

Before the Hearings Panel
At Greater Wellington Regional Council

Under	Schedule 1 of the Resource Management Act
In the matter of	Proposed Plan Change 1 to the Natural Resources Plan
Hearing Topic	Hearing Stream 2 – Objectives and ecosystem health policies

**Statement of evidence of Gabriela Nes on behalf of Upper Hutt City Council
(Planning)
Date: 14 March 2025**

INTRODUCTION

1. My full name is Gabriela Nes (née Jimenez Rojas), and I am employed as Senior Policy Planner at Upper Hutt City Council (UHCC).
2. I have prepared this statement of evidence on behalf of UHCC in support of the UHCC submission to Greater Wellington Regional Council's (GWRC) Plan Change 1 (PC1) to the Natural Resources Plan (NRP).
3. This statement of evidence relates to Hearing Stream Two – Objectives and ecosystem health policies.
4. I am authorised to provide this evidence on behalf of UHCC.

QUALIFICATIONS AND EXPERIENCE

5. I hold the qualification of Bachelor of Urban Planning (Honours) from University of Auckland.
6. I have worked for Upper Hutt City Council as Senior Policy Planner since August 2022, in this time I have supported the development of Plan Changes, including the Intensification Planning Instrument, Rural Review and Outstanding Natural Features and Landscapes Review.
7. I am familiar with PC1 having drafted the UHCC submission on the plan change.
8. Prior to working at UHCC, I was employed by Aurecon New Zealand as an Environment and Planning Consultant. My role included the preparation of district and regional resource consents for major infrastructure projects, residential and commercial developments and the preparation and processing (on behalf of both district and regional councils) of environmental, economic, and social impact assessments, and policy research and analysis across Australia and New Zealand.
9. I am an intermediate member of the Te Kōkiringa Taumata/New Zealand Planning Institute.

CODE OF CONDUCT

10. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving oral evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

SCOPE OF EVIDENCE

11. In preparing my evidence I have relied on the following:
 - The Resource Management Act (RMA)
 - The National Policy Statement for Freshwater Management 2020 (NPS-FM)
 - The operative NRP for the Wellington Region

- The NRP PC1 Section 32 Assessment
- The NRP PC1
- The submission on NRP PC1 made by Upper Hutt City Council
- The Section 42A reports for Hearing Stream Two written by Ms O’Callahan and supporting evidence of Dr Michael Greer and Mr David Walker
- Information provided to UHCC by Wellington Water Limited (WWL)

12. For ease of administration, this statement of evidence is focused only on areas of particular concern. Where I have not commented specifically on a provision, I am generally comfortable/neutral with the recommendations proposed by Ms O’Callahan within the Hearing Stream Two section 42A reports.

General comments

13. UHCC made several general submission points on NRP PC1, which are relevant to both topics in Hearing Stream Two. Rather than repeating them in each of the topics discussed in this statement of evidence, these are identified below. For ease of reference, the submission point numbers allocated to the points raised by UHCC in the Summary of Submissions are also shown. UHCC’s general submission points are:

- [S225.002 and S225.023] That GWRC undertakes a full legal, planning and natural justice review of the provisions in light of the evolving national direction and amend PC1 to address concerns. UHCC also seeks any other consequential amendments to remedy errors and address relief sought.
- [S225.003, 026 and 027] Considers that PC1 circumvents or undermines national directives and seeks that provisions be amended to remove actions which conflict with or are more onerous than the 2023 National led government direction included in the Incoming Government Coalition agreements, November 2023 and letter from Chris Bishop dated 13 December 2023 which identifies changes to RMA, NPS-FM, NES-FW and NPS-IB prior to end of 2023.
- [S225.004] UHCC seek that further work, and consultation is undertaken in partnership with territorial authorities to accurately reflect roles and function in achieving outcomes and aspirations of Whaitua documents.
- [S225.007] Delete or significantly amend provisions which have a lack of higher order document direction or evidentiary support.
- [S225.013] Amend timeframes in NRP to give reasonable timeframes to implement new direction for landowners, ensure these are reasonable and achievable and where practicable, funded from external sources.
- [S225.017] Delete or significantly amend provisions circumventing and not giving effect to, higher order documents without clear reasoning or supporting evidence within the section 32a assessment, i.e. rules surrounding plantation forestry trying to provide a higher level of

protection than is allowed under the National Environmental Standards Commercial Forestry.

14. It is not obvious within the Section 42A reports whether consideration has been given to these submission points. As a result, I do not consider that the general comments made in the UHCC submission have been fully addressed, and some concerns remain. I am of the opinion that some provisions as recommended for amendment by the Section 42A authors still:
 - lack higher order document or evidentiary support or are beyond what can be achieved within the statutory functions provided for in the RMA;
 - cannot practically be implemented;
 - are not the most appropriate method of achieving an outcome.
15. I note that given the highly technical nature of the reports, submitters have not been given enough time to review the Section 42A report or to provide evidence, particularly given the changes proposed to the target attribute states proposed by Ms O'Callahan.
16. While I acknowledge Ms O'Callahan's intent to reduce the target attribute states in order to make them more achievable and practical within the 2040 timeframe¹, freshwater science is outside of my expertise, and I cannot estimate the implications of the reduced target attribute states as compared to as notified. However, the timeframe provided to give evidence was not sufficient for UHCC to procure the services of a freshwater scientist to review the significant amount of technical evidence and provide advice.
17. Therefore, the issues identified above would need further consideration, including whether consequential amendments would be required as a result of any further amendments proposed to address the concerns raised in this statement of evidence.

Objectives

WH.O1

18. [S225.059] UHCC supported the notified version of WH.O1 noting that the objective is aspirational and is intended to be considered as such. UHCC sought that the provision be retained as notified.
19. I support the amendment proposed to WH.O1 by the section 42A author including the specificity of changing "freshwater bodies" to "river and lakes".

WH.O2

20. [S225.060] UHCC supported the objective in principle and sought the provision to be retained as notified.
21. I support the amendments proposed to WH.O2, particularly where the section 42A author has recommended changes acknowledging that improvement should only be required where

¹ As discussed in the 42A Hearings Report: Objectives

water quality is degraded. However, I note that the drafting of subclause (b) is difficult to interpret, and I recommend the following amendment for sense and readability²:

“...(b) *natural form and character is maintained, or where degraded;*
(i) *improvement has been made to the hydrology of rivers; and erosion processes, including bank stability, are improved and*
(ii) *sources of sediment are reduced to a more natural level, and*
(iii) *the extent and condition of indigenous riparian vegetation is increased and improved, supporting ecosystem health, and”*

22. Notwithstanding the above, I remain of the opinion that the 2040 timeframe, referenced in subclause (a) which cross references to Objective WH.O9 is unachievable – as discussed in paragraphs 30 to 53 of this evidence – and I recommend this cross reference be deleted.

WH.O6

23. [S225.063] UHCC supported the intent of the provision although, was concerned that saltwater intrusion can only be managed and mitigated rather than fully avoided, and recommended an amendment to replace ‘avoid’ with ‘minimise’.

24. UHCC did not submit on the rest of the objective as it was considered that maintenance of a current state was appropriate and achievable.

25. However, I note that the amendments proposed to this objective in the section 42A report appear to make the objective more onerous than the notified version of PC1. The notified version of PC1 required that water quality was ‘maintained’, whereas the recommended amendments in the section 42A require that quality is ‘maintained and improved where degraded’.

26. Whilst it is understood that improving degraded waterbodies is consistent with Policy 5 of the NPS-FM, I am unclear at this stage whether there will also be proposed amendments to policies that give effect to this objective, in future hearing streams. As such, I wish to reserve my position until the hearings where relevant policies are addressed.

WH.O8

27. I support the section 42A report writers’ position to retain this objective as notified, nevertheless, I note that UHCC’s submission [S225.084] identifies that there may still be comments on the policies and rules that give effect to this objective. I am happy to consider this further at the relevant hearing streams.

WH.O9

General comments

28. [S225.065] UHCC supported this objective in principle and sought that it was retained as notified, however the submission noted that UHCC may still have comments on the specific policies and rules which implement the objective.

29. On a minor note – I consider that there has been an inconsistent application of the amendment of ‘all river and river reaches’ within the subclauses. It is not clear why this has

² My recommend amendment are shown in [green](#)

been changed in subclause (a) but there are still references to ‘rivers and river reaches’ in subclause (b) and (c). This leaves this objective having inconsistent terminology between its own subclauses. I recommend that this drafting is amended to be consistent for sense and clarity.

Timeframe to achieve target attribute states – 2040 vs. 2060

30. Despite the submission point noted against the provision in paragraph 28, a key part of UHCC’s submission on PC1 [S225.004, S225.008, S225.013, S225.018, S225.025] was concerns surrounding the process, timing and sequencing of requirements within the notified provisions of PC1, particularly where the practical implementation of provisions has not adequately been weighed against real-world financial and resource implications and the impact this will have on territorial authorities and crucially, our ratepayers.

31. For completeness I note that as notified, Table 8.4 – ‘Target attribute states for rivers’ sets out exceedingly unachievable and unrealistic targets within the identified timeframe of 2040.

32. I acknowledge the intent of Ms O’Callahan to make the target attribute states more achievable within the specified 2040 timeframe³:

“My recommendation for the Hearing Panels is to consider achievability, and where the evidence indicates targets will be very difficult to achieve, to reduce the target where possible, i.e. where this can be done without compromising any national bottom lines minimum required improvement that must be met under the NPS-FM.”

33. I agree with the consideration that target attribute states for part-FMUs with rural livestock must be considered differently than urban part-FMUs. Particularly given the implication in Dr Greer’s evidence identifying that a multiple attribute state improvement, could require over 90% load reductions in some areas and that this would be likely to require significant destocking⁴ alongside infrastructure upgrades in order to achieve the PC1 target attribute states.

34. However, it is the *2040 timeframe* which is highly unachievable due to the level of investment, resources and infrastructure projects it requires over the next 16 years⁵. This remains the case even with the reduced target attribute states recommended by Ms O’Callahan in the section 42A report.

35. I understand that the original draft PC1 was drafted on the basis of a 2060 timeframe. The section 32 evaluation acknowledged that the level of investment and resources required would make achieving the target attribute states by 2040 ‘very challenging’ and therefore a longer timeframe of 35 years in Whaitua Te Whanganui-a-Tara for completion of the works, was recommended to be appropriate by officers.

36. Whilst the addendum to the section 32 assessment identifies the process, within which the 2040 date was included in PC1 as notified, it does not appear to fulfil the requirements of

³ Refer paragraph 299, 300 and 334

⁴ Refer paragraph 92

⁵ As identified by our fellow territorial authorities and UHCC’s original submissions on PC1 and draft PC1

section 32 of the RMA to determine that the provision is the most appropriate way to achieve the purpose of the Act. Further, I do not consider that the section 32AA analysis provided in the section 42A adequately addresses this.

37. I call into question the justification of retaining a 2040 timeframe which is not supported by a robust section 32 evaluation, section 32AA evaluation or the economic evidence on behalf of GWRC by Mr Walker.

38. I note the section 32 addendum also states the following⁶ in regard to achievability implications:

- “Additional funding methods, such as targeted rates, water user charges and infrastructure growth charges (as used by Watercare in Auckland) should also be considered by territorial authorities to support achievement of the 2040 timeframe.
- The Council will work collaboratively with territorial authorities and Wellington Water, along with the wider community in meeting the ambitious timeframe in anyway it can in order to secure this clear community desired environmental outcome”.

39. These are long term funding options which have significant implications for territorial authorities and are unlikely to be stood up in time to meaningfully support achievement of the 2040 timeframe. It is also unclear how GWRC can work collaboratively to help territorial authorities achieve the outcomes unless it provides significant additional funding. UHCC has already increased rates by more than 19% in the 2024-2034 Long Term Plan, with over 40% of the rates collected in this year already being spent on three waters activities, which is causing financial pressure on rate payers.

40. With regards to targeted rates, I note that Wellington Water has identified that options for achieving target attribute states are either to replace all wastewater infrastructure that is in poor or very poor condition or to undertake pilot testing to achieve a better understanding of how performance standards can be met. In my opinion, I could not support targeted rates being implemented for either option at this stage, given that significant further work is required.

41. In his evidence, Mr Walker identifies that not only would a 2040 timeframe to achieve the target attribute states require a 72% step-change increase to Upper Hutt rates, maintained for 16 years⁷, but it would also require a 162% step-change in employment of heavy and civil construction workers (from 100% to 262%) to complete the wastewater and stormwater infrastructure upgrades⁸. Mr Walker additionally identifies that this employment boom would need to occur immediately to complete the infrastructure upgrades required by 2040.

⁶ Refer page 33

⁷ Refer paragraph 38.1

⁸ Refer paragraph 57

42. I note that Mr Walker's evidence and the underlying assumptions for the estimates provided do not appear to include operational costs or debt financing costs, both of which will have an additional (and potentially significant) rates impact for the territorial authorities.
43. WWL has also provided information to show that high level costs, without land acquisition, to treat 100% of permeable areas could be up to \$8.26 billion for the region and up to \$1.36 billion specifically for Upper Hutt (or over \$90m per year for Upper Hutt over the next 15 years).
44. In addition to the above, I am concerned that while Mr Walker's evidence identifies that achieving the *E. coli* minimum required improvement (MRI) would likely be more achievable than the *E. coli* and proxy metals (zinc and copper) target attribute states as notified in PC1, it is not clear whether the achievement of the 'MRI' scenario also includes the proxy metals. From my understanding the scenarios that should have been considered are:
- (i) Achieving the target attribute states for *E. coli* and metals (zinc and copper) in PC1 as notified on 30 October 2023.
 - (ii) Achieving the target attribute states for proxy metals (zinc and copper) as notified in PC1 and the reduced minimum required improvement targets for *E. coli*
 - (iii) Achieving reduced proxy metals targets and minimum required improvement targets for *E. coli* as proposed by the section 42A report.
45. It is unclear from the evidence which of the second two scenarios (ii or iii) have been considered by the economic evidence, or if the MRI scenario is only for *E. coli* and does not consider the proxy metals at all – which has further implications for the costings identified within the economic evidence.
46. Despite this, Mr Walker identifies that achieving the 'MRI' (noting that it is not clear what this includes) would still require a 20-69% increase in employment⁹ – which would need to be stood up instantly. In comparison, for a longer timeframe (i.e. the 30-year timeframe associated with 2060), the workforce needed to deliver the capital works to contribute to the achievement of the PC1 metals and *E. coli* TAS will be more similar to the size of the workforce today.
47. I also note – in regard to scope of submissions that the UHCC submission and that of other territorial authorities did not necessarily question or raise concerns surrounding the target attribute states, but instead our concerns surrounded the implications of the 2040 timeframe itself.
48. On this basis, and for the reasons considered in UHCC's original submission and feedback on draft PC1, I consider that the 2060 timeframe is the only appropriate approach to the achievement of water quality targets for the region, given the real-world financial and resource implications (and in fact impossibilities) which would be required for a 2040 timeframe. Even with a longer timeframe, this still represents a significant rates increase.

⁹ Refer paragraph 59

49. Reducing the target attribute states does not negate the level of resources and funding required which needs longer than 16 years to stand up, consent, build, test and complete infrastructure upgrades to a stage that they are able to meaningfully contribute to achieving the water quality outcomes sought.
50. As a result, I recommend that the timeframes within Table 8.4 be changed to 2060 and any consequential amendments within objectives or additional provisions which are required to reflect the 2060 date.

Subclauses (d) and (e)

51. Beyond the implications of the 2040/2060 timeframes, I agree with Ms O’Callahan that prioritising areas where human health is most likely to be impacted by poor water quality is an appropriate approach and support the amendments to prioritisation clause (d) for WH.O9. However, I note that prioritisation in an objective is not usual drafting and as such could be more appropriate in a supporting prioritisation policy which implements the objective, but I am happy to leave this to the discretion of the Hearing Panel.
52. Further I acknowledge that Ms O’Callahan has sought to make it clear that any single consent cannot achieve the ‘state of the environment’ outcomes sought by the target attribute states by making amendments to subclause (e)¹⁰. However, it is my opinion that the objective, as drafted in Appendix 4, does not adequately reflect this intent and is still subject to interpretation by a processing planner in the future who may seek to implement section 104 tests against a resource consent application – such as will be required when WWL’s global stormwater and wastewater network discharge consents are renewed.
53. I note Dr Greer’s evidence that¹¹:

“To date the biophysical effects of the proposed provisions have not been explicitly modelled, although I understand that this is in process. Consequently, the collaborative modelling project (CMP) and biophysical science program (BSP) scenario testing outputs still represent the best available information that can be used to assess the extent to which the proposed provisions will contribute to achievement of the.. TAS”

and that the CMP and BSP modelling was used to inform the section 32 analysis to the panel with a broad indication of the potential effectiveness of the PC1 provisions.

54. As result, given the final ‘effectiveness of provisions’ modelling is not complete, I recommend that flexibility within the provisions would be beneficial while still seeking to achieve the outcomes sought in the objective.
55. To address the concerns raised in this evidence whilst still supporting meaningful progress towards the target attribute states, I recommend the following amendment to Objective WH.O9¹²:

¹⁰ Refer paragraph 334 of section 42A Hearings Report: Objectives

¹¹ Refer section 2.2.1

¹² My recommended amendments are shown in [green](#)

Objective WH.O9 Water quality, habitats, *natural form and character*, water quantity and ecological processes of rivers are maintained or improved by ensuring that:

- (a) where a target attribute state in Table 8.4 is not met, the state of that attribute is improved *throughout in all rivers and river reaches in* the part Freshwater Management Unit so that *it contributes towards achieving the* target attribute state *is met* within the timeframe indicated within Table 8.4, and
- (b) where a target attribute state in Table 8.4 is met, the state of that attribute is at least maintained in all rivers within the part Freshwater Management Unit, and
- (c) where any attribute in any river or river reach is in a better state than the target attribute state, that attribute is *at least* maintained at the better state *in every river or river reach*, and
- ~~(d) where a huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) and is not achieved, the state of the river or river reach is improved.~~
- ~~(d) where improvements are required to existing wastewater or stormwater networks:~~
 - ~~(i) prioritise *E. coli/enterococci* reductions that contribute to achieving the targets for primary contact site locations in Table 8.3, ahead of coastal targets in Table 8.1A and then the broader part Freshwater Management Unit *E. coli* targets in Table 8.4.~~
 - ~~(ii) prioritise dissolved copper and dissolved zinc reductions in locations where macroinvertebrate target attribute state(s) in Table 8.4 are not met once the priorities in clause (i) above have been addressed.~~
- (e) the targets in Table 8.4 are managed and monitored at a part Freshwater Management Unit level, by the Council on behalf of mana whenua and the wider community, and, where specific policies and rules are included in this chapter of the plan to manage an activity, and:
 - ~~(i) when the specific policies and rules are fully satisfied, then the target attribute states can be considered to be consistent with this objective; or~~
 - ~~(ii) when the specific policies and rules are not satisfied, then an assessment of the impact of an activity or discharge on the achievement of the target attribute states will be required; or~~
 - ~~(iii) where policies and rules are not included in this chapter to manage the proposed activity, then an assessment of the impact of an activity or discharge on the achievement of the target attribute states will be required.~~

56. I consider this would create a consenting pathway which recognises that a particular activity or project may not achieve a target alone but can make progress towards it alongside other activities including non-regulatory actions. Without the amendment recommended above, I am concerned that there is unlikely to be a consent pathway for some activities that contribute to achieving a target attribute state but cannot demonstrate that they are consistent with the objective.

New objective WH.O10

57. As this is a new objective proposed by Ms O'Callahan, UHCC did not specifically seek relief in relation to this provision.
58. I agree that the target attribute state timeframe is arguably not long-term given it is only a single generational change period of 17 years post-notification of PC1.
59. I have noted my reasoning against the 2040 timeframe above, supported by GWRC's own section 32 evaluation and economic evidence. I repeat these concerns here in regard to a 2030 interim timeframe. As Mr Walker notes within his evidence, Long Term Plans (LTPs) for 2024-3034 have already been set. At the very least these are not required to be reviewed until 2027 at which time new or additional interventions are constrained to occur within that 3 year period prior to the 2030 target identified in WH.O10.
60. I note that Dr Greer's evidence (which has informed Mr Walker's costings) assumed that 'no load reduction' or a '0% load reduction' would be required in order to maintain current/baseline states. Bearing in mind, it is likely that even the maintaining of existing water quality will require additional investment/intervention as discharge quality can be disrupted by growth and impacts such as leaks etc. I consider this is a gap which has not been well considered within the supporting evidence.
61. In his evidence¹³ Mr Walker notes that it is likely that budgeted LTP spending may be lower than is required to directly tackle water quality improvement. It is impossible to tell how much investment is required to achieve *maintenance* of current states given this has not been considered – however given the timing of Hearing Stream 2, it is a certainty that achieving this target was not a consideration when LTP financials and rates increases were being set last year.
62. Information supplied by WWL also identifies that these costs are not well understood, that the rate of renewals in the Wellington region has historically been below asset replacement lives and is not currently funded or resourced to increase markedly – so *“there could real risk that more problems would be identified through investigations than could be fixed”*.
63. Moreover, I note that UHCC has proposed levels of funding in the LTP that are capped by what is considered to be affordable to ratepayers.
64. As a result, I consider that given the amendments I have proposed to WH.O9 to extend the implementation timeframe to more long term timeframe of 2060, that WH.O10 should be amended to a 2040 date – reflecting the interim phase while still being cognisant of the lag time likely to be needed to see such results in the monitoring.
65. Should the Hearings Panel not consider this to be appropriate – I recommend the new objective WH.O10 be deleted in its entirety.

¹³ Refer paragraph 30 and 52.2

Ecosystem Health and Water Quality Policies

WH.P1

66. [S225.066] UHCC supported this provision in part, however expressed concerns about the practicality of working to reduce all the identified contaminants at once and sought the clarification of whether the subclauses are able to be achieved within the relevant planning cycle and sought consideration of a more prioritised approach.
67. I support the amendment proposed by Ms O’Callahan to make it clear that improvement should only be directed and required where a target attribute state or coastal objectives are not met. This amendment will ensure that improvement efforts are directed which require intervention rather than areas where water quality targets are already met, effectively prioritising these locations.

WH.P2

68. [S225.067] UHCC opposed the provision and the prohibition of development as it limits options to give effect to NPS-UD and overrides District Plan changes and reviews currently underway or proposed in future. UHCC identified that greenfield development has more opportunity to address effects, particularly given space available to incorporate design and infrastructure solutions when compared to constrained urban environments.
69. Further this submission point noted that the prohibition within this policy and direction in the objective above it would render any future plan change an impossibility as it wouldn't implement higher order documents (i.e. the objectives and policies of the NRP) and thus would fail to meet the section 32 evaluation requirements.
70. UHCC sought that clause (a) of the policy be amended to instead ‘manage’ unplanned greenfield development.
71. I support and agree with the deletion of the policy recommended by Ms O’Callahan.
72. I note that the issues regarding the prohibition of development remain a concern, but I am happy to leave these issues to be considered at the relevant hearing stream.

WH.P4

73. [S225.069] UHCC supported the intent of the policy, however considered that the achievement of the target within the identified timeframe was overly ambitious, reflecting our general submission points surrounding timeframes within the NRP discussed earlier in this statement of evidence.
74. I note that as with the objectives, Ms O’Callahan’s preference was to modify the targets that are unlikely to be achieved rather than extend the timeframe due to the risk of delayed action.
75. It is my understanding that Table 8.5 converts the suspended fine sediment target attribute state (also referred to as visual clarity) identified in Table 8.4 into an annual average load reduction. I note that Ms O’Callahan has recommended an amendment for visual clarity target attribute state for Mangaroa River in recognition of the fact that peat has an impact on visual

clarity in that river, and subsequently has amended the proposed load reduction in Table 8.5 to reflect this change in baseline state.

76. I support the amended target in principle but as discussed in paragraph 15, have not had the time to engage a water scientist/freshwater engineer to determine whether the reduced load reductions identified in the amended Table 8.5 is actually achievable.

Conclusion

Overall, I consider that some of the key issues raised by UHCC have not been adequately addressed. I, therefore, recommend amendments to the following provisions for the reasons set out in this statement of evidence:

- Objective WH.O2
- Objective WH.O9
- Objective WH.O10

Gabriela Nes

BUrbPlan(Hons), NZPI.Int

Senior Policy Planner

A handwritten signature in black ink, appearing to read 'Gabriela', is centered on a light gray grid background.