

Dawn Thieding, MA
Cultural Resources Specialist
323 E. Matilija St, Ste 110-230
Ojai, CA 93023

October 20, 2015
Ventura County Board of Supervisors
RE: CRC OIL AND GAS PROJECT
Case No. PL13-0150

This project fails to assess potentially significant impacts to cultural resources. The project area is in close proximity to a significant archaeological site and previous archaeological studies indicate a “relatively high incidence of prehistoric sites” in the area. However, the previous EIR fails to identify potential resources and fails to assess impacts of well installation on resources.

Given this “new information of substantial importance,” I respectfully request that you affirm this appeal and direct the Planning Department to prepare a subsequent or supplemental EIR. For the record, evidence of “new information of substantial importance” includes:

- 1) Staff Report claims that the project does not have the potential to substantially affect archeological resources as existing drill sites will be used. FACT: The report wholly 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 were identified. FACT: No attempt was made to identify potential (or yet-to-be-discovered) resources. The report wholly fails to identify undiscovered buried resources in the project area. Additionally, the previous “certified EIR” failed to evaluate the impacts at Drill Site Nos. 1 and 7. Drill Site No. 1 existed prior to the first EIR and the 1984 EIR was a focused EIR and only addressed access roads. Actual drilling and production of oil from new wells was never addressed. Additionally, 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 misleading, as the impact of drilling was not assessed and project design *is not* a mitigation measure for potential impacts under CEQA.
- 3) Determination of environmental impact and their significance requires appropriate investigation of potential cultural resources by a qualified professional archaeologist and in consultation with recognized local Native American groups. FACT: There is no evidence that tribal representatives were consulted or that a Sacred Lands File search was performed. Additionally, the EIR lacks evidence that the Native American Heritage Commission, the State Trustee Agency for the protection and preservation of Native American cultural resources, was ever contacted regarding the proposed project in this very sensitive area.

This information was not considered in the original EIR and is therefore “new information of substantial importance” which necessitates preparation of a subsequent or supplemental EIR. I urge you to **affirm this appeal and direct Planning Department to prepare a subsequent or supplemental EIR.**

Thank you.