Exhibit F

Public Comments Received for

File Nos.: PGPA19-004 and PSP19-001
Good morning,

Please see attached Comments on South Ontario Logistics Center Specific Plan: Environmental Assessment, General Plan Amendment, And Specific Plan Review For File Nos. PGPA19-004 AND PSP19-001.

If you have any questions, please contact Aidan Marshall.

Thank you.

Alisha Pember

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Via Email Only
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Alexis Vaughn, Assistant Planner
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Re: Public Hearing Item C: Comments on South Ontario Logistics Center Specific Plan: Environmental Assessment, General Plan Amendment, And Specific Plan Review For File Nos. PGPA19-004 AND PSP19-001

Dear Planning Commission Members and Ms. Vaughn:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARECA"), to provide comments on Public Hearing Item C, "Environmental Assessment, General Plan Amendment, and Specific Plan Review for File Nos. PGPA19-004 and PSP19-001" for the South Ontario Logistics Center Specific Plan Project (collectively, “the Project”). The environmental assessment is a Draft Environmental Impact Report ("DEIR") prepared by the City of Ontario (“City”) for the South Ontario Logistics Center Specific Plan (SCH No. 2021010318).

CARECA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. The coalition includes Ontario residents Ricardo Cuevas, Irvin Cruise, Luis Garcia, Jaime Paredes, John Fierro, the District Council of Ironworkers, and Southern California Pipe Trades DC 16, along with their members, their families, and other individuals who live and work in the City of Ontario.
The proposed Project consists of a General Plan Amendment, Specific Plan, Development Plan Review, Tentative Parcel Maps, and a Development Agreement to allow for the development of an industrial and business park encompassing 23 parcels totaling 219.39 acres in the City of Ontario, San Bernardino County, California. The proposed Project site is on a total of 219.39-acre site bound by Eucalyptus Avenue to the north, Campus Avenue to the west, Merrill Avenue to the south, and Grove Avenue to the east. The Project is proposed in two phases. Phase 1, comprised of Planning Areas ("PAs") 1 and 2, would allow approximately 3,174,518 sf of industrial and business park uses. Phase 1 consists of the construction of Buildings 1 through 8 and includes the Development Plan for PAs 1 and 2. The DEIR also evaluates, at a programmatic level, potential future development of Phase 2, comprised of three future planning areas (no specific development proposals have been identified for the Phase 2 area). Furthermore, pursuant to the Housing Accountably Act, or Senate Bill 330 (SB330), the Project will create an Overlay District on an “SB330 Replacement Site” to increase the residential zoning capacity by 1,352 units, which will offset the loss of residential zoning capacity within the Project site. In order for this Overlay District to be approved, a Zone Change and General Plan Amendment are required.

On January 3, 2022, we submitted comments on the Project’s DEIR. The evidence presented in our initial comments shows that the DEIR does not accurately disclose, analyze, and mitigate potentially significant air quality, agricultural, public health, GHG, energy, transportation, and biological resources impacts. The public comment period on the DEIR closed just two weeks ago. The City has not yet responded to our comments or the DEIR comments of any other members of the public or responsible agencies, and has not revised or recirculated the DEIR in response to our comments. The Staff Report explains that the City has not yet prepared the Final EIR.\(^1\) It is therefore premature for the Planning Commission to recommend certification of the Final EIR or approval of the Project to the City Council.

And as will be discussed below, the Planning Commission lacks substantial evidence to make, or recommend that the City Council make, the requisite findings to approve the Specific Plan and General Plan Amendment. The Planning Commission also cannot make, or recommend that the City Council make the requisite findings to cancel the Williamson Act contracts on the Project site at this time.

\(^1\) Staff Report, p. 29.
For these reasons, CARECA urges the Planning Commission not to take any action on the Project at this hearing. Instead, the Commission should continue today’s recommendation hearing to a future date after the City has responded to all comments on the DEIR and prepared a legally adequate Final EIR pursuant to CEQA.

I. It is Premature to Recommend Approval of the Project

It is premature for the Planning Commission to make a recommendation regarding approval of the Project at this time because the City has not reviewed or responded to comments on the Draft EIR. The Planning Commission Staff Report states that “[r]esponses to comments are being prepared by the Project Applicant and consultants and will be provided with the Final EIR to be reviewed and considered by the City Council.” Written responses to comments are required by CEQA. In order to address environmental issues raised in public comments, the City may need to make modifications to the Project or consider alternatives and additional mitigation that is not currently proposed in the DEIR or as part of the Project. CARECA urges the Planning Commission to remand the DEIR back to Staff to allow for preparation of a legally adequate Final EIR before making any recommendation to the City Council.

II. The Planning Commission is Precluded from Making the Requisite Findings to Approve the Specific Plan and General Plan Amendment At this Time.

Section 4.01.035(D) of the City of Ontario Development Code ("ODC") provides that an application to adopt, amend, or supplement a Specific Plan shall be denied if one or more of the below listed findings cannot be clearly established:

1. The proposed Specific Plan, or amendment thereto, is consistent with the goals, policies, plans and exhibits of the Vision, Policy Plan

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2 Staff Report, p. 29.
3 CEQA Guidelines Section 15088 (B) (The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency’s position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice).
(General Plan), and City Council Priorities components of The Ontario Plan;

2. The proposed Specific Plan, or amendment thereto, would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City;

3. In the case of an application affecting specific property(ies), the proposed Specific Plan, or amendment thereto, will not adversely affect the harmonious relationship with adjacent properties and land uses; and

4. In the case of an application affecting specific property(ies), the subject site is physically suitable, including, but not limited to, parcel size, shape, access, and availability of utilities, for the request and anticipated development.

Similarly, ODC Section 4.01.025(D)(3)(b) provides that a General Plan Amendment is justified if the proposed General Plan Amendment would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

Here, the Planning Commission lacks substantial evidence to find that the Project's approvals would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City, due to the Project's unresolved environmental and public health impacts. To begin with, the Project's DEIR identifies significant and unavoidable impacts to agricultural resources, air quality, cultural resources, greenhouse gases, and transportation/traffic. And beyond the impacts identified in the DEIR, our comments on the DEIR identify potentially significant impacts that the City did not adequately disclose, analyze, or mitigate. These include impacts on air quality, public health, greenhouse gas emissions, energy, transportation, and biological resources. Since the City has not yet corrected the DEIR's flaws, there is substantial evidence demonstrating that the Project, as currently proposed, has several unmitigated significant impacts which preclude the findings required by the ODC. Until the errors and omissions in the DEIR are corrected, and additional mitigation is applied to the Project to further reduce significant impacts, the Planning Commission lacks the requisite substantial evidence to find that the Project’s approvals would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

The Planning Commission also lacks substantial evidence to find that the proposed Specific Plan will not adversely affect the harmonious relationship with
adjacent properties and land uses. The City’s Staff Report and the DEIR acknowledge, in Impact 5.2-3, that the Specific Plan would not be harmonious with adjacent properties and land uses:

Development of the City in accordance with TOP would increase the amount of nonagricultural land uses. When nonagricultural land uses are placed near agricultural uses, the odors, noises, and other hazards related to agriculture conflict with the activities and the quality of life of the people living and working in the surrounding areas. Consequently, conversion of agricultural uses in the city may cause farms and agricultural land uses outside the City to be converted to nonagricultural uses because of the nuisances related to agriculture. Impact 5.2-3 would remain significant and unavoidable. Therefore, a Statement of Overriding Considerations would be required.

Since the DEIR identified this impact as significant and unavoidable, the Planning Commission is precluded from finding that the Project approvals will not adversely affect the harmonious relationship with adjacent properties and land uses.

III. The Planning Commission Cannot Make or Recommend Making the Requisite Findings to Approve the Tentative Parcel Map

The proposed Project includes a Tentative Parcel Map to allow for the development of an industrial and business park on approximately 219 acres. According to the ODC, a tentative parcel map shall be denied if one or more of the below listed findings cannot be clearly established:

1. The proposed map is consistent with the goals, policies, plans and exhibits of the Vision, Policy Plan (General Plan), and City Council Priorities components of The Ontario Plan, and applicable area and specific plans, and planned unit developments;
2. The design or improvement of the proposed subdivision is consistent with the goals, policies, plans and exhibits of the Vision, Policy Plan (General

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4 ODC Section 4.01.035(D)(4).
5 Planning Commission Staff Report, File Nos. PGPA19-004 and PSP19-001 (January 25, 2022) pg. 23.
6528-006acp
Plan), and City Council Priorities components of The Ontario Plan, and applicable specific plans and planned unit developments;
3. The site is physically suitable for the type of development proposed;
4. The site is physically suitable for the proposed density of development;
5. The design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
6. The design of the subdivision or type of improvements are not likely to cause serious public health problems; and
7. The design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.\(^6\)

Here, due to the Project’s significant and unavoidable impacts, and otherwise unresolved significant environmental impacts, the Commission cannot clearly establish all of the above findings at this time.

IV. The Planning Commission Cannot Make or Recommend Making the Requisite Findings to Cancel the Williamson Act Contracts

The Project would require the cancellation of several Williamson Act contracts. At the time of the publication of the Notice of Preparation, there was an active Williamson Act Contract (Contract #72-392) on APN 1054-051-01, 02 and 1054-061-01, 02. A notice of nonrenewal was recorded for that contract, starting the process to terminate the contract. There are also several active Williamson Act contracts located within the SB330 Replacement Site. The DEIR states that “[o]nce development is proposed for the SB330 Replacement Site, a notice of non-renewal may be recorded, starting the process to terminate these contracts.” The DEIR states that “[c]ancellation of any site will comply with provisions and requirements identified at Government Code (GC) §51280 et seq. [the Williamson Act].”\(^7\) But the DEIR lacks substantial evidence to support this claim because the City will not be able to make the requisite findings to cancel the Williamson Act contracts. For the same reason, the Planning Commission is precluded from recommending the approval of this Project until these issues are resolved.

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\(^6\) ODC Section 4.02.095 (D).

\(^7\) DEIR, pg. 4.1-5.
In order to cancel a Williamson Act contract, cancellation must be (1) consistent with the purposes of the Act, or (2) in the public interest. A cancellation of a contract is consistent with the Act if the decisionmaker makes all of the following findings:

(1) That the cancellation is for land on which a notice of nonrenewal has been served pursuant to Section 51245.
(2) That cancellation is not likely to result in the removal of adjacent lands from agricultural use.
(3) That cancellation is for an alternative use which is consistent with the applicable provisions of the city or county general plan.
(4) That cancellation will not result in discontiguous patterns of urban development.
(5) That there is no proximate noncontracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or, that development of the contracted land would provide more contiguous patterns of urban development than development of proximate noncontracted land.

Cancellation of a contract is in the public interest only if the decisionmaker makes the following findings:

(1) that other public concerns substantially outweigh the objectives of this chapter; and
(2) that there is no proximate noncontracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or that development of the contracted land would provide more contiguous patterns of urban development than development of proximate noncontracted land.

For determining whether cancellation is consistent with the Act or in the public interest, the Act explains that “the uneconomic character of an existing agricultural use shall not by itself be sufficient reason for cancellation of the contract... The uneconomic character of the existing use may be considered only if there is no other reasonable or comparable agricultural use to which the land may be put.”

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8 Gov. Code Section 51282(a).
9 Gov. Code Section 51282(b).
10 Gov. Code Section 51282(c).
11 Gov. Code Section 51282(d).
5326-006acp
Here, the DEIR puts forth one reason for cancelling the Williamson Act contracts on the Project site: their uneconomic character. The DEIR variously states:

Ontario’s future development emphasizes mixed-use, commercial, industrial, and residential projects rather than supporting the continuation of agricultural uses, which are becoming less economically viable;\textsuperscript{12}

Existing agricultural uses within the City are becoming economically unsustainable and represent land uses that are increasingly incongruous with continuing urbanization of the City;\textsuperscript{13} and

Economic viability of agricultural uses in the City has declined as a result of losing many of the necessary support services. Increasing urbanization, rising land values, and relatively high operational costs have also put City agricultural and dairy farming uses at a competitive disadvantage in regional markets. Ultimately, the long-term viability of agriculture within the City is limited due to the increasing land values, increased water costs, higher labor costs, higher property taxes, competition from other parts of the state, and the growing urbanization of the area.\textsuperscript{14}

Since the DEIR makes it clear that the uneconomic character of the Williamson Act contracts is the sole reason for their cancellation, the Planning Commission is unable to make the requisite findings to cancel the contracts at this time.

Further, the Commission will not be able to find that cancellation is consistent with the purposes of the Act at this time because cancellation is likely to result in the removal of adjacent lands from agricultural use. The DEIR acknowledges that as the agricultural uses diminish, so too are the necessary support uses such as feed stores, agricultural equipment sales and rentals, and manure services. And the Planning Commission Staff Report states that conversion of agricultural uses may cause nearby agricultural uses to be converted to nonagricultural uses because of the nuisances related to agriculture. Thus,

\textsuperscript{12} DEIR, pg. 4.1-3.
\textsuperscript{13} DEIR, pg. 4.1-12 – 13.
\textsuperscript{14} DEIR, pg. 4.1-13.
cancellation will likely result in removal of adjacent agricultural lands without adequate mitigation, and is inconsistent with the purposes of the Act.

As a result, the City will not be able to make the requisite findings to cancel the Williamson Act contracts.

V. CONCLUSION

For these reasons, CARECA urges the Planning Commission to continue its recommendation hearing on the Project until a legally adequate Final EIR has been prepared for the Project which fully analyzes and mitigates the Project's potentially significant environmental and public health impacts. We thank you for the opportunity to provide these comments.

Sincerely,

[Signature]

Aidan P. Marshall

APM:acp
Good afternoon,

Confirming receipt of your comments below and attachments. I have confirmed both links work and saved all items to the file.

Thank you,

Alexis Vaughn, Assistant Planner
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ments into the record for this hearing.

thank you

--
Mary Ann Ruiz
Chair, Sierra Club San Gorgonio Chapter

--
Mary Ann Ruiz
Alexis Vaughn, Assistant Planner  
1/25/2022  
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303 East “B” Street  
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Project Title/File No: South Ontario Logistics Center Specific Plan EIR (PSP19-001/PGPS19-004)

Dear Planner Vaughn:

Thank you for the opportunity to provide comment on the subject project through the public hearing January 25 at 6:30 pm, with written comment due by noon that day.

I am writing as a resident of the neighboring city of Chino regarding the impacts of this massive warehouse proposal on current agricultural lands. The unavoidable significant impacts of this project on our region are of great concern. Our communities are already heavily impacted by logistics development and the diesel truck traffic involved.

Of primary concern is the poor air quality in our region, and the resulting public health impacts. Attached with this letter you will find a research report from April of 2021 about the impacts of logistics on warehouses and pollution. Also attached is a recent news article about the effects of growing up with smog. I hope you will take the time to review this information and consider the health of our communities as you review the DEIR for this project.

Here in the Inland Valleys, we are losing our rich agricultural heritage and open working lands. These lands sequester carbon, provide green spaces and storm water retention. The lack of vision by local politicians for preserving these lands for sustainable agriculture mixed with livable communities is disappointing. Local small farms, training in farming, open space improvements such as restoring native habitat, and residential communities mixed in could address so many issues we have in this community. Approving massive warehouses with all the problems they bring does nothing for the community.

Jobs that come with these projects are typically low paying, physically demanding jobs with no upward mobility. Many jobs are rapidly replaced through automation. Our workforce deserves better opportunities.

Vehicle Miles Traveled and greenhouse gas emissions contribute to climate change and our warming planet. Here in the Inland Valley, we are already experiencing hotter summers, cooler
winters, and drought conditions. Approving this project increases local VMT and spews diesel and gas emissions throughout our communities.

Attached you will also find the California Attorney General’s Warehouse Best Practices and Mitigation Measures to Comply with CEQA. I hope you will consider these best practices as you review this project. You will also find attached the recent settlement regarding the World Logistics Center project in Moreno Valley. Please note the many mitigations that developers and city officials agreed to for this project and incorporate them into your planning.

As a resident of the adjoining City of Chino, I strongly urge you to pause approvals for warehouse projects in Ontario. Invoke a moratorium on all current and future warehouse projects while the Planning Commission, your City Planners, and your City Council educate themselves on the harmful impacts of these projects.

Thank you for your attention to my concerns and this information.

Sincerely,

Mary Ann Ruiz
Chair, Sierra Club San Gorgonio Chapter
Growing up with smog leads to health issues

Researchers say those living in regions with high levels of air pollution suffer from lifelong problems

By Claudia Boyd-Barrett
"Correspondent"

Amparo Miramontes and her husband thought they'd found the perfect place to raise a family when they moved with their baby daughter from Burbank to Fontana in 2010. They bought a spacious, five-bedroom home for a fraction of the cost of anything equivalent in the San Fernando Valley. The neighborhood was safe, rural and friendly. They barely noticed the nearby landfill and the small but growing collection of online shopping warehouses.

Then they started getting sick. Miramontes was constantly wiping mucus from her daughter's nose and taking her to the pediatrician's office to be treated for respiratory infections. Allergies, the doctor said.

Within a couple of years, Miramontes herself was struggling to breathe. At 34, she was diagnosed with asthma, even though she had no history of the condition. When she became pregnant with her second child in 2013, the doctors induced the baby four weeks early because Miramontes' oxygen levels were dangerously low. Her newborn son also had breathing difficulties.

"Finally I started asking the question: What could cause this?" Miramontes said. "I talked to the doctor about it and he told me there was something called PM 2.5 (referencing fine particulates in smoggy air), and that it was linked to a lot of symptoms they were seeing all over the world for kids exposed to high pollution levels."

Researchers have known for decades that air pollution is bad for people's health, but only recently have they begun to understand the full extent of the danger. Babies and young children are especially at risk from toxins

SMOG»PAGE7

Kevin and Amparo Miramontes, with their children Ari, 12, Lucas Orion, 8, and Echo their dog, stand near an industrial park and landfill across the freeway and less than a mile from their home in Fontana on Dec. 12.

PHOTOS BY MINDY SCHAUER — STAFF PHOTOGRAPHER

Homes and industrial buildings closely coexist in the Southridge Village area of Fontana. Community members began a coalition in an effort to prevent the city from allowing more warehouses to be built.

Smog
FROM PAGE 1
in the air because their bodies are still developing, and they breathe in proportionally more air than adults. New research suggests that growing into adulthood in smoggy communities can result in permanent, life-altering damage. An ongoing study of more than 12,000 school children by USC found that those exposed to high levels of air pollution had smaller and more unhealthy lungs by the time they reached adulthood than did those who breathed cleaner air. Now, researchers are looking into the possibility that early exposure to smog might even alter DNA, possibly harming subsequent generations.

Stanford University researchers recently discovered that breathing dirty air alters gene expression in young children in a way that could predispose them to heart disease as adults. A growing number of studies have linked early exposure to air pollution to other, potentially life-long ills including obesity, developmental delays, ADHD, autism, preterm birth and birth defects.

“There’s just an enormous body of evidence that suggests these early windows of exposure” affect children’s health, said Tracy Bastain, an associate professor in the Department of Population and Public Health Sciences at USC’s Keck School of Medicine.

“Air pollution impacts can be (felt) across the lifespan and these early periods, especially prenatal periods when the fetus is developing, and during the early childhood periods ... are particularly sensitive.”

Children in the Inland Empire are among those at highest risk. The region is the smoggiest in the nation, according to the American Lung Association. Specifically, San Bernardino and Riverside counties rank among the top 10 counties in the United States for year-round particle pollution, a precursor to smog that includes PM 2.5, or particulate matter 2.5 — tiny, airborne droplets that penetrate deep into the lungs and are linked to increased rates of respiratory illness, heart disease and premature death.

The problem has worsened in San Bernardino County since about 2015 when air pollution levels started ticking up after years of decline. Riverside County has fared better, but the number of high ozone days also has been trending upward. Both counties received a “Fail” grade for air quality in the American Lung Association’s most recent State of the Air report.

Now, some parents in the Inland Empire are sounding the alarm. They say their kids are battling asthma, persistent nosebleeds and other ailments that studies show can be linked to air pollution.

Many believe the recent drop in air quality is the result of an explosion in online shopping warehouses and logistics led by retail giant Amazon, a trend that is driven by soaring consumer demand for home-delivered goods. The new industry has brought heavy truck and freight traffic off the freeways and into communities such as Fontana and San Bernardino. That's on top of the region’s existing geographic and topographic challenges, particularly its location beside several mountain ranges, which results in the accumulation of pollution that originates in coastal areas such as Los Angeles and Orange counties.

Many researchers say climate change is almost certainly playing a role in the new wave of pollution. Hotter temperatures combined with traffic exhaust creates ideal conditions for the formation of smog. Climate change also is making wildfires more
common and bigger, creating longer periods of elevated smoke in the region’s air — another reason behind the downturn in local air quality.

Dr. Afif El-Hasan, a San Juan Capistrano pediatrician and a spokesperson for the American Lung Association, said people should be “extremely concerned” about pollution levels in the Inland Empire and the risks to children living there. In the short-term, air pollution inflames children’s airways and affects their ability to fight off infection, leading to more frequent asthma attacks and respiratory illnesses. In the long-term, he said, those children are more likely to develop heart disease, cancer, emphysema and other health problems as adults.

“If you’re basically condemning these children to reduced lung capacity for their lives and not giving them healthy air to breath, they’re going to have problems later on, whether it’s going to be directly in the lungs or in another part of their bodies,” El-Hasan said.

Unless action is taken to clean the region’s air, he said, “it is going to affect the allocation of resources later on, when all of these kids whowere exposed to all this air pollution become very sick and require expensive treatment.”

Dr. Brett Cherry, an allergist and immunologist at Riverside Medical Clinic, often sees patients, including children, with allergy symptoms such as itchy eyes or a constantly runny nose who test negative for typical allergens such as pollen and pet dander. What they’re actually reacting to, Cherry said, is polluted air.

“Sometimes they joke that my prescription should be, ‘move to the beach.’” Instead, Cherry advises them to stay indoors when the air is particularly bad, run air conditioning to filter the air whenever possible, and be aware of anything that triggers their symptoms. In some cases where this doesn’t help, he prescribes medications. Among Cherry’s older patients are people who grew up in the region during the 1960s and ’70s, when air pollution in the Inland Empire was far worse and smoking was more prevalent. Many of those patients have dealt with allergies and asthma since they were children; some now battle chronic lung disease. To them, the air quality these days — even with the recent retrenchment — isn’t bad by comparison, Cherry said. But to him, he said, the region’s air is concerning, particularly with the recent increase in wildfires and smoke.

**Indoor summer**

Leonardo Barrera can’t write his name or tie his shoes but, at age 3, he’s a pro at using his inhaler.

His mother, Roxana Barrera, said he’s suffered breathing difficulties most of his short life and that she and her husband keep him inside when outdoor air poses a risk. But last summer, she said, there were so many smoggy days in their San Bernardino community that Leonardo was kept indoors pretty much all the time.

“It’s hard to tell a kid not to run. He just wants to run everywhere. He wants to be wild and free,” she said. “I worry that when he’s older he’s still going to have these issues. He’s still going to have to use an inhaler.”

The Barrera family lives close to dozens of logistics center warehouses and the San Bernardino BNSF Railyard, one of the biggest and busiest logistics hubs in California. Trucks constantly rumble up and down the nearby roads; Barrera recently counted 30 semi-trailers at the intersection nearest her home in the time it took the light to turn green.
Young Leonardo isn’t alone in his battle to breathe. Many other kids in the neighborhood, Barrera noted, seem to have asthma and respiratory problems. A 2015 study of elementary school children in Barrera’s community confirms what she’s noticed anecdotally.

Lead researcher Rhonda K. Spencer-Hwang at the Loma Linda University School of Public Health said she was surprised and angered to discover that children living in Barrera’s neighborhood were much sicker than kids who went to school just 7 miles away. The problem has likely worsened since the study was conducted, given the increase in air pollution, she said. And while children across the Inland Empire are exposed to bad air quality, Spencer-Hwang said those living closest to key sources of pollution, such as the railyard, are hurt the most.

Referencing children in the study, she said breathing the polluted air “impacted their ability to blow out.”

In surveys, the parents reported significantly more asthma among their kids and that they thought “a chronic cough was normal, like a smoker’s cough, because they all had it.”

Dr. Barbara Ariue, a pediatric allergist with Loma Linda University Children’s Hospital, said this trend plays out among the young patients she sees.

Babies and children from low-income neighborhoods like Barrera’s are more likely to live near transportation hubs and busy roads and endure respiratory problems as a result. Those families often don’t have air conditioning or can’t afford to run it, so they open windows when it gets hot, inviting dirty air into their homes and inadvertently, their children’s lungs.

**Parents take action**

Liz Sena, a nurse’s assistant and mother of two young children, had long been bothered by two related issues: South Fontana’s bad air quality and the number of warehouses popping up in the community.

Isolated at home during the pandemic, Sena began chatting with other residents on Facebook and realized she wasn’t alone with her concerns. Many residents complained about the local haze, a condition in which the air is so thick they couldn’t see the nearby San Bernardino Mountains. They shared posts about frequent headaches and shortness of breath and about how their kids repeatedly suffered nosebleeds or seemed to need more and more asthma medication.

“I realized that this is real. If so many of us are sharing the same stories ... this isn’t just happening to one or two people,” Sena said. “We started to say, ‘How do we do something about this?’” So Sena and like-minded residents formed the South Fontana Concerned Citizens Coalition. The group attends City Council and Planning Commission meetings, seeking stricter regulation of warehouse development and air quality and calling for a reduction in truck traffic and more investment in parks and green spaces. They’ve protested against warehouse projects near homes and schools.

Their actions and those of other environmental and community activists in the region have garnered some results.

In July, state Attorney General Rob Bonta filed a lawsuit against Fontana following the city’s approval of a nearly 206,000-square-foot warehouse project by Duke Realty Corp., arguing that the city failed to properly review and mitigate environmental
concerns. Last year, the South Coast Air Quality Management District board, which regulates air quality in the region, approved a landmark rule that will require large warehouse operations — those 100,000 square feet or more — to reduce their impact on air quality by transitioning to electric trucks or installing solar panels, among other measures.

Dr. Sarah Rees, deputy executive officer for planning and rule development at the South Coast Air Quality Management District, said the rule is expected to reduce air pollution in communities near warehouses and transportation corridors. The California Air Resources Board also recently took unprecedented action to reduce emissions from trucks.

But Rees said more change will be required from the federal government to bring down emissions enough to improve air quality and community health. More than 80% of the emissions that form smog come from mobile sources and most of those are from heavy-duty trucks, as well as ships and locomotives, Rees said.

"We're working hard to partner with (the Environmental Protection Agency) and other entities in the federal government to make them understand the urgency ... so that they can help us work together to clean up the air," she said.

Still, some parents worry change won't be big enough, or happen fast enough, to protect their kids and undo damage that's already happened.

Ana Gonzalez, a Rialto resident and executive director of the Inland Empire-based Center for Community Action and Environmental Justice, said parents fear their kids won't live as long because of the poor air quality. She said her own son was recently diagnosed with asthma at age 15, three years after developing severe bronchitis and pneumonia.

"You almost feel guilty for living in an area where you're putting your own kids, you're exposing them to this danger," she said. "But when you're a single parent that's all you can afford."

Meanwhile, Amparo Miramontes said she and her husband have done what they can to counter the air pollution around them. They've installed air filters throughout their home, bought new windows to keep the dust out and added purifying plants. They send their kids to school in Upland, where the air is cleaner, and take them to swimming lessons at an indoor pool. It's helped, she said. But her son, who is now 8, still gets nosebleeds two to three times a week and has asthma. He also recently was diagnosed with autism.

Many others, particularly in low-income neighborhoods like Barrera's, can't afford to take the same measures as Miramontes and her family. About 15% of Inland Empire residents lived in poverty as of 2019, according to the Public Policy Institute of California and more than 40% struggle to make ends meet.

Miramontes said she wants health officials to test children in the area for air pollution exposure. She wants warehouse operators to fund indoor recreation centers for kids so they can play in clean air. And she'd like to see commercials on TV explaining what PM 2.5 is and why it's dangerous.

"I can't stay silent. I feel like we all have a responsibility to take care of each other," she said. The warehouses and pollution are "costing us our health. And the very people that are going to have to pay are the kids." Claudia Boyd-Barrett reports for
The Center for Health Reporting at USC's Schaeffer Center for Health Policy and Economics. This report was supported by a grant from First 5 L.A.

Homes and industrial buildings closely coexist in the Southridge Village area of Fontana on Dec. 12. Experts say air pollution in the Inland Empire has dramatically increased since 2015.
MINDY SCHAUER STAFF PHOTOGRAPHER
Good Evening my name is Patrick Haninger and I'm with the Golden State Environmental Justice Alliance. Our organization submitted a comment letter regarding the DEIR. Our comment letter identified several deficiencies with the DEIR. Additionally we submitted a letter to the Planning Commission with analysis of the project area using models from CalEnviroScreen as well as additional commentary regarding Proposition 70 land analyzed in the DEIR.

The Comment Period for the Draft EIR ended less than 30 days ago, this project is already before you tonight and is tentatively scheduled to be heard before the City Council in just a few short weeks.

The City of Ontario Planning Commission in good conscience should delay a vote to recommend approval or denial of this project to the City Council until such time as the Final EIR has been made public which includes all responses to comment letters submitted to the Draft EIR.

Further, the citizens of Ontario as well as the state of California deserve full transparency regarding this project and the Prop 70 land that is involved.

During these turbulent times, we as citizens expect and deserve our local government’s elected and appointed officials to protect us from environmental and social injustice, to aid in the preservation and rehabilitation of the environment in which we all share, and to ensure accountability and responsibility in regard to the environmental decisions they may make. If you choose to take a vote tonight and move this project forward, we stand by our comment letter and believe the DEIR is flawed and must be redrafted and recirculated for public review. In closing we call on this commission to be a leader on the aforementioned issues and be the first line of defense for our citizenry and environment. Only by working together can we continue to be excellent stewards of our environment, outstanding stewards to our citizens and each other. Thank you.
To whom it may concern,

Attached you will find full comment to be distributed to the Planning Commission from the Golden State Environmental Justice Alliance regarding Planning Commission Meeting 1/25/2022 Public Hearing Item C, due to the time limit of 3-5 minutes per speaker.

Respectfully Submitted,

Patrick Haninger
Golden State Environmental Justice Alliance
To: City of Ontario Planning Commission  
From: Golden State Environmental Justice Alliance  
Subject: South Ontario Logistics Center  

**CalEnviroScreen 4.0 Information**  

CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution’s effects. CalEnviroScreen uses environmental, health, and socioeconomic information to produce scores for every census tract in the state. The scores are mapped so that different communities can be compared. An area with a high score is one that experiences a much higher pollution burden than areas with low scores. CalEnviroScreen ranks communities based on data that are available from state and federal government sources. CalEnviroScreen is updated and maintained by The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency.  

**CalEnviroScreen Data on South Ontario Logistics Project EIR Location/Area**  

The above listed project sits in census tract 6071001903. Overall, when compared to other census tracts, the project site census tract is in the 72nd percentile regarding pollution. As far as pollution burden is concerned, this census tract is in the 99th percentile. This data means only 1 percent of census tracts in the entire state of California have a worse pollution burden on its residents. In terms of Ozone, this census tract is in the 77th percentile, Particulate Matter 2.5 93rd percentile, Diesel Particulate Matter 57th percentile, Toxic Releases 68th percentile and Traffic 18th percentile.
CA Proposition 70

California Proposition 70 (Wildlife, Coastal, and Park Land Conservation Act of 1988) was passed by California voters on the June 7, 1988 statewide primary ballot as an initiated state statute.

Proposition 70 authorized a $776 million general obligation bond to provide funds for the "acquisition, development, rehabilitation, protection, or restoration of park, wildlife, coastal, and natural lands in California including lands supporting unique or endangered plants or animals."

The intent of CA Prop 70 was to provide taxpayer funds to local agencies and non profit organizations for the preservation of park, wildlife, coastal, and natural lands within the state of CA in perpetuity.

CA Proposition 70 as related to South Ontario Logistics Center Project

Section 5907 (b) (3) (F) states the following:

(b) "Three hundred thirty-eight million seven hundred thousand dollars ($338,700,000) to the Department of Parks and Recreation for acquisition of parklands, wildlife habitat, coastal, and natural lands in California, and for grants to local agencies and nonprofit organizations, including an amount not to exceed five million eighty thousand five hundred dollars ($5,080,500) for state administrative costs, in accordance with the following schedule:
(3) One hundred eighty-five million four hundred thousand dollars ($185,400,000) to the Department of Parks and Recreation for grants to local agencies in accordance with the following schedule:
(F) Twenty million dollars ($20,000,000) for a grant to the County of San Bernardino for acquisition of land primarily through the use of conservation easements within the Chino Agricultural Preserve.”

As related to the South Ontario Logistics Center Project, there are 8 APN’s (Assessor’s Parcel Number) listed below that are part of this project. The first set of numbers is how the APN’s appear in the DEIR and in parenthesis is how they appear when searched on the County of San Bernardino’s Parcel Search Tool.

1054-051-01 (10540510100000)
1054-051-02 (10540510200000)
1054-061-01 (10540610100000)
1054-061-02 (10540610200000)
1054-251-01 (10542510100000)
1054-251-02 (10542510200000)
1054-301-01 (10543010100000)
1054-301-02 (10543010200000)

A records search reveals these 8 APN’s are owned by the County of San Bernardino, C/O Southern California Agricultural Land Foundation (SCALF). This land was likely acquired with money allocated to the County of San Bernardino by Proposition 70 for the purpose of preserving its use as Agricultural Land in perpetuity. SB 1124 authorized the sell or exchange of the originally acquired properties purchased with Proposition 70 funds, with the condition that the County of San Bernardino preserve all lands and conservation easements acquired as the replacement properties in perpetuity for agricultural preservation, including agricultural and wildlife education or wildlife habitat, or for open space and conservation.

Due to the ownership of these 8 parcels by the County of San Bernardino as well as the convoluted nature of the source of funding and legislation used by the County to acquire these lands GSEJA questions why they are included in this entitlement process at all.

GSEJA is concerned that changing the land use zoning on agricultural land which was to be preserved by the county of San Bernardino in perpetuity, will be of great detriment to the citizens of the City of Ontario as well as the State of California.

**Conclusion**

Consider the above referenced information when making this important decision. Realize that you and the citizens of this area face some of the WORST POLLUTION BURDEN in the entire state of California.

Additionally, as an informational document to the public and decision makers, (City of Ontario Planning Commission and City Council) the Draft EIR is flawed. The City of Ontario Planning Commission in good conscience should delay a vote to recommend approval or denial of this
project to the City Council until such time as the Final EIR has been made public which includes all responses to comment letters submitted to the Draft EIR.

Further, the citizens of Ontario as well as the state of California deserve full transparency regarding the lands purchased with taxpayer funds and how said lands and funds are being utilized for their intended intentions.

It is the responsibility of the City’s elected and appointed officials to make environmentally responsible development decisions. Based on the CalEnviroScreen data, this is more than sufficient evidence of the further air quality impacts that the citizenry of Ontario and its surrounding area will continue to encounter with further development of another warehouse/distribution center. We are not against development, as we believe it is necessary for further economic growth in our current society. Development needs to be conducted with the highest of expectations to ensure the local population does not suffer further air quality burdens.

We stand by our comments and believe the EIR is flawed and needs to be redrafted and recirculated for public review.

Respectfully Submitted,

Patrick Haninger

Patrick Haninger
GSEJA

Glossary of Terms

Ozone - Amount of daily maximum 8-hour Ozone concentration

Particulate Matter 2.5 - Annual mean PM 2.5 concentrations

Diesel Particulate Matter - Diesel PM emissions from on-road and non-road sources

Toxic Releases - Toxicity-weighted concentrations of modeled chemical releases to air from facility emissions and off-site incineration.

Traffic - Traffic density, in vehicle-kilometers per hour per road length, within 150 meters of the census tract boundary.
My name is Angela Miramontes, Chair of Civic Engagement, League of United Latin American Citizens (LULAC) LULAC de Ontario and lifelong resident of the City of Ontario. This is notification that I, along with a number of individuals, community leaders, community organizations, and environmental groups are adamantly opposed to the Planning Commission’s approval of the South Ontario Logistics Center (Agenda Item C-3).

On behalf of the residents and citizens of the Ontario community, I request that you take action to deny the approval of the South Logistics Center - “totaling 219.39 acres in the City of Ontario. The development proposes 8 warehouse buildings, totaling a maximum development of 5,333,518 square feet of warehouse and office use.” As planning commissioners, you need to recognize that the Ontario community is opposed to this Logistics Center and other warehouse projects based on the findings of the Draft Environmental Impact Report (DIR). These findings from the Draft EIR (PSP19-001) examines the potential environmental impacts as a result of this project which includes the following: Air quality, biological resources, agricultural resources, cultural resources. Greenhouse gas emissions, noise, health impacts., transportation, Tribal Cultural Resources and utilities. This project will have significant and unavoidable impacts pertaining to violations of laws on the Federal, State and local levels which includes:

4.1.7. - The Project would convert Prime Farmland to urban development, and it would conflict with existing Williamson Act contract lands. This unavoidable significant impact is consistent with findings of the City’s TOP EIR, which implemented the interim Agricultural Overlay District in anticipation of future development for the site. Even with implementation of regulatory requirements, standard conditions of approval, and consideration of mitigation, the Project would result in significant and unavoidable impacts.

4.3.1 - A total of 47 sensitive species of plants and 59 sensitive species of animals have the potential to occur on or within the vicinity of the Project area. These include those species listed or candidates for listing by the United States Fish and Wildlife Service (USFWS), CDFW and California Native Plant Society (CNPS). A total of 17 plant species have the potential to exist on site. These species are listed as state or federally Threatened or Endangered. These species include: Tricolored blackbird, Grasshopper sparrow, Great blue heron, California glossy snake, Burrowing owl, Swainson’s hawk, and Western pond turtle. While the Western Burrowing Owl (BUOW) is not protected by state or federal endangered species acts, the possession or destruction of individual BUOW, their nests and/or eggs is prohibited under California CDFW Code §3503, 3503.5 and 3513, as well as the federal Migratory Bird Treaty Act of 1918 (MBTA) (16 U.S.C. 703-711). Under CEQA, goals would consist of measures that would avoid, minimize and mitigate impacts to a less than significant level. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of State CEQA Guidelines §15126.4(a)(4)(B),§15064, §15065, and §16355. If it were later determined that active nests would be lost as a result of site preparation, it would be in conflict with these regulations, and could also be considered a significant impact under CEQA without mitigation. In order to avoid violation of the MBTA and CDFW Code requirements, CDFW guidelines 1995 and 2012 suggest that project-related disturbances at active nesting territories be reduced or eliminated during the BUOW nesting/breeding cycle (typically February 1 to August 31).
4.4.7 - The Project site consists of the Borba main house, the manager’s house, the Boersma house, the Borba main dairy barn/milking parlor, the Borba auxiliary dairy barn/milking parlor, the Boersma dairy barn/milking parlor, four single-family residences, an older barn, and structures associated with a dairy farm operation. Consistent with the direction provided by the City, the assessment of the Project site’s historical resources found significance for the Borba main house and the Boersma House and the associate dairy as they are recognized likely eligible for listing on the local inventory. This unavoidable significant impact is consistent with findings of the City’s TOP EIR, which implemented the interim Agricultural Overlay District in anticipation of future development for the site. Even with implementation of regulatory requirements, standard conditions of approval, and consideration of mitigation, the Project would result in significant and unavoidable impacts.

4.6.6 - Implementation of the proposed Project would result in net annual emissions that exceed the GHG emissions significance threshold of 3,000 MTCO2e/yr under the City’s CAP. Therefore, Project-related GHG emissions and their contribution to global climate change would be cumulatively considerable, and GHG emissions impacts would be significant.

4.6.6 Significant Unavoidable Impacts Even with implementation of regulatory requirements, standard conditions of approval, and reasonable and feasible mitigation, the Project would result in significant and unavoidable impacts with respect to consistency with GHG plans and GHG emissions, on an individual and cumulative basis.

4.13.7 - Cumulative traffic impacts at Project Buildout are estimated to exceed the City’s adopted VMT threshold. Regardless of potential reductions in VMT through feasible TDM measures, as future Project design features and building tenants are not yet known, reductions in VMT related to TDM measures cannot be accurately estimated or guaranteed. Even with implementation of regulatory requirements, standard conditions of approval, and consideration of mitigation, the Project would result in significant and unavoidable impacts. In order to be able to make sensible decisions which include participation of Ontario community organizations, residents, and citizens, we call on you to support a moratorium on the proliferation of warehouses in Ontario. This is the most critical issue that the voters will address in the Ontario City Council Elections in November 2022.

Your decision to deny the South Logistics Center project will be the first step towards protecting Ontario Air quality, biological resources, agricultural resources, cultural resources, Greenhouse gas emissions, noise, transportation, Tribal Cultural Resources and utilities, as well as, the health and quality of life of Ontario residents.

Thank you,

Angela Miramontes
Correction to include agenda Item number RE: South Ontario Logistics Center (Agenda Item C.3)

On Jan 25, 2022, at 7:04 AM, Anthony Noriega wrote:

Public comments submitted to the Ontario Planning Commission by Anthony Noriega, at 6:57 am on 25 Jan 2022. RE: South Ontario Logistics Center (Agenda Item C.3)

My name is Anthony Noriega, Director District 5, League of United Latin American Citizens (LULAC) LULAC de Inland Empire. This is notification that I, along with many of your constituents, community leaders, community organizations, and environmental groups are adamantly opposed to this project and to the continued proliferation of warehouses in Ontario.

On behalf of the residents and citizens of the Ontario community, I ask that you reject the South Ontario Logistics Center project. As Planning Commissioners, you need to recognize that the Ontario community is opposed to this project and others.

As Planning Commissioners, each of you plays a critical role relative to land use, urban design, and the quality and sustainability of the built environment. Your team focuses on development that enhances economic value, quality of life, and complete community. However, as is evident in this project and other warehouse projects, you support the business developers and expansion of warehouses without regard for the negative impact on the health and safety of the entire community, including our existing neighborhoods. You ignore quality of life and potential for rewarding and sustainable jobs.

Your past decisions have failed to protect our health, safety, and quality of life in existing neighborhoods, to the detriment of residents here and in the larger community. The increased impacts on air quality, noise, truck traffic and
public health that will be caused by this warehouse project and others is magnified if you move forward with this project.

Ontario residents, as well as the surrounding communities, already suffer from these impacts. The promise of good jobs is an empty promise, as most of the jobs provide by these large logistics projects are filled through temp agencies with low pay; and even if hired by the logistics company, worker health and safety are not priorities. Many, if not most, of these jobs will disappear as warehouses are further automated.

In order to be able to make sensible decisions which include participation of Ontario community organizations, residents, and citizens, we call on you to support a moratorium on any additional warehouse logistics projects in Ontario, including those that are currently going through CEQA approvals. This is a critical issue that the voters will address in the Ontario City Council Elections in November 2022. Your decision to deny the the South Logistics Center project will be the first step towards protecting the Ontario Air Quality and the Ontario community.
Good Evening, Planning Commission Chair Gage and Commissioners Anderson, Dean, DeDiemar, Lampkin, Ricci, and Willoughby:

My name is Lois Sicking Dieter. I am a 30 plus year resident of the Inland Valley, an air pollution engineer, and member of the LULAC de Ontario Coalition for Clean Air (LOCCA).

I am speaking in opposition to the South Ontario Logistics Center approvals and ask you to vote “No” on the actions listed under Public Hearing Item C. The Proposed Project for the South Ontario Logistics Center is before you to allow 9 Warehouse/Logistics Center buildings of a total 5.3 million sq ft on 219 acres of currently agricultural land to be rezoned to industrial and business park use.

Ontario residents and I ask you to “No” vote on the certification of the Final Environmental Impact Report (EIR), deny the adoption of a Mitigation Monitoring and Reporting Program, reject the Statement of Overriding Considerations, with an associated denial of the General Plan Amendment (File No. PGPA19-004) to modify the Policy Plan (General Plan) Land Use Plan (Exhibit LU-01), and deny changing the land use designation on 219 acres of agricultural land to industrial/business park land, vote “No” to Specific Plan (File No. PSP19-001 – South Ontario Logistics Center Specific Plan).

This request to vote “No” is based on several aspects to include unavoidable significant environmental impacts identified in the EIR as Agricultural Resources, Air Quality, Historic Resources, Greenhouse Gas Emissions, and Vehicles Miles Traveled. The Mitigation Monitoring and Reporting Program proposed to mitigate these environmental impacts is inadequate and falls short of true mitigation. Staff provides a Statement of Overriding Considerations as a remedy for those aspects that have “unavoidable” significant environmental impacts.

We also have concerns regarding the evaluations for Agricultural Resources, Land Use and Planning, Air Quality, Noise, Biological Resources, Population/Housing (where 157 acres were zoned for low to medium residential unit of the 219 acres now proposed for industrial warehousing and logistics center), and Hydrology/Water Quality. Several appear to warrant designation as having a “significant environmental impact.” In the big picture, I ask you, are these EIR elements and staff recommendations defensible if challenged?

In the near future, despite the vote outcome this evening, the South Ontario Logistics Center proposal will go to the City Council for review and a vote. In the meantime, we will continue our review and will provide detailed and substantive comments.

In summary, based on the above stated issues, concerned Ontario residents and I ask you to vote “No” on all proposals, to deny certification of the EIR, deny the adoption of a Mitigation Monitoring and Reporting Program, reject the Statement of Overriding Considerations, with an associated denial of the General Plan Amendment PGPA19-004 and deny changing the land use designation from agricultural land to industrial/business park land, and vote “No” on the Specific Plan PSP19-001 for the South Ontario Logistics Center Specific Plan.
Thank you for your time and consideration.
Lois Sicking Dieter, LOCCA Member, Upland, CA
25, 2022
My name is Randy Wetmur a proud member of Ironworkers local 416. Myself and the local skilled and Trained Union members that live in the community do not support this project. It doesn't benefit the community, just the developers pocket. We need a project that will be considerate to the community and the skilled and trained workforce that lives in it, not the untrained workers that will be coming from outside of the city, county, or state. Please VOTE NO!!!
Thank You

Randy Wetmur
Ironworkers Local 416
Business agent LA/Orange County
January 27, 2022

Honorable Mayor of the City of Ontario
City Council Members of the City of Ontario Members of the City of Ontario Planning
Commission City Hall
303 East "B" Street
Ontario, California 91764

Re: Ontario Ranch Business Park Specific Plan (SCH Number: 2019050018)

Dear Honorable Mayor and Members of the City Council and Planning Commission:

On behalf of Golden State Environmental Justice Alliance, a California not for profit corporation ("GSEJA"), which submitted a comment letter dated December 16, 2021, in regard to the South Ontario Logistic Center Specific Plan, SCH Number: 2021010318 ("Project"), we hereby formally withdraw GSEJA’s December 16, 2021 comment letter and its objections to the above-referenced Project. GSEJA no longer opposes the Project and instead now supports the Project.

Sincerely,

[Signature]

Joseph Bourgeois
President
Golden State Environmental Justice Alliance