Ms. Cynthia K. Hailes, P.E.
Oklahoma Department of Environmental Quality
Land Protection Division
707 North Robinson Avenue
Oklahoma City, Oklahoma 73102

Re: Technical Review Complete – Draft Permit Proposed
Tier III Permit Application – Lateral Expansion
East Oak Recycling and Disposal Facility
Oklahoma County
Solid Waste Permit No. 3555036

Dear Ms. Hailes:

The purpose of this submittal is to provide documentation related to Conditions 1 and 2 included in the Oklahoma Department of Environmental Quality (ODEQ) Draft Solid Waste Permit Modification dated January 26, 2021 for the East Oak Recycling and disposal Facility Tier III Permit Modification. The conditions are as follows:

1. The conditional letter of map revision (CLOMR) shall be approved by the Oklahoma City Flood Plain Administrator and the Federal Emergency Management Agency (FEMA) prior to any construction within 100-year flood plain; and

2. The CLOMR approval letters from the Oklahoma City Flood Plain Administrator and FEMA and the letter of map revision (LOMR) from FEMA shall be submitted to DEQ within thirty (30) days of receipt.

Please find attached the CLOMR approval letter and signed title page that was approved by FEMA on February 16, 2021 and Oklahoma City on July 13, 2020, respectively. Excerpts from the CLOMR were included in Appendix I of the Tier III Permit Modification Landfill Expansion Application, dated January 2020. Additional correspondence between FEMA, Oklahoma City, Weaver Consultants Group, and Waste Management of Oklahoma, Inc. is included in the Site Operating Record.
Please call if you have any questions.

Sincerely,

**Weaver Consultants Group, LLC**

Jonathan V. Queen, P.E.
Project Director

Attachment:  Attachment 1: FEMA CLOMR Comment Document
Attachment 2: CLOMR Signed Cover Page (Oklahoma City Approval)

cc: Guy R. Campbell, Waste Management of Oklahoma, Inc.
Pete Schultze, Waste Management of Oklahoma, Inc.
ATTACHMENT 1

FEMA CLOMR COMMENT DOCUMENT
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IN REPLY REFER TO:
Case No.: 20-06-3237R
Community Name: City of Oklahoma City, OK
Community No.: 405378

Mr. Craig Freeman
City Manager, City of Oklahoma City
200 North Walker Avenue, Third Floor
Oklahoma City, OK 73102

Dear Mr. Freeman:

We are providing our comments with the enclosed Conditional Letter of Map Revision (CLOMR) on a proposed project within your community that, if constructed as proposed, could revise the effective Flood Insurance Study report and Flood Insurance Rate Map for your community.

If you have any questions regarding the floodplain management regulations for your community, the National Flood Insurance Program (NFIP) in general, or technical questions regarding this CLOMR, please contact the Director, Mitigation Division of the Federal Emergency Management Agency (FEMA) Regional Office in Denton, Texas, at (940) 898-5127, or the FEMA Mapping and Insurance eXchange (FMIX) toll free at 1-877-336-2627 (1-877-FEMA MAP). Additional information about the NFIP is available on our website at https://www.fema.gov/flood-insurance.

Sincerely,

Patrick “Rick” F. Sacbit, P.E., Branch Chief
Engineering Services Branch
Federal Insurance and Mitigation Administration

List of Enclosures:
Conditional Letter of Map Revision Comment Document

cc: Mr. Eric J. Wenger, P.E.
Director of Public Works
City of Oklahoma City

Mr. Guy Campbell
Engineering Manager-North
Texas-Oklahoma
Waste Management of Oklahoma, Inc.

Mr. Charles R. Marsh, P.E.
Senior Project Manager
Weaver Consultants Group, LLC
CONDITIONAL LETTER OF MAP REVISION COMMENT DOCUMENT

COMMUNITY INFORMATION

<table>
<thead>
<tr>
<th>COMMUNITY</th>
<th>PROPOSED PROJECT DESCRIPTION</th>
<th>BASIS OF CONDITIONAL REQUEST</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Oklahoma City</td>
<td>FILL</td>
<td>HYDRAULIC ANALYSIS FLOODWAY UPDATED TOPOGRAPHIC DATA</td>
</tr>
<tr>
<td>Oklahoma County Oklahoma</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

COMMUNITY NO.: 405378

IDENTIFIER: East Oak Landfill

APPROXIMATE LATITUDE AND LONGITUDE: 35 503.997 420 83.338

SOURCE: USGS QUADRANGLE DATUM: NAD 83

AFFECTED MAP PANELS

<table>
<thead>
<tr>
<th>TYPE</th>
<th>FIRM*</th>
<th>NO.</th>
<th>DATE</th>
<th>DESCRIPTION</th>
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<tbody>
<tr>
<td>FIRM</td>
<td>FIRM</td>
<td>NO. 40109C0195H</td>
<td>December 18, 2009</td>
<td>FIRM - Flood Insurance Rate Map</td>
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<tr>
<td>FIRM</td>
<td>FIRM</td>
<td>NO. 40109C0310H</td>
<td>December 18, 2009</td>
<td></td>
</tr>
</tbody>
</table>

FLOODING SOURCE AND REACH DESCRIPTION

North Canadian River – From the upstream side of Northeast 23rd Street to the downstream side of Northeast 36th Street

PROPOSED PROJECT DESCRIPTION

Flooding Source
North Canadian River

Proposed Project
Fill Placement

Location of Proposed Project
From the upstream side of Northeast 23rd Street to approximately 2,860 feet upstream of Northeast 23rd Street and from approximately 920 feet downstream of Northeast 36th Street to the downstream side of Northeast 36th Street

SUMMARY OF IMPACTS TO FLOOD HAZARD DATA

<table>
<thead>
<tr>
<th>Flooding Source</th>
<th>Effective Flooding</th>
<th>Proposed Flooding</th>
<th>Increases</th>
<th>Decreases</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Canadian River</td>
<td>BFEs*</td>
<td>BFEs</td>
<td>None</td>
<td>Yes</td>
</tr>
<tr>
<td>Zone AE</td>
<td>Zone AE</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Floodway</td>
<td>Floodway</td>
<td>Yes</td>
<td>None</td>
<td>Yes</td>
</tr>
<tr>
<td>Zone X (shaded)</td>
<td>Zone X (shaded)</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

* BFEs - Base (1-percent-annual-chance) Flood Elevations

COMMENT

This document provides the Federal Emergency Management Agency's (FEMA's) comment regarding a request for a ClOMR for the project described above. This document is not a final determination; it only provides our comment on the proposed project in relation to the flood hazard information shown on the effective National Flood Insurance Program (NFIP) map. We reviewed the submitted data and the data used to prepare the effective flood hazard information for your community and determined that the proposed project meets the minimum floodplain management criteria of the NFIP. Your community is responsible for approving all floodplain development and for ensuring that all permits required by Federal or State/Commonwealth law have been received. State/Commonwealth, county, and community officials, based on their knowledge of local conditions and in the interest of safety, may set higher standards for construction in the Special Flood Hazard Area (SFHA), the area subject to inundation by the base flood. If the State/Commonwealth, county, or community has adopted more restrictive or comprehensive floodplain management criteria, these criteria take precedence over the minimum NFIP criteria.

This comment is based on the flood data presently available. If you have any questions about this document, please contact the FEMA Mapping and Insurance eXchange (FMIX) toll free at 1-877-336-2627 (1-877-FEMA MAP) or by letter addressed to the LOMC Clearinghouse, 3601 Eisenhower Avenue, Suite 500, Alexandria, VA 22304. Additional Information about the NFIP is available on the FEMA website at https://www.fema.gov/flood-insurance.

Patrick 'Rick' F. Sacchetti, P.E. Branch Chief Engineering Services Branch Federal Insurance and Mitigation Administration

20-06-3237R
COMMUNITY INFORMATION

To determine the changes in flood hazards that will be caused by the proposed project, we compared the hydraulic modeling reflecting the proposed project (referred to as the proposed conditions model) to the hydraulic modeling used to prepare the Flood Insurance Study (FIS) (referred to as the effective model). If the effective model does not provide enough detail to evaluate the effects of the proposed project, an existing conditions model must be developed to provide this detail. This existing conditions model is then compared to the effective model and the proposed conditions model to differentiate the increases or decreases in flood hazards caused by more detailed modeling from the increases or decreases in flood hazards that will be caused by the proposed project.

The table below shows the changes in the BFEs:

<table>
<thead>
<tr>
<th>Flooding Source vs</th>
<th>North Canadian River</th>
<th>BFE Change (feet)</th>
<th>Location of maximum change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing vs</td>
<td>Maximum increase</td>
<td>None</td>
<td>N/A</td>
</tr>
<tr>
<td>Effective</td>
<td>Maximum decrease</td>
<td>N/A</td>
<td>Approximately 1.170 feet upstream of Northeast 23rd Street</td>
</tr>
<tr>
<td>Proposed vs</td>
<td>Maximum increase</td>
<td>None</td>
<td>N/A</td>
</tr>
<tr>
<td>Existing</td>
<td>Maximum decrease</td>
<td>N/A</td>
<td>Approximately 1.170 feet upstream of Northeast 23rd Street</td>
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<tr>
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Patrick "Rick" F. Seebold, P.E.  Branch Chief  Engineering Services Branch  Federal Insurance and Mitigation Administration

This page has been signed by the author.
DATA REQUIRED FOR FOLLOW-UP LOMR

Upon completion of the project, your community must submit the data listed below and request that we make a final determination on revising the effective FIRM and FIS report. If the project is built as proposed and the data below are received, a revision to the FIRM and FIS report would be warranted.

- Detailed application and certification forms must be used for requesting final revisions to the maps. Therefore, when the map revision request for the area covered by this letter is submitted, Form 1, entitled “Overview and Concurrence Form,” must be included. A copy of this form may be accessed at https://www.fema.gov/flood-maps/change-your-flood-zone/paper-application-forms/mt-2.

- The detailed application and certification forms listed below may be required if as-built conditions differ from the proposed plans. If required, please submit new forms, which may be accessed at https://www.fema.gov/flood-maps/change-your-flood-zone/paper-application-forms/mt-2, or annotated copies of the previously submitted forms showing the revised information.

Form 2, entitled “Riverine Hydrology and Hydraulics Form.” Hydraulic analyses for as-built conditions of the base flood, the 10-percent, 2-percent, and 0.2 percent annual chance floods, and the regulatory floodway, must be submitted with Form 2.

- A certified topographic work map showing the revised and effective base and 0.2 percent annual chance floodplain and floodway boundaries. Please ensure that the revised information ties in with the current effective information at the downstream and upstream ends of the revised reach.

- An annotated copy of the FIRM, at the scale of the effective FIRM, that shows the revised base and 0.2 percent annual chance floodplain and floodway boundary delineations shown on the submitted work map and how they tie into the base and 0.2 percent annual chance floodplain and floodway boundary delineations shown on the current effective FIRM at the downstream and upstream ends of the revised reach.

- As-built plans, certified by a registered Professional Engineer, of all proposed project elements.

- A copy of the public notice distributed by your community stating its intent to revise the regulatory floodway, or a signed statement by your community that it has notified all affected property owners and affected adjacent jurisdictions.

- Documentation of the individual legal notices sent to property owners who will be affected by any widening or shifting of the base floodplain along North Canadian River.

This comment is based on the flood data presently available. If you have any questions about this document, please contact the FEMA Mapping and Insurance eXchange (FMIX) toll free at 1-877-336-2627 (1-877-FEMA MAP) or by letter addressed to the LOMC Clearinghouse, 3651 Eisenhower Avenue, Suite 500, Alexandria, VA 22304.

Additional Information about the NFIP is available on the FEMA website at https://www.fema.gov/flood-insurance.

Patrick 'Rick' F. Sacbibit, P.E., Branch Chief
Engineering Services Branch
Federal Insurance and Mitigation Administration
CONDITIONAL LETTER OF MAP REVISION
COMMENT DOCUMENT (CONTINUED)

COMMUNITY INFORMATION (CONTINUED)

DATA REQUIRED FOR FOLLOW-UP LOMR (continued)

FEMA's fee schedule for reviewing and processing requests for conditional and final modifications to published flood information and maps may be accessed at https://www.fema.gov/flood-maps/change-your-flood-zone/status/flood-map-related-fees. The fee at the time of the map revision submittal must be received before we can begin processing the request. Payment of this fee can be made through a check or money order, made payable in U.S. funds to the National Flood Insurance Program, or by credit card (Visa or MasterCard only). Please either forward the payment, along with the revision application, to the following address:

LOMC Clearinghouse
Attention: LOMR Manager
3601 Eisenhower Avenue, Suite 500
Alexandria, Virginia 22304-6426

or submit the LOMR using the Online LOMC portal at: https://hazards.fema.gov/femaportal/onlinelomc/signin

After receiving appropriate documentation to show that the project has been completed, FEMA will initiate a revision to the FIRM and FIS report. Because the flood hazard information (i.e., base flood elevations, base flood depths, SFHAs, zone designations, and/or regulatory floodways) will change as a result of the project, a 90-day appeal period will be initiated for the revision, during which community officials and interested persons may appeal the revised flood hazard information based on scientific or technical data.

This comment is based on the flood data presently available. If you have any questions about this document, please contact the FEMA Mapping and Insurance eXchange (FMX) toll free at 1-877-336-2627 (1-877-FEMA MAP) or by letter addressed to the LOMC Clearinghouse, 3601 Eisenhower Avenue, Suite 500, Alexandria, VA 22304-6426.

Additional Information about the NFIP is available on the FEMA website at https://www.fema.gov/flood-insurance.

Patrick 'Rick' F. Sacchit, P.E., Branch Chief
Engineering Services Branch
Federal Insurance and Mitigation Administration

20-06-3237R 104
COMMUNITY REMINDERS

We have designated a Consultation Coordination Officer (CCO) to assist your community. The CCO will be the primary liaison between your community and FEMA. For information regarding your CCO, please contact:

Ms. Sandy Keefe
Director, Mitigation Division
Federal Emergency Management Agency, Region VI
Federal Regional Center, Room 202
800 North Loop 288
Denton, TX 76209
(940) 898-5127
ATTACHMENT 2

CLOMR SIGNED COVER PAGE
(OKLAHOMA CITY APPROVAL)