Dennis Heckman

Dennis Heckman, P.E.
State Bridge Engineer

Water One

Setting the Standard for Utility Excellence

Water District No. 1 of Johnson County

April 2, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, Missouri 64106-2896
matthew.c.sailor@usace.army.mil

Mr. Charles Frerker
Regulatory Project Manager
U.S. Army Corps of Engineers
St. Louis District
1222 Spruce Street
Saint Louis, Missouri, 63103
charles.f.frerker@usace.army.mil.

RECEIVED
REGULATORY BRANCH
2015 APR -6 PM 4:26

RE: WaterOne Comments in Response to Public Notice of Missouri River Commercial Dredging Permit Renewal Request

Dear Sirs:

On behalf of Water District No. 1 of Johnson County, Kansas, I am submitting comments to the public notice for renewal of commercial sand dredging permits on the Missouri River. WaterOne respectfully asks that because of the widespread impact commercial dredging has on Missouri River stakeholders, that a formal hearing be held on this matter to allow for maximum public input. Furthermore, WaterOne urges the Corps of Engineers to delay the renewal of any commercial dredging permits until after the Missouri River Bed Degradation Feasibility Study is complete.

WaterOne is a public water supply system that serves over 400,000 customers in 17 cities of Johnson County, KS. We have a water intake facility on the Missouri River at mile marker 379 as well as a Collector Well at mile 385. Together these two facilities supply about 50% of the water distributed in our system. In 2004 WaterOne's Missouri River intake was rendered useless due to a combination of river icing and the degradation problem. We were required to spend about $2.5 million to install low river pumps to pump water up into our intake because the surface level had dropped so significantly. After this event, WaterOne began discussing the degradation issue with the Corps of Engineers.

In 2007, WaterOne joined several other local stakeholders to work with the Corps on what is now known as the Missouri River Bed Degradation Feasibility Study. Millions of dollars have been invested in this cost share study to date. WaterOne alone has invested over $500,000 and additional thousands of hours of staff time in the Study. Preliminary results of the hydraulic model developed for the Study demonstrate that

commercial sand dredging is a significant contributor to the degradation problem. The effectiveness of alternatives and solutions that have been considered is conditional upon the reduction or complete elimination of commercial dredging. Granted, these results are preliminary and the Corps is going to great lengths to ensure the dredging industry has input in the process. So much so that a schedule waiver is being requested for the Study into 2017 to make sure comments submitted by the commercial dredgers regarding the hydraulic model are considered and incorporated where deemed appropriate.

Again, WaterOne requests and strongly encourages the Corps to hold a formal hearing on this important matter. We believe that dredging permits on the Missouri River should not be renewed at this time and should remain inactive at a minimum until the Degradation Feasibility Study is complete. The sand and gravel needs of the Kansas City area can be met by off river mining. Certainly the dredging industry representatives will not be in favor of moving off the river. For years dredgers have enjoyed a "no cost" place of operation but it has been at the expense of the public infrastructure in the areas they operate. Renewal of the commercial dredging permits at this time will cost the public in the long run in terms of the repair and maintain required to infrastructure if current conditions persist and the threat of total failure of that infrastructure over time.

Best Regards,

Darci L. Meese
Government Affairs Coordinator
WaterOne
(913) 895 5516
dmeese@waterone.org

DLM/dlm
Attachments

LATHROP & GAGE LLP

DAVID A. SHORR
DIRECT LINE: 573.761.5005
EMAIL: DSHORR@LATHROPGAGE.COM
WWW.LATHROPGAGE.COM

314 E. HIGH STREET
JEFFERSON CITY, MISSOURI 65101
PHONE: 573.893.4336
FAX: 573.893.5398

2015 APR -6 PM 4:19

April 2, 2015

VIA EMAIL TRANSMISSION
AND U.S. MAIL

Matthew Sailor, Regulatory Project Manager — Matthew.C.Sailor@usace.army.mil
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager — Charles.F.Frerker@usace.army.mil
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Sand Dredging Permits

Gentlemen:

This letter is in response to your Public Notice issued March 13, 2015, and is in support of the permit applications of Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Group."

The Group supports commercial sand dredging on the Missouri River. Commercial sand dredging from the Missouri River provides over 80% of the sand necessary for the production of concrete within the boundaries of the State of Missouri. Material is also provided to parts of Kansas. It helps drive the economy of the States and provides jobs, both directly and indirectly, to its citizens.

Missouri River sand is of the highest quality and supports excellent construction.

The dredgers who move sand from the River and on the River have made appropriate accommodations as part of their permits for protection of the endangered

pallid sturgeon. In general, all members of the Group have complied with all permit conditions relating to the rights granted them by the State and the United States.

The bed of the River is owned by the citizens of Missouri and Kansas. The citizens have the right to benefit from their asset. Restrictions on tonnage deny the citizens of Missouri and Kansas access to their asset and to the use and utilization of their owned resource.

Previous permits have taken steps to contain the issue of bed degradation. Restrictions on the acquisition of sand throughout the River should be relaxed in favor of greater tonnage. It remains the position of the Group that the major causes of bed degradation are the containment of sediment behind the dams in the reservoirs and the failure to properly and adequately maintain training structures in the Bank Stabilization and Navigation Project. Preliminary model runs as part of the Missouri River Management Plan alternatives demonstrate that the bed will continue to degrade on its own accord without adjustments to its structures and without the dredgers participation.

The Group requests that the Corps issue new 404 permits and the States accompany that decision by issuance of 401 certifications consistent with the applications submitted by members of the Group.

Very truly yours,

LATHROP & GAGE LLP

By: David A. Shorr

DAS/jf

cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

AGCMO

Jefferson City Office
1221 Jefferson Street • Jefferson City, MO 65109
Ph: 573.636.3188 Fax: 573.634.3510

St. Louis Office
6330 Knox Industrial Dr., Ste. 200 • St. Louis, MO 63139
Ph: 314.781.2356 Fax: 314.781.2874

March 25, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Dredging Permits

Gentlemen:

This letter is in response to your Public Notice dated March 13, 2015, regarding permits requested by Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Dredgers."

Commercial sand dredgers provide the majority of sand material for the construction industry. The sand goes into concrete that provides our roads, bridges, sidewalks, homes, driveways, etc. in the State of Missouri and parts of Kansas. Missouri River sand is of high quality and important to the construction trades.

Dredging has taken place on the Missouri River long before the Corps developed the Bank Stabilization and Navigation Project. The dredging interests have generally complied with permit requirements previously issued by the Corps of Engineers in previous permits.

The permits provide for an accommodation of the endangered pallid sturgeon. The Dredgers present no other impacts to any other endangered or threatened species on the River.

The Dredgers provide a source of employment and pay taxes in their respective communities. They participate in their local communities, providing donations and other contributions to civic betterment.

The undersigned supports the Corps re-issuing permits for commercial and dredging on the Missouri River.

Sincerely,

Jack D. Atterberry
Interim Vice-President, Heavy/Highway Infrastructure Division

Cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

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16100 Swingley Ridge Road
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Chesterfield, Missouri 63005-1786
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800-625-1144
FAX: 636-532-7445

April 3, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

2015 APR -6 PM 4:27
RECEIVED
REGULATORY BRANCH

Re: Missouri River Commercial Sand Dredging Permits

Gentlemen:

This letter is in response to your Public Notice dated March 13, 2015, regarding permits requested by Capital Sand Company, Inc.; Hermann Sand & Gravel, Inc.; Holliday Sand & Gravel Company; Con-Agg of Missouri, LLC; Limited Leasing Company; and J.T.R., Inc.; hereinafter "Dredgers."

Commercial sand dredgers provide the majority of sand material for the construction industry. The sand goes into concrete that provides our roads, bridges, sidewalks, homes, driveways, etc. in the State of Missouri and parts of Kansas. Missouri River sand is of high quality and important to the construction trades.

Dredging has taken place on the Missouri River long before the Corps developed the Bank Stabilization and Navigation Project. The dredging interests have generally complied with permit requirements previously issued by the Corps of Engineers in previous permits.

The permits provide for an accommodation of the endangered pallid sturgeon. The Dredgers present no other impacts to any other endangered or threatened species on the River.

The Dredgers provide a source of employment and pay taxes in their respective communities. They participate in their local communities, providing donations and other contributions to civic betterment.

I support the Corps re-issuing of permits for commercial sand dredging on the Missouri River.

Very truly yours,

Tom Beck, President
Continental Cement Company, L.L.C.
16100 Swingley Ridge Rd, Ste 230
Chesterfield, MO 63017

Tom Beck

cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water -Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

31 March, 2015

Matthew Sailor, Regulator Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th St, Room 402
Kansas City, Mo 64016-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, Mo 63103

2015 APR -6 PM 4:27

Sirs:

This letter is in regard to your public notice dated March 13 2015 regarding permits requested by Capital Sand Company, Inc., Hermann Sand and Gravel, Inc., Holiday Sand & Gravel Company, Con-Agg of Missouri, LLC, and J.T.R., Inc.

Commercial sand dredgers provide the sand for the construction industry. That sand is used for the concrete that goes into transportation infrastructure as well as the sidewalks, driveways and foundations of homes and business infrastructure in Missouri and Kansas. I know two people in the small scale farm/home concrete business and when I lived in Kansas I had a neighbor who worked for a commercial concrete supplier in Kansas City. They say Missouri River sand is of a high quality and makes the concrete better and less expensive than sand that is harvested from quarries away from the river.

Dredging has been occurring on the Missouri River long before the Corps was tasked with bank stabilization and navigation. In fact, my forbearers told stories of using mules and slips to harvest sand from the Missouri river adjacent to our farm near Levasy at the turn of the century for use in construction of foundations for everything from houses and barns to churches and schools.

I serve as an Agricultural Stakeholder on the Missouri River Recovery Implementation committee and it is my understanding the dredgers have generally complied with permit requirements previously issued by the Corps. The new permits provide accommodation for the endangered pallid sturgeon and the dredging operators present no other impacts to other endangered or threatened species.

With all the pressures on government budgets, having a high quality, low-cost source of sand for Missouri's roads and bridges is critical to all of us who must move products on the state's highways as well as the government agencies tasked with managing tighter budgets. It is critical to my farming operation to have competitive transportation options for my grain. Additionally, the dredgers are strong members of the business community and provide employment and pay taxes.

I strongly support the reissuances of permits by the Corps to the commercial sand dredgers on the Missouri River.

Don Borgman
Owner, D&C Farms, LLC
35603 East Neil Chiles Road
Buckner, Missouri 64016

CC:
Missouri DNR
P.O. Box 176
Jefferson City, Missouri 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson St, Suite 420
Topeka, Ks 66612-1367

EMERY SAPP & SONS, INC

O: 573.445.8331
F: 573.445.0266

2301 I-70 DRIVE NW
COLUMBIA, MO 65202

WWW.EMERYSAPP.COM

April 1, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Dredging Permits

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The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,

Glen Robertson

Glen Robertson, VP
Emery Sapp & Sons, Inc.

CC: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

March 31, 2015

Matthew Sailor, Regulatory Project Manager
US Army Corps of Engineers
Kansas City Regulatory Office
601 East 12th Street, Room 402
Kansas City, MO 64106-2896

Charles Frerker, Regulatory Project Manager
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Missouri River Commercial Sand Dredging Permits

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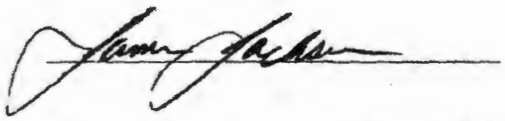
The undersigned supports the Corps re-issuing permits for commercial sand dredging on the Missouri River.

Very truly yours,



cc: Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Kansas Department of Health and Environment
Bureau of Water – Watershed Management Section
1000 SW Jackson Street, Suite 420
Topeka, KS 66612-1367

International Union of Operating Engineers

AFFILIATED WITH THE AFL-CIO

LOCAL NO. 101

6601 WINCHESTER, SUITE 280
KANSAS CITY, MO. 64133

OFFICE (816) 737-8600
FAX (816) 737-8700

SCOTT RETTIG, Business Manager
MIKE CHARLTON, President
KURT CHAFFEE, Vice President

AARON BROWN, Recording Secretary
TERRY SIMPSON, Financial Secretary
DARWIN GARDNER, Treasurer

April 1, 2015
Fax 816-389-2032
E: matthew.c.sailor@usace.army.mil

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor:

Please accept this letter in support of the matter of the Holliday Sand & Gravel, LLC, (will refer to as Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment of the river by 79 percent. We believe that the company's three facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are vital to the economic development of the region, and that any further tonnage reductions would harm jobs, construction and the region's economy. Our comments are on behalf of the members of Operating Engineers Local #101.

Holliday supports hundreds of union and construction employees in the Kansas City metropolitan area. In addition to our union, Local #101, Holliday's organized employees include: Heavy Construction Laborers' Local 663. The construction industry has not fully recovered from the recession, and we support Holliday's requested volumes of dredging to avoid losing hundreds of construction materials jobs, which would be harmful to the local economy. Additionally, the economic impact of each of these jobs should be multiplied by nine (9) times to understand the total employment impact from the loss of family purchasing power and related construction industry job loss. These jobs represent millions of dollars in payroll for the local and regional economy.

Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available, infrastructure projects will be halted (i.e. highways, bridges and buildings). In addition, there is concern in the construction community that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precast concrete products and asphalt.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and we ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Sincerely,

Scott Rettig
Business Manager
Operating Engineers

Cc:
Missouri Department of Natural Resources
Attn: Stacia Bax
Wpsc401cert@dnr.mo.gov
PO Box 176
Jefferson City, MO 65102

Kansas Department of Health & Environment
Bureau of Water – Watershed Management Section
Attn: Scott Satterthwaite
ssatterthwaite@kdheks.gov
1000 SW Jackson St., Ste. 420
Topeka, KS 66612-1367

CAREFREE INDUSTRIAL PARK

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March 30, 2015

Delivered via;

FAX Submission: 816-389-2032
Email Submission: matthew.c.sailor@usace.army.mil

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor:

This letter is written in support of the matter of the Holliday Sand & Gravel, LLC (Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment of the river by 79 percent. We believe that the company's three facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are vital to the economic development of the region, and that any further tonnage reductions would harm jobs, construction and the region's economy.

As you may be aware, Carefree Industrial Park is one of the largest sub-surface developments in Missouri with more than 5 million + square feet developed as a multi-tenant facility. The uniqueness of Carefree is our 100% commitment to concrete throughout the project. With the anticipation of our Phase 2 coming online in the next few years we are very cognizant of construction material costs and availability.

The construction industry has not fully recovered from the recession, and we support Holliday's requested volumes of dredging to avoid losing construction materials vital to our project, as well as hundreds of construction materials jobs, which would be harmful to the local economy. Additionally, the economic impact of each of these jobs should be multiplied by nine (9) times to understand the total employment impact from the loss of family purchasing power and related construction industry job loss. These jobs represent millions of dollars in payroll for the local and regional economy.

Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available our Phase 2 development could be delayed along with the

possibility of infrastructure projects being halted (i.e. highways, bridges and buildings). In addition, there is concern in the construction community that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precast concrete products and asphalt.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and we ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Sincerely,

CAREFREE INDUSTRIAL PARK

Paul Licausi
Managing Agent

Cc:
Missouri Department of Natural Resources
Attn: Stacia Bax
Wpsc401cert@dnr.mo.gov
PO Box 176
Jefferson City, MO 65102

Kansas Department of Health & Environment
Bureau of Water – Watershed Management Section
Attn: Scott Satterthwaite
ssatterthwaite@kdheks.gov
1000 SW Jackson St., Ste. 420
Topeka, KS 66612-1367

Sailor, Matthew NWK

From: Bernie Sherin [bsherinjr@gmail.com]
Sent: Tuesday, March 31, 2015 3:25 PM
To: Sailor, Matthew NWK
Cc: ssatterthwaite@kdheks.gov; MDNR MVS External Stakeholder
Subject: [EXTERNAL] Re: Renewal of Missouri River Commercial Dredging Permits

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Mr. Matthew Sailor

Regulatory Project Manager

U.S. Army Corps of Engineers–Kansas City Regulatory Office

601 E. 12th St., Room 402

Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor:

Please accept my comments in the matter of the Holliday Sand & Gravel, LLC (Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment of the river by 79 percent. I believe that the company's three facilities, located on the Missouri River in the Kansas City metropolitan area and St. Joseph, are vital to the economic development of the region, and that any further tonnage reductions would harm jobs, construction and the region's economy.

Holliday supports hundreds of union and non-union construction employees in the Kansas City metropolitan area. The unions representing Holliday's organized employees include: Operating Engineers Local 101 and Laborers Local 663. The construction industry has not fully recoveredfrom the recession, and we support Holliday's requested volumes of dredging to avoid losinghundreds of construction materials jobs, which would be harmful to the local economy.Additionally, the economic impact of each of these jobs should be multiplied by nine to understand the total employment impact from the loss of family purchasing power and related industry job loss. These jobs represent millions of dollars in payroll for the local economy.

Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available, infrastructure projects would be halted (highways, bridges and buildings). In addition, there is concern in the construction community that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precast concrete products and asphalt.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and i ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Sincerely,

Bernard J. Sherin Jr.

Mark Kreiser
8776 W 255th Street
Louisburg, KS 66053

March 31, 2015

FAX Submission: 816-389-2032
Email Submission: matthew.c.sailor@usace.army.mil

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Re: Renewal of Missouri River Commercial Dredging Permits

Dear Mr. Sailor:

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Sincerely,

Mark Kreiser

Cc:
Missouri Department of Natural Resources
Attn: Stacia Bax
Wpsc401cert@dnr.mo.gov
PO Box 176
Jefferson City, MO 65102

Kansas Department of Health & Environment
Bureau of Water – Watershed Management Section
Attn: Scott Satterthwaite
ssatterthwaite@kdheks.gov
1000 SW Jackson St., Ste. 420
Topeka, KS 66612-1367

FAX Submission: 816-389-2032
Email Submission: matthew.c.sailor@usace.army.mil

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Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
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Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available, infrastructure projects would be halted (highways, bridges and buildings) and the Kansas City population would be forced to utilize infrastructure that may not be safe, or may be at or near the safe useful life expectancy

In addition, there is concern in the construction community that further reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precast concrete products and asphalt. The effect of this would be to increase taxes or reduce viable projects in the future, further eroding a fragile area economy.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and we ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Sincerely,

Todd Hinton
12904 Ballentine St.
Overland Park, KS 66213
Cc:
Missouri Department of Natural Resources
Attn: Stacia Bax
Wpsc401cert@dnr.mo.gov
PO Box 176
Jefferson City, MO 65102

Kansas Department of Health & Environment
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Attn: Scott Satterthwaite
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Associated Industries of Missouri

The Voice of Missouri Business.

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March 31, 2015

Mr. Matthew Sailor
Regulatory Project Manager
U.S. Army Corps of Engineers—Kansas City Regulatory Office
601 E. 12th St., Room 402
Kansas City, Missouri 64106

Email Submission: matthew.c.sailor@usace.army.mil

Re: Renewal of Missouri River Commercial Dredging Permit, Holliday Sand & Gravel, LLC

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Holliday is the key producer of sand for the Kansas City metropolitan area and St. Joseph. If sufficient sand is not available, infrastructure projects would be halted, affecting construction of highways, bridges and buildings. In addition, there is concern in the construction community that further

reducing or eliminating dredging in these three locations will result in significantly increased costs of building materials containing sand for concrete, precast concrete products and asphalt.

Kansas City and St. Joseph's construction and transportation industry depends on quality and economical sand from the Missouri River, and we ask that Holliday's dredging be allowed to continue at the greatest levels that are possible.

Sincerely,

Ray McCarty
President/CEO

Cc:

Missouri Department of Natural Resources
Attn: Stacia Bax
Wpsc401cert@dnr.mo.gov
PO Box 176
Jefferson City, MO 65102

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GATEWAY DREDGING AND CONTRACTING, LLC
1777 Highway 79 South
Old Monroe, MO 63369
Office# (636)665-5180
Fax# (636)665-5184

Mr. Charles Frerker
US Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Mr. Frerker:

This letter is in response to the Public Notice for P-2920 and P-2921. Gateway Dredging and Contracting Inc. is the operating company for Limited Leasing Company and J.T.R. Inc. We would like to express our support for the issuance of the permits. These companies have been dredging sand in this area for over 45 years. During that time we have employed numerous highly skilled and compensated Union Operators. These employees have produced sand for many of the high profile construction projects in the area. Some of the projects include Lambert Field Expansion, Highway 40 and 364, the Dome, and new Busch Stadium. Our operation is an essential part of the St. Louis area and economy. Issuance of the permits would allow our companies to continue their operations and service to the area. Please consider our comments pertaining to permit renewal. Thank you.

Brian J. Viehmann, CEO

Gateway Dredging and Contracting, LLC.