

Let Others Make Noise. We'll Make Everything Else.

Jefferson Parish Industrial Districts Zoning Study | Framework Report Consultant: Camiros, Ltd. | Draft Industrial Districts Regulations Statement of Opposition

Industry Makes. is a 501 (c) 4, formally established in mid-2022, and consistent with the request of industry leaders, our mission is *To be a trusted source of industrial communications, while advocating for future investment and the industrial growth that is the backbone of Louisiana.*

The proposed industrial district zoning regulations are in complete conflict with the mission of *Industry Makes*. More specifically, while proponents claim that stakeholders were engaged with conversations and site visits, heavy industry (as defined in proposed regulations) in Jefferson Parish was not. Heavy industry was denied input while the "framework" study was being drafted and were not involved until after the draft was released to the public for comment.

Additionally, proponents present the findings stating that heavy industry is "grandfathered in" the draft regulations. However, there are restrictions in the draft that disallow growth of specific processes with no exceptions granted. Those that are allowed require extensive amendments to a company's existing SPU, with many requiring a new SPU permit.

More specifically, PAGES 18-22 - Section 33-3.45 - Hazardous Materials Overlay District (HM-O)

- Section covers the new HM-O district, an overlay district likely to include Cornerstone
 Energy Park, and aligned requirements including: This district would be mapped upon
 the existing SPU sites for bulk storage of hazardous materials.
 - o An odor control plan will be required for facilities under this designation to be submitted to and approved by the parish Department of Environmental Affairs.
 - SPU Applications for bulk storage of hazardous materials will require notation of the general location of the storage on the site plan.
 - Any changes made to the site plan regarding these locations would require an additional SPU or a revisit of the SPU.
 - A 24-hour public hotline will be required and must be clearly posted in multiple locations near the site visible to the public.

• Section 33-3.45.5

- Existing storage tanks may be replaced for maintenance, safety or where new technologies are available.
- If replaced, storage capacity cannot be increased.

 Administrative approval of a site plan would be required for any storage replacement.

• Section 33-3.45.6

- Expansion of existing bulk storage area is permitted within the SPU process if all the standards of the HM-O are met.
- A major amendment to the SPU would be required.
- Specific landscape buffers would be required for any expansion of bulk storage facilities

• Section 33-3.45.8

- Variances The parish council shall not grant variances to the HM-O overlay district regulations.
- "Coke plant" and "grain elevator" were also added and defined in order to <u>prohibit</u> them within the Parish.

PAGE 27 - DRAFT USE REGULATIONS

Sec. 33-3.40 - Industrial Zoning Districts Use Matrix

- (Pg. 41-42) Chemicals, metals, machinery, electronics manufacturing; bulk storage of materials; chemical manufacturing, plastics and rubber products; ammonia and acid manufacturing; pesticide, fertilizer and other agriculture chemicals.
- (Pg. 45) Bulk storage; bulk storage of non-hazardous materials; bulk storage of hazardous materials, etc.

The intent is to limit this use to the HM-O Overlay District only and limit to SPUs existing as of the effective date of this amendment. Please see the HM-O Overlay District.

For the specifics listed above, in addition to many others not listed above, *Industry Makes* stands in opposition to the proposed industrial regulations, as well as the process used to draft them that excluded the very industry the parish seeks to add additional regulations on that are overly burdensome and redundant.

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Sources: Industrial Districts Zoning Study | Framework Report Prepared for Jeferson Parish, Lousiana by Camiros, Ltd. | February 2022 Industrial Districts Zoning Study | Draft Industrial Districts Regulation; Harris Deville & Associates