



UCLA  
Journal of Environmental  
Law & Policy

---

VOLUME 38 • ISSUE 2 • 2020

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

Manuscripts can be submitted electronically to [jelp@lawnet.ucla.edu](mailto:jelp@lawnet.ucla.edu),  
in Microsoft Word format.

A curriculum vitae and abstract should accompany the manuscript.

Please cite the Journal as 38 UCLA J. ENVTL. L. & POL'Y \_\_ (2020).  
Citations conform generally to *The Bluebook: A Uniform System of Citation*  
(20th ed. 2015).

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

© 2020 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: 978-1-946696-47-2

Visit our Open Access home at:  
[http://www.escholarship.org/uc/uclalaw\\_jelp](http://www.escholarship.org/uc/uclalaw_jelp)

# UCLA Journal of Environmental Law and Policy

---

VOLUME 38

2020

NO. 2

---

## *Editors-in-Chief*

ANDREW RAUNAU & EMILY WARFIELD

### *Senior Editors*

MINDY JIAN  
LAURA YRACEBURU

### *Faculty Advisor*

SEAN HECHT

### *Chief Managing Editors*

CONNOR HE-SCHAEFER  
RYAN VANDERLIP

### *Chief Articles Editors*

MATTHEW SIMMONS  
HEIDI VANDERWEL

### *Chief Production Editor*

MICHAEL COHEN

### *Chief Comments Editors*

ALLISON KUTNER  
JACQUELINE RELATORES

## *Symposium Director*

KELTON MURPHY

## *Articles Editors*

JOHN GRAHAM  
CAMERON LEE  
MARIELLA McCORMACK  
HADLEY MORRIS  
LAUREN PARTCH

SARA SOLLI  
JULIE TAOUK  
ALEX VAN ROEKEL  
ILAN ZUR

## *Managing Editors*

OSCAR ALVAREZ  
CHRISTOPHER DAMITIO  
DANIEL DEL GIORNO  
AMANDA DWORKIN  
LENA FREIJ  
GABRIEL GREIF  
GRANT HORTON

JOO WON KIM  
THEO MAYER  
ALEXANDRIA McCOLLUM  
JOSEPH MORGAN  
LILLIAN RAND  
ETHAN SALANT  
DYLAN SCOTT

MICHAEL SHIMADA  
ANDREW SU  
STEPHANIE TEUBER  
FERDEZA ZEKIRI  
SAMANTHA ZURCHER