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June 11, 2015
Ventura County Planning Commission
RE: CRC OIL AND GAS PROJECT
Case No. PL13-0150

For the record, I would like to convey my grave concern regarding this project's potentially significant impacts to cultural resources. The project area is in close proximity to a significant cultural resource, CA-VEN-404. Artifacts have been found northeast of the archaeological site and previous research indicates a "relatively high incidence of prehistoric sites" in the area and the potential for the occurrence of subsurface archaeological remains.

This project lacks appropriate environmental review as required by CEQA. I respectfully request that you deny the modified CUP and approve the appeal for the following reasons:

- 1) Staff Report claims that the project does not have the potential to substantially affect archeological resources as existing drill sites will be used; however, the report fails to discuss the impact of well installation which involves ground-disturbing activities that may impact possible cultural resources.
- 2) Staff Report asserts that no archaeological resources are known to exist on site and no new significant environmental impacts that were not evaluated in the previous certified EIR have been identified..." The report wholly fails to recognize potentially undiscovered buried resources. Additionally, the previous "certified EIR" (1978 and 1984) failed to evaluate the impacts at Drill Site Nos. 1 and 7. Drill Site No. 1 existed prior to 1978 and the 1984 certified EIR was a focused EIR and only addresses the environmental consequences of providing access. Actual drilling and production of oil from the proposed new wells was not addressed. Staff response to the appeal stating that the use of previously graded pads reduces the potential for significant effects on cultural resources to a less than significant level is inappropriate, as project design *is not* a mitigation measure for potential impacts and the impact of drilling is not assessed.
- 3) Determination of environmental impact and their significance cannot be made without appropriate investigation of potential cultural resources by a qualified professional archaeologist and in consultation with recognized local Native American groups. There is no evidence that the Native American Heritage Commission, the State Trustee Agency for the protection and preservation of Native American cultural resources, has been contacted regarding the proposed project. Additionally, there is no evidence that a Sacred Lands File search has been performed or that Tribal representatives were consulted.
- 4) Further, as evidenced above, this project is inconsistent with the Ventura County General Plan which requires all discretionary development be assessed for potential cultural resource impacts.

Based on the information provided in the certified EIR and in light of the whole record, there is substantial evidence to warrant further environment review of this project as required by CEQA and the Ventura County General Plan.

Thank you.