The UCLA Journal of Environmental Law and Policy is edited and produced by the students of UCLA School of Law.

Manuscripts should be submitted electronically to jelp@lawnet.ucla.edu, in Microsoft Word format. A curriculum vitae and abstract should accompany the manuscript.

Please cite the *Journal* as 31 UCLA J. Envtl. L. & Pol'y _____ (2013).

Citations conform generally to *A Uniform System of Citation* (19th ed. 2010).

Authors have been requested to disclose economic interests and affiliations, and pertinent information will be found in the author's footnote.

The views expressed in articles printed herein are not necessarily those of the *Journal*, the editors, or the Regents of the University of California.

The UCLA Journal of Environmental Law and Policy is funded by:
UCLA Graduate Students Association Publications

Cover Design by William Morosi

© 2013 UCLA Journal of Environmental Law and Policy. All Rights Reserved.
Authors retain the copyright to their individual publications.

ISSN (print): 0733-401X
ISSN (online): 1942-8553
ISBN: 978-0-9828354-1-8

Visit our new Open Access home at:
http://www.escholarship.org/uc/uclalaw_jelp

UCLA JOURNAL OF ENVIRONMENTAL LAW & POLICY

VOL. 31 2013 NO. 1

Editor-in-Chief
YOSEF MAHMOOD

Senior Editors
IAN EDWARDS
JOSEPH LAM

Executive Editor
SARAH ENGLISH

Chief Managing Editors
ERICA ABSHEZ
SARA TAYLOR

Chief Articles Editors
LIZ FEDEROWICZ
DONALD RISTOW
MOLLY WYLER

Chief Comments Editor
LARA LEITNER

Chief Production Editors
GRACE HWANG
JASON SAXE

Articles Editors
JASON BARBATO
GRACE HWANG
JOSHUA MIN
KRISTIN NIVER

Managing Editors
CHRISTA DALEY
CORDELIA DANIELS
MICHAEL FISHER
GARRY PADRTA
KYLE MADDEN-PREISTER
RAFAEL TUMANYAN
CODY WEISS

Webmaster
JASON SAXE

Business Manager
EVAN LEE

Staff Editors
KATHRYN ALIMOHAMMADI
CASEY CURRAN
DYLAN HOFFMAN
GREGORY MAESTRI
KELLY MILLER
BENJAMIN REITER
KEVIN WHITFIELD

STEPHANIE AMARU
REBECCA ECKERT-FONG
JW LAFFERTY
MATT MARKOVICH
BRETT MOODIE
JILLIAN ROBERTS

SCOTT BALL
CAMERON GOODMAN
HEATHER LESLIE
HILLARY MATOS
ALEX MURCHISON
KEVIN WEBB
RYAN WOODFORD

Faculty Advisor
SEAN HECHT