

# BOARD OF SUPERVISORS AGENDA LETTER

**Agenda Number:** 

Clerk of the Board of Supervisors 105 E. Anapamu Street, Suite 407

.05 E. Anapamu Street, Suite 40 Santa Barbara, CA 93101 (805) 568-2240 Submitted on: (COB Stamp)

**Department Name:** Planning and Development

(P&D)

**Department No.:** 053

Agenda Date: April 8, 2025

**Placement:** Departmental Agenda

**Estimated Time:** 45 minutes

Continued Item: No
If Yes, date from: N/A

Vote Required: Majority

**TO:** Board of Supervisors

**FROM:** Department Director(s): Lisa Plowman, Planning Director, (805) 568-2086

Contact Info: Alex Tuttle, Deputy Director, (805) 568-2072

SUBJECT: Long Range Planning Division (LRP) Fiscal Years (FY) 2025 – 2028 Work Program

County Counsel Concurrence Auditor-Controller Concurrence

As to form: Yes As to form: N/A

Other Concurrence:
As to form: N/A

## **Recommended Actions:**

That the Board:

- a) Receive a report on the staff-recommended Long Range Planning FY 2025 2028 Work Program;
- b) Provide any direction that the Board would like to make regarding the staff-recommended Long Range Planning FY 2025 2028 Work Program; and
- c) Determine that the Board's action is not a "project" that is subject to environmental review pursuant to the State California Environmental Quality Act (CEQA) Guidelines [§ 15378(b)(5)].

#### **Summary Text:**

This Board letter and attachments provide an update on, and set forth staff's recommendations regarding, the Planning & Development (P&D) Department's Long Range Planning Division (LRP) FY 2025 – 2028 Work Program. Staff's recommendations are based on the following considerations:

- Multi-year projects that staff initiated at the Board's direction as part of past LRP work programs, that require a continued commitment of resources to complete;
- Existing State mandates, as well as changes in State and federal laws and regulations that affect local land use policies and regulations;

- Projects that advance the goals and programs set forth in the Santa Barbara County Comprehensive Plan;
- Continued P&D support for County-sponsored projects that have specific deadlines that must be met and/or funding commitments that must be satisfied; and
- Staff availability and budget constraints, given the fiscal priorities of Santa Barbara County and available funding sources.

This will be the sixth, three-year work program that the Board will be considering since converting to a three-year planning timeframe for the work program. The three-year planning timeframe affords the Board the opportunity to prioritize multiyear projects, some of which are interrelated and should be considered together when developing the work plans for them.

#### 1. FY 2024 – 2025 Quarter (Q)1 – Q3 Accomplishments

The following is a list of LRP's accomplishments in the first three quarters of FY 24-25. Attachment 1 to this Board letter includes a more complete summary of these accomplishments to date.

- Housing Element Update (HEU) LRP staff made substantial progress in implementing programs and actions from the 2023-2031 HEU during the past nine months. Specific accomplishments included the following:
  - o Program 1, Adequate Sites for Regional Housing Needs Allocation (RHNA) Submitted a Local Coastal Program Amendment (LCPA) in July 2024, to the California Coastal Commission for certification of four rezone sites located in the Coastal Zone. Staff has since been working with Coastal Commission staff on the LCPA submittal to address questions regarding consistency with Coastal Act resource protection policies.
  - o Program 1, Monitoring of No Net Loss Hired a consultant, Draw Tap GIS, to develop a GIS-based tool to track progress toward the County's RHNA and ensure compliance with Government Code Section 65863 (No Net Loss). Staff anticipates the tool will be completed in March 2025.
  - o Program 4, Inclusionary Housing Reviewed and contributed to the County CSD's draft amendments to the Inclusionary Housing Ordinance (Chapter 46A of the County Code), such as applying the ordinance to rental housing projects and increasing the length of time units retain sales or rental price restrictions. The Board adopted these changes on March 4, 2025.
  - o Program 9, Sites for Emergency Shelters Researched current capacity of Emergency Shelters in the County to ensure sufficient capacity to meet homeless Point-in-Time counts. Drafted zoning ordinance amendments to comply with state law. Staff presented the draft amendments to the County Planning Commission on March 12, 2025 and anticipates Board adoption by summer 2025.
  - o Program 10, Accessory Dwelling Units (ADUs) Researched options for providing pre-approved ADU plans in compliance with state law. Selected a consultant, RRM, to develop pre-approved plans for ADUs. Staff will execute the RRM contract in spring 2025 and anticipates completion of the project by early fall 2025.
  - o Program 11, Senate Bill 9 Implementation As part of our annual zoning ordinance amendment package, the Board adopted new regulations implementing SB 9 on February 4, 2025.
  - o Program 13, Density Bonus Provisions Prepared an analysis of current moderate-income density bonus provisions and recent changes to State Density Bonus Law that require zoning

- ordinance amendments. Staff anticipates drafting zoning ordinance amendments in spring/summer 2025 and presenting them to decision-makers in fall 2025 as part of the next general amendment package.
- o Program 21, Local Preference Prepared a framework for a local preference program that prioritizes people who live and/or work within the South Coast to rent or purchase new housing units. Staff expects to come to the Board for further direction regarding a draft program in spring/summer 2025.
- o Program 23, Workforce Housing Study Reviewed CSD's draft Workforce Housing Study. CSD will present the study to the Board in April 2025.
- o Prohousing Designation Application In fall 2024, in coordination with CSD, LRP staff began drafting the County's application for the State's Prohousing Designation Program. Since January 2025, staff has been working with California Department of Housing and Community Development (State HCD) staff to prepare its application for formal submittal. Staff anticipates presenting the application to the Board of Supervisors in spring 2025 and earning the Prohousing Designation in summer 2025.
- Agricultural Enterprise Ordinance (AEO) Amendments LRP staff completed the AEO amendments project during the past 9 months. Specific accomplishments included the following:
  - o Completed the eighth and final Planning Commission hearing (hearings between November 2023 and August 2024) culminating in the Planning Commission's recommendations for the AEO amendments (Q1).
  - o The Board of Supervisors held two hearings on the AEO (November and December 2024), made additional revisions, certified the Final Program EIR, and adopted the AEO on December 10, 2024 (Q2).
  - o The AEO took effect on January 9, 2025 in the Inland areas of the county.
  - o Working with Development Review staff on processing procedures for implementation.
  - o AEO amendments to the Coastal Zoning Ordinance will be submitted to the Coastal Commission for certification in March 2025.
- State Housing Bill Implementation Project LRP staff presented an ordinance package to the Board for adoption in February 2024 to bring the County ordinances into compliance with State law. The Coastal Commission conditionally certified the project amendments on December 12, 2024, and the Board accepted the CCC's conditional certification on February 4, 2025. Staff anticipates official adoption of the amendments into the coastal zone in April 2025. Staff also completed a second amendment to the CZO to implement Qualifying Housing Streamlined Review (spurred by SB 423) that was recommended by the MPC on September 18, 2024; the CPC on September 25, 2024; and adopted by the Board on December 3, 2024. LRP submitted the most recent CZO amendment to the Coastal Commission for certification in December 2024 and staff anticipates final certification later in 2025.
- Comprehensive Plan Annual Progress Report (APR) Completed the 2024 Comprehensive Plan APR in time to file it with the State Housing and Community Development Department by the April 1, 2025, filing deadline.
- Environmental Justice (EJ) Element Continued to make refinements and adjustments to the draft EJ Element, met with staff from 14 other County departments and the CEO's office to review draft

policies and implementation strategies, and continued public outreach and engagement. Prepared for decision maker hearings.

- Responsible Agency Reviews (RARs) / Local Agency Formation Commission (LAFCO) Reportbacks
   Processed 18 RARs and processed nine LAFCO reportbacks.
- *Pre-Approved Consultants List Management* Processed and accepted nine new pre-approved consultants and updated 11 existing consultants on the County's pre-approved consultant list.
- Safety Element Update LRP staff continued to prepare the following Safety Element Update components 1) the Draft Climate Adaptation Plan, and 2) the Evacuation Modeling and Planning Project. Climate Adaptation Plan efforts included coordination with an interdepartmental advisory group and the project consultant to continue to make necessary revisions to the draft adaptation strategies and actions. Additionally, staff completed the Evacuation Modeling and Planning Project, which was funded by a grant received from the California Fire Safe Council. Accomplishments associated with the Evacuation Project included the following:
  - o Completed the Evacuation Traffic Modeling Study, including the evacuation simulation model assessing the capacity, safety, and viability of all roadways in the county to protect the community from geologic and climate-related risks. In coordination with the Project's Evacuation Advisory Group and consultant, identified 67 evacuation recommendations that the Board may choose to direct further action on. The Study will be released to the public and presented to the Board on May 6, 2025.
  - o As part of the project's grant scope related to public education and outreach, posted a fourpart social media series on emergency preparedness for all hazards in coordination with the Office of Emergency Management.
  - o Completed the Project's Community Hazard Awareness and Emergency Preparedness Interactive Map and Know Your Way Out Infographics for grant purposes. The Office of Emergency Management is further refining elements of these public-facing materials. Public engagement materials will be released to the public in FY25/26.
- Zoning Ordinance and Other Comprehensive Plan Amendments (FY 2022 2023 Expansion Project- Modernization of Multi-Family/Commercial Zone Districts; Expand Ministerial Permits) Made significant progress in drafting amendments related to modernization of multi-family and commercial zone districts and permit process streamlining; obtained Board approval of outdoor lighting and sign ordinance amendments, completing the technical updates portion of the project; and continued work on other project components. This project is funded by a one-time budget expansion granted by the Board in FY 22 23 for a supervising planner and consultants.
- Utility Scale Solar Ordinance Amendments Continued preparation of draft amendments.
  Presented the project to the Agricultural Advisory Committee in August 2024. Presented the
  proposed Williamson Act Uniform Rules Amendments to the Agricultural Preserve Advisory
  Committee in August and September 2024. Secured a \$100,000 grant from the California Clean
  Energy Planning Program through the California Energy Commission to complete the ordinance
  amendments. Obtained Board approval of consultant contract in September 2024. Kicked off the
  CEQA process with a Notice of Preparation, and public Scoping Hearing in November and
  December 2024.
- Zoning Ordinance Maintenance and Amendment Packages Prepared and completed a package of zoning ordinance amendments regarding (1) Senate Bill (SB) 9 ministerial design and approval

standards, (2) commercial wireless telecommunications regulations, (3) recent ADU/JADU legislation, (4) and other minor ordinance amendments to address Board-identified clean-up items, including expanding the allowed uses in the M-2 zone in the LUDC to allow farm equipment sales and the C-1 zone in the CZO to allow for outdoor retail sales, for Board adoption on February 4, 2025. Staff is currently preparing a Local Coastal Program (LCP) Amendment to submit the CZO amendments for certification. A separate ordinance package to allow art tours and streamline the permit process for home occupations was presented to the Planning Commission on February 5, 2025 and is scheduled for Board adoption on May 6, 2025. Completed ongoing publication tasks associated with publishing the zoning ordinances on-line with the County Code.

- Cannabis Odor Ordinance Amendments Prepared and completed an ordinance amendment package regulating odor from commercial cannabis operations, with Board adoption anticipated on March 18, 2025.
- 2030 Climate Action Plan Update / Greenhouse Gas (GHG) Emission CEQA Thresholds of Significance obtained Board approval of the Energy Element amendment and the GHG emissions thresholds concurrent with the CAP in August 2024.
- Comprehensive Plan Conformity Review of the Five-Year Capital Improvement Program for Fiscal Years 2024-2029 – completed review of all Capital Improvement Program projects including a detailed review of 13 projects which was presented to the Planning Commission on December 4, 2024, for referral to the Board.
- *Circulation Element Update* Prepared RFP and selected a consultant to conduct traffic modeling in support of the Circulation Element update.
- Open Space Element Update Reviewed SB 1425 statutory requirements for updating the Comprehensive Plan Open Space Element; conducted background research, including research on jurisdictions with recent Open Space Element amendments; and developed scope of work options and tasks to initiate development of the proposed project.
- Airport Land Use Compatibility Plan (ALUCP) Amendments Prepared draft ordinance and Comprehensive Plan amendments to ensure consistency with adopted ALUCPs, to be presented at decision maker hearings in summer 2025.

#### 2. Priorities for Q4 of FY 2024 – 2025

- Housing Element Update Obtain a completeness determination from Coastal Commission staff on the rezones LCPA; continue to make progress on other implementation efforts.
- *Circulation Element Update* Manage the consultant in the completion of the traffic modeling component of the contract.
- EJ Element Complete preparation of the draft EJ Element and present at decision-maker hearings for consideration during spring and summer 2025.
- Open Space Element Update Finalize direction regarding the scope of work for amending the Open Space Element in compliance with recent state laws.

- Safety Element Update Complete the Board briefing of the Evacuation Modeling and Planning Project; work with the consultant in completing the Climate Adaptation Plan draft adaptation strategies and coordinate with affected county departments in refining draft strategies.
- Zoning Ordinance and Other Comprehensive Plan Amendments (FY 2022 2023 Expansion Project) Initiate decision maker hearings for ordinance amendments related to modernization of multi-family and commercial zone districts and permit process streamlining; begin drafting other ordinance amendments related to establishing more ministerial permits; coordinate with Coastal Commission staff on the LCPA submittal and certification of the lighting and signs Coastal Zoning Ordinance amendments.
- Zoning Ordinance Maintenance and Amendment Packages Coordinate with Coastal Commission staff on the LCPA submittal and certification of SB 9 and telecommunications Coastal Zoning Ordinance amendments; identify and initiate work on next set of ordinance amendments.
- Cannabis Odor Ordinance Amendments Coordinate with Coastal Commission staff on the LCPA submittal and certification of the Coastal Zoning Ordinance amendments.
- Mobile Home Park Overlay Ordinance Amendments Complete draft ordinance amendments to create a Mobile Home Park Overlay and initiate decision maker hearings.
- Airport Land Use Compatibility Plan Amendments Complete draft amendments and initiate decision maker hearings.
- 3. Recommendations for Fiscal Year One (FY 2025 2026)

Table 1 summarizes staff's recommended staffing allocations for the services, operations, and ongoing projects to be included in Year One of the Work Program, based on a total Division staff of 15 FTE. Attachment 1 to this Board letter provides descriptions of the Comprehensive Plan Projects that are listed in Table 1 and discussed further below. Attachment 2 provides a timeline for completion of the projects based on staff's recommended staffing allocations shown in Table 1.

Table 1 – Staff-Recommended LRP Staffing Allocations

Task / Project	FTEs
Required Services	
Grant Research and Applications	
Ag Preserve Processing and APAC Support	
Regional and Inter-Agency Coordination	
Technical Support to other Departments	
Legislative Review	
General Plan Consistency Review and Maintenance	
Responsible Agency Review and LAFCO Report backs	
CIP Conformity Review	
General Plan Annual Progress Report	
Consultants List Maintenance	
SBCAG Review/Participation	
Required Services Subtotal	1.5
Operations	
Budget Development and Implementation	

Task / Project	FTEs	
Public Information (including Public Records Act requests), Referrals, Website, and Outreach		
Staff Meetings and Training		
Process Improvement / Strategic Plan		
Evaluation and Performance Reviews		
Division Administration		
Operations Subtotal	4.0	
New, On-Going FY 24 – 25, and Delayed Projects from Past Work Programs		
Airport Land Use Compatibility Plans (ALUCPs) Consistency Amendments & Coastal Commission Certification (Mandated)	0.3	
Circulation Element Update (Mandated)	0.8	
Open Space Element Update (Mandated)	0.8	
Environmental Justice Element Adoption and Implementation (Mandated)	0.3	
Housing Element Update Implementation (Mandated)	2.0	
Safety Element Update (Mandated)	1.3	
Objective Standards - Local Coastal Program Amendment (LCPA) (CCC Mandated)	0.4	
Mandated Projects Subtotal	5.9	
Agricultural Enterprise Ordinance Amendments – Coastal Commission Certification and Implementation	0.2	
Climate Action Plan Implementation	0.2	
Zoning Ordinance Amendments to Allow Ministerial Development/Uses & Changes to Residential/Commercial Development Standards	0.6	
Recreation Master Plan - Comprehensive Plan Consistency Amendments	0.2	
Utility Scale Solar General Plan, Ordinance, Williamson Act Amendments	0.6	
Short-Term Rentals LCPA	0.4	
Potential Zoning Ordinance Amendments Packages		
Completing Mobile Home Park Overlay		
Additional Cannabis Ordinance Updates – Inland		
Farmworker Housing	1.4	
ADUs – Separate Conveyance		
Special Events		
General Package Other New and On-Going Projects	3.6	
	0.0	
New, On-Going FY 24 – 25, and Delayed Projects from Past Work Programs Subtotal	9.5	
LRP WORK PROGRAM TOTAL	15.0	

## 3.1 State Mandated, On-Going Projects

State-mandated projects play a significant role in establishing the priorities for the Work Program in the next fiscal year. The Work Program includes the following State-mandated projects.

- Airport Land Use Compatibility Plans (ALUCP) Consistency Amendments The Santa Barbara County Association of Governments (SBCAG) adopted updates to the ALUCPs in January 2023 and, consequently staff must (1) prepare amendments to the Comprehensive Plan and zoning ordinances to achieve consistency with the updated ALUCPs, present the consistency amendments to decision-makers for consideration of adoption in Fall 2025, and obtain Coastal Commission-certification of a LCPA involving changes to the Santa Barbara Airport ALUCP.
- Circulation Element Update This update involves amendments to the Circulation Element and community plans to be consistent with the Public Works Department's ATP and, more generally, develop policies and programs that facilitate the development of infrastructure

designed to reduce vehicle miles traveled (VMTs), pursuant to State mandates. The Public Works Department completed the ATP in FY 2023 - 2024. During FY 2025 – 2026, LRP staff will work with the consultant to complete traffic modeling, begin preparation of the draft amendments to the Circulation Element, and initiate the appropriate level of environmental review for the project.

- Environmental Justice Element Implementation Once adopted by the Board (anticipated for summer 2025), the EJ Element identifies various implementing actions to be undertaken by different County departments, including Planning & Development.
- Housing Element Implementation The Board-adopted Housing Element Update includes 25 programs that must be implemented, including several identified for FY 25-26. These include:
  - o Program 1 Rezone LCPA CCC Certification and RHNA Tracking
  - o Program 5 Tools and Incentives for Affordable Housing
  - Program 10 Pre-approved ADUs
  - Program 12 County Sites
  - o Program 13 Density Bonus Program
  - o Program 16 Reduction of Governmental Constraints
  - o Program 21 Local Preference
  - o Program 22 Recreational Amenities for Housing Projects
  - Program 24 Rental Housing Incentive Program
- Safety Element Update As stated above, LRP staff will be managing the third concurrent phase of the State-mandated Safety Element Update. The third phase includes continued preparation of the Climate Adaptation Plan which will include development of final adaptation strategies, implementation framework, additional public outreach, and new Safety Element policies. A Programmatic EIR will be also be prepared for the Climate Adaptation Plan during FY 25-26.
- Open Space Element Update SB 1425, signed by the Governor on September 30, 2022, requires every city and county to review and update its Open Space Element by January 1, 2026. The update is to address the following: (1) Access to open space for all residents in a manner that considers social, economic, and racial equity, correlated with the environmental justice element; (2) Climate resilience and other co-benefits of open space, correlated with the safety element; and (3) rewilding opportunities, correlated with the land use element. Based on final determination on the scope of the update, LRP activities next fiscal year will include continued background research, public outreach, and preparing the update and completing environmental review prior to initiating decision maker hearings in early FY 26-27.

#### 3.2 Non-Mandated, Delayed, and On-Going Projects

There are a number of non-mandated projects that the Board either included or considered including in FY 2024 – 2025 which staff is proposing to continue working on, provided that the Board allocates the budgetary resources to do so. These projects include:

- AEO Amendments As discussed above, staff will submit the LCPA application to the CCC to initiate the certification process during spring 2025, a process that will likely take a year or longer requiring continued staff review and coordination.
- Utility-Scale Solar Ordinance Amendments Staff will continue to coordinate with the consultant in drafting the ordinance amendments and amendments to the Williamson Act Uniform Rules, completing environmental review, and presenting the final amendment package to County decision makers for adoption in winter 2025.
- Short-Term Rentals (STRs) LCPA As discussed in Attachment A, in Summer 2024, the Board directed staff to delay work on the Coastal Zone STRs LCPA in order to prioritize other ordinance amendments, including cannabis odor control regulations and a Mobile Home Park Overlay. The Board may direct staff to recommence work on the STRs LCPA in FY 25-26. Completion of this project would implement Program 19 of the Housing Element Update.
- Zoning Ordinance Amendment Packages As stated above, in FY 24-25, staff completed work on the SB 9 ordinance amendments, amendments to the County's commercial telecommunication regulations, ADU and JADU updates, and other miscellaneous amendments. Staff will 1) complete the certification of these ordinance amendments in the coastal zone in FY 25-26, 2) complete work on the Mobile Home Park Overlay ordinance amendment project, 3) prepare a general ordinance clean-up package, and 4) initiate work on any other new Board priorities, which may include any of the following:
  - o Farmworker housing (consistent with Program 6 of the Housing Element Update)
  - Additional cannabis regulations (Inland)
  - Special events
  - o Separate ADU Conveyence
  - Equestrian Facilities
- Zoning Ordinance and Other Comprehensive Plan Amendments (FY 2022 2023 Expansion Project- Modernization of Multi-Family/Commercial Zone Districts; Expand Ministerial Permits) As discussed above and further in Attachment A, this project involves a number of ordinance amendments that differ with regard to complexity and potential environmental impacts. During FY 2025 2026 staff will (1) work with the California Coastal Commission on the certification of the zoning ordinance amendments for lighting and sign regulations in the coastal zone, (2) complete work on the ordinance amendments involving updates to the multi-family and commercial zone districts to facilitate housing (consistent with Programs 1 and 16 of the Housing Element Update) and ordinance updates to streamline permit processes; and (3) conduct outreach and other activities to further develop the project description for the expansion of ministerial permits that will likely require preparation of a PEIR.

In addition, there are two County Community Services Department projects that LRP staff will continue to support that require additional work in the next and/or other future fiscal years:

- Climate Action Plan Implementation With adoption of the Climate Action Plan, LRP staff will be involved with the implementation of Climate Action Plan programs that affect P&D activities / functions or otherwise require LRP staff's subject matter expertise.
- Recreation Master Plan In coordination with the Development Review Division of P&D, LRP will provide support and advise on proposed Comprehensive Plan and Zoning Ordinance

amendments throughout the preparation of the Recreation Master Plan, in order to align them with certain features of the Agricultural Enterprise Ordinance Amendments.

#### 3.3 New Projects

Objective Standards – LCPA – With the growing inability to apply subjective policies and development standards to certain housing projects under state law, this effort would involve reviewing applicable subjective policies and development standards contained within our Local Coastal Program (LCP) and developing comparable objective policies and standards where feasible. This project has been directed by the California Coastal Commission as part of a recent LCP Amendment, consistent with guidance provided at the state level. The project could be expanded to accomplish a similar goal for the inland area as well with additional staffing allocation.

#### 4. Future Projects

Staff has developed a list of projects that the Board could include in Year Two, Year Three, and/or a future fiscal year, of the Work Program, including but are not limited to the following:

- Updates to outdated components of the Comprehensive Plan (e.g., Environmental Resources and Management Element and Conservation Element). In particular, Assembly Bill 1889, approved by the Governor in 2024, directs jurisdictions to update their Conservation Elements (in conjunction with the next update of one or more elements on or after January 1, 2028) to consider the effect of development on wildlife movement and habitat connectivity.
- Comprehensive Plan amendments to align with governing strategies of the Groundwater Sustainability Plans (GSPs), as groundwater sustainability agencies (GSAs) adopt GSPs that govern the groundwater basins that are subject to the Sustainable Groundwater Management Act (SGMA) (GC § 65352.5 et al).
- Comprehensive update of the County's *Environmental Thresholds and Guidelines Manual*, as a number of the impact areas (e.g. Groundwater Thresholds) are out of date.
- Revisiting the Isla Vista Master Plan to guide future development of the community.
- Revisiting the Coastal Resiliency LCPA, which was suspended in FY 21-22 due to policy disagreements with Coastal Commission staff and due to other Board priorities and state mandates.

#### **Fiscal and Facilities Impacts:**

Funding to implement the staff-recommend services, operations, and projects that are included in FY 2025 - 2026 of the FY 2025 - 2028 LRP Work Program will be included in the P&D FY 2025 - 2026 Requested Budget submittal for the Board's consideration during the budget adoption process in June 2025. Funding for subsequent fiscal year work programs will be considered as part of the annual County budget process.

#### **Attachments:**

Attachment A – LRP FY 2024 – 2025 Work Program Project Status Report

**Attachment B** – Timeline of Staff-Recommended Projects

**Attachment C** – Long Range Planning Division Work Assignments

# **Authored by:**

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