

Greenwood and Associates
1885 Sunnydale Avenue
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October 20, 2015

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

For the record, it has come to our attention that the above project has the potential to impact archaeological resources. We are a cultural resource firm with over 60 years of experience in Ventura County. Based upon our review of the project components it is evident that the project lacks appropriate environmental review as required by CEQA. It is our recommendation that you deny the modified CUP and approve the appeal for the following reasons:

1. Archaeological boundaries of the known sites has never been established, e.g., CA-VEN-404, and as yet other unidentified archaeological resources may be impacted as a result of well installation which involves ground-disturbing activities. The supporting documentation (1978 and 1984) for the project points out that there is a potential for buried or undocumented archaeological resources within the project area (pgs 374; 407a, b, c; 441; 712). The number of disclaimers (six) by the project archaeologists are alarming and suggests that the archaeologists were acknowledging a high potential for unrecorded archaeological resources. The County response is that the proposed impacts are not within a known site and this is simply not known to be true.

2. It is evident that the archaeologists who previously surveyed the project did not consider historical archaeological resources of the ranch and potential impacts to these resources. There is no mention of the history of the Ferndale Ranch area in any of the documents provided and it does not appear that the archaeologists investigated these potential resources. These resources have the potential to provide important information on the historical development of the area.

3. In addition, there does not seem to be an evaluation of the historical or archaeological significance of the project area with specific reference to the oil field itself. The field was in place since the 1890s, and was never evaluated as a cultural resource. If evaluated, it may qualify under the National Register of Historic Places as a district with specific reference to oil, gas, and production facilities. It appears that the field is the location of the first commercially productive oil wells in the state of California, ca. 1867. There is no doubt that the oil and gas industry has played a significant role in the development of the County. Without evaluating this aspect of the historical record it is impossible to understand what impacts may result from the proposed project. This proposition is supported by the Santa Paula General Plan under historical themes which include oil and gas production, among others.

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.
Sincerely,
Greenwood and Associates
John M. Foster, RPA