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**September 29, 2015**

Rebecca Malone  
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1222 First Avenue MS 501  
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Via Electronic Mail  
[DSDEAS@saniego.gov](mailto:DSDEAS@saniego.gov)

**Re: City of San Diego Climate Action Plan (CAP), SCH No. 2015021053  
CERF Comments on DEIR and CAP**

Dear Ms. Malone:

Please accept the following comments on behalf of our client Coastal Environmental Rights Foundation (CERF), a nonprofit environmental organization established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents.<sup>1</sup>

First, we applaud the City for drafting a Climate Action Plan (CAP) with aggressive goals to achieve greenhouse gas (GHG) reductions that comply with State targets. We also understand the City's desire to streamline California Environmental Quality Act (CEQA) review for projects based on bright-line thresholds. However, as currently drafted, the City's Draft GHG Emissions Screening Criteria (Screening Criteria) potentially undermine the City's GHG reduction goals, the CAP, and the City of Villages planning approach.

As detailed below, the City's Screening Criteria may also result in a significant impact on the environment which has not been addressed in the CAP DEIR. We therefore urge the City to modify the Screening Criteria to further the City's goals and comply with CEQA.

**I. The Screening Criteria Are Part of the CAP Project**

Admittedly the CEQA Project under review is the City's CAP. However, to achieve the necessary reductions and enable CEQA streamlining, the CAP includes a CAP Consistency Checklist (Checklist). (DEIR, p. 2-18). The DEIR examines both the CAP and the associated Consistency Checklist, but describes the Screening Criteria as a mere "companion document." (DEIR, p. 2-18). However, the Screening Criteria are part and parcel with the CAP and are necessary to reduce the City's GHG emissions and ensure the State reduction goals are met: "The Screening Criteria will be used in conjunction with the City's Climate Action Plan Consistency Checklist to determine if a project has a cumulatively significant impact on greenhouse gas emissions." (Screening Criteria, p. 6).

Because the Screening Criteria are part of the "Project," the City's failure to consider the impacts of the Screening Criteria in the DEIR results in piecemealing. (CEQA Guideline §15378(a) [defining "project" broadly as "whole of an action..."]; see also, *Berkeley Keep Jets Over the Bay*

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<sup>1</sup> CERF's comments on a prior version of the Climate Action Plan are attached hereto as Exhibit A. The CAP's water supply analysis continues to rely on outdated water usage metrics and therefore results in artificial GHG reductions. CERF therefore incorporates its prior comments on water supply reductions.

*Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1358, [It is well settled that “CEQA forbids ‘piecemeal’ review of the significant environmental impacts of a project.”]). Both the CAP and the Screening Criteria should therefore be subject to environmental review. (*Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1171-1172).

Further, a key CAP project objective is to provide CEQA streamlining for GHG emissions for new developments. (DEIR, p. 2-2). The CAP is meant to serve as a tiering and streamlining document pursuant to CEQA Guideline Section 15183.5. However, as part of the streamlining mechanism, the Screening Criteria were not analyzed in the DEIR:

Through 2020, the CAP meets the requirements set forth in CEQA Guidelines Section 15183.5, whereby a lead agency (e.g. the City of San Diego) may analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce GHG emissions. Following adoption of the CAP, eligible individual projects preparing project-specific environmental documents may tier from and/or incorporate by reference the CAP’s programmatic review of GHG impacts in their cumulative impacts analysis by using the CAP Compliance Checklist (Appendix A of the CAP) and the GHG Emissions Screening Criteria. (Public Notice, p. 2, emphasis added).

CEQA Guideline Section 15183.5 requires more. A qualified Greenhouse Gas Reduction Plan “should” be adopted in a public process following environmental review and may be used for cumulative impacts analysis “once adopted following certification of an EIR...” (CEQA Guideline Section 15183.5(b)(1)(F) and (2)).

Indeed, the City’s screening process for new developments shows the significance of the Screening Criteria to the City’s evaluation of GHG impacts. First, a project is reviewed pursuant to the Screening Criteria. (Screening Criteria, p. 7). Only if a project is above the thresholds in the Screening Criteria would the project be assessed for CAP consistency through the Checklist. (*Id.*). Therefore, a variety of relatively large and expansive projects – regardless of their location or project-specific elements – would evade CEQA review and would not be evaluated for consistency with the CAP. This is improper. Not only has the impact of such an approach not been subject to CEQA review, it directly undermines the purpose of the CAP as a CEQA streamlining document.

## **II. The Screening Criteria Use An Improper Methodology**

As a companion to the CAP, and as a first step in assessing a Project’s cumulative impacts, the Screening Criteria fail to ensure consistency with the CAP. The Screening Criteria thresholds were established by using the Statewide land use emissions and extrapolating the necessary 2020 reduction associated with land use-driven sectors. (Screening Criteria, p. 15). This reduction percentage was then purportedly applied to the City’s 2020 projected GHG inventory. (*Id.* at p. 16). However, the Statewide land use-driven sector reductions should not simply be extrapolated to the City. Admittedly, the City’s GHG emission sectors do not parallel the State’s. (*Id.*, pp. 9-10). For example, the transportation sector accounts for 37 percent of total GHG emissions in the State, while it accounts for considerably more – 54 percent – of the City’s emissions. (*Id.*). Thus, the City’s land use-driven reductions should likely account for a greater percentage of needed reductions.

Further, the Screening Criteria appear to use the City’s 2010 baseline emissions instead of the projected 2020 emissions in calculating the necessary land use-driven reductions. (See,

Screening Criteria, p. 10, Table 2 [13.02 MMT CO<sub>2</sub>e is 2010 baseline]; compare, *Id.* at p. 20 [13.02 MMT CO<sub>2</sub>e identified as 2020 forecast emissions]).

After extrapolating the necessary land use-driven reductions, the Screening Criteria apportion the necessary reductions between new and existing development based on the CAP. (*Id.* at p. 20). From there, the Screening Criteria model the number, size, and type of projects necessary to meet the aggregate emission reduction for new development. (*Id.*, p. 22). However, such an approach relies on CAP reduction strategy measures being apportioned to new development without requiring consistency with the CAP until and unless a project exceeds the screening criteria. Moreover, the CAP's goals to focus development in the TPA would be frustrated by the brightline threshold which does not account for a project's location or site-specific constraints.

The Screening Criteria should therefore be amended to require consistency with the CAP first and rely on a threshold derived from the CAP, not piecemealed by using statewide and local figures.

### **III. In Conjunction with the CAP, the Screening Criteria Must Mitigate Greenhouse Gas Impacts For the General Plan**

In 2008, the City updated its General Plan and certified a Program Environmental Impact Report (PEIR) prepared in conjunction with the Plan. In response to public concern regarding the General Plan's contribution to climate change, the City strengthened its GHG mitigation policies in the General Plan itself, and made them enforceable through the Mitigation Monitoring and Reporting Program (MMRP). (Report to City Council February 27, 2008, p. 8; see also, Final PEIR, p. 5-31).

The PEIR itself reiterates the City's commitment: "The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors." (PEIR, pp. 5-31-32). The City's General Plan Action Plan also includes the short-term action to "expand the scope of the Climate Protection Action Plan to include measures to reduce GHG emissions from the community-at-large;" and the ongoing action of "comprehensively address[ing] climate change through the implementation and actions associated with the individual policies identified in Table CE-1 in the General Plan." (General Plan Action Plan July 2009, pp. 26, 28).

The MMRP likewise outlines mitigation measures for the General Plan impacts to global warming. "The purpose of the MMRP is to ensure that the updated San Diego General Plan... complies with all applicable environmental mitigation requirements." (General Plan MMRP, p. 1, pp. 49-50). The General Plan Monitoring Report likewise states: "The City is in the process of preparing a [CMAP]. The CMAP is a companion document to the General Plan and was prepared in accordance with Policy CE-A.13." (General Plan Monitoring Report, p. 2-4; see also, Report to City Council, July 25, 2013, p. 1 ["The City's General Plan [PEIR MMRP] specifically requires the mitigation of climate change."]). The City committed to preparing a Climate Action Plan that both mitigates the General Plan GHG emissions, and at a minimum, complies with applicable laws. (See CE-A.1, CE-A.2, CE-A.13).

Thus, the CAP serves as mitigation for the General Plan and must meet State reduction targets. Indeed, one of the CAP's objectives is to "[i]mplement climate action policies of the General Plan" and the CAP itself reiterates that it serves as mitigation for the General Plan. (DEIR, p. ES-2; CAP, p. 4). As mitigation for the General Plan, the CAP must be enforceable. "Mitigating conditions are not mere expressions of hope." (*Lincoln Place Tenants Assn. v. City of Los Angeles*, (2005) 130

Cal. App. 4th 1491, 1508). “When mitigation measures are incorporated in a plan, the agency must take steps to ensure that they will actually be implemented as a condition of later development approved under the plan, ‘not merely adopted and then neglected or disregarded.’” (2 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act, §14.16 (rev. 3/13), citing *Federation of Hillside & Canyon Associations v. City of Los Angeles*, (2000) 83 Cal. App. 4th 1252, 1261).

Executive Order S-3-05, issued in 2005, committed the State to reducing its GHG emissions to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Consistent with the objective of the Executive Order, the Legislature followed with the Global Warming Solutions Act of 2006, commonly known as AB 32. (Health & Saf. Code, §§ 38500, *et seq.*). AB 32 requires emission levels be reduced to 1990 levels by 2020. (Health & Saf. Code, § 38550). However, the AB 32 Scoping Plan acknowledges the 2020 goal is an interim step towards the further reductions set out in the Executive Order. Likewise, recently approved Executive Order B-30-15 further established an interim 2030 statewide GHG reduction target of 40 percent below 1990 levels.

Thus, as acknowledged in the CAP and as evidenced by its interim 2035 goal, reduction measures are necessary not only to meet the 2020 goals, but also to continue progress to the ultimate 2050 goal. However, despite the fact that the CAP and the Screening Criteria are meant to function as tiering documents for new development through 2020 only, they frustrate the City’s interim goal and the ultimate 2050 goal.

The CAP and Screening Criteria allow development projects approved between now and 2020 (and built beyond 2020) to (1) avoid CEQA review for GHG emission impacts altogether if the project falls below the Screening Criteria thresholds; and (2) only demonstrate consistency with the 2020 target. New development projects undergoing review between now and 2020 will continue to emit GHGs well beyond 2020. Indeed, the Screening Criteria and current GHG emission models amortize construction emissions over an assumed 20-year life of new development projects. Therefore, most – if not all – projects approved using the Screening Criteria as thresholds of significance will continue past the City’s interim target without any additional mitigation measures to achieve the necessary additional reductions for 2035 and beyond.

The Screening Criteria therefore undermine the CAP’s 2035 target. Further, because the Screening Criteria are designed to help achieve and implement the CAP goals, use of the Screening Criteria will fail to ensure the CAP adequately mitigates GHG impacts of the General Plan.

#### **IV. SANDAG’s Regional Plan May Frustrate the CAP**

Recent analysis has shown the SANDAG Regional Plan may frustrate the City’s CAP GHG reduction goals.<sup>2</sup> Therefore, it is important for the public and decision-makers to know the extent to which the City CAP relies on SANDAG for CAP implementation. This is not clearly articulated in the CAP, though it is clear some reliance on SANDAG is contemplated:

Some of the implementing actions of the CAP may involve other agencies, such as SANDAG, concerning expanded transit service, but such actions will require project-level CEQA evaluation at which time such agencies would be involved as a lead or approving agency.” (DEIR, p. 2-19, emphasis added).

“Based on current transit mode share in TPAs, the City planners and transportation engineers we consulted anticipate that by prioritizing these areas for transit

improvements, it will be possible to achieve 12% commuter transit (peak period) mode share in 2020 and 25% commuter transit (peak period) mode share in 2035 in these high density areas. These goals are 4.2% greater than the regionally projected transit mode share for 2020 and 13% greater for 2035.” (CAP Appendix B-30)

In light of the gap between SANDAG’s projections and the City CAP – and the need to achieve the CAP’s 2020 transportation goals before SANDAG approves a new Regional Plan or RTP – the CAP should make clear what agency is responsible for filling this gap. It is clear from these figures that at the very least, SANDAG’s approval of a weak Regional Plan will either directly undermine the City’s CAP, or compel the City to make substantial improvements to meet the CAP transportation goals *despite* SANDAG. Under either scenario, SANDAG’s role in the CAP should be clearly articulated.

**V. Conclusion**

CERF urges the City to amend the Draft GHG Screening Criteria to serve as mitigation measure to the General Plan and aid the City in streamlining CEQA review for future development projects. Further, as part of the CAP Project, the Screening Criteria should be analyzed in the DEIR. Should the City fail to make these changes, the CAP and the City’s associated environmental review will fail to comply with CEQA.

Thank you in advance for your consideration of our comments.

Sincerely,

**COAST LAW GROUP LLP**



Marco A. Gonzalez



Livia Borak  
Attorneys for CERF

Enc.: Exhibit A. CERF Comments.CMAP.10.1.2012

# **EXHIBIT A**

Anna McPherson  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

Via Electronic Mail  
Dsdeas@sandiego.gov

**Re: City of San Diego Climate Mitigation and Adaptation Plan (CMAP)  
Comments on Draft Negative Declaration and CMAP**

Dear Ms. McPherson:

Please accept the following comments on behalf of Coastal Environmental Rights Foundation (CERF). CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California's coastal communities. CERF was established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents.

CERF supports the City of San Diego ("City")'s efforts to prepare a Climate Mitigation and Adaptation Plan to address the significant impact continued greenhouse gas (GHG) emissions and climate change will have on our environment, locally and globally. While CERF applauds the City for its efforts, the CMAP simply does not go far enough, and certainly does not establish a threshold below which contribution to greenhouse gas emissions will not be cumulatively considerable.

As detailed below, in order to truly reduce GHG emissions and make the necessary reductions, the City must be more aggressive in its approach. Further, in order to qualify as a California Environmental Quality Act (CEQA) tiering document, the City must meet the mandates of CEQA Guideline section 15183.5. The CMAP does not meet these standards.

**I. The CMAP Reduction Goals Are Too Weak**

The City purportedly relies on the CARB Climate Change Scoping Plan directive for local agencies to develop a CMAP target that tracks the statewide target. (CMAP, p.2-1). The *Climate Change Scoping Plan*, Pursuant to AB 32, The California Global Warming Solutions Act of 2006 (Scoping Plan) specifically states:

"Therefore, California State government has established a target of reducing its greenhouse gas emissions by a *minimum* of 30 percent below its estimated business-as-usual emissions by 2020 – *approximately a 15 percent* reduction from current levels." (Scoping Plan, p. 24, emphasis added).

In addition to tracking emissions using these protocols, ARB encourages local governments to adopt a reduction goal for municipal operations emissions and *move toward establishing similar goals for community emissions that parallel the State commitment* to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020. (*Id.*, p. 27, emphasis added).

Notably, the Scoping Plan qualifies the 15 percent reduction from current levels as an estimate to substitute for a 30 percent reduction below BAU emissions in 2020 and is a *minimum* target. Moreover, the local government plans are meant to parallel the State commitment – not take advantage of it. Thus, the City has short-changed the CMAP process in the following ways: (1)



setting the goal as a minimum 15 percent reduction from current levels; and (2) taking credit for state and federal measures in the local CMAP.

In setting the goal at the minimum target (or slightly above), the City has left itself no margin of error. If any of the implementation measures do not work as expected, or any of the other CMAP modeling assumptions do not prove to be accurate<sup>1</sup>, the City will have left to work even more aggressively in the future to “catch up”. The City must develop a CMAP with a margin of safety built in to the reduction target to account for future unexpected increases or modeling/calculation errors.

In addition, though the Scoping Plan provides a local target of 15 percent below baseline, this number was adapted from the statewide target: 30 percent below business as usual (BAU) in 2020. (Scoping Plan, p. 24). The City chooses not to use the 30 percent below BAU target (which would be a lower target) and simultaneously takes credit for state and federal implementation measures that should be part of the BAU. As a result, 59 percent of the City’s reduction “measures” come from implementation of state and federal policies for which there is “no additional local action”. (CMAP, p. 4-7).

Thus, the City is not committing to reduce GHG emissions by 15 percent below baseline or 30 percent below BAU. Rather, the City proposes to reduce 2020 BAU emissions by *12 percent*.<sup>2</sup> Available guidance indicates the local governments should not take advantage of statewide fuel emission standards and RPS reductions in developing local plans.<sup>3</sup> In order for local plans to work in parallel with the state, as suggested in the CARB Scoping Plan, the City cannot rely on the state or federal measures over which it has no control.

## **II. The CMAP Water Efficiency Measures Will Not Increase Conservation**

The CMAP and Negative Declaration (Neg. Dec.) qualify water use efficiency improvements as an energy-reduction measure. The stated goal of water use efficiency is reducing daily per capita water consumption to achieve the SB7X goal of 142 daily gallons per capita by 2020 and 116 daily gallons per capita by 2035. (CMAP, p. ES-3, p. 4-2, Table 4-3). According to the City’s 2010 Urban Water Management Plan (UWMP), the City has already achieved this target – so no additional energy savings will result from baseline conditions. (2010 UWMP, pp. 3-6 to 3-10 [reflecting 2010 annual daily per capita water use was 127 gallons per capita per day]).<sup>4</sup>

The City should also be aware that current CEQA documentation and water supply assessments being circulated for various projects paint a different water supply picture than

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<sup>1</sup> Indeed, the City’s baseline (an average of 2004, 2007-2009) from which to calculate reductions could have been compared to the actual 1990 emissions (for which the City apparently did conduct an inventory) for a cross-reference. (Negative Declaration, p. 6). EPIC’s San Diego County GHG Inventory estimates Countywide emissions went up 18 percent from 1990. (EPIC San Diego County GHG Inventory Executive Summary, p. 3). If this holds true for the City, a 15 percent reduction in “baseline” emissions will surely fail to get us to 1990 levels in 2020.

<sup>2</sup> BAU with federal and state strategies beyond 2020 is 12,254,548. The target is 10,754,790. This is a 12 percent reduction from BAU.

<sup>3</sup> See Local Government Operations Protocol For the quantification and reporting of greenhouse gas emissions inventories Version 1.1 May 2010, pp. 23-26 (scopes and double-counting); see also, Climate Action Planning: <http://www.coolcalifornia.org/article/step-3-develop-a-climate-action-plan> (reflecting lack of reductions allocated to state or federal level measures)

<sup>4</sup> It should also be pointed out that the City’s 2020 goal in the UWMP is particularly lax as the City chose one of four options to calculate the SBX7 goal. (2010 UWMP, p. 3-10). The second available method would have set the target at 133 gpcd. (*Id.* at p. 3-8).



assumed in the CMAP. For example, the City's Environmental Impact Report (EIR) for the Shawnee/Riverbend project set for City Council review and approval on October 2, 2012 a Water Supply Assessment (WSA) contained in Appendix K. The WSA states:

The utilization of 116 gallons per person per day is the City's acceptable standard for single-family water consumption (including landscaping) and 80 gallons per person per day for multi-family water use (includes landscaping)...<sup>5</sup>

In response to the EIR and supporting WSA, CERF submitted comments questioning the reliability of the 116 and 80 gpcd figures. The City has remained steadfast in relying on this water usage assumption for an almost 1000-unit proposed project.<sup>6</sup> (See FEIR Response to Comments p. RTC-15). Thus, the City's CEQA baseline is either incorrect for the CMAP (meaning no energy reduction will be realized because water conservation targets have already been met) or for the Shawnee/Riverbend project will use more water than anticipated (meaning the City will not have enough supply to meet the water supply needs of the new project, and will have to find new sources).

Before the City claims conservation as an energy reduction measure, it must accurately and transparently quantify its current and future anticipated water supply. Until this is done, the City must assume its water efficiency measures will not only fail to result in energy reduction, but will likely incentivize water waste because of the embarrassingly low UWMP and SBX7 targets set by the City. To that end, CERF suggest the City set the following real energy efficiency reduction goals:

- 1) Develop a water supply loading order that rates energy-intensive options such as desal as a supply of last resort;
- 2) Set a SBX7 goal of 86 gallons per capita per day, following the example of Sydney, Australia<sup>7</sup> (with a similar climate)

### **III. The City's Must Prepare an EIR To Evaluate Project Alternatives**

The City's CEQA problems are two-fold: (1) the currently proposed CMAP is supported by a Neg Dec, which claims no significant environmental impacts will result from the project; and (2) the CMAP is meant to be used as a tiering document for future CEQA climate change cumulative impacts analysis pursuant to CEQA Guideline section 15183.5. (CMAP, pp. 2-2, 2-6, 2-7; Neg Dec p.1).

Although a CMAP is meant to serve as a qualified GHG reduction plan under CEQA Guideline section 15183.5, it fails to meet the applicable requirements. In doing so, the CMAP also ensures GHG emissions will continue to increase because projects which rely on the CMAP will not prepare project-specific GHG analysis or mitigate GHG impacts on a project-specific level. (Neg. Dec., p. 1). In that regard, the Neg Dec provides that adoption and implementation of the CMAP would not generate GHG emissions that may have a significant impact on the environment, but instead would reduce GHG emissions over the baseline business-as-usual condition. (Neg Dec, p.

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<sup>5</sup> WSA, p. 4, Table 3-1

<sup>6</sup> Specifically, part of the City's response was: "In addition, typical usage has for quite a while been 14 HCF, and can be seen referenced in many documents such as proposed water service rates and charges. In general, the number was identified some time ago and has not been updated. With the current conservation efforts and other factors, the actual water usage has been going down." (FEIR, p. RTC-15).

<sup>7</sup>

<http://www.cityofsydney.nsw.gov.au/environment/water/currentstatus/waterconservation/waterdemand.asp>



26). However, by implementing the CMAP, the City would actually be foreclosing meaningful project-specific analysis. Because the monitoring and inventory specifics have yet to be articulated (and many years may pass before they are developed), the City may approve numerous projects and fail to analyze the project-specific GHG impacts. (CMAP, pp. 6-1-6-2). As a result, these projects will be approved without adequate alternatives analysis or mitigation measures. Further, without specific and enforceable implementation measures, the CMAP cannot be relied upon to establish a threshold below which the contribution to GHG emissions would not be cumulatively considerable. (CEQA Guideline Section 15183.5(b)(1)(B)).

Further, the City only has a reduction target for 2020. In the interim, local GHG emissions will continue to contribute to climate change. As pointed out in the Sierra Club letter, the City will be contributing to overall GHG emissions each year until 2020, and those GHGs remain in the atmosphere for decades to 100 years. Thus, without annual, interim benchmarks and targets, the City will be exacerbating climate change until 2020 (and likely beyond since the 2020 target is not aggressive enough).

#### **IV. Conclusion**

Unless the City implements a more aggressive target for GHG emission reductions and relies on *local* measures to reduce emissions, it will not be in compliance with the local AB 32 directive. Further, if the City relies upon the CMAP for future project-specific analysis, significant impacts to GHG emissions will result. CERF urges the City to consider its role in reducing GHG emissions as the local entity with land-use authority. The City should more seriously consider implementing the General Plan policies by urging SANDAG (and using its voting power at SANDAG) to develop a Regional Transportation Plan (RTP) that prioritizes public transit instead of freeway widening. As evidenced by the current litigation against SANDAG, the RTP itself, and the metrics set in the RTP are woefully inadequate. As a leader in the region, the City can do better. CERF urges the City to comply with AB 32 and with CEQA, and go back to the drawing board.

Thank you in advance for your consideration of our comments.

Sincerely,

**COASTAL ENVIRONMENTAL RIGHTS FOUNDATION**

  
Marco A. Gonzalez

  
Livia Borak

