

December 2, 2025

Stephanie LeGrange
Louisiana Office of Economic Development
P.O. Box 94185
Baton Rouge, LA 70804
Via email to: Stephanie.Legrange@la.gov

Re: Comments on Rulemaking in Advance of Public Hearing on December 3, 2025

Dear Ms. LeGrange,

The undersigned write to express our serious concerns regarding the Louisiana Office of Economic Development's ("LED") increasing lack of transparency in matters that are of profound and urgent concern to the public. These matters impact people whose homes and lives are threatened in every corner of our state, from the data centers in the north to the gas export facilities near our coast, from the Carbon Capture and Sequestration schemes in central Louisiana to the massive expansions along the Mississippi River's Cancer Alley. This administration's plans will forever alter the landscape and the character of Louisiana, yet it is being done with great speed and in secrecy.

With so much at stake, the only notice that we have of this public hearing and comment deadline is vague and open-ended, calling for comments "on any rule of the agency" – providing no meaningful notice of what the Agency is considering.¹

Our concerns are as follows:

1. Plan to fast track industrial expansion. LED is seeking to fast-track processes to bring highly controversial and contested industrial development projects around the state that will have lasting, serious and harmful impacts to the communities targeted and to the land, air, and water in our state. These processes are also harmful to our democracy. One such process is the so-called *Lightning Speed Initiative*, implemented via executive order on September 16, 2025, which calls for LED to push state agencies to move faster on industrial permitting.²
2. The secrecy behind these plans. The acceleration around projects with such far-reaching repercussions and consequences and the poor public notice is bad enough. Worse, we are learning that LED's efforts in many instances are shrouded in secrecy through Non-Disclosure Agreements (NDA's) with local government officials and out-of-state corporations. These local government officials are then prevented from *speaking to their own constituents* about these projects and providing public access to public records about them.³

¹ Louisiana Register, Vol. 51, No. 10, Oct. 20, 2025, at 1776, available at <https://www.doa.la.gov/media/1dinjutv/2510.pdf>.

² Governor's executive order "Louisiana Lightning Speed Initiative" set out in Executive Order 25-102, Louisiana Register, Vol. 51, No. 10, Oct. 20, 2025, at 1544, available at <https://www.doa.la.gov/media/1dinjutv/2510.pdf>.

³ Three such agreements with local officials in Ascension Parish on file with Rural Roots Louisiana.

3. The additional, dangerous element of Carbon Capture and Sequestration (CCS) projects. The acceleration and secrecy are happening at the same time that LED is marketing the state for CCS projects⁴ and other projects to be powered by blue hydrogen, which relies on CCS technology and CO2 pipeline infrastructure.⁵ There is a clear and growing concern and opposition in the state to this type of infrastructure⁶ – and for good reason given all of the unknowns about the technology and the dangers it poses to aquifers, surrounding residents, and the fundamental property rights of Louisiana landowners.⁷
4. Vague public notice. Now, this office has issued a public notice for comment on rulemaking without giving any information whatsoever about what rule changes it is considering and why.
5. Abuse of emergency rulemaking: After it published notice about the hearing and rulemaking comment period, LED proceeded to promulgate emergency rules⁸ without prior notice or hearing to implement the “Site Investment and Infrastructure Improvement Fund,” which appropriates funds to be used “for economic development efforts, specifically for site investment and infrastructure improvements for economic development purposes.”⁹ To justify circumventing the normal rules for notice and hearing, LED invoked the “emergency rulemaking” law allowing for these types of procedures in “extraordinary circumstances” to “prevent imminent peril to the public health, safety, or welfare.” La. R.S. 49:962(A)(1)(a). We question whether LED’s desire to rush funding to some of the projects it is promoting constitutes such an “extraordinary circumstance” that presents the “imminent peril” the law was intended to address. To the contrary, we are concerned that many of the projects LED seeks to fast-track are what pose an imminent threat to the public health, safety, and welfare.

For decades, this office has subjected Louisiana to out-of-state and often foreign interests that have poisoned our communities, destroyed our coast and wetlands, and diminished so much of what is unique and special about us. This office has marketed areas of the state as open for business as though the

⁴ *Louisiana’s Energy Development: Leading in Carbon Capture, Utilization, & Storage*, Louisiana Department of Economic Development (Mar. 11, 2025), <https://www.opportunitylouisiana.gov/news/louisianas-energy-development-leading-in-carbon-capture-utilization-storage>.

⁵ David Schlissel and Anika Juhn, *Blue Hydrogen: Not Clean, Not Low Carbon, Not a Solution: Making Hydrogen from Natural Gas Makes No Sense*, Institute for Energy Economics and Financial Analysis, September 2023, available at [090. David Schlissel and Anika Juhn, IEEFA, Blue Hydrogen Not Clean Not Low Carbon.pdf](https://www.iefefa.org/wp-content/uploads/2023/09/090-David-Schlissel-and-Anika-Juhn-IEEFA-Blue-Hydrogen-Not-Clean-Not-Low-Carbon.pdf).

⁶ David Mitchell, *Louisiana group challenges law for CO2 storage under private land*, [NOLA.com](https://www.nola.com/news/business/louisiana-carbon-capture-environment-energy-lawsuit/article_bae9ddf7-e20a-5d5c-9353-fa3f0c817f1c.html) (Nov. 21, 2025), https://www.nola.com/news/business/louisiana-carbon-capture-environment-energy-lawsuit/article_bae9ddf7-e20a-5d5c-9353-fa3f0c817f1c.html; Elise Plunk, *Central Louisiana residents, leaders sue state over carbon capture land grabs*, Louisiana Illuminator (Nov. 20, 2025), <https://lailuminator.com/2025/11/20/central-louisiana-residents-leaders-sue-louisiana-over-carbon-capture-land-seizures/>.

⁷ Natalie McLendon, *Local opposition mounts to carbon capture projects in Louisiana*, Louisiana Illuminator, Feb. 26, 2025, <https://lailuminator.com/2025/02/26/carbon-capture/>.

⁸ DECLARATION OF EMERGENCY, Louisiana Office of Economic Development, Louisiana Register, Vol. 51, No. 11, at 1806, available at <https://www.doa.la.gov/media/lounb2en/2511.pdf>.

⁹ Act 365 of 2025, Sec. 4, enacting La. R.S. 51:2316, Louisiana Legislature, available at <https://legis.la.gov/legis/ViewDocument.aspx?d=1425978>.

communities that have long lived there do not exist or matter. The Meta project in north Louisiana,¹⁰ the historic town of Modeste in Ascension Parish that is currently targeted for an industrial “megapark,”¹¹ and the fishing/shrimping/oystering/crabbing community in Cameron that is on the verge of extinction as a result of the LNG buildout are but three recent examples.¹²

The Ascension Parish example

The community of Modeste in Ascension Parish is a perfect example of all that is wrong in LED’s working model:

- LED is fast-tracking development of an industrial “MegaPark”¹³ that would wipe this historic town off the map, forcibly displace people who have lived in the tight-knit community for generations, and destroy valuable historic properties that have received national designation for their historic significance.
- The area targeted for development has long been zoned as a “**conservation district**” because it is “**environmentally fragile**” and “**not served by roads which can handle large traffic increases.**”¹⁴ Despite its environmentally fragile designation, LED has listed the MegaPark in its “Certified Sites Program,” certifying that it is “development-ready.”¹⁵
- LED is seeking to bring Hyundai Steel, a pig iron plant, and two ammonia facilities to the environmentally-fragile area. Three of these companies¹⁶ say they will rely on CCS technology and

¹⁰ Joe Wilkins, *Meta’s \$27 Billion Datacenter Is Wreaking Havoc on a Louisiana Town*, MSN, Nov. 25, 2025, <https://www.msn.com/en-us/autos/ownership/meta-s-27-billion-datacenter-is-wreaking-havoc-on-a-louisiana-town/ar-AA1R9iqM?ocid=BingNewsSerp>.

¹¹ Tyler Bridges and Stephanie Riegel, *Hyundai’s new steel mill, seen as a huge win for Louisiana, has a \$600M taxpayer price tag*, The Times Picayune, May 29, 2025, https://www.nola.com/news/business/hyundai-steel-mill-will-cost-taxpayers-in-louisiana-600m/article_267b82f7-006b-4d02-a934-cf468d881960.html.

¹² Nick Cunningham, *Louisiana LNG Could Be ‘Nail in the Coffin’ for Local Fishermen: Commercial fishing in southwest Louisiana is already facing hard times. But the rush to build LNG export terminals there may put an end to a once-vibrant industry*, DeSmog Blog, May 24, 2024, <https://www.desmog.com/2024/03/02/cameron-louisiana-lng-calcasieu-pass-fishermen/>.

¹³ *Louisiana’s next frontier: Ascension’s 17,000-acre RiverPlex MegaPark*, Greater Baton Rouge Business Report, Nov. 10, 2025, <https://www.businessreport.com/article/louisianas-next-frontier-ascensions-17000-acre-riverplex-megapark>.

¹⁴ [Ascension Parish Zoning Code, Sec. 17-2022\(a\)](#).

¹⁵ Greater Baton Rouge Business Report, *supra* n. 13.

¹⁶ Tiffany Bradford, *Hyundai Unveils \$6B Hydrogen-Powered Steel Mill in Louisiana, Aims to Position State as National Energy Leader: Massive Investment in Ascension Parish Targets Green Steel, Job Growth, and Hydrogen Infrastructure*, The Weekly Press, June 20, 2025, <https://www.brweeklypress.com/hyundai-unveils-6b-hydrogen-powered-steel-mill-in-louisiana-aims-to-position-state-as-national-energy-leader/>; Emilia Jackson, *Environmental Groups Sue Over Ammonia Plant Permits in Ascension Parish*, ChemAnalyst.News, Nov. 27, 2025, <https://www.chemanalyst.com/NewsAndDeals/NewsDetails/environmental-groups-sue-over-ammonia-plant-permits-in-ascension-parish-40198>; Greg LaRose, *CF Industries, Japanese partners to build \$4B ‘blue’ ammonia plant in Ascension Parish*, Louisiana Illuminator, Apr. 8, 2025, <https://lailluminator.com/2025/04/08/blue-ammonia/>.

infrastructure, which includes CO2 pipelines. CO2 pipelines are deadly and dangerous, according to the Pipeline Safety Trust:¹⁷

- *CO2 is an asphyxiant that's heavier than air, and it can travel large distances at lethal concentrations from the pipeline after a rupture.*¹⁸ And see, e.g., what happened in See, e.g., [Satartia, Mississippi](#).¹⁹
 - *CO2 pipelines are susceptible to ductile fractures, which can, like a zipper, open up and run down a significant length of the pipe, they can release immense amounts of CO2, hurl large sections of pipe, expel pipe shrapnel, and generate enormous craters.*²⁰
 - *Water, notoriously difficult to eliminate from CO2 pipelines, allows the formation of carbonic acid in the pipeline which has a ferocious appetite for carbon steel.*²¹
- Making matters even worse, LED has entered into NDA's with local officials, as well as with officials of Hyundai Steel, who are prevented from speaking with us about these projects, and Parish officials have said public records about these projects are exempt from disclosure under the Public Records Law.
 - This comes after years of disinvestment in Modeste, closure of services, and zoning restrictions that prevented local businesses from operating there – because it was a conservation area.

Rather than seeking to sell our state to outside interests that do harm and destroy communities like Modeste, LED could be looking within and investing in and building upon the uniqueness, creativity, talent, diversity, richness, and resilience we have here. After 90 years of LED's existence and decades of promises about these industries that never materialize, Louisiana still ranks last overall in national rankings, and always at or near the bottom in education (46), fiscal stability (46), infrastructure (48), natural environment (49), and opportunity.²² The solution is not to repeat these mistakes.

Rather than changing the rules to allow LED and our state agencies to race ahead and do more of the same, only faster and bigger, we demand that you pause and take stock of the fact that what this office has been

¹⁷ Pipeline Safety Trust, *Carbon Dioxide Pipelines*, <https://pstrust.org/carbon-dioxide-pipelines/>.

¹⁸ *Id.*

¹⁹ [Dan Zegart, *The Gassing of Satartia: A CO2 pipeline in Mississippi ruptured last year, sickening dozens of people. What does it forecast for the massive proposed buildout of pipelines across the U.S.?*, HuffPost, Aug. 26, 2021, \[https://www.huffpost.com/entry/gassing-satartia-mississippi-co2-pipeline_n_60ddea9fe4b0ddef8b0ddc8f\]\(https://www.huffpost.com/entry/gassing-satartia-mississippi-co2-pipeline_n_60ddea9fe4b0ddef8b0ddc8f\).](#)

²⁰ Pipeline Safety Trust, *supra* n. 17.

²¹ *Id.*

²² Presley Bo Tyler, *With poor education and infrastructure, Louisiana ranked worst state by U.S. News & World Report*, Shreveport Times, May 7, 2025, <https://www.shreveporttimes.com/story/news/2025/05/07/what-are-best-and-worst-states-in-the-u-s-what-u-s-news-world-report-says-louisiana-worst-states/83495158007/>.

doing hasn't worked. While much has already been lost, and lives and communities have been sacrificed, it's not too late to save what's left, and build from there.

Signed,

Ashley Gaignard

Ashley Gaignard, President, Rural Roots Louisiana, Ascension Parish - ashley@ruralrootslouisiana.org

Joy Banner

Joy Banner, Co-Director and Co-Founder, The Descendants Project, St. John the Baptist Parish - joy@thedescendantsproject.org

Pastor Harry Joseph

Pastor Harry Joseph, Mt. Triumph Baptist Church, St. James Parish – (225) 623 – 3655

Robyn Thigpen, FISH

Robyn Thigpen, Executive Director, Fishermen Involved in Sustaining Our Heritage (FISH), Cameron Parish - robyn.swla@gmail.com

JOE & ROBIN WILLIAMS

Joe and Robin Williams, neighbors of proposed Meta Data Center, Richland Parish – mawmawnay@icloud.com

Gail LeBoeuf

Gail LeBoeuf, Co-Founder and Co-Director, Inclusive Louisiana - gleboeuf27@gmail.com

Barbara Washington

Barbara Washington, Co-Founder and Co-Director, Inclusive Louisiana - bobbybee51@hotmail.com

Anne C. Rolfes

Anne Rolfes, Director, Louisiana Bucket Brigade – anne@labucketbrigade.org

Adrian Alpay

Submitted by: Adrian Alpay, Attorney and Primary Contact - adrian@alpaylaw.net