



The Heavy Constructors Association of The Greater Kansas City Area

April 8, 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

OFFICERS

TREY BOWEN
President

BARCLAY HORNING
Vice President

DAVID KISSICK
Treasurer

EDWARD R. DeSOIGNIE
Executive Director

BRIDGETTE WILLIAMS
Deputy Director

DIVISION DIRECTORS

MARK DOMBROWSKI
Asphalt Paving Division

GAVIN BARMBY
Bridge-River Division

ROB LOCH, III
Concrete Paving Division

STEVE KELLERMAN
Excavation Division

JIM KISSICK
Utility Division

AT LARGE DIRECTORS

JOHN T. BOWEN

BILL CLARKSON, JR.

GEORGE G. HORNUNG

KEVIN FAHEY

PATRICK O'DONNELL

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





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."

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 the 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.



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

BOARD OF GOVERNORS

Chair

JENNY RICHARDS

Joplin Building Material Company
Joplin, Missouri

Vice-Chairman

ROB WAINSCOTT

Central Concrete Company
Columbia, Missouri

Secretary/Treasurer

STEVE KUEFFER

Penny's Concrete Inc./
Green Ready Mix of Missouri
Shawnee Mission, Kansas

READY MIXED CONCRETE DIVISION REPRESENTATIVES

President of Division

TONY WESSELMAN

Fischer Concrete Services LLC
Sedalia, Missouri

Vice-President of Division

JIM JACKSON

Ozark Ready-Mix Company, Inc.
Osage Beach, Missouri

Secretary/Treasurer of Division

ANDY ARNOLD

Breckenridge Material Company
St. Louis, Missouri

Representatives of Division

AARON HARLESS

Springfield Ready Mix Company
Springfield, Missouri

JAN CODY

Kienstra Enterprises, Inc.
Town and Country, Missouri

CONCRETE PRODUCTS DIVISION REPRESENTATIVES

President of Division

JEREMY WINEGAR

Midwest Block & Brick
Jefferson City, Missouri

Representative of Division

DAVID ADAM

E & M Ready Mix & Pre-Cast, Inc.
Gower, Missouri

ASSOCIATE DIVISION REPRESENTATIVES

President of Division

DE SURMA

Barnes Industrial Group
Kansas City, Missouri

Vice-President of Division

MIKE HAYS

Heathwood Oil Company
Kansas City, Kansas

Secretary/Treasurer of Division

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

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



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:

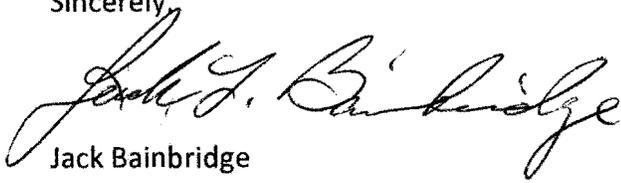
Please accept this letter in support of the matter of the Holliday Sand & Gravel, LLC (Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the Kansas City segment 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,

A handwritten signature in cursive script that reads "Jack Bainbridge". The signature is written in black ink and is positioned above the printed name and title.

Jack Bainbridge
Business Manager



2203 E. McCarty Street
P.O. Box 2290
Jefferson City, MO 65102
www.midwestblock.com
Phone: 573.635.7119
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.

- KANSAS CITY: 4101 E. 12th Terrace, Kansas City, MO 64127 Phone: 816.241.5197
- COLUMBIA: 3115 Paris Road, Columbia, MO 65202 Phone: 573.445.9484
- OSAGE BEACH: 6293 Osage Beach Parkway, Osage Beach, MO 65065 Phone: 573.348.1774
- QUINCY: 600 State Street, Quincy, IL 62301 Phone: 217.223.2633
- WATERLOO: 8605 Route 3, Waterloo, IL 62298 Phone: 618.939.7600
- WENTZVILLE: 15584 Veterans Memorial Parkway, Wentzville, MO 63385 Phone: 636.332.9784
- Gray Summit: 2993 Highway 100 villa Ridge, MO Phone 636.742.5480

Page Two
April 3, 2015

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,

A handwritten signature in black ink, appearing to read "D. Winegar". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

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



*Consistent Quality . . .
Superior Service*

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.

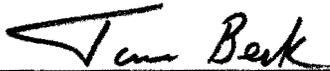
Corporate Office:
16100 Swingley Ridge Road
Suite 230
Chesterfield, Missouri 63005-1786
636-532-7440
800-625-1144
FAX: 636-532-7445

2015 APR - 6 PM 4: 27
RECEIVED
REGULATORY BRANCH

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



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

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
LATHROP & GAGE

April 2, 2015

***VIA EMAIL TRANSMISSION
AND U.S. MAIL***

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

Matthew.C.Sailor@usace.army.mil

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

Charles.F.Frerker@usace.army.mil

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

Matthew Sailor, Regulatory Project Manager
Charles Frerker, Regulatory Project Manager
April 2, 2015
Page 2

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

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.

2015 APR - 6 PM 4:26
REGULATORY BRANCH

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



P.O. Box 50
Leavenworth, KS 66048-0050
www.geigerreadymix.com

Central Dispatch
913-281-0111
Fax 913-281-1492

Administrative Office
913-772-4010
Fax 913-772-8661

Leavenworth, Kansas

Kansas City, Kansas

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.



O: 573.446.8331
F: 573.445.0266

2301 I-76 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

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,

A handwritten signature in black ink that reads "Glen Robertson". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

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

International Union of Operating Engineers

AFFILIATED WITH THE AFL-CIO

LOCAL NO. 101

6601 WINCHESTER, SUITE 280
KANSAS CITY, MO. 64133

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

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

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:

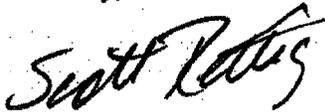
Please accept this letter in support of the matter of the Holliday Sand & Gravel, LLC, (will refer to as Holliday) request for a renewed Missouri River Dredge Permit. We understand that during the previous permit renewal in 2010, the U.S. Army Corps of Engineers cut Holliday's dredging volume in the 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



**Associated
Industries
of Missouri**

The Voice of Missouri Business.

3234 West Truman Blvd.
Jefferson City, MO 65109
(573) 634-2246
Fax: (573) 634-4406
www.aimo.com

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

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 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. 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, affecting construction of highways, bridges and buildings. In addition, there is concern in the construction community that further

Mr. Matthew Sailor
March 31, 2015
Page Two

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

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

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.

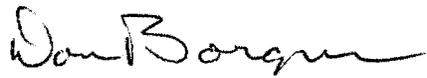
Commercial sand dredgers provide the sand for the construction industry. That sand is used for the concrete that goes into transportation infrastructure as well as the sidewalks, driveways and foundations of homes and business infrastructure in Missouri and Kansas. I know two people in the small scale 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

CAREFREE INDUSTRIAL PARK

KANSAS CITY'S PREMIER SUBSURFACE BUSINESS PARK

Kentucky Road and M-291 Highway • Sugar Creek, MO / Independence, MO

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

Professionally Represented By:

LS COMMERCIAL REAL ESTATE

Corporate Office: 8301 W. 125th Street, Suite 210 • Overland Park, KS 66213
(P) 913-681-5888 • (F) 913-681-7869 • www.lscer.com

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



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.

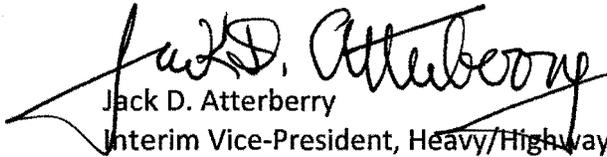
Dredging has taken place on the Missouri River long before the Corps developed the Bank Stabilization and Navigation Project. The dredging interests have generally complied with permit requirements previously issued by the Corps of Engineers in previous permits.

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,

A handwritten signature in black ink that reads "Jack D. Atterberry". The signature is written in a cursive style with a large, sweeping initial "J".

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