



UCSB Audit and Advisory Services

Internal Audit Report

**Long Range Development Plan
Reporting and Mitigation Monitoring**

April 7, 2016

Performed by:

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Approved by:

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Report No. 08-16-0009

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AUDIT AND ADVISORY SERVICES
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April 7, 2016

To: Vice Chancellor Administrative Services Marc Fisher
Alissa Hummer, Director, Campus Planning and Design

Re: **Long Range Development Plan: Reporting and Mitigation Monitoring
Audit Report No. 08-16-0009**

As part of the 2015-16 audit services plan, Audit and Advisory Services has completed an audit of required reporting under the *2010 UC Santa Barbara Long Range Development Plan (LRDP)*. Enclosed is the audit report detailing the results of our review.

The purpose of this audit was to determine whether reports required by the LRDP are being submitted timely, are complete and accurate, and meet LRDP requirements. We also determined whether there is a mitigation monitoring and reporting plan established to meet annual mitigation reporting requirements.

The results of our work indicate that the campus is in compliance with LRDP reporting requirements. We did identify opportunities for improvement in campus processes, including formalizing procedures for LRDP and mitigation measure reporting, and enhancing related website communications.

Detailed observations and management corrective actions are included in the following sections of the report. The management corrective actions provided indicate that positive measures are being taken to implement the recommendations. We greatly appreciated the assistance on this project by Campus Planning and Design personnel. If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert Tarsia".

Robert Tarsia
Director
Audit and Advisory Services

cc: Chancellor Henry Yang

Todd Lee, Assistant Chancellor Finance and Resource Management

UCSB Audit Committee

Senior Vice President and Chief Compliance and Audit Officer Sheryl Vacca

PURPOSE

The purpose of this audit was to determine whether reports required by the *2010 UC Santa Barbara Long Range Development Plan* (LRDP) are being submitted timely, are complete and accurate, and meet LRDP requirements. We also determined whether there is a mitigation monitoring and reporting plan established to meet annual mitigation reporting requirements. This project is part of the 2015-16 audit services plan of the University of California, Santa Barbara (UCSB).

SCOPE, OBJECTIVES AND METHODOLOGY

The scope of this audit includes all reporting requirements related to the LRDP; we also included some review of compliance with underlying mitigation requirements in order to evaluate the accuracy of reporting.

Our objectives were to determine whether:

- Annual LRDP reporting has been planned and scheduled.
- Reports submitted to date meet LRDP requirements.
- Mitigation monitoring processes and related reporting have been planned and scheduled.
- Mitigation reports submitted to date meet reporting requirements.

Our audit fieldwork included:

- Researching and reviewing the LRDP and associated documents, such as the *Executive Summary, Changes to the Environmental Impact Reports (EIR), and Mitigation Monitoring and Reporting Program*¹; California Coastal Commission LRDP reporting of other UC campuses, and best practices.
- Through interviews and discussions, gaining and documenting an understanding of Campus Planning and Design processes and practices as they relate to LRDP policy and mitigation measure monitoring and reporting.
- Gaining an understanding of the systems, applications, and repositories that process and store information related to the mitigation measure monitoring program, through discussions and demonstrations of information and systems currently available.
- Performing detailed comparison of LRDP policies from the LRDP to the annual LRDP report tracking methodology used by Campus Planning and Design, and also to the annual LRDP report prepared for submission to the California Coastal Commission.
- Evaluating plans for mitigation monitoring reporting.

This audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*.

¹ Vol.3, dated July 2010

BACKGROUND

California Coastal Commission

The California Coastal Commission was established by voter initiative in 1972 (Proposition 20) and later made permanent by the Legislature through adoption of the California Coastal Act of 1976, which regulates development on California's coast. In partnership with coastal cities and counties, the California Coastal Commission plans and regulates the use of land and water in the coastal zone. Development activities are broadly defined by the California Coastal Act of 1976; these activities include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters. These activities generally require a coastal permit from either the Coastal Commission or the local government².

2010 UC Santa Barbara Long Range Development Plan

The *2010 UC Santa Barbara Long Range Development Plan* (LRDP), which was approved by the California Coastal Commission in 2014, identifies and describes the physical development needed to achieve campus academic goals through 2025, including changes in academic programs and the development of additional campus housing for students, faculty, and staff. It is a land use plan for the development of future campus facilities, and for the stewardship of the campus environment. The plan is based on one percent annual enrollment increases to the year 2025. The LRDP addresses the requirements of the California Coastal Act of 1976.

The LRDP:

- Details campus plans up to the year 2025.
- Anticipates a growth rate of one percent per year in student enrollment, which mirrors the growth rate of the Santa Barbara region. This projection equals roughly 250 students per year, to a maximum enrollment of 25 thousand in 2025.
- Includes the development of housing needed to accommodate all additional students.
- When fully implemented, anticipates providing housing for more than 1,600 faculty and staff members. The University currently provides about 190 units of faculty and staff housing, and has approval to construct another 60 units.
- Addresses resident concerns about increased traffic. The LRDP proposes a fair-share payment by the University for needed traffic improvements. Past contributions include \$6.8 million for El Colegio Road improvements, \$3.2 million for traffic impacts identified in 1991, and \$1.9 million for North Campus faculty and staff housing.
- Reflects the campus commitment to environmental issues and includes numerous policies covering green building, sustainability, coastal protection, and other areas.³

² California Coastal Commission website.

³ Source: Adapted from information posted on the UCSB Campus Design and Facilities website.

LRDP Reporting

Annually, Campus Planning and Design is required to report to the California Coastal Commission under 16 LRDP policy categories. Categories include:

- Annual campus student enrollment.
- Transportation alternatives program.
- Coastal access parking lot monitoring.
- Residential parking for campus housing monitoring.
- Traffic count monitoring.
- Planning, tracking, management, and monitoring open space restoration.
- Water supply and demand.
- Purchased electricity and natural gas consumption.
- Tree replacement and planting plan.
- Updated Devereux building inventory.
- Posted coastal access signage.

Mitigation Monitoring & Reporting Program

In response to the first federal environmental protection statute in 1969, the National Environmental Policy Act (NEPA), the California State Assembly created the Assembly Select Committee on Environmental Quality to study the possibility of supplementing NEPA through state law. This legislative committee, in 1970, issued a report entitled *The Environmental Bill of Rights*, which called for a California counterpart to NEPA. Later that same year, acting on the recommendations of the select committee, the legislature passed, and Governor Reagan signed, the California Environmental Quality Act (CEQA) statute. CEQA requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible.

CEQA requires that a Lead Agency establish a program to monitor and report on mitigation measures adopted as part of the environmental review process, to avoid or reduce the severity and magnitude of potentially significant environmental impacts associated with project implementation. CEQA requires that a mitigation monitoring and reporting program be adopted at the time that the agency determines to carry out a project for which an Environmental Impact Report (EIR) has been prepared, to ensure that mitigation measures identified in the EIR are implemented.

The mitigation monitoring and reporting program requires annual reporting related to 15 impact mitigation categories as identified in the EIR. The mitigation categories are Air, Biology, Cultural Resources, Geology and Soils, Hazards, Hazardous Materials, Hydrology and Water Quality, Noise, Population and Housing, Public Service, Recreation, Traffic, Water, Waste Water, and Utilities.

By the end of each calendar year, the Director of Campus Planning and Design is required to provide mitigation reporting covering compliance with the terms and conditions of each LRDP authorization that year, as well as continuing obligations from authorizations in previous years. In addition, the annual mitigation monitoring report also provides information on progress in implementation of general campus mitigation measures not specifically tied to specific development projects. The annual mitigation report is available for review, by appointment, at Campus Planning and Design.

Campus Planning and Design

The Campus Planning and Design department is considered the Lead Agency for UCSB, responsible for physical planning, environmental assessment, regulatory approvals, community planning, and long-range development planning. The department is responsible for coordination among campus departments to ensure compliance with LRDP policies and any relevant mitigation measures.

SUMMARY OPINION

The results of our work indicate that the campus is in compliance with LRDP reporting requirements. We did identify opportunities for improvement in campus processes, including formalizing procedures for LRDP and mitigation measure reporting and enhancing related website communications.

Audit observations and management corrective actions are detailed in the remainder of the audit report.

DETAILED OBSERVATIONS AND MANAGEMENT CORRECTIVE ACTIONS

A. Formalize LRDP and Mitigation Monitoring Reporting Procedures

Although work on written procedures has started, department processes and practices are not yet fully formalized or documented in detail. Formalizing these processes with complete written procedures would help ensure compliance with LRDP requirements, and assist in training and personnel succession issues. Topics could include the following, among others:

- Annual LRDP report development, coordination, and submission.
- Mitigation measure monitoring and reporting.
- Posting of the campus water demand and supply report to the UCSB Sustainability website, and developing a process that would ensure referencing this report in any environmental review process for new development, as required.

We recommend that Campus Planning and Design continue to work with campus departments involved with LRDP requirements (and mitigation measure monitoring and reporting) to develop detailed written procedures identifying roles, responsibilities, and practices for all facets of LRDP reporting, mitigation measure monitoring and reporting, and providing information to the public.

B. Mitigation Measure Monitoring

Our review of existing mitigation measure monitoring and reporting processes found that improvements are needed to ensure that:

- All required mitigation reporting is completed.
- There is timely recognition of unresolved mitigation issues.
- Data is consolidated in ways that would facilitate accurate reporting.

We recommend that Campus Planning and Design continue to work with Facilities information technology personnel, project managers, and inspectors to evaluate what data collection processes and reporting options could be reasonably developed to create a systematic approach to address these concerns.

C. Timely Public Communications

The LRDP requires that the campus water demand and supply report be posted to a UCSB website and used as a reference in any environmental review process for new development. When we compared LRDP requirements to the annual LRDP report developed for submission to the California Coastal Commission, we found that the campus water demand and supply report had not been posted to a UCSB website. Although posting to the campus Sustainability website has subsequently been completed, additional actions should include:

- Updating the LRDP section of the campus website to communicate where the campus water demand and supply report may be located online.
- Document communications with appropriate UCSB personnel regarding the LRDP requirement to reference the campus water demand and supply report in any future environmental review process for new development.

Management Corrective Actions

Campus Planning and Design will:

- Continue to work with campus departments to develop detailed written procedures identifying roles, responsibilities, and practices for all facets of LRDP reporting, mitigation measure monitoring and reporting, and providing information to the public. These procedures will be completed by September 30, 2016.
- Work with information technology personnel, project managers, and inspectors to create a systematic approach to mitigation measure monitoring and reporting processes.
- Update the LRDP section of its website to direct the public to the online location of the campus water demand and supply report. We will also issue a written communication to appropriate UCSB personnel to advise them of the LRDP requirement to reference the campus water demand and supply report in any environmental review process for new development.

Audit and Advisory Services will follow up on the status of the website content and mitigation measure monitoring and reporting process issues by June 30, 2016. We will follow-up on the status of the written procedures by October 31, 2016.