

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

<p>INCLUSIVE LOUISIANA; MOUNT TRIUMPH BAPTIST CHURCH; RISE ST. JAMES, by and through their members <i>Plaintiffs,</i></p> <p>vs.</p> <p>ST. JAMES PARISH; ST. JAMES PARISH COUNCIL; ST. JAMES PARISH PLANNING COMMISSION, <i>Defendants.</i></p>	<p>Civil Action No. 2:23-cv-00987 Section J Judge Carl Barbier Magistrate Judge Janis van Meerveld</p>
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DECLARATION OF GAIL LEBOEUF AND BARBARA WASHINGTON

We, Barbara Washington and Gail LeBoeuf, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. We are the co-founders and co-executive directors of Inclusive Louisiana.
2. On June 17, 2026, we attended the Parish Council meeting at which the Council voted 4-3 to redesignate an area in Romeville from “Agricultural” to “Industrial.”
3. Neither of us received individualized or advanced notice of this redesignation. We first learned about it on May 18, when we realized it was on the Planning Commission’s website on the agenda for its meeting that same day. There, we saw an agenda item for a proposal to redesignate an area “commonly known as Shady Grove” from Agricultural to Industrial.
4. We were not sure of what area this referred to, as we did not see a map in the agenda packet. It was the first time we had heard or read the phrase “Shady Grove.”
5. We soon after learned that the agenda item referred to our own community of Romeville.

6. We then learned that the proposal would redesignate into “Industrial” the Pleasant Hill Cemetery, the Estate of Harriet Jones, other residential and agricultural lands, and potentially the Colomb Plantation Cemetery.
7. We also learned that the redesignation would also impact Inclusive Louisiana’s Community Hub, which is in Romeville; Romeville Park, where children in the community play, which residents use for walking and recreation, and which charity groups use for distribution of food products; and the residential community that includes Barbara Washington’s residence, which is also in Romeville. While those areas were not formally redesignated by the Ordinance, the Ordinance allows industry to fully encircle them.
8. We both care immensely about the Romeville community: we care about its current residents, and we care about the remarkable historical mark that our ancestors have left in this community.
9. Pleasant Hill Baptist Church and Cemetery were built by a community of freedpeople after they were emancipated from slavery.
10. Both the Church and Cemetery are of deep cultural, religious, and historic significance to both of us because of their history.
11. Pleasant Hill Baptist Church is just down the street from where Barbara Washington lives. She started attending the Church as a teenager, and was baptized there, in the Mississippi River. The Church is still active. Inclusive Louisiana helped repair the roof of the Church after Hurricane Ida.
12. Pleasant Hill Cemetery is also nearby. Generations of Romeville residents have been buried there. Our loved ones are buried in Pleasant Hill Cemetery.

13. Inclusive Louisiana helps maintain the Cemetery. This is a religious practice for us, a way for us to give respect to their ancestors.
14. We visit the Cemetery frequently. At times, it is for funerals, and at other times it is for other community or religious events.
15. Just in 2026, we have visited the cemetery several times.
16. After Hurricane Ida, Inclusive Louisiana led a community effort to clean up and maintain the Pleasant Hill Cemetery.
17. Inclusive Louisiana held another event there to memorialize a midwife, Zelia “Mama Dutt” Johnson, who was buried there. This was a religious event: there was a pastor who memorialized her burial site, there were prayers, there was music, singing, and people made speeches.
18. Inclusive Louisiana has been involved in receiving historic markers for the Cemetery and the Church through the Louisiana Historic Markers Program.
19. The Parish has also redesignated the cemetery land into “Industrial.”
20. I, Barbara Washington, am also the co-administrator of the Estate of Harriet Jones, which has been in my family for over 150 years. The land was acquired by my fifth-generation grandmother, Harriet Jones, after she was emancipated from slavery.
21. The Estate of Harriet Jones is of deep cultural and historic significance to both of us.
22. We understood from the agenda for the June 17, 2026 meeting that the Parish was planning to redesignate that land to “Industrial.” I attended the meeting to express my concerns and to plead the parish council not to redesignate my family’s land.
23. I, Gail LeBouef, also attended the meeting and spoke in opposition to the redesignation. I reminded the Council about a map they have been given that shows where St. James

residents live and where the plants are, so that they could visually see that the plants are in Convent and St. James, the majority-Black parts of the Parish. I wanted to remind them of which residents are most directly harmed. I told them that like my neighbors, I want to be “treated like a human being and not put on the auction block for the next big industry that wants to come to St. James, because we already know it’s coming to Convent. It’s not going to Vacherie, it’s not going to Gramercy, or Lutchet or Paulina. It’s coming to Convent or St. James.”

24. Many other people spoke in opposition to the redesignation, including both of us, members of RISE St. James, and other landowners in the area that was redesignated. Some people spoke in support of the redesignation, none of whom live in Romeville.
25. At the meeting, we heard Councilmember Long ask counsel for the Parish, Victor Franckiewicz, about the ongoing Comprehensive Plan process, through which the Parish is comprehensively modifying and updating the Land Use Plan.
26. Mr. Franckiewicz relayed that the new Comprehensive Plan will be ready for a Parish Council vote by December 2026. Mr. Franckiewicz also explained that the only land in the Parish that is currently slated for redesignation in the new Comprehensive Plan is the “Shady Grove” area that was the subject of the proposed ordinance. In other words, the Comprehensive Plan would propose the exact same redesignation as the Ordinance 26-08, but six months later.
27. The Parish’s decision to act now to redesignate land that was already set to be considered for redesignation through the Comprehensive Plan, and the opportunities for public comment that are part of that process, raises red flags for us. We are very concerned that

the Parish wants to act now because it believes that the redesignation will lead to an industrial land use application for the land before December 2026.

28. We also heard Councilmember Etienne-Steib raise concerns about how quickly the Parish moved on this redesignation and the lack of transparency about what is motivating the Parish to do so. She described community members as being “in the dark” about the process and said that raises concerns for her as a Parish official.
29. We also heard people raise concerns about the Parish’s willingness to alter, and sometimes ignore, the Parish’s Land Use Plan to make it possible for industry to come into the majority-Black 4th District, where Romeville sits, and the 5th District. Yet the Parish insists on consistency with the Land Use Plan as is when the plan prevents industry from coming into other parts of the Parish.
30. After the hearing and public comment, despite all of the opposition to the redesignation, the Parish Council voted 4-3 to redesignate the area. This meeting had the largest turnout of residents from the area to be impacted by an industrial land use decision. That all of those residents were opposed to this redesignation did not prevent the Council from approving the Ordinance anyway.
31. The vote was racially divided. All three of the white council members voted in favor of the redesignation. Three of the four Black council members expressed serious concerns and voted against it.
32. When we first learned that St. James Parish was planning to redesignate the area into “Industrial,” we were distraught. Now that the Parish has voted to redesignate the land, we feel like the Parish has told us it plans to destroy the Pleasant Hill Cemetery, where our ancestors and family members are buried, the historic Estate of Harriet Jones, and

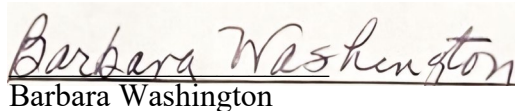
potentially also the Colomb Plantation Cemetery, where our enslaved ancestors are likely buried.

33. This devastating decision by the Parish also signals to us a plan to erase our community of Romeville, where Inclusive Louisiana's Community Hub is based, where Pleasant Hill Baptist Church is located, where Romeville Park is, and where Barbara Washington lives.
34. Inclusive Louisiana uses its Community Hub for community meetings, as well as internal Inclusive Louisiana meetings; for a youth summer camp that is currently ongoing; and to plan religious and cultural events, including our upcoming Juneteenth events.
35. Barbara Washington has lived in Romeville her whole life. Ms. Gail LeBoeuf lived in nearby convent her whole live until 1999, and attended Romeville School for her sophomore to senior years of high school in the first year after integration. It became an all girls' school during my senior year of high school. A couple of years after I graduated, it burned down and then closed soon after.
36. We were already concerned that the Romeville Park in particular is vulnerable to being sold off and converted into industry. Comments from Parish officials at the June 17 Parish Council meeting have raised those concerns even further because of the lack of transparency about any existing plans for industry to come onto that land.
37. The Parish Council's decision to approve this Ordinance has confirmed for us that our own government places so little value on our lives and on our histories, and on sites that are of deep historic, cultural, and religious significance to us, that it has labeled these areas as "Industrial," instead of preserving them. We are deeply distraught by this confirmation, and the stigma it places on us and our community.

38. We want to protect our community and our history. We want to protect the stories of our enslaved ancestors, and of our ancestors who were able to survive slavery and gain freedom from it. We want to protect the mark they were able, against all odds, to leave in this community of Romeville, and that we, their descendants, have been able, against all odds, to preserve.

39. Should the Parish be allowed to enforce this act to redesignate this land as “Industrial,” we would feel the psychological harm of that redesignation immediately and immeasurably.


Gail LeBoeuf


Barbara Washington

EXECUTED this 18 day of June 2026