

**Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management  
Standard Designated Floodplain  
B.W. Cooper Senior (First Phase in Phase 2 of Redevelopment Master Plan)**

To: All interested Agencies, Groups and Individuals

This is to give notice that the Louisiana Housing Corporation (LHC), as the Responsible Entity under 24 CFR Part 58, has conducted an evaluation as required by Executive Order 11988, as amended by Executive Order 13690, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded (in part) by LHC's Piggyback Mixed Income Resilience (PRIME) Program in accordance with the CDBG Piggyback Program (Grant # B-21-DF-22-0001) and (in part) with Project Based Vouchers (PBV) under the Housing Authority of New Orleans' (HANO) Housing Assistance Program (HAP). The proposed project is situated along the north side of Erato Street and the west side of South Galvez Street in New Orleans (Lat. 29.950549, Long. -90.092184), with an address of 3401 Erato Street in New Orleans, Orleans Parish, Louisiana 70125 (associated with the one remaining building on site) and is located in the Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined using 0.2 Percent Flood Approach (0.2PFA). Additionally, as shown on the current FEMA FIRM (Panel 22071C0229F, effective 9/30/2016), approximately 0.2 acres on the eastern side of the property are in Zone AE / 1% Annual Chance Flood Hazard, and the remainder of the property (approx. 2.8 acres) is in a Shaded X / 0.2% Annual Chance Flood Hazard.

The proposed project is the first phase in Phase 2 of the Redevelopment Master Plan and will redevelop a portion of land of the former Calliope Projects, also previously known as B. W. Cooper Public Housing Development, to create a new multi-family development. Activities will include construction of a new 3-story building containing 103 one-bedroom rental units reserved entirely for seniors (aged 62 and older), gated off-street parking, and substantial rehabilitation of an existing 2-story building being repurposed for use as the leasing office, community space and other ancillary services. Additionally, a short stretch of road connecting the existing section of Clio Street (south of South Tonti Street) with South Galvez Street will be built, then dedicated to the City of New Orleans as a public street. The subject property includes Parcel IDs 3401-ERATOST and 1195-SGALVEZST, comprising a total of approximately 3.0 acres (131,789 square feet) and is generally level. Although recently cleared of all but one structure, the subject property previously included several additional multifamily residential buildings built in the 1930s and is located in a heavily urbanized area, significantly diminishing any functional benefit that might otherwise be associated with this type of floodplain such as water storage and conveyance, natural filtration and groundwater recharge. Per the National Wetlands Inventory, no mapped wetlands are present on or adjacent to the site, and no wetland characteristics were observed onsite.

LHC has considered the following alternatives and mitigation measures to minimize adverse impacts and to restore and preserve natural and beneficial functions and intrinsic values of the existing floodplain/wetland:

**Locate the project outside of the FFRMS floodplain:** Under this alternative LHC would abandon the proposed site within the larger Phase 2 B.W. Cooper Housing Redevelopment Area in favor of locating the project on a property outside of the floodplain. This alternative would require LHC to abandon the current site and to identify and acquire a suitable property in the vicinity. Situating the project on another site would also likely require a complete redesign of the project to maximize functional use of

the space and ensure the design is appropriate for the setting, considering the extensive historical and cultural significance of these communities.

The City of New Orleans is densely populated and heavily developed, with limited open or green space, and even fewer undeveloped properties – most of which are less than 0.25 acres in size. Aside from the land to the southeast across S. Galvez Street, which is part of the Phase 2 of the B.W. Cooper Housing Redevelopment, there are no sufficiently sized properties available for purchase that are outside of the FFRMS floodplain and compatible with the proposed multi-family residential development, in the current neighborhood, or any of the surrounding neighborhoods. Thus, relocating outside of the floodplain would also effectively remove this housing project from the community where it is needed most. This would severely delay the project but would not serve to provide affordable and quality rental housing in the existing neighborhood.

Also, relocating the entirety of the project outside of the floodplain would not provide any significant benefit in terms of preserving natural (topography, habitat, and hazards), social (aesthetics, historic and cultural values, and land use patterns), and economic values of floodplains since the property is located in a heavily urbanized area – significantly diminishing any functional benefit that might otherwise be associated with this type of floodplain including water storage and conveyance, natural filtration and groundwater recharge. Therefore, this alternative was rejected.

**Alternative project design:** Over the course of several years, multiple alternative options for the use and design of the property were proposed and considered with extensive involvement and feedback from the community. Compatible non-residential uses included improvements to the property to create open park and recreation spaces, and renovating the existing building into a community center to provide literacy and vocational support services for residents and a venue for cultural activities, social interaction and community events. Alternative residential designs considered renovating the existing building to provide dormitory style housing for young local artists and constructing three distinct multi-family buildings and a series of multiple townhomes, all situated around the perimeter of the property and a large parking lot in the center of the property with two points of egress (Erato Street and Clio Street).

Utilizing the property for open park/recreational space and a community center would have provided many potential benefits; however, it would not accomplish the primary objective of the proposed project - to provide much needed affordable rental housing within the community. Additionally, any beneficial impact in terms of preserving the natural, social and economic values of the floodplain would have been minimal, since the property is located in a heavily urbanized area, significantly diminishing any functional benefit that might otherwise be associated with this type of floodplain including water storage and conveyance, natural filtration and groundwater recharge. It was quickly decided that there was not a critical need for open park/recreational space and a community center, as these needs are being adequately served by existing resources.

The alternative residential design would have accomplished the primary objective of the proposed project by providing much needed affordable rental housing within the community. However, the utilitarian placement of the buildings and site layout were not ideal in terms of aesthetics and creating a welcoming environment that is both functional and safe for the intended target population (adults over the age of 62). The alternative site design would not provide any significant impact to the natural, social and economic value of the floodplain, since the property is located in a heavily urbanized area,

significantly diminishing any functional benefit that might otherwise be associated with this type of floodplain including water storage and conveyance, natural filtration and groundwater recharge. Therefore, these design alternatives were rejected.

**“No Action” alternative:** Under this alternative, LHC would take “No Action”, meaning the agency would not approve the proposed action, or any alternative action and funds would not be expended to implement the proposed project. As a result, the project would not be constructed as proposed. The no action alternative would not address the critical housing needs of the area for low-moderate income residents and would not aid in the recovery of their neighborhood. Although the project proponent may seek other funding sources to eventually proceed with development of the site, this would inevitably result in delays, perpetuating the shortage of affordable housing in this community. Furthermore, development of the structure in the absence of federal funding would not require the structure to meet the most stringent applicable construction and elevation requirements, which are intended to minimize risks to human life and property. Therefore, the “No Action” alternative would not meet the need to provide rental assisted homes. This alternative does not provide any benefit and was therefore rejected.

The design and operation of the BW Cooper Senior residential project is fundamentally shaped by floodplain management principles aimed at minimizing flood risk and ensuring community safety. The project’s planning and design reflect a proactive commitment to flood resilience while addressing New Orleans’ critical affordable housing needs.

The project design incorporates a 3-story building to provide the desired number of housing units (103) with the smallest possible footprint, as a way of minimizing impervious surface area. Additionally, the site is situated such that the buildings are placed outside of the higher risk area of the floodplain (Zone AE). Permeable pavers will be used in parking areas to support natural stormwater drainage. The building’s placement was also situated to preserve the mature oak trees on-site to further enhance stormwater absorption and reduce runoff. The project will be constructed in compliance with HUD’s regulations and policies, with the finished floor elevation (FFE) being at or above FFRMS elevation height for the subject property of 1ft NAVD88. The proposed project will also be constructed with all buildings and all mechanical systems elevated three (3) feet above the centerline of the adjacent street, consistent with local floodplain requirements for structures in the 100-year floodplain. To further safeguard the structure, all first-floor materials will be waterproofed up to three (3) feet in height, meeting state funding requirements. Lastly, if any portion of the structural footprint of the completed building(s) is subsequently determined to be within the 100-year floodplain, flood insurance will be required to be obtained and maintained for the economic life of the project.

Project considerations also included planning for residents' and occupants' safety per 24 CFR 55.20(e)(4). As a multifamily residential property, an evacuation plan will be developed that includes safe egress route(s) out of the FFRMS floodplain, plans for evacuating residents with special needs, and clear communication of the evacuation plan and safety resources for residents.

Overall, the proposed project will greatly assist the targeted individuals who meet low-moderate income status and further protect them from future storms. The funding of this project will provide safe and affordable housing for the tenants, prevent loss of life, and enhance housing opportunities for low- and moderate-income residents in the BW Cooper neighborhood and surrounding community.

Following a thorough reevaluation of the identified alternatives, LHC has determined that it has no practicable alternative to the proposed floodplain development. Environmental files documenting compliance with Executive Order 11988, as amended by Executive Order 13690, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in the floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about the floodplain can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in the floodplain, it must inform those who may be put at greater or continued risk.

Written comments must be received by the Louisiana Housing Corporation at the following address on or before **April 24, 2025**: Louisiana Housing Corporation, 2415 Quail Drive, Baton Rouge, LA 70808 and (225) 763 – 8700, Attention: Amber Lavergne, Environmental Impact Specialist. A full description of the project may also be reviewed from 8:00 AM – 4:00 PM at the same address as above, or via the web, at <http://www.lhc.la.gov/>. Comments may also be submitted via email to [ALavergne@lhc.la.gov](mailto:ALavergne@lhc.la.gov).

Date: **April 17, 2025**