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Superior Court of California
County of Los Angeles

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15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

16 CALIFORNIA COMMUNITIES AGAINST
17 TOXICS, a California non-profit corporation;
COMMUNITIES FOR A BETTER
18 ENVIRONMENT, a California non-profit
19 corporation; and COALITION FOR A SAFE
20 ENVIRONMENT, a California non-profit
corporation

21 Plaintiffs and Petitioners,
22 v.

23 STATE OF CALIFORNIA; SOUTH COAST AIR
24 QUALITY MANAGEMENT DISTRICT

25 Defendants and Respondents
26
27
28

CASE NO.: BS124264

**VERIFIED FIRST AMENDED
PETITION FOR WRIT OF
MANDATE; COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

(California Code of Civil Procedure 1085)

Judge: Honorable James C. Chalfant
Dept: 85

Action Filed: December 30, 2009

1 Plaintiffs and petitioners CALIFORNIA COMMUNITIES AGAINST TOXICS,
2 COMMUNITIES FOR A BETTER ENVIRONMENT, and COALITION FOR A SAFE
3 ENVIRONMENT (collectively “Petitioners”) bring this action on their own behalf, on behalf
4 of their members, on behalf of the general public and in the public interest to uphold the
5 Constitution of the State of California and protect air quality in and around the South Coast
6 Air Basin. Petitioners allege as follows:

7 **INTRODUCTION**

8
9 [I]t is difficult to see how the legislature could more palpably invade the judicial
10 department and effectively usurp its functions, than to pass statutes which should
11 operate to set aside or annul judgments of courts in their nature final, and which
12 would otherwise be conclusive on the rights of parties.

13 *Mandel v. Myers*, (1981) 29 Cal. 3d 531, 548 quoting *Denny v. Mattoon* (1861) 84 Mass. (2
14 Allen) 361 [79 Am.Dec. 784].

15 1. The Constitution of the State of California sets out the duties, powers, and functions
16 of our government, dividing them among the three branches: the judiciary, the legislature,
17 and the executive. It is bedrock constitutional law that neither the Legislature nor the
18 Executive may usurp the authority of the Judiciary.

19 2. On October 11, 2009, Governor Schwarzenegger signed into law two bills, SB 827
20 and AB 1318, that overturn the July 28, 2008 judgment of the Los Angeles Superior Court in
21 Case No. 110792.

22 3. That judgment prohibited Defendant South Coast Air Quality Management District
23 (“the District”) from fabricating emission reduction credits for distribution and sale without
24 fully complying with the California Environmental Quality Act (“CEQA”). In addition to
25 broadly addressing the creation of these credits without adequate CEQA analysis, the
26 judgment specifically addressed the District’s efforts to swell its emission reduction credits
27 accounts in order to sell the credits to power plants and later to other large polluting entities.

28 4. The judiciary has already decided the question of whether CEQA is required prior to
creation and distribution of these emission reduction credits. The Constitution prohibits the
legislature from readjudicating the decisions.

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JURISDICTION AND VENUE

5. This Court has jurisdiction over this action pursuant to California Code of Civil Procedure Section 1085 and California Constitution Article 3 Section 3.

6. Venue is proper in this court pursuant to Code of Civil Procedure sections 393 and 394 because the District is located and operates in the County of Los Angeles. Further, the effects of the pollution and the illegal usurpation of power will be felt most intensely in the County of Los Angeles. Although the Legislature and Governor are located in Sacramento, the California Attorney General maintains an office in the County of Los Angeles.

PARTIES

7. Petitioner and Plaintiff California Communities Against Toxics (“CCAT”) was founded in 1989 at the Santa Isabel Church after a march on a proposed hazardous waste incinerator in Vernon. Over 25 environmental justice groups from across California came together to form a statewide coalition that would help the environmental justice community in California network, learn from each other's struggles, and advocate for policy change in state and federal government. CCAT now has 70 member organizations holds a conference in a different part of the state each year, and is active in a number of efforts to advance community based environmental health protections across the state. CCAT's mission is pollution prevention, environmental justice, and world peace. CCAT was a petitioner in the cases that this legislation seeks to overturn.

8. Petitioner and Plaintiff Communities for a Better Environment (“CBE”) is an environmental justice public interest organization and a California not-for-profit corporation. CBE has approximately 20,000 members throughout the state of California, many of whom reside in the Los Angeles metropolitan area. CBE's mission is to achieve environmental health and justice for communities of color and working-class communities. CBE strives to accomplish its mission by organizing in traditionally disempowered communities, by facilitating public participation in administrative decision-making processes, and by ensuring implementation of laws like CEQA, which protect public participation, public health and the environment. For 30 years, CBE has advocated for meaningful protection of California's air.

1 Full enforcement of state environmental laws is critical to achieving CBE's mission, because
2 air pollution has a disparate impact on people from poor communities and communities of
3 color in the Los Angeles region. CBE's members are among the people who will be
4 impacted by weakening the New Source Review system through the District's Program,
5 which includes its plan to turn historic minor source shutdowns and reductions into new
6 emissions, because the Program will allow deterioration of air quality in their communities,
7 exacerbating the health impacts of air pollution in these communities. CBE was a petitioner
8 in the cases that this legislation seeks to overturn.

9 9. Petitioner and Plaintiff Communities for a Safe Environment ("CFASE") is a not-
10 for-profit membership corporation organized under the laws of the State of California.
11 CFASE has approximately 500 members that live within the regulatory jurisdiction of the
12 District. The health, well-being, and enjoyment of these members have been, and continue to
13 be, adversely affected by the District's Program, which includes turning historic minor
14 source shutdowns and reductions into new pollution. CFASE is dedicated to environmental
15 justice, public health and public safety, and the reduction, elimination and mitigation of air,
16 land and water pollution. CFASE actively pursues effective enforcement of air quality rules
17 and regulations, and the reduction of air pollution in Southern California. On behalf of its
18 members, CFASE works to reduce, eliminate and mitigate public exposure to carcinogenic,
19 respiratory, reproductive and developmental toxicants and pollutants caused by air, land,
20 water pollution and manufactured products. CFASE is further dedicated to protecting,
21 promoting, preserving and restoring our nature's delicate ecology through the protection of
22 environment, natural resources, wildlife and habitats. CFASE was a petitioner in the cases
23 that this legislation seeks to overturn.

24 10. Defendant and Respondent State of California is the entity that acted to violate the
25 State Constitution by first passing, then signing bills that overturn a duly adjudicated decision
26 of the Los Angeles Superior Court.

27 11. Defendant and Respondent South Coast Air Quality Management District
28 ("AQMD" or "District") is established under Division 26 of the Health & Safety Code,

1 section 40400 *et seq.*, as the sole local agency within the South Coast Air Basin with
2 responsibility for comprehensive air pollution control for the purpose of achieving and
3 maintaining air quality within ambient air quality standards by developing, implementing and
4 enforcing ambient air quality standards on non-vehicular sources. Under Senate Bill 827 and
5 Assembly Bill 1318, AQMD is ordered to issue permits that rely on offset credits “that have
6 resulted from emission reductions and shutdowns from minor sources since 1990.” Under
7 Assembly Bill 1318, AQMD is ordered to transfer these retroactive minor source emission
8 reduction credits into its “Priority Reserve Account” and then sell the credits to “qualifying
9 power plants.” Both bills also require the District to make “any necessary submissions to the
10 United States Environmental Protection Agency with regard to the crediting and use of
11 emission reductions and shutdowns from minor sources.” In this Petition and Complaint,
12 reference to any act of the District shall be deemed to include the officers, directors, agents,
13 employees, or representatives of the District who committed or authorized such acts, or failed
14 to adequately supervise or properly control or direct their employees while engaged in the
15 management, direction, operation, or control of the affairs of the District and did so while
16 acting within the course and scope of their employment or agency.

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STATEMENT OF FACTS

19 **Background**

20 12. Air quality in the Los Angeles area is the worst in the nation, putting its millions of
21 residents at unnecessarily high risk of poor health and premature death. Indeed, as of 2008,
22 twice as many people died each year from exposure to small particles in the air than in car
23 crashes. In recognition of the impacts of air pollution, federal law requires any new source of
24 air pollution to “offset”—or cancel out—new emissions with equal or greater reductions.
25 Facilities that cannot reduce their emissions onsite may purchase emission reduction credits
26 for pollutants on the offset credit market. In addition, the District maintains a cache of
27 emission reduction credits called the “Priority Reserve.” It uses the Priority Reserve to
28 facilitate “essential public services” meeting federal Clean Air Act offset requirements

1 regardless of the market price for credits. These essential public services are facilities such
2 as hospitals and schools. The District also allocates its emission reduction credits to
3 businesses that qualify for District-created exemptions to the federal offsetting requirements.
4 These District-created exemptions to not relieve the businesses from complying with federal
5 law.

6 13. In 2006, EPA directed the District to remove from its account the vast majority of
7 its emission reduction credits because it had no documentation to show that the emission
8 reductions underlying the credits ever occurred. Because the EPA realized that the District
9 was not taking adequate steps to ensure that its emission offset credits met federal
10 requirements, EPA also directed the District to develop a rule that formalizes its procedure
11 for ensuring that any emission reduction credits in its accounts are valid under federal law.

12 14. In response to the EPA's concerns, the District adopted Rule 1315. Going beyond
13 the EPA's concerns, however, Rule 1315 also included provisions to generate more than 111
14 tons per day of emission reduction credits. By far the largest source of new credits was
15 retroactive orphan minor source shutdowns. The District had never monitored, tracked or
16 otherwise accounted for orphaned minor source shutdowns before, but under Rule 1315, they
17 would generate more than 99 tons each day of new emission reduction credits.

18 15. Simultaneous with its adoption of Rule 1315, the District amended its Rule
19 1309.1 to allow it to sell the newly created credits to new power plants.

20

21 **California Courts Have Twice Ruled that the District Must Fully Analyze its Program,**
22 **Especially the Credit-Generating Function of the Program, Prior to Implementation**

23 16. When it first adopted Rule 1315 and amended Rule 1309.1 in 2006, the District
24 claimed each action was exempt from CEQA, and denied that they were both parts of a
25 program to generate and distribute new credits.

26 17. Petitioners sued, contending that the District must conduct CEQA analysis of its
27 Program. In February 2007, the Superior Court rejected the District's claimed exemptions,
28 and the Court of Appeal declined to overturn that conclusion.

1 18. In response to the Court’s ruling, in August 2007 the District adopted a Program
2 Environmental Assessment for its adoption of Rule 1315 (to generate and account for new
3 credits) and amendments to Rule 1309.1 (to open the Priority Reserve so power plants could
4 purchase newly-created emission reduction credits) (“PEA”), and adopted Rule 1315 and
5 amendments to Rule 1309.1. The PEA was deeply flawed, including the District’s re-
6 assertion of its position that there would be no environmental impact from Rule 1315’s
7 credit-generating function. Petitioners again filed suit.

8 19. The Superior Court found the District’s CEQA document inadequate. In its July
9 28, 2008 dispositive decision, the Court observed, *inter alia*, that Rule 1315 expanded
10 “exponentially the universe of pollution credits” that would allow new emissions “into an
11 already polluted Basin.” Decision on Ruling on Respondent’s Motion for Summary
12 Adjudication, *NRDC et al. v. South Coast AQMD et al.*, Los Angeles Super. Ct. No. BS
13 110792, July 28, 2008, p. 8 (“Decision”) (incorporated in full as if set out fully herein.)

14 20. The Court opined that decisions such as “whether to allow certain credits
15 historically unavailable for use as credits to be captured and re-sold, and *whether to take*
16 *credits retroactively from clean air improvements already attained*” were indisputably
17 decisions that would “have real, foreseeable and substantial environmental consequences.”
18 *Id.* (emphasis added)

19 21. The Court further concluded that the Program, and specifically the aspect of the
20 Program that was seeking retroactively to convert minor source shutdowns into emission
21 reduction credits, would have significant environmental impacts and therefore required
22 CEQA review.

23 22. The Court then considered whether the District had complied with CEQA’s
24 requirements to describe the project, analyze its environmental impacts, consider alternatives
25 to the project, and mitigate impacts. The Court concluded the District had failed to do so. *Id.*
26 at 11.

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1 23. The Court explained that the Program that needed to be described, and was not
2 described, included the mechanisms by which the District intended to create new emission
3 reduction credits:

4 The mischief in the PEA begins with the District’s repeated assertion that Rule
5 1315 will have no environmental impacts and, therefore, need not be evaluated in
6 the PEA. But, *it is the universe of emission credits . . . that is at the heart of the*
7 *rule-making*. Whether it is for electric generation, or bio-solid treatment facilities
8 or some other project of importance to the region, it cannot be doubted that in a
9 world of ever-scarcer emission credits that [sic] a huge cache of district-held
10 credits in a now-accessible Priority Reserve will be used. This foreseeable
11 consequence is particularly apparent where, as in this case, the District has
12 articulated a willingness to open the Priority Reserve for uses far removed from
13 the entities who historically could obtain access to those reserves. *The scope and*
foreseeable impact of Rule 1315 on the environment is greater, in fact, than the
Rule 1309.1 amendments Nor is the impact of Rule 1315 – on a
14 programmatic basis – limited to the eleven power plants currently in line for
15 Priority Reserve access.
16 Decision, pp. 11-12. (emphasis added)

17 In this project, the District has amended its New Source Review program with the
18 articulated commitment of *retroactively generating 111 tons/day of credits and*
19 *making them available* now and in the future to all facilities through access to the
20 Priority Reserves accounts....
21 *Id.* pp. 13-14. (emphasis added)

22 24. The Court issued a judgment and writ of mandate that prohibited the District from
23 relying on Rule 1315 while it readopted all *or part* of the Project. The Judgment provided
24 that:

25 IT IS FURTHER ORDERED that the District is enjoined from undertaking any
26 action to implement the Project unless and until such time as the District has
27 complied with the California Environmental Quality Act (California Public
28 Resources Code § 21000 *et seq.*) and Guidelines (California Code of Regulations,
tit. 14, § 15000 *et seq.*), and the Writ of Mandate issued in this case.

Writ of Mandate and Injunction, November 3, 2008. (“Writ”) (incorporated in full as if set
out fully herein.)

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1 25. Minor source shutdowns were a significant part of Rule 1315, generating
2 approximately 90% of the new emission reduction credits, and therefore included in the
3 Program.

4 26. Although it initially filed an appeal of the Superior Court’s Writ, the District
5 withdrew its appeal.

6 **The Legislature Adopted Two Bills that Act to Overturn the Court’s Ruling that the**
7 **District Must Comply With CEQA Prior to Generating Emission Reduction Credits**
8 **from Minor Source Shutdowns**

9 27. Assembly Bill 1318 (M. Perez, 2009) orders the District to “make use of”
10 emission reduction credits from “minor sources since 1990” (“minor source shutdowns”).
11 Further, it explicitly orders the District to set aside the Court’s mandate to undertake CEQA
12 prior to relying on any part of the Program, by providing that CEQA “does not apply” to
13 “[t]he selection, credit, and transfer of emission credits by the South Coast Air Quality
14 Management District pursuant to Section 40440.14 of the Health and Safety Code, until the
15 repeal of that section on January 1, 2012, or a later date.” Public Res. Code § 21080(b)(16).

16 28. AB 1318 amends Section 40440.14 of the Health and Safety Code to require that
17 the District credit to its “internal emission credit accounts and transfer from [its] . . . accounts
18 to eligible electrical generating facilities emission credits in the full amounts needed to issue
19 permits for eligible electrical generating facilities to meet requirements for sulfur oxides
20 (SOx) and particulate matter (PM2.5 and PM10) emissions.” Health & Saf. Code §
21 40440.14(a).

22 29. Like AB 1318, Senate Bill 827 (Wright, 2009) orders the District to “make use
23 of” minor source shutdowns. Senate Bill 827, CA Health & Saf. Code § 40440.13(c)(2).

24 30. SB 827 includes the following language “Nothing in this section affects the
25 decision in the case described in subdivision (a) concerning the adoption, readoption, or
26 amendment, or environmental review, of south coast district Rule 1315.” Despite this
27 language, the Legislature also orders that “the district shall also make use of any emission
28 credits that have resulted from emission reductions and shutdowns from minor sources since

1 1990” to issue permits under its existing rules, a vital aspect of Rule 1315, and a key concern
2 in the Decision and Writ.

3 **FIRST CAUSE OF ACTION**

4 **VIOLATION OF CALIFORNIA CONSTITUTION ARTICLE 3 SECTION 3**
5 **STATE USURPED POWER OF JUDICIARY**
6 **BY ORDERING GENERATION AND USE OF**
7 **EMISSION REDUCTION CREDITS PRIOR TO CEQA REVIEW**
8 **(By all Plaintiffs against Defendant State of California)**

9 31. Plaintiffs hereby incorporate by reference all of the foregoing paragraphs as
10 though fully set forth herein.

11 32. Article 3 Section 3 of the California Constitution provides that “[t]he powers of
12 state government are legislative, executive, and judicial. Persons charged with the exercise
13 of one power may not exercise either of the others except as permitted by this Constitution.”

14 33. The judicial branch of the state government is entitled to make final decisions
15 regarding specific controversies. That function is considered core to the judiciary, and may
16 not be usurped by the legislative or executive branches of the state government.

17 34. The Superior Court of the County of Los Angeles issued a final decision,
18 judgment and writ of mandate prohibiting the District, *inter alia*, from generating credits
19 from minor source orphan shutdowns dating back to 1990 unless and until it adopts a rule
20 enabling it to do so, and conducts an adequate environmental analysis under CEQA of that
21 rule.

22 35. Further, the Superior Court of the County of Los Angeles issued a final decision,
23 judgment and writ of mandate prohibiting the District, *inter alia*, from issuing permits that
24 rely on credits from minor source orphan shutdowns dating back to 1990 unless and until it
25 adopts a rule enabling it to do so, and conducts an adequate environmental analysis under
26 CEQA of that rule.

27 36. By enacting SB 827, which requires the District to generate credits from minor
28 source orphan shutdowns dating back to 1990, the legislative and executive branches have
29 usurped the powers of the Superior Court of the County of Los Angeles.

30 37. By enacting SB 827, which requires the District to issue permits that rely on

1 credits from minor source orphan shutdowns dating back to 1990, the legislative and
2 executive branches have usurped the powers of the Superior Court of the County of Los
3 Angeles.

4 38. By enacting AB 1318, which requires the District to generate credits from minor
5 source orphan shutdowns dating back to 1990, the legislative and executive branches have
6 usurped the powers of the Superior Court of the County of Los Angeles.

7 39. By enacting AB 1318, which requires the District to issue credits from minor
8 source orphan shutdowns dating back to 1990, the legislative and executive branches have
9 usurped the powers of the Superior Court of the County of Los Angeles.

10 40. By enacting AB 1318, which requires the District to transfer to qualifying power
11 plants credits from minor source orphan shutdowns dating back to 1990, the legislative and
12 executive branches have usurped the powers of the Superior Court of the County of Los
13 Angeles.

14 41. By enacting AB 1318, which requires the District to transfer to qualifying power
15 plants credits from minor source orphan shutdowns dating back to 1990, and exempting the
16 selection, credit, and transfer of emission reduction credits from CEQA, the legislative and
17 executive branches have usurped the powers of the Superior Court of the County of Los
18 Angeles.

19 **SECOND CAUSE OF ACTION**

20 **VIOLATION OF HEALTH AND SAFETY CODE SECTION 40440.13(b)**

21 (By all Plaintiffs against Defendant South Coast Air Quality Management District)

22 42. Plaintiffs hereby incorporate by reference all of the foregoing paragraphs as
23 though fully set forth herein.

24 43. Pursuant to Senate Bill 827, the California Health and Safety Code is amended to
25 provide that “Nothing in this section affects the decision in the case described in subdivision
26 (a) concerning the adoption, readoption, or amendment, or environmental review, of south
27 coast district Rule 1315.”

28 //

1 44. Health and Safety Code Section 40440.13(a) identifies “the case described in
2 subdivision (a)” as Natural Resources Defense Council v. South Coast Air Quality
3 Management District (Super. Ct. Los Angeles County, 2007, No. BS 110792).

4 45. The Decision issued by the Court in the case clearly enjoined the District “from
5 undertaking any action to further implement these rules pending CEQA compliance.”

6 46. The use of emission reductions and shutdowns from minor sources was part of the
7 rule that was before the Court and the Court enjoined relying on all or part of the project
8 prior to CEQA compliance.

9 47. Crediting and issuing this category of emission reduction credits prior to CEQA
10 compliance violates Health and Safety Code sections 40440.13(b), and is therefore arbitrary,
11 capricious, and not accordance with the law.

12
13 **THIRD CAUSE OF ACTION**

14 **VIOLATION OF HEALTH AND SAFETY CODE SECTIONS 40440.13(b)(2) AND**
15 **40440.14(c)(2)**

16 **(By all Plaintiffs against Defendant South Coast Air Quality Management District)**

17 48. Plaintiffs hereby incorporate by reference all of the foregoing paragraphs as
18 though fully set forth herein.

19 49. Pursuant to both Senate Bill 827 and Assembly Bill 1318, the California Health
20 and Safety Code is amended to provide that “The district shall make any necessary
21 submissions to the United States Environmental Protection Agency with regard to the
22 crediting and use of emission reductions and shutdowns from minor sources.” Health & Saf.
23 Code 40440.13(c)(2) and 40440.14(b)(2).

24 50. The “crediting and use of emission reductions and shutdowns from minor
25 sources” is a revision of the District’s portion of the State Implementation Plan required
26 under federal law for regions that, like the South Coast Air Basin, fail to meet the National
27 Ambient Air Quality Standards.

28 51. The procedure for making “submissions to the United States Environmental
Protection Agency” is outlined in 40 C.F.R pt 51 App. V and requires, *inter alia*, “A formal

1 letter of submittal from the Governor or his designee, requesting EPA approval of the plan or
2 revision thereof;” “A copy of the actual regulation;” “The State's demonstration that the
3 national ambient air quality standards, prevention of significant deterioration increments,
4 reasonable further progress demonstration, and visibility, as applicable, are protected if the
5 plan is approved and implemented;” and “Modeling information required to support the
6 proposed revision.” 40 C.F.R. 51 App V.

7 52. The District has not caused such a submission to be made to the United States
8 Environmental Protection Agency.

9 53. The District has indicated that it will begin crediting and using emission
10 reductions and shutdowns from minor sources as emission reduction credits on January 1,
11 2010, or very soon thereafter. Crediting and issuing this category of emission reduction
12 credits without “submissions to the United States Environmental Protection Agency” violates
13 Health and Safety Code sections 40440.13(b)(2) and 40440.14(c)(2), and is therefore
14 arbitrary, capricious, and not accordance with the law.

15
16 **THE NEED FOR INJUNCTIVE RELIEF**

17 54. By committing the acts alleged herein, Defendants and Respondents have caused
18 irreparable harm for which there is no plain, speedy, or adequate remedy at law. In the
19 absence of equitable relief, the general public is harmed and will continue to be harmed.

20
21 **PRAYER FOR RELIEF**

22 WHEREFORE, Petitioners pray for judgment as set forth below:

23 A. A temporary restraining order, preliminary and permanent injunction enjoining
24 Defendant and Respondent South Coast Air Quality Management District, its agents,
25 employees, assigns, and all persons acting in concert or participating with it from crediting or
26 using any of the credits generated by minor source shutdowns and reductions dating back to
27 1990 until the District:

28 i. adopts and submits to United States Environmental Protection Agency a rule

- 1 allowing it use any such credits, and
- 2 ii. complies with the Decision, Judgment and Writ issued by the Superior Court of
- 3 the County of Los Angeles;
- 4 B. For an injunction to be issued under the seal of this Court enjoining the State of
- 5 California from implementing SB 827 and AB 1318;
- 6 C. For a writ of mandate to be issued under the seal of this Court commanding the State
- 7 of California to set aside its adoption of SB 827 and AB 1318;
- 8 D. For a writ of mandate to be issued under the seal of the Court prohibiting the South
- 9 Coast Air Quality Management District from relying on SB 827 and AB 1318;
- 10 E. For a declaratory judgment that, by adopting SB 827 and AB 1318 the State of
- 11 California violated the California Constitution's Separation of Powers requirement;
- 12 F. For plaintiffs' fees and costs, including reasonable attorneys' and expert witness fees,
- 13 as authorized by California Code of Civil Procedure section 1021.5 and any other applicable
- 14 provisions of law;
- 15 G. For such other relief as this Court deems appropriate and just.

16 Respectfully submitted,

17 Dated: January 14, 2010

22 Dated: January 14, 2010

LAW OFFICES OF ANGELA JOHNSON MESZAROS
Angela Johnson Meszaros
COMMUNITIES FOR A BETTER ENVIRONMENT

Shana Lazerow

27 Attorneys for Petitioners

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