

# Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA -- April 2007

See 44 Code of Federal Regulation Part 10

**Project Name/Number:** Lakefront Airport Terminal Interior Renovations (Improved Project) – PW 7745

**Contributing PW's and Corresponding AIDB Entries:**

Chevron Office Building Replacement - PW 6109 (AIDB 1557)

Lakefront Airport Terminal Exterior Renovations - PW 7583 (AIDB 1558)

Lakefront Airport Terminal Exterior Renovations – PW 19645 (AIDB 1558)

South Shore Harbor Marina Harbor Master Building - PW 10782 (AIDB 1559)

**Applicant Name:** Orleans Levee District

**Project Location:** 6001 Stars and Stripes Boulevard  
Latitude/Longitude: 30.03580/-90.02554

**Project Description:**

Hurricane Katrina's high winds, storm surge, and wave action from adjacent Lake Pontchartrain caused catastrophic damage to the Lakefront Airport Terminal during the incident period, August 29, 2005 through November 1, 2005. The damages include the following: wind damage to structures and windows; wave damage to walls, windows, and doors, and flood damage to interior finishes and furnishings. The roof was near totally destroyed and will be or has been rebuilt. Due to the roof damage, water leaked into parts of the building. There is extensive damage to ceiling and wall surfaces as well as carpets on the second floor. There was a storm surge, estimated at nine feet in depth, which hit the ground floor and did heavy structural damage. Windows and doors were torn off and walls smashed. All first floor and main lobby damages were caused by flood water and surge.

The applicant has requested to have funds contributed from the above-listed PW's to the subject improved project based on each contributing PW being an integral part of the aggregate function of the New Orleans Lakefront Airport.

**See attached for the Scope of Work related to the above-described damages.**

This document provides consideration of the proposed action to ensure compliance with applicable environmental laws and regulations. As needed, conditions may be required for the project, and these are presented at the end of this document.

**National Environmental Policy Act (NEPA) Determination**

- Statutorily excluded from NEPA review (**Review Concluded**)
- Programmatic Categorical Exclusion - Category (**Review Concluded**)
- Categorical Exclusion - Category xii and xv
  - No Extraordinary Circumstances exist.  
Are project conditions required?  Yes (see section V)  No (**Review Concluded**)
  - Extraordinary Circumstances exist (see Section IV).
    - Extraordinary Circumstances mitigated. (see Section IV comments)  
Are project conditions required?  Yes (see section V)  No (**Review Concluded**)
- Alternative Arrangements
  - Public Involvement Plan on file (see comments below)  
Are project conditions required?  Yes (see section V)  No (**Review Concluded**)
- Environmental Assessment
- Supplemental Environmental Assessment (Reference EA or PEA in comments)
- Environmental Impact Statement

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**Comments:** Based on information provided by the applicant, the scope of work for this project is categorically excluded from the preparation of an Environmental Impact Statement or Environmental Assessment under 44 CFR Part 10.8 (d)(2)(xii) and (xv). Any changes to this approved scope of work will require submission to, and evaluation and approval by, the state and FEMA prior to initiation of any work, for compliance with the National Environmental Policy Act. The applicant is required to obtain and comply with all local, state and federal permits and requirements. Non-compliance with the requirements noted above may jeopardize the receipt of federal funding.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

Project is Non-Compliant (see attached documentation justifying selection).

## **Reviewer and Approvals**

### **FEMA Environmental Reviewer:**

Name: Keith Whittinghill, Environmental Specialist, FEMA, Louisiana Recovery Office

Signature Keith Whittinghill Date 8/18/11

### **FEMA Environmental Liaison Officer or Delegated Approving Official:**

Name: LeSchina Holmes, Lead Environmental Protection Specialist, FEMA, Louisiana Recovery Office

Signature LeSchina Holmes Date 08-19-2011

## **I. Compliance Review for Environmental Laws (other than NEPA)**

### **A. National Historic Preservation Act (NHPA)**

- Not type of activity with potential to affect historic structures or archaeological resources (**Review Concluded**)  
 Activity meets August 17, 2009 Programmatic Agreement, as amended on July 22, 2011 (Amended 2009 Statewide PA),  
Are project conditions required?  Yes (see Section V)  No  
 Programmatic Agreement not applicable for historic structures or archeological sites, must conduct standard Section 106 Review (see below).  
 Other Programmatic Agreement dated \_\_\_\_\_ applies

### **HISTORIC BUILDINGS AND STRUCTURES**

- No historic properties that are listed or 45/50 years or older in project area. (**Review Concluded**)  
 Building or structure listed or 45/50 years or older in project area and activity not exempt from review.  
 Determination of No Historic Properties Affected (FEMA finding/SHPO/THPO concurrence on file)  
Are project conditions required?  Yes (see Section V)  No (**Review Concluded**)  
 Determination of Historic Properties Affected (FEMA finding/SHPO/THPO concurrence on file)  
 Property a National Historic Landmark and National Park Service was provided early notification during the consultation process. If not, explain in comments  
 No Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file)  
Are project conditions required?  Yes (see Section V)  No (**Review Concluded**)  
 Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file)  
 Resolution of Adverse Effect completed (MOA on file)  
Are project conditions required  Yes (see Section V)  No (**Review Concluded**)

### **ARCHEOLOGICAL RESOURCES**

- Project scope of work has no potential to affect archeological resources (**Review Concluded**)  
 Project affects only previously disturbed ground. (**Review Concluded**)  
 Project affects undisturbed ground or grounds associated with a historic structure  
 Project area has no potential for presence of archeological resources

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- Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence on file) **(Review Concluded)**
- Project area has potential for presence of archeological resources
  - Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence on file)  
Are project conditions required  Yes (see Section V)  No **(Review Concluded)**
  - Determination of historic properties affected
    - NR eligible resources not present (FEMA finding/SHPO/THPO concurrence on file)  
Are project conditions required  Yes (see Section V)  No **(Review Concluded)**
    - NR eligible resources present in project area (FEMA finding/SHPO/THPO concurrence on file)
      - No Adverse Effect Determination (FEMA finding/ SHPO/THPO concurrence on file)  
Are project conditions required?  Yes (see Section V)  No **(Review Concluded)**
      - Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file)
        - Resolution of Adverse Effect completed (MOA on file)  
Are project conditions required?  Yes (see Section V)  No **(Review Concluded)**

**Comments:** A review of this project was conducted in accordance with Stipulation I.B of FEMA's Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (Amended 2009 Statewide PA), Appendix C: Programmatic Allowances, Item I, Section A. FEMA has determined that there is No Adverse Effect to historic properties findings as a result of the proposed undertaking. SHPO concurrence with this determination was received, dated October 18, 2010. Any change to the approved scope of work will require reevaluation under Section 106.

**Correspondence/Consultation/References:** C. Dluzak, Historic Preservation Specialist

## B. Endangered Species Act

- No listed species and/or designated critical habitat present in areas affected directly or indirectly by the Federal action. **(Review Concluded)**
- Listed species and/or designated critical habitat present in the areas affected directly or indirectly by the Federal action.
  - No effect to species or designated critical habitat. (See comments for justification)  
Are project conditions required?  Yes (see Section V)  No **(Review Concluded)**
  - May affect, but not likely to adversely affect species or designated critical habitat (FEMA determination/USFWS/NMFS concurrence on file) **(Review Concluded)**  
Are project conditions required?  Yes (see Section V)  No **(Review Concluded)**
  - Likely to adversely affect species or designated critical habitat
    - Formal consultation concluded. (Biological Assessment and Biological Opinion on file)  
Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**

**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect listed species and/or critical habitat.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

## C. Coastal Barrier Resources Act

- Project is not on or connected to CBRA Unit or Otherwise Protected Area **(Review Concluded)**.
- Project is on or connected to CBRA Unit or Otherwise Protected Area. (FEMA determination/USFWS consultation on file)
  - Proposed action an exception under Section 3505.a.6 **(Review Concluded)**
  - Proposed action not excepted under Section 3505.a.6.  
Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**

**Comments:** Project is not within a CBRA zone.

**Correspondence/Consultation/References:** Louisiana Coastal Barrier Resource System Map, referenced, 2002

## D. Clean Water Act

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- Project would not affect any waters of the U.S. **(Review Concluded)**
- Project would affect waters, including wetlands, of the U.S.
- Project exempted as in kind replacement or other exemption. **(Review Concluded)**
- Project requires Section 404/401 of Clean Water Act or Section 9/10 of Rivers and Harbors Act permit, including qualification under Nationwide Permits.
- Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**
- Project would affect waters of the U.S. by discharging to a surface water body.

**Comments:** No jurisdictional waters of the United States, including wetlands, would be impacted by the proposed project.  
**Correspondence/Consultation/References:** National Wetlands Inventory, accessed via Google Earth, referenced. Keith Whittinghill, Environmental Specialist

### E. Coastal Zone Management Act

- Project is not located in a coastal zone area and does not affect a coastal zone area **(Review concluded)**
- Project is located in a coastal zone area and/or affects the coastal zone
- State administering agency does not require consistency review. **(Review Concluded)**
- State administering agency requires consistency review.
- Are project conditions required?  YES (see section V)  NO **(Review Concluded)**

**Comments:** The proposed project is located within the Louisiana Coastal Management Zone. The applicant must check with the Louisiana Department of Natural Resources (LDNR) for permitting and other authorization requirements. The project may be coordinated by contacting LDNR at 1-800-267-4019.

**Correspondence/Consultation/References:** Louisiana Coastal Zone Map, 2000, referenced. Keith Whittinghill, Environmental Specialist

### F. Fish and Wildlife Coordination Act

- Project does not affect, control, or modify a waterway/body of water. **(Review Concluded)**
- Project affects, controls, or modifies a waterway/body of water.
- Coordination with USFWS conducted
- No Recommendations offered by USFWS. **(Review Concluded)**
- Recommendations provided by USFWS.
- Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**

**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect fish and wildlife resources.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

### G. Clean Air Act

- Project will not result in permanent air emissions. **(Review Concluded)**
- Project is located in an attainment area. **(Review Concluded)**
- Project is located in a non-attainment area.
- Coordination required with applicable state administering agency.
- Are project conditions required?  YES (see section V)  NO **(Review Concluded)**

**Comments:** This project involves the demolition and replacement of a public structure. The proposed project includes activities that would produce a minor, temporary, and localized impact on air quality from fugitive dust particles. No long-term air quality impact is anticipated. Regardless of the asbestos content, the applicant is responsible for ensuring that renovation or demolition activities are coordinated with the Louisiana Department of Environmental Quality (LDEQ) in accordance with the LDEQ "Seventh Amended Declaration of Emergency and Administrative Order" dated August 28, 2006, incorporating the provisions of EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) and the Louisiana Administrative Code (LAC) 33.m.5151 and Chapter 27. Should asbestos containing materials (ACMs) be present at the project site, the applicant is also responsible for ensuring proper disposal in accordance with the previously referenced administrative order.

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**Correspondence/Consultation/References:** LDEQ and EPA Guidance 2006, referenced. Keith Whittinghill, Environmental Specialist

## H. Farmland Protection Policy Act

- Project will not affect undisturbed ground. **(Review Concluded)**
- Project has a zoning classification that is other than agricultural or is in an urbanized area. **(Review Concluded)**
- Project does not affect designated prime or unique farmland. **(Review Concluded)**
- Project causes unnecessary or irreversible conversion of designated prime or unique farmland.
  - Coordination with Natural Resources Conservation Service required.
  - Farmland Conversion Impact Rating, Form AD-1006, completed.
  - Are project conditions required?  YES (see section V)  NO **(Review Concluded)**

**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect prime or unique farmland.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

## I. Migratory Bird Treaty Act

- Project not located within a flyway zone **(Review Concluded)**
- Project located within a flyway zone.
  - Project does not have potential to take migratory birds **(Review Concluded)**
    - Are project conditions required?  Yes (see section V)  No **(Review Concluded)**
  - Project has potential to take migratory birds.
    - Contact made with USFWS
    - Are project conditions required?  YES (see section V)  NO **(Review Concluded)**

**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect migratory birds.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

## J. Magnuson-Stevens Fishery Conservation and Management Act

- Project not located in or near Essential Fish Habitat **(Review Concluded)**
- Project located in or near Essential Fish Habitat.
  - Project does not adversely affect Essential Fish Habitat **(Review Concluded)**
    - Are project conditions required?  Yes (see Section V)  No **(Review Concluded)**
  - Project adversely affects Essential Fish Habitat (FEMA determination/USFWS/NMFS concurrence on file)
    - NOAA Fisheries provided no recommendation(s) **(Review Concluded)**
      - Are project conditions required?  Yes (see Section V)  No **(Review Concluded)**
    - NOAA Fisheries provided recommendation(s)
      - Written reply to NOAA Fisheries recommendations completed.
      - Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**

**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect essential fish habitat.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

## K. Wild and Scenic Rivers Act

- Project is not along and does not affect Wild or Scenic River (WSR) - **(Review Concluded)**
- Project is along or affects WSR
  - Project adversely affects WSR as determined by NPS/USFS. **FEMA cannot fund the action.** (NPS/USFS/USFWS/BLM consultation on file) **(Review Concluded)**
  - Project does not adversely affect WSR. (NPS/USFS/USFWS/BLM consultation on file)
    - Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**

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**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect wild or scenic rivers.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

## L. Resource Conservation and Recovery Act

Unusable equipment, debris and material shall be disposed of in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, applicant shall handle, manage, and dispose of petroleum products, hazardous materials (such as asbestos and lead based paint) and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.

## M. Other Relevant Laws and Environmental Regulations

None

## II. Compliance Review for Executive Orders

### A. E.O. 11988 - Floodplains

- No Effect on Floodplains/Flood levels and project outside Floodplain - (**Review Concluded**)
- Located in Floodplain or Effects on Floodplains/Flood levels
- No adverse effect on floodplain and not adversely affected by the floodplain. (**Review Concluded**).  
Are project conditions required?  Yes (see Section V)  No (**Review Concluded**)
- Beneficial Effect on Floodplain Occupancy/Values (**Review Concluded**).
- Possible adverse effects associated with investment in floodplain, occupancy or modification of floodplain environment
- 8 Step Process Complete - documentation on file  
Are project conditions required?  YES (see Section V)  NO (**Review Concluded**)
- A Final Public Notice is required

**Comments:** Preliminary Digital Flood Insurance Rate Map (DFIRM) Panel #: 22071C0120 F, dated 11/13/08 identifies the proposed project to be located in the Zone "VE", EL 13, and identifies the donor projects to be located in Zones "VE" ELs, 14 and 13, area of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined. **Floodplain Review:** Repair of the Airport Terminal Interior. Project worksheet 7583 was formulated for the replacement of the Aviaport Hangar. GOHSEP previously submitted an Alternate Project request for Project Worksheet (PW) 7583 to apply a portion of the funding to the New Orleans Lakefront Airport Terminal **Exterior** renovations, as an Improved Project, PW 8615. The funding from PW 7583 was de-obligated and re-obligated in PW 19465. However, the funding for the Project was not utilized by the applicant for this purpose. The applicant's request amends the previously submitted Alternate Project request. It is the Orleans Levee District's intentions to apply the funding from PW 19465 to the New Orleans Lakefront Airport Terminal **Interior** Renovations Improved Project, PW 7745; and **NOT** PW 8615. PW 6109 was formulated for the replacement of the Chevron Office Building. GOHSEP previously submitted an Alternate Project request for PW 6109 to apply the FEMA funding to the New Orleans Lakefront Airport Terminal **Exterior** renovations, as an Improved Project, PW 8615. The funding from PW 6109 was not de-obligated. FEMA simply noted that "the money from this PW 6109 (NEMIS) will be used as an Alternate Project applied to PW 8615 V5". However, the funding for the project was not utilized by the applicant for this purpose. The applicant's letter withdraws the previously submitted Alternate Project request. It is the Orleans Levee District's intentions to apply the funding from PW 6109 to the New Orleans Lakefront Airport Terminal **Interior** Renovations Improved Project, PW 7745, as an Improved Project, because the Chevron Office Building and the New Orleans Lakefront Terminal are both an integral part of aggregated function of the New Orleans Lakefront Airport. PW 10782 was formulated for the replacement of the South Shore Harbor Marina Harbor Master Building. It is the Orleans Levee District's intentions to apply the funding from PW 10782 to the New Orleans Lakefront Airport Terminal **Interior** Renovations Improved Project, PW 7745, as an Improved Project. The South Shore Harbor Marina Harbor Master Building and the New Orleans Lakefront Terminal are both an integral part of aggregated function of the New Orleans Lakefront Airport. Repair of the Airport Terminal **interior**

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(existing structure) was determined to be the most practicable of alternatives. Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. As per 44 CFR 9.11 (d) (9), the replacement of building contents, materials, and equipment shall require, as appropriate, disaster proofing and/or elimination of such future losses by relocating those building contents, materials, and equipment outside or above the DFIRM elevation. As per 44 CFR 9.12, a Final Public Notice was published 10/26/07-11/02/07 and is attached or on file.

**Correspondence/Consultation/References:** June R. Griffin, CFM, FEMA Environmental

### B. E.O. 11990 - Wetlands

- No Effects on Wetland(s) and/or project located outside Wetland(s) - **(Review Concluded)**  
 Located in Wetland or effects Wetland(s)  
 Beneficial Effect on Wetland - **(Review Concluded)**  
 Possible adverse effect associated with constructing in or near wetland  
 Review completed as part of floodplain review  
 8 Step Process Complete - documentation on file  
Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**

**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect wetlands.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

### C. E.O. 12898 - Environmental Justice for Low Income and Minority Populations

- Project scope of work has no potential to adversely impact any population **(Review Concluded)**  
 No Low income or minority population in, near or affected by the project based on information gathered from <http://factfinder.census.gov>. **(Review Concluded)**  
 Low income or minority population in or near project area  
 No disproportionately high and adverse impact on low income or minority population **(Review Concluded)**  
 Disproportionately high or adverse effects on low income or minority population  
Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**

**Comments:** The proposed project, renovation of the interior of the airport terminal building, would not affect any specific populations in the surrounding area.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

### III. Other Environmental Issues

Identify other potential environmental concerns in the comment box not clearly falling under a law or executive order (see environmental concerns scoping checklist for guidance).

**Comments:** No comment.

**Correspondence/Consultation/Reference:** None

### IV. Extraordinary Circumstances

#### Yes

- (i) Greater scope or size than normally experienced for a particular category of action  
 (ii) Actions with a high level of public controversy  
 (iii) Potential for degradation, even though slight, of already existing poor environmental conditions;  
 (iv) Employment of unproven technology with potential adverse effects or actions involving unique or unknown environmental risks;  
 (v) Presence of endangered or threatened species or their critical habitat, or archaeological, cultural, historical or other protected resources;  
 (vi) Presence of hazardous or toxic substances at levels which exceed Federal, state or local regulations or standards requiring action or attention;

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- (vii) Actions with the potential to affect special status areas adversely or other critical resources such as wetlands, coastal zones, wildlife refuge and wilderness areas, wild and scenic rivers, sole or principal drinking water aquifers;
- (viii) Potential for adverse effects on health or safety; and
- (ix) Potential to violate a federal, state, local or tribal law or requirement imposed for the protection of the environment.
- (x) Potential for significant cumulative impact when the proposed action is combined with other past, present and reasonably foreseeable future actions, even though the impacts of the proposed action may not be significant by themselves.

*Comments:* None

## **V. Environmental Review Project Conditions**

### **Project Conditions:**

#### **The following conditions apply as a condition of FEMA funding reimbursement:**

1. If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their public assistance (PA) contacts at FEMA, who will in turn contact FEMA historic preservation staff. The applicant will not proceed with work until FEMA historic preservation staff has completed consultation with the Louisiana State Historic Preservation Officer (SHPO). In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Unmarked Burial Sites Board (call the Louisiana Division of Archeology at 225-3428170) within seventy-two hours of the discovery. Failure to comply with these stipulations may jeopardize receipt of FEMA funding.
2. Applicant must comply with all local state and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, discharge of surface runoff and storm water from the site.
3. The applicant must check with the Louisiana Department of Natural Resources (LDNR) for permitting and other authorization requirements. The project may be coordinated by contacting LDNR at 1-800-267-4019.
4. Regardless of the asbestos content, the applicant is responsible for ensuring that renovation or demolition activities are coordinated with the Louisiana Department of Environmental Quality (LDEQ) in accordance with the LDEQ "Seventh Amended Declaration of Emergency and Administrative Order" dated August 28, 2006, incorporating the provisions of EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) and the Louisiana Administrative Code (LAC) 33.m.515! and Chapter 27. Should asbestos containing materials (ACMs) be present at the project site, the applicant is also responsible for ensuring proper disposal in accordance with the previously referenced administrative order.
5. Unusable equipment, debris and material shall be disposed in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, applicant shall handle, manage and dispose petroleum products, hazardous materials (such as asbestos and lead based paint) and/or toxic waste in accordance to the requirements and to the satisfaction of the relevant local, state and federal agencies.
6. The applicant is required to coordinate with the local Floodplain Administrator regarding Floodplain Permit (s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or the local floodplain ordinances; whichever is more stringent.