

## Summary of Key PCA Refresh Final Report Comments and Staff Responses

#	External Comments	MTC/ABAG Staff Response/Action
1	Integrate conservation and climate considerations into the Priority Development Areas Framework.	The Final Report includes a section, "Relationship Between PCAs and Growth Geographies, Including PDAs," that provides additional clarity on this topic.
2	The online mapping viewer was helpful to understand the eligibility maps. Provide additional information on the data and incorporate the Bay Area Ridge Trail.	The Final Report now references the <a href="#">PCA Refresh methodology documentation</a> which details the data by PCA type objective. The Ridge Trail has been added.
3	Further describe the relationship between Regionally-Identified PCAs and locally nominated PCAs and how regionally-identified PCAs will be adopted.	Additional language has been added to the section, "Incorporating Regionally-Identified PCAs Into the Framework," that states they will be used equally in planning and policy but that local nomination will continue to be a requirement for the PCA grant program.
4	Additional farms and ranches, beyond the two-mile buffer around cities, are at-risk and should be nominated as Regionally-Identified PCAs.	The goal with the Regionally-Identified layers is to take a unified regional approach to identify key priorities. Local knowledge of unique needs should inform future local nominations to complement the regional data layers.
5	Reconsider allowing the Natural Land PCA type to exist within City Limits and Urban Growth Boundaries beyond what is already allowed on the shoreline.	The proposed PCA Framework would continue to allow PCAs to be designated both inside and outside of city limits and urban growth boundaries, ensuring that a diverse range of communities remain eligible for PCA funding. However, the Refresh is an important opportunity to align PCA types with the longstanding Plan Bay Area land use vision. Green spaces within existing communities serve a different suite of regional goals than natural and working lands in rural areas; staff recommends that the revamped PCA Framework reflect this important planning context, while recognizing that both are equally critical. Identifying three enhancement-oriented PCA types most appropriate for these urban and suburban communities (Urban Greening, Recreation, and Climate Adaptation) is consistent with Plan Bay Area, which prioritizes growth within cities and towns while focusing on protection of natural and working lands outside of existing growth boundaries. These three PCA types would allow for a wide range of investments in new parks, trails, and green infrastructure in harmony with existing communities, recognizing opportunities to create or enhance green spaces while simultaneously building more housing for all. Finally, it is important to underscore that a PCA designation, or lack thereof, does not change the land use status; local

		jurisdictions maintain planning and permitting authority and private property owners maintain their development rights.
6	The report suggests all PCA boundaries were “loosely” defined, but in some cases the boundaries were intentionally set.	The report text has been adjusted to reflect that some (but not all) PCA boundaries had loosely defined boundaries.
7	Wildfire is a critical climate adaptation need and should be further emphasized.	Additional wildfire language has been added to reflect the important connection between conservation and wildfire adaptation.
8	The interim memo had additional description on each of the five PCA types, but it does not exist in the Final Report.	Table 5-1 from the Interim Report has been updated to provide this clarity. The Table with the desired information is now available on the <a href="#">PCA Refresh methodology webpage</a> and is linked in the Final Report.
9	Provide clarity on whether recreation and public access are potential activities for Natural and/or Working Lands.	Recreation is a co-benefit opportunity for Natural Lands and is more clearly identified in the methodology documentation described in Comment #8.
10	How will local PCA leads be engaged in the PCA amendment process? Locals should have a say in the amendment process.	Local PCA leads will be responsible for determining the PCA amendment approach. At the request of local government staff, MTC/ABAG will provide initial amendment options for local staff to build off of.
11	Future nomination cycles should allow non-government entities to nominate PCAs. There is concern that local-jurisdictions will not nominate Regionally-Identified PCAs.	Local governments with land use authority, or with existing land management responsibilities, will remain the eligible entities to nominate PCAs.
12	PCAs should be incorporated into Plan Bay Area 2050+.	PCAs will be incorporated into the Plan Bay Area 2050+ Implementation Plan and will be available as a key land use dataset to leverage for Plan Bay Area 2060, which will begin its process in 2026.
13	Regionally-Identified Natural Land PCAs should include shoreline ecosystems and leverage other science-based documents like the <i>Baylands Ecosystem Habitat Goals</i> .	Shoreline habitats are included as Regionally-Identified Climate Adaptation PCAs. Other conservation resources helped guide the PCA Refresh datasets and can provide additional context for future local nominations.
14	Supportive of “enhancement” being added to the definition but concerned that it could draw future PCA grants resources away from acquisition efforts.	Priorities are set for each PCA grant cycle in part based on the fund source restrictions. It is worth noting that protection and acquisition are a priority for the current PCA grant cycle.
15	Request that the public be included to develop the process for future nomination cycles.	The public is invited to provide comments on PCA items at the ABAG Administrative Committee and Executive Board meetings.

16	Request for future PCA nominations to be posted online.	After the existing PCA geographies are amended, MTC/ABAG will update and maintain an online PCA dataset and map.
17	Request for MTC/ABAG staff to remain engaged with the Bay Conservation and Development Commission's Regional Shoreline Adaptation Plan (RSAP) effort to ensure consistency with PCAs.	MTC/ABAG and BCDC staff meet on a bi-weekly basis and participate in RSAP working groups. The agencies are actively developing an MOU with other key agencies to further outline the shared roles and responsibilities for the shoreline.
18	Specific text recommendations to improve readability and clarity were suggested by commenters.	Text edits that resulted in improved clarity were largely incorporated. These edits did not alter findings or policy recommendations.

[Click here to review public comment letters](https://mtcdrive.box.com/s/y07ngyeixld4l9nbk73dkzt1wca0cpc) (https://mtcdrive.box.com/s/y07ngyeixld4l9nbk73dkzt1wca0cpc)

Comment letters were received from the: Fairfax Open Space Committee, Peninsula Open Space Trust, Santa Clara Valley Open Space Authority, Sonoma County Agricultural Preservation and Open Space District, and a joint letter from the following environmental organizations: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Ohlone Audubon Society, Santa Clara Valley Audubon Society, and the Sierra Club 3-Chapter Bay Alive Committee