Federal Invasive Species Prevention Efforts Suffer Significant Litigation Defeat

Also,

NY District Court Halts Development Plans to Construct in Estuarine Sanctuary

No Easy Road to a Public Beach Easement in Rhode Island

Rivers as Legal Persons Emerge as a Solution: Acknowledge Cultural Interests and Solve Pollution
The SandBar is a quarterly publication reporting on legal issues affecting the U.S. oceans and coasts. Its goal is to increase awareness and understanding of coastal problems and issues. To subscribe to The SandBar, visit: nsglc.olemiss.edu/subscribe. You can also contact: Barry Barnes at bdbarne1@olemiss.edu.

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The SandBar is a result of research sponsored in part by the National Oceanic and Atmospheric Administration, U.S. Department of Commerce, under award NA140AR4170065, the National Sea Grant Law Center, Mississippi Law Research Institute, and University of Mississippi School of Law. The U.S. Government and the Sea Grant College Program are authorized to produce and distribute reprints notwithstanding any copyright notation that may appear hereon.

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Recommended citation: Author’s Name, Title of Article, 16:3 SandBar [Page Number] (2017).

Cover page photograph of a green anaconda courtesy of Emmanuel Keller.

Contents page photograph of the Hawaiian shore courtesy of Jens Karlsson.
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On April 7, 2017, the D.C. Circuit Court of Appeals issued its opinion in United States Association of Reptile Keepers v. Zinke. The court held that 18 U.S.C. § 42 (Title 18) of the Lacey Act prohibits only the importation of listed injurious species into the United States and shipments of injurious species between the continental United States and listed territories. This ruling struck down the longstanding interpretation of the U.S. Fish and Wildlife Service (FWS) that Title 18 also prohibited the shipment of injurious species across state lines.

Background
The Lacey Act is one of the oldest wildlife protection statutes in the United States. It was enacted in 1900 to help states protect their native wildlife by prohibiting the interstate transport of wildlife killed or taken in violation of state law. Title 18 of the Lacey Act, often referred to as the “injurious species provision,” authorizes the FWS to prohibit the importation and shipment of species “deemed to be injurious or potentially injurious to the health and welfare of human beings, to the interest of forestry, agriculture, and...
horticulture, and to the welfare and survival of the
wildlife or wildlife resources of the United States.”

On March 6, 2015, the FWS issued a regulation under
Title 18 declaring the reticulated python, DeSchauensee’s
anaconda, green anaconda, and Beni anaconda as
“injurious.” This listing was part of the FWS’s ongoing
efforts to prevent the introduction and spread of large
constrictor snakes in the United States. The FWS first took
action in 2012, listing four species as injurious: Burmese
python, yellow anaconda, and northern and southern
African pythons. The 2012 and 2015 rules prohibited both
the importation and interstate shipment of listed species.

The United States Association of Reptile Keepers
(USARK) filed a lawsuit challenging the authority of the
FWS to restrict the interstate shipment of the listed
species. While the language of Title 18 clearly prohibits
the importation of injurious species into the United States,
it does not directly refer to interstate transportation.
In addition to importation, Title 18 prohibits “any
shipment between the continental United States, the
District of Columbia, Hawaii, the Commonwealth of
Puerto Rico, or any possession of the United States.”
USARK argued that this provision bans only the shipment
of injurious species between a state in the continental
United States and either the District of Columbia, Puerto
Rico, Hawaii, or other possessions, and not the shipment
between two states within the continental United States.
The district court issued a preliminary injunction against
FWS enforcement of the rule in May 2015, after
concluding that USARK demonstrated a likelihood of
success on the merits. The FWS appealed.

D.C. Circuit Court of Appeals

On appeal, the D.C. Circuit Court of Appeals upheld the
ruling of the lower court. The court focused exclusively
on the plain language of Title 18 and its grammatical
structure. Citing the Chicago Manual of Style and
Garner’s Modern American Usage, the court noted that
the use of the word “between” to introduce multiple
items speaks to one-to-one relationships across the listed
items. According to the court, between “ordinarily
expresses nothing about relationships within any one of
the listed items.”

Applying this rule to Title 18, the court concluded
that the shipment clause “is best read – indeed can only
be read – solely to prohibit shipments from one listed
jurisdiction to another.” According to the court,
Congress’s use of “between” should be interpreted
to refer to the relationship of individual listed
jurisdictions – the continental United States (as a
whole), the District of Columbia, Hawaii, Puerto Rico,
and other U.S. possessions – to each other. Title 18
does not speak to relationships within the listed
jurisdiction. As the court stated, “[i]t would make no
sense to speak in terms of barring ‘shipments between
Puerto Rico.’”

It addition to being grammatically correct, the court
found that this interpretation was consistent with the
legislative history and evolution of the Lacey Act. The
original language of Title 18 only prohibited the
importation of injurious species into the United States,
which by statutory definition included its territories and
possessions. In 1960, Congress amended the Lacey Act
and added the shipment clause primarily to protect the mainland (i.e., the continental United States) from shipments of injurious species, such as the mongoose, from Hawaii, Puerto Rico, and other U.S. island territories. If the shipment clause prohibited the shipment of injurious species between any state, Congress’s separate reference to Hawaii in Title 18 would have been unnecessary as Hawaii became a state in 1959.

The FWS did not dispute this legislative history but argued for a broader interpretation due to the inclusion of the District of Columbia among the listed jurisdictions. If the purpose of the shipment clause was to protect the continental United States from the islands, why would Congress list the District of Columbia, which is legally part of the continental United States? The court suggested that the District of Columbia may have been included because, at the time, the District lacked legislative authority to protect itself. “Individual states, by contrast, could protect themselves by enacting their own law prohibiting the importation into their borders of invasive species.”

Conclusion
The D.C. Circuit Court of Appeals held “as a matter of law that the government lacks authority under the shipment clause to prohibit shipments of injurious species between the continental states.” The impact of this ruling is unknown at this time. Almost every state prohibits the importation, shipment, transport, and possession of invasive species. The species covered by those state laws, however, vary widely. There may be significant legal gaps in states that have not incorporated the federal injurious species list into state law.

Endnotes
1 Director, National Sea Grant Law Center.
2 852 F.3d 1131 (D.C. Cir. 2017).
4 For more information about the D.C. District Court’s ruling, see Autumn Breeden and Stephanie Showalter Otts, Court Questions FWS’s Authority to Restrict Interstate Transport of Injurious Species, THE SANDBAR 14:3 (July 2015).
6 Id. at 1138.
7 Id.
8 Id. at 1140.
9 Id. at 1142.
In 2015, the Hudson River Trust (Trust) obtained private funding to create and build a new pier in the Hudson River Park (Park) in New York. The pier would house a $200 million performing arts venue and replace the functions of the neighboring deteriorated pier by hosting movies and concerts for the park-goers. The plan proposes three performance areas that would accommodate several thousand people, as well as spaces for relaxation and cultural events. The project quickly drew controversy. Several opponents claimed that during the permitting process the U.S. Army Corps of Engineers (Corps) failed to consider that the proposed development was located in a special aquatic area. In March, the U.S. District Court for the Southern District of New York agreed and remanded the case for re-evaluation.

**Background**

Although only officially designated by law a little less than 20 years ago, the area within the Hudson River Park (Park) has a long and vibrant history dating back several centuries. In the 1400s, Algonquin tribes established the area as an important village and trading post. In the 1700s, George Washington arrived in New York just south of today’s Pier 34 on his way to command American troops. In the 1800s, the world’s first viable commercial steamboat departed from Pier 45. In the early 1900s, “the Carpathia dock[ed] at Pier 54 with 709 survivors of the Titanic disaster.” In 1998, New York passed the Hudson River Park Act, which created the well-known five-mile park and designated the area of the river that lies within the park as an estuarine sanctuary. The Hudson River Park Trust oversees administration and
development of the Park and, with private funding, sought
to create a new pier for public use within the Park.

The Trust applied for a Clean Water Act (CWA) § 404
permit from the Corps. The Corps granted the permit
in April 2016. The City Club of New York, Robert
Buchanan, and real estate mogul Tom Fox (plaintiffs)
challenged the permit in federal district court, claiming the
location was on a “special aquatic site” as defined by the
Environmental Protection Agency (EPA), and the issuance
of the permit violated the CWA and the Administrative
Procedure Act (APA).

Clean Water Act
The CWA considers dredged or fill materials to be
pollutants and does not allow the discharge of these
materials in the nation’s navigable waters without a permit.
The Corps has the authority to issue § 404 permits for the
discharge of dredged or fill materials but must follow the
guidelines set by the EPA. The EPA’s § 404 guidelines
establish criteria for activities regulated under § 404 of the
CWA. The guidelines prohibit the Corps from issuing a
permit “if there is a practicable alternative to the proposed
discharge which would have less adverse impact on the
aquatic ecosystem, so long as the alternative does not have
other significant adverse environmental consequences.” An
alternative is practicable if “it is available and capable of
being done after taking into consideration cost, existing
technology, and logistics in light of overall project
purposes.” The EPA guidelines further require the Corps to
conduct an environmental assessment (EA). In the EA, the
Corps produces a statement of findings that defines the
project’s basic purpose.

The Corps’ guidelines identify the basic purpose of a
project as “the fundamental, essential or irreducible purpose
of the project, used to determine whether the permittee’s
project is water dependent.” The Corps defined the purpose
of the Trust’s project as “[providing] a vegetated pier platform
within Hudson River State Park with an amphitheater and
public restrooms; and to continue to provide safe public
access pier structures within Hudson River Park.”

In their complaint, the plaintiffs argued that the Corps
too narrowly defined the project’s basic purpose to force
a finding that the project was water dependent. Existing law
requires that “the purposes for the project must not be
so narrow that they foreclose the consideration of
reasonable alternatives.” Additionally, the project’s basic
purpose cannot be so narrowly defined as to make its
water dependency inherent.” The plaintiffs argued that the
project was not water dependent, and a correctly defined
purpose would support this conclusion. Finally, the
plaintiffs argued the Corps did not follow the § 404
guidelines, because they should have considered practicable
alternatives, as required by the guidelines for projects that
are not deemed water dependent.

The court agreed that the agency defined the purpose
too narrowly. The court noted that the fundamental,
essential, or irreducible purpose of the project is to
provide additional public park and performance space, as
indicated by the record. A finding of water dependent
status means that the project “requires access or
proximity to, or a location on, water in order to fulfill its
basic purpose.” Providing additional public park and
performance space does not always require access or
proximity to water, and therefore is not water dependent.

When a proposed project is not water dependent,
EPA guidelines require the Corps to apply presumptions
during its analysis. According to EPA guidelines, the Corps
should have made two presumptions: 1) that practicable
alternatives are available in less sensitive areas; and 2) that these alternatives have less of an adverse impact on the aquatic ecosystem. The court held that the Corps’ analysis was too restricted; therefore, the decision to grant the permit was inappropriate.

**Conclusion**

The court ruled that the Corps violated the CWA and APA when it incorrectly defined the basic purpose and found that the project was water dependent. The pier project is not water dependent because a performance venue does not always require a location on water; therefore, the Corps should have presumed that there were practicable alternatives available and that those alternatives had a less adverse impact. The Corps and the Trust have both appealed.

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### Guilty Plea in Seafood Industry Price-Fixing Conspiracy

**Kaelyn Barbour**

In early May 2017, charges were filed in federal district court in Northern California against Bumble Bee Foods LLC (Bumble Bee) for the role it played in a scheme to fix the prices of packaged tuna fish. The charge states that Bumble Bee agreed to “fix, raise, and maintain prices of packaged seafood.” This was the first charge to be filed against a corporate defendant as a result of a federal antitrust investigation into the packaged seafood industry.

Bumble Bee has agreed to plead guilty to the price fixing charge for actions beginning in the first quarter of 2011 until the fourth quarter of 2013. Bumble Bee has consented to pay a criminal fine of $25 million. In addition to the corporation, the Senior Vice President of Sales and the Senior Vice President of Trade Marketing have also agreed to plead guilty to charges against them; both remain on paid leave. Recently, Walmart has sued Bumble Bee and two additional seafood companies, Starkist and Chicken of the Sea, alleging a price-fixing conspiracy. Look for an in-depth article on these issues in the next edition of *The SandBar.*

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### Endnotes

1. 2019 J.D. Candidate, Vermont Law School.
3. *Id.*
4. 40 C.F.R. § 230.10(a).
5. *Id.*
7. *Id.* at *8.
8. *Id.*
9. *Id.*
10. 40 C.F.R. § 230.10(a).
From Hawaii to Florida, people flock to beaches as a way to escape the burdens of life. Actually accessing the beach in some places, however, can be a burden in its own right. Recently, the Rhode Island Supreme Court ruled on whether there was a public right to access two miles of beach in the Misquamicut area of Westerly, Rhode Island. The trial judge had previously held that there was no easement creating a public beach access, because not all the original landowners signed off on the plat and it was not demonstrably clear that the landowners intended to create an easement. The Rhode Island Supreme Court affirmed.

**Background**

In 1909, a group of Westerly, Rhode Island property owners subdivided a beachfront property with an indenture and plat map (Plat and Indenture). As a result, nine specific right-of-ways were carved out for public use. Dashed lines on the map clearly listed the northern, eastern, and western boundaries of the property. However, the property line on the southern boundary used an undulating line labeled “line of foot of bank.” The beach area below this line was not divided by the kind of dashed lines used for the other boundaries.
The current property owners took action to prevent public beach access with fences and signs. The Rhode Island Attorney General, on behalf of the state, filed suit. The Attorney General asserted the existence of a public easement allowing the public to access the beach area.

Under the public trust doctrine, the state holds title to submerged land under navigable waters in trust for the benefit of the public. Each state's law regarding the extent of the rights of the public to reach the ocean differs. Under Rhode Island's public trust doctrine, the public is granted access to the shore for activities such as swimming, fishing, and seaweed collection; however, the public only has these rights in tidal waters up to the mean high tide line (MHTL). This means that the public cannot walk above the MHTL unless they have an easement created by dedication or prescription.

A valid dedication requires a “manifest intent” by the landowner to dedicate the land in question. The state argued that the 1909 Plat clearly and unambiguously demonstrates the Plattors' manifest intent to dedicate the disputed area to the public. Further, even if the 1909 Plat was ambiguous, the state claimed that the extrinsic evidence reveals the Plattors’ intent to dedicate the beach.

Trial Court
The Rhode Island Attorney General asserted that the original owners had dedicated the disputed beach area to the public in the 1909 Plat. However, four of the original property owners did not sign the Plat and Indenture, so the Plattors did not have the power to dedicate all of the land at issue. Accordingly, the trial judge ruled that the Plattors did not have the power to dedicate the entire beach area to public use. Although the judge noted that this “should end the inquiry,” he proceeded to answer the remaining legal questions, namely, whether the owners had the “manifest intent” required to dedicate the beach area to the public.

The judge ultimately concluded that the Plat and Indenture did not show a manifest intent to dedicate the beach to the public. The judge noted that specific right-of-ways existed elsewhere in the Plat; therefore, the Plattors knew how to make specific easements. If the Plattors had intended to dedicate the beach to the public via an easement, then they would have specifically done so.

The court dismissed the state's attempt to apply a doctrine known as “incipient dedication to roadways.” Under this doctrine, drawing roads as part of a plat is typically sufficient evidence of intent to dedicate land. The state argued that since the beach was drawn as a road, it meant the Plattors intended to dedicate the land. The trial judge found that the odd lines by the beach were merely intended to indicate a geographical feature, and the beach was clearly not treated as a road.

Under Rhode Island case law, when instrumentalities of a land plat are unclear - like when the lines and legend of a plat are ambiguous - courts can consider extraneous evidence to augment the plat. The state contended that the Plat and Indenture were ambiguous enough for extrinsic evidence to be introduced. However, the trial judge concluded that the Plat and Indenture were unambiguous; therefore, the judge precluded the extraneous evidence. The court noted that even if the Plat and Indenture were ambiguous, the state’s extrinsic evidence did not show a manifest intent to dedicate a public beach easement.

RI Supreme Court
On appeal, the Rhode Island Supreme Court reiterated that a valid dedication requires “manifest intent” for the landowner to dedicate the land in question. The state challenged three points that led the trial court to conclude that there was a lack of manifest intent. The state also attempted to admit extrinsic evidence.

The state first argued that the trial judge ignored key parts of the Plat and Indenture, which led to a misreading of the lines on the Plat. The Rhode Island Supreme Court was unconvinced. The court found that the trial judge “carefully analyzed the Plat’s lines and markings and the Indenture’s language.” The court reasoned that the trial judge had “correctly noted” the difference between the clear lines bordering Atlantic Ave to the north and the irregular undulating lines to the south.

The state also claimed that the trial judge improperly concluded that beach access rights were not granted by the right-of-ways. The Rhode Island Supreme Court, like the trial court, reasoned that right-of-ways on the map did not dedicate the beach area to the public. Rather, the right-of-ways demonstrated the Plattor's ability to specifically dedicate land to the public when they so chose. Therefore, if the Plattors had specifically intended to dedicate, then they would have specifically dedicated the beach as they had done with the right-of-ways.

Finally, the state asserted that the judge incorrectly limited the doctrine of incipient dedication to roadways. The court rejected this assertion. It explained that the trial judge did not limit the doctrine at all. Rather, because the doctrine is not easily assumed for non-road areas, the trial justice found that beach area dedication could not be presumed merely from the word “beach” on the Plat. The court explained that the trial judge did not render the doctrine inapplicable. Instead, the trial judge found that the intent element was simply not satisfied to dedicate the beach by incipient dedication.

The state also maintained that the trial judge should have considered extrinsic evidence despite the finding that the Plat and Indenture unambiguously showed no manifest intent.
However, the Rhode Island Supreme Court reasoned that because there was no ambiguity regarding manifest intent, the trial court was right to preclude extrinsic evidence. Nevertheless, the court addressed the state’s concerns and stated that “the extrinsic evidence does not reveal the Plattors’ manifest intent to dedicate the beach area to the public.”

Conclusion

Article I, Section 17 of the Rhode Island Constitution gives the public the right to enjoy the privileges of the shore; however, the MHTL typically serves as the boundary between public and private property, and beach access isn’t guaranteed. In this case, the court ultimately found that the public did not have a right to use the disputed area. The Rhode Island Attorney General stated, “Among all the things we hold dear as Rhode Islanders, unfettered access to our shoreline is among the highest. ... Although we are disappointed in the opinion, it was the right decision to bring the matter before the court to determine the intent of the original landowners more than 100 years ago.”

The Rhode Island Chapter of Surfrider Foundation, Save the Bay, Rhode Island Saltwater Anglers Association, Clean Ocean Access and Friends of the Waterfront Inc. all supported the state in its case to provide public access to the upland beach access and were disappointed by the loss. A representative of Surfrider noted, “It’s a shame because publicly accessible property along the coast is dwindling. So much of it has been privatized. Any time there’s a chance of making more available to the public, it’s a fight we’re willing to take.”

Endnotes

1 2019 J.D. Candidate, Tulane University School of Law.
3 Id. at 2.
7 Barbuto, 158 A.3d at 23.
8 Id. at 22.
9 Id. at 28.
11 Katie Mulvaney, R.I. high court upholds owners’ right to restrict access to Misquamicut beach, PROVIDENCE JOURNAL, May 2, 2017.
12 Id.
RIVERS AS LEGAL PERSONS EMERGE AS A SOLUTION: ACKNOWLEDGE CULTURAL INTERESTS AND SOLVE POLLUTION

Morgan Stringer

The longest litigation in New Zealand’s history has come to a close with a landmark decision: a river now has legal personhood. The Whanganui River, also known as the Te Awe Tupua, is New Zealand’s third longest river and culturally significant to the indigenous Maori. The grant of personhood will help protect the river and could prove influential in protecting other natural resources across the globe.

Whanganui River Personhood

The controversy over the Whanganui River began in 1840. That year, the British Crown entered into the Treaty of Waitangi with the Maori. The Treaty granted full rights to the Maori to land, forests, fisheries, and other possessions; however, colonists settled the land near the river, diminishing those rights. In response to the colonization, the Maori began seeking legal protection for the river in the 1870s.
On March 15, 2017 the Whanganui River received personhood through the Te Awe Tupua (Whanganui River Settlement) Bill.4 The Whanganui River is not the first natural resource granted legal personhood in New Zealand. In 2014, the New Zealand government granted legal personhood to the Te Urewera National Park, giving it the “rights, powers, duties, and liabilities of a legal person.”5 An appointed board acts as agents for Te Urewera, and they assert any claims of violated rights.6 New Zealand granted Te Urewera National Park legal personhood as a solution to a dispute over the ownership interests of the Ngai Tuhoi Iwi Tribe.

The Whanganui River Settlement Bill declares the Whanganui River is a legal person “and has all the rights, powers, duties, and liabilities of a legal person.”7 The bill also establishes a partnership between the Iwi Tribe and the Crown to represent the best interests of the river.8

Gerrard Albert, the lead negotiator for the Whanganui Iwi Tribe said, “The reason we have taken this approach is because we consider the river an ancestor, and always have[.]”9 Some may say it is strange to give a river legal personhood, “but it’s no stranger than family trusts, or companies or incorporated societies [having legal personhood],” according to Chris Finlayson, the minister in charge of negotiating the treaty.10 The settlement also calls for financial redress of NZ $80 million and an additional NZ $1 million towards setting up the river’s legal framework.11

This law will enable the Whanganui River to advocate on its own behalf. Like the Te Urewera Board, which charges two nominees with protecting the national park’s interests, the Whanganui River Board’s two nominees will represent the River.12 The river’s legal personhood now means that ownership or regulatory interests would not matter when bringing a claim, but rather, the river could instead protect its own interests and seek remedies for its harms.13

Future Implications
The Whanganui River solution has already proved influential as legal precedent. Days after the decision, citing to the
Whanganui River legislation, India gave the Ganges and its main tributary, the Yamuna, legal personhood. Like Te Urewera and the Whanganui River, the Ganges River has great cultural significance. More than 1 billion Indians believe that the Ganges River is sacred. However, the Ganges River is heavily polluted. One and a half billion liters of untreated sewage and 500 million liters of industrial waste enter the Ganges River daily. Because of this pollution, litigation ensued, claiming that the state governments of Uttarkhand and Uttar Pradesh were not cooperating with the federal government to adequately protect the Ganges from pollution.

Citing the Whanganui River decision, the high court of Uttarkhand granted the Ganges and Yamuna legal personhood. In addition to granting the rivers personhood, the court appointed three officials to act as custodians of the river and mandated the establishment of a management board within three months. In addition to the Whanganui River legislation, India gave the Ganges and Yamuna legal personhood. The court cited to the river’s religious and cultural significance and to the River’s impact on many Indians’ health and well-being. Previous attempts to clean the Ganges have failed, so this decision may empower the courts to step in to protect the Ganges from pollution and become more involved in the river’s management. This may ensure a quicker cleanup of the Ganges and a wider scope of remedies for pollution to the river.

In another case, Cetacean Community v. Bush, the plaintiffs argued that the Navy’s sonar use harmed endangered whales; therefore, the endangered whales suffered an injury and had standing to sue under the Endangered Species Act (ESA). The Ninth Circuit rejected this argument. It held that the ESA allowed only allowed persons to sue, which the ESA defined as individuals, corporations, agents, government departments, and political subdivisions. The court concluded that without explicit approval from Congress, the animals did not have standing to sue. In order for water sources to have legal personhood, Congress must redefine “person” under environmental laws to include natural resources.

Citing the Whanganui River Decision, the High Court of Uttarkhand Granted the Ganges and Yamuna Legal Personhood.

What This Could Mean
Granting rivers personhood is emerging as a solution for both incorporating indigenous views into law and for cleaning up water pollution. However, this strategy has not proven successful in the U.S. In Sierra Club v. Morton, the Sierra Club claimed that the Mineral King Valley, itself, had standing because it was subject to injury. The U.S. Supreme Court rejected this argument, holding that the persons or organizations themselves must be injured for legal standing to apply. Justice Douglas’s dissent proposed that natural resources could have legal standing if they were subject to environmental injury. He pointed out that inanimate objects often served as plaintiffs in lawsuits, such as ships in maritime cases.

Endnotes
1 2019 J.D. Candidate, University of Mississippi School of Law.
2 Daniel Melfi, New Zealand Grants Whanganui River Legal Personhood, Settles Case Dating Back to 1870s, National Post (March 15, 2017).
5 Te Urewera Act 2014 (N.Z.).
6 Id.
7 Te Awe Tupua (Whanganui River Claims Settlement) Bill 2016 (N.Z.), subpt. 2, cl. 14.
8 Id. at §§ 19-20.
9 Id.
10 Melfi, supra note 2.
12 Melfi, supra note 2.
15 Safi, supra note 14.
16 Safi, supra note 14.
17 See Safi, supra note 14.
18 BBC, India Court Gives Sacred Ganges and Yamuna Rivers Human Status (March 21, 2017).
19 Safi, supra note 14.
21 Id.
22 Cetacean Cmty. v. Bush, 386 F.3d 1169, 1173 (9th Cir. 2004).
23 Id. at 1177; See also 16 U.S.C. § 1532(13).
24 Cetacean Cmty., 386 F.3d at 1179.
Littoral Events

American Fisheries Society — 147th Annual Meeting

August 20-24, 2017
Tampa, FL

For more information, visit: https://afsannualmeeting.fisheries.org

2017 FMA Annual Conference

September 5-8, 2017
Long Beach, CA

For more information, visit: http://floodplain.org/annual-conference

32nd Annual WaterReuse Symposium

September 10-13, 2017
Phoenix, AZ

For more information, visit: https://watereuse.org/news-events/conferences/annual-watereuse-symposium