



Staff Report and Recommendations

Agenda of May 23, 2022, Item 7a

County of Ventura • Resource Management Agency

800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • www.vcrma.org/divisions/planning

I. APPLICANT/PROPERTY OWNER:

Applicant/Property Owner: California Natural Resources Group (CalNRG)
Attn: Clif Simonson
1746 F South Victoria #245
Ventura, CA 93003

II. REQUEST:

Request for a Certificate of Appropriateness (COA) (Cultural Heritage Ordinance (CHO) Section 1366) from the Cultural Heritage Board (CHB) to authorize decommissioning activities at the Tenby Facility located at 3450 East 5th St., Oxnard, CA 93033. The request would enable the removal of any remaining contents from the existing tanks and vessels onsite; demolition and removal of tanks, vessels, mechanical and electrical equipment, piping, and utilities; rehabilitation of existing facility structures, and recycling/removal of scrap metals. The request is related to Zoning Clearance Case No. ZC21-0385 in order to partially abate code violations identified in Notice of Violation CV19-0177 (Supervisory District 3 – Long) (Case No. CH21-0005).

III. LOCATION AND PARCEL INFORMATION:

3450 East 5th St., Oxnard, CA 93033 (unincorporated Ventura County)
Assessor's Parcel Number (APN): 218-0-011-485

Historic Designation: undesignated, determined eligible as a Ventura County Landmark and Ventura County Historic District

The subject property consists of a 40.14-acre parcel in the Agricultural General Plan land use designation and the Agricultural Exclusive Zone (Refer to Exhibit 1– Assessor's Parcel Map). The Tenby Facility occupies approximately 12.22 acres of the subject property and consists of buildings, equipment, and other accessory structures associated with oil and gas extraction and unpermitted former refinery operation activities. Figure 1 depicts the location of the project site in the broader vicinity; Figure 2 provides a closer aerial view of the project site; and Figure 3 provides an image of the entrance to the site along East 5th Street.

Figure 1 – Regional Vicinity

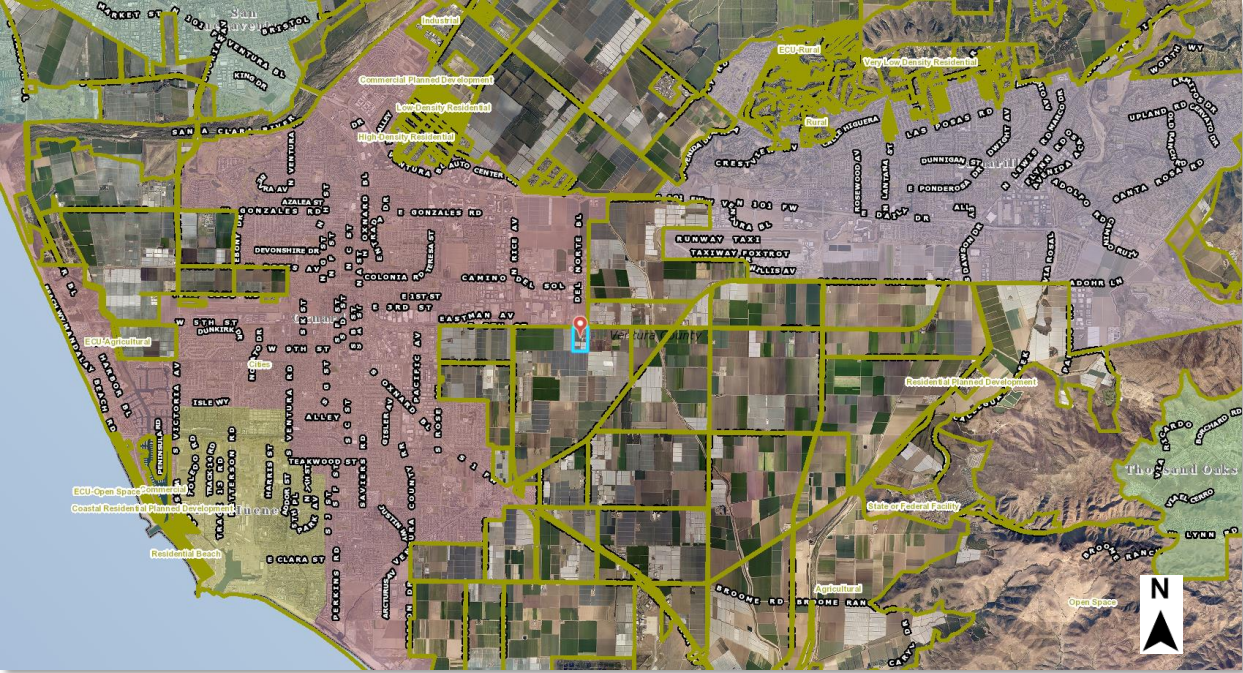


Figure 2 – Aerial View of Site

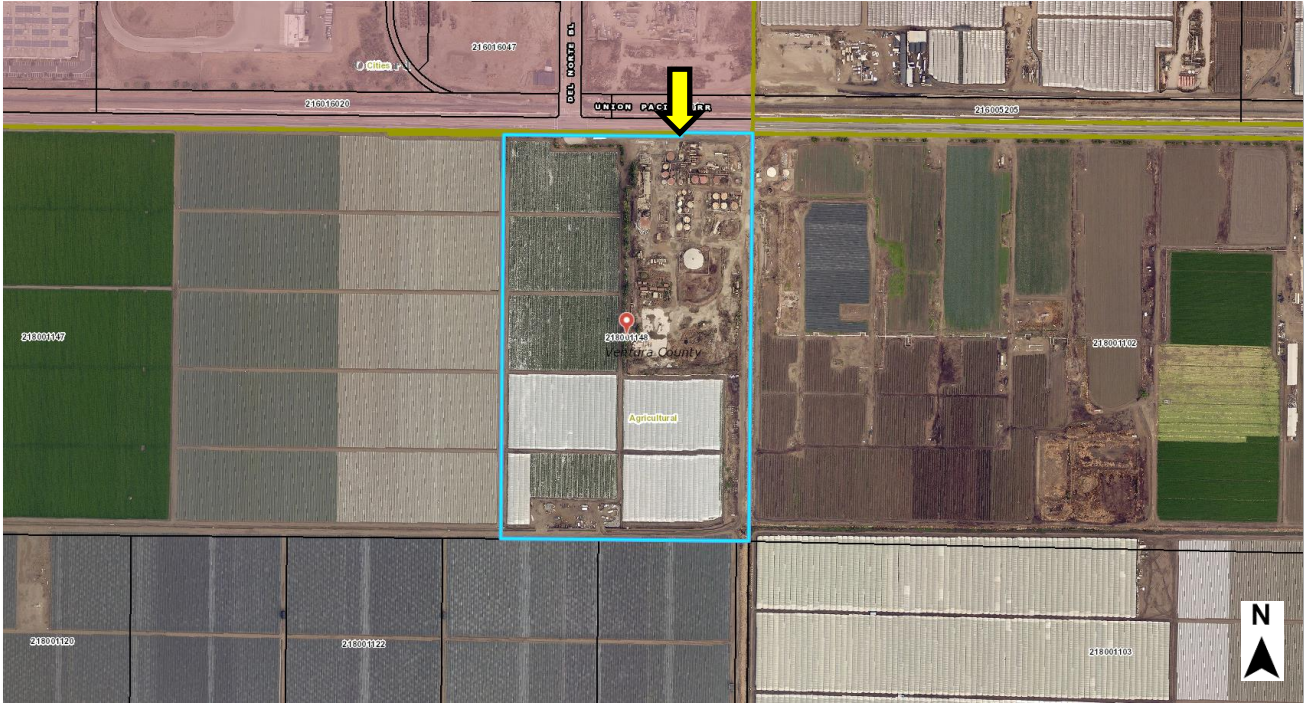


Figure 3 – View of Site from East 5th Street



Source: ASM Affiliates, Inc.

IV. **PROJECT SCOPE:**

On August 7, 2019, the Ventura County Code Compliance Division issued a Notice of Violation to the property owner for multiple violations of the Ventura County Building Code and Zoning Ordinance at the subject property. Specifically, the following violations were confirmed:

- VIOLATION 1: The site owned by California Resources Production Corporation is now an oil production facility with bulk storage. The facility is being operated with no valid Conditional Use Permit (CUP) having been issued or permit applications on file. No Planning Division permits have been issued authorizing the use of the equipment, refinery vessels, machinery, and structures on the site. Expansion and repurposing of various refinery vessels and equipment has been conducted and was not authorized under CUP 186. In December of 1952, the refinery requested a special use permit from the Ventura County Planning Commission for the production of oil and gas, specifically listing “Drilling for and extraction of oil, gas and other hydrocarbon substances and installing and using buildings, equipments, and other appurtenances accessory thereto, including pipe lines, but specifically excluding processing, refining, packaging, bulk storage or any other use specified in Ordinance No. 412 as amended as requiring review and special use permit.”

- VIOLATION 2: The presence of dangerous buildings and dilapidated or deteriorated structures due to inadequate maintenance. The site has become (i) an attractive nuisance to children; (ii) a harbor for vagrants, criminals or immoral persons; and (iii) has enabled persons to resort thereto for the purpose of committing unlawful or immoral acts. Further, graffiti and dumping is occurring on the property.
- VIOLATION 3: Excessive open storage of abandoned equipment, machinery and buildings.

In order to abate these violations, the property owner must obtain required permits and authorizations from the Planning Division, Building and Safety Division, and Integrated Waste Management Division. Abatement could also require approval from other agencies such as the Fire Department, Environmental Health Division and Public Works Agency. If left unabated, daily civil administrative penalties range from \$50 to \$250 daily, per violation.

The applicant requests the CHB approve a COA to authorize decommissioning activities at the Tenby Facility (Case No. ZC21-0385) in order to partially abate code violations identified in Notice of Violation CV19-0177. The request consists of the following scope of activities:

- Removal of any remaining contents from the existing tanks and vessels onsite;
- Demolition and removal of tanks, vessels, mechanical and electrical equipment, surface piping, and utilities;
- Rehabilitation of existing facility structures; and
- Recycling/removal of scrap metals.

Conditional Use Permit (CUP 186) was previously approved for the property by the County of Ventura to authorize “drilling for and extraction of oil, gas, and other hydrocarbon substances and installing, and using, building, equipment, and other appurtenances accessory thereto, including pipelines, but specifically excluding processing, refining, packaging, bulk storage or any other use specified in Ordinance No. 412, as amended, as requiring review and special use permit.” The decommissioning of these above ground facilities is to bring the underlying oil and gas exploration CUP 186 into compliance with condition no. 4 of CUP 186 for the area within the boundary of APN 218-0-011-485 such that the parcel be restored to the conditions prior to the issuance of the permit as nearly as practicable. The equipment and structures formerly associated with the refinery operation are unpermitted. Refer to Exhibit 2 – Site Plan, for an overview of the facilities located on the site and to Exhibit 3 – Detailed Site Plan, for a view of the equipment proposed for demolition. Please note that the present owner now proposes to retain the derrick on site as well as the facility structures (lab, fire station, and maintenance shop).

At the July 26, 2021 CHB hearing, your Board heard the request for a COA. A consensus of your Board favored retaining the oil derrick on site. The applicant agreed to prepare an additional engineering assessment of the derrick to determine the feasibility of retaining it on site. Your Board unanimously voted to continue the item without taking action until such time that additional information is received from the applicant on the feasibility of retaining the derrick. Since that time, the a new property owner acquired the subject property and now requests issuance of the COA. The new property owner submitted the requested evaluation of the derrick prepared by Thomas and Beers, LLC (Exhibit 6 – Derrick Assessment). This assessment recommended that the derrick be removed rather than retained. Nonetheless, the new applicant has indicated a willingness to retain the derrick on site as well as the facility structures (lab, fire station, and maintenance shop).

V. PROPERTY DESCRIPTION:

The Tenby Facility occupies approximately 12.22 acres of the 40.14-acre subject property. It is located in a primarily agricultural/industrial area along East 5th Street, approximately 200 feet east of the Del Norte Boulevard intersection. The facility consists of 40 buildings and structures associated with the oil and gas extraction and former refinery operations, clustered across 13 areas. These include the following components:

- A complex of buildings and structures
- Crude oil storage tanks
- Pipes
- Equipment to process crude oil
- Storage tanks for processed material
- Earthen berms and ditches around tanks
- Derrick
- Office or lab buildings

In December 2020, the previous property owner's consultant, ASM Affiliates, Inc, completed a Phase I Historic Resources Report for the subject property (Exhibit 5 — Historic Resources Report).¹ The survey of the Tenby Facility included the identification of five permanent buildings remaining on the parcel (control room, maintenance shop, fire station, lab, and shed) in addition to the derrick. Refer to Exhibit 5 for individual photos of on-site structure and components. The permanent buildings are described as follows:

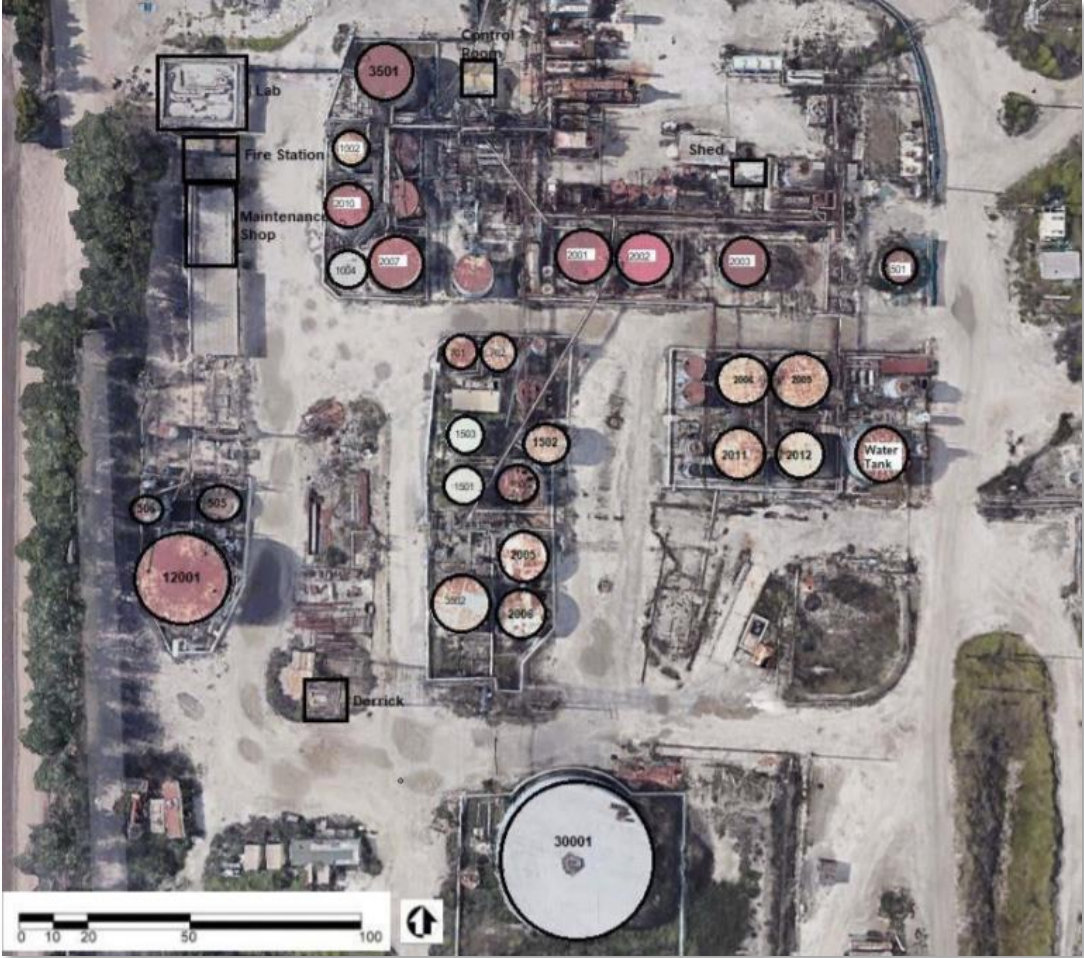
¹ Kung, Laura Taylor, M.A. and Shannon Davis, M.A., RPH, ASM Affiliates, Inc, *Phase I Historic Resources Report for the Edgington Oxnard Refinery, Oxnard, Ventura County, California*, December 2020.

- Control Room. This building contains instrumentation and other devices and is located in the process area near the north end of the site.² It is constructed of concrete block with a simple rectangular plan with a small addition to the south. It is capped by a corrugated steel gable roof with slightly overhanging eaves. All of the fenestration has been boarded over or removed.
- Maintenance Shop (built in the late 1950s). This building has a simple rectangular plan and is capped by a shed roof.³ The building is clad in corrugated steel and has minimal fenestration. The primary (east) façade has a sliding metal door that has been boarded over.
- Fire Station (built in 1983). This building is located immediately north of the Maintenance Shop.⁴ It is a small shed with a flat roof clad in corrugated steel. The solid metal door is the only fenestration and it is located on the east façade.
- Lab building (likely built between 1962 and 1967). This building is located immediately north of the Fire Station and has a simple rectangular plan and a flat roof.⁵ A projecting awning with a thick wood fascia surrounds the building a few feet below the roofline. The primary entrance is located in a projecting enclosed shed roof porch centrally located on the east façade.
- Shed. A small shed with an adjacent steel sheltered area is located in the chemical usage area at the northeast corner of the facility.⁶ The shed has a simple rectangular plan and is capped with a shed roof; it appears to be of steel construction. There is no fenestration except for the door on the north façade which has been removed.
- Derrick (appears to have been built between 1947 and 1962). The derrick is the most prominent feature of the Tenby Facility and frequently appeared in advertisements for the facility.⁷ The derrick covers the well El Rio No. 2 which was first drilled in 1945 and re-drilled in 1952. It is not clear in aerial photos, but it does not appear to be present at the time of the 1947 map but might be present in the 1962 map. The steel derrick has a square shape and narrows toward the top. There are two access areas with railings at the mid-point and at the top.

Figure 4 on the following page provides a site map with surveyed tanks and structures labeled, Figure 5 contains a view of the Lab, Fire Station and Maintenance Shop, looking southwest, and Figure 6 shows a view of the north façade of the Lab from 2011.

2 Ibid.
3 Ibid.
4 Ibid.
5 Ibid.
6 Ibid.
7 Ibid.

Figure 4 – Survey Site Map



Source: ASM Affiliates, Inc.

Figure 5 – View of Lab, Fire Station and Maintenance Shop



Source: ASM Affiliates, Inc.

Figure 6 – View of North Façade of Lab



Source: ASM Affiliates, Inc.

Further, the facility contains 34 tanks ranging across 11 different sizes and types and constructed of varying materials and often at different times.⁸ These consist of the following, grouped by size:⁹

- 500 barrels of oil (Bbl). The smallest tanks on the site contain 500 Bbl or 21,000 gallons (42 gallons per barrel). There are three 500 Bbl tanks on the property, labeled on the map as 501, 505, and 506. Tank 501 is a bolted steel tank on an earthen foundation and is in fair condition. Tanks 506 and 507 are taller welded steel tanks on earthen foundations. The age of the 500 series tanks is unknown.
- 700 Bbl. The 700 Bbl tanks, 701 and 702, are of welded steel construction on earthen foundations. They were used as stock tanks of diluent and their date of construction is unknown.
- 1,000 Bbl. The 1000 Bbl tanks are some of the oldest on the property and built at the time of the first refinery in 1938. The four remaining tanks (1001, 1002, 1003, and 1004) were used to hold asphalt. They are welded tanks covered in corrugated steel on an earthen foundation and are in fair condition.
- 1,500 Bbl. The 1500 Bbl tanks were also added in 1938. The four remaining tanks (1501, 1502, 1503, and 1506) were stock tanks that held diluent. They are constructed of welded steel on an earthen foundation.
- 2,000 Bbl. The 2,000 Bbl tanks range in age and use. Tanks 2001, 2002, and 2003 were used to store crude oil and are of welded steel construction on earthen foundations. Tank 2001 was added in the late 1950s. An additional tank, 2004, was formerly located east of 2003 but has since been removed. Tanks 2005 and 2006 were used as stock tanks for crude oil and are constructed of welded steel on earthen foundations. The tanks were added in the early 1960s. Tank 2006 is in poor condition with some rusting and damage to the insulation. Tanks 2007 and 2010 were both used to hold asphalt. Tanks 2008 and 2009 were stock tanks that held crude oil and were built in the late 1950s. They are of welded steel construction on earthen foundations. Tanks 2011 and 2012 are also stock tanks for crude oil and added in the late 1950s. An unnumbered water tank is also located to the east of tank 2012.
- 3,500 Bbl. There are two 3,500 Bbl tanks. Tank 3502 is a stock tank for crude oil and is of welded steel construction on an earthen foundation. Tank 3501 was used to store asphalt and is of welded steel construction.
- Large tanks. There are two large tanks on the property. Tank 12001 is a 12,000 Bbl tank added in 1963 to hold asphalt. A 30,000 Bbl tank, 30001, was built in 1955 and used to store crude oil. Tank 30001 is unique because it has a wooden top enclosure.

⁸ Ibid.

⁹ Ibid.

Figure 7 provides a view of the 1500 series tanks and derrick looking southwest and Figure 8 shows Tank 30001 looking south.

Figure 7 – View of 1500 Series Tanks



Source: ASM Affiliates, Inc.

Figure 8 – View of Tank 30001



Source: ASM Affiliates, Inc.

In addition to the large tanks there are a various smaller tanks, distilling towers, and pipes located throughout the property.¹⁰ Other notable equipment includes a clay brick heater used to heat the product. A freshwater tank and other equipment are located to the east of the east driveway to the facility. The south end of the parcel contains multiple portable units and scrap metal and was not part of the original boundaries of the refinery.

VI. HISTORICAL BACKGROUND AND SIGNIFICANCE:

Historical Background

The property was surveyed in 2014 as part of the Historic Context Statement and Reconnaissance Survey for the Eastern Oxnard Plain. It identified as potentially significant for its association with the “Extractive Industry” historical context theme in Ventura County with a period of significance between 1945 and 1965. The eligibility of the property as a historic resource was not assessed due to the reconnaissance-level nature of the survey (Exhibit 4 – Survey DPR Form). In December 2020, the property owner’s consultant, ASM Affiliates, Inc, completed a Phase I Historic Resources Report for the subject property (Exhibit 5 — Historic Resources Report).¹¹

The history of the Tenby Facility begins with the Chase family, specifically with the “Chase Brothers,” Glywn Sunley and James Warren Chase.¹² Glywn was born in Riverside in 1900 and James in 1903; the Chase Brothers were first raised on their family’s farm in Riverside before the family moved to the San Fernando Valley in 1917 and operated a dairy farm. In 1927, around the same time the brothers were starting their own families, they purchased 320 undeveloped acres along East 5th Street in an unincorporated area of Ventura County, three miles east of Oxnard.¹³ The brothers followed in their father’s footsteps and started a dairy on a portion of the land near what is now Wolff Road. The dairy quickly became a center of activity in the community, serving as a meeting place for beet sugar farmers and donating milk for children attending Christmas events. The dairy opened a store on the property during the 1950s and continued to operate for several decades.¹⁴

The Chase Brothers, like many landowners on the Oxnard Plain, would go on to lease portions of their property to oil companies as sources of income.¹⁵ Oil exploration at the property began in 1935, when the first well was drilled in the area on land leased by the Vaca Oil Exploration Company. In 1937, the brothers leased 200 acres of their land to the Canadian El Rio Oil Company who successfully broke through the layer

¹⁰ Ibid.
¹¹ Ibid.
¹² Ibid.
¹³ Ibid.
¹⁴ Ibid.
¹⁵ Ibid.

and triggered an oil boom in the area. Vaca Oil Exploration soon drilled its well 100 feet east of the El Rio No. 1 well. With multiple producing wells in the area, the Chase Brothers began building the first refinery facilities between 1937 and 1938.¹⁶ The first name for the refinery was Pacific Asphalt Company. By 1949, Ralph Edgington, a lawyer turned oilman, had become part owner of the company. Ralph Edgington was born in Delaware, Ohio, in 1905 and later moved to California to begin his career in law. In 1941, he acquired property in Long Beach which turned out to be an old refinery.¹⁷ He was soon dragged into producing asphalt when World War II began and there were no west coast shippers of asphalt. His company ultimately supplied 78 percent of all asphalt used in the Pacific.¹⁸

In December of 1952, the Oxnard refinery was granted a special use permit from the Ventura County Planning Commission for the drilling of oil and gas. Immediately after the permit was granted, drilling for a new well, El Rio No. 3 was started by the Edgington Refinery of Long Beach and soon after the name of the refinery was changed to Edgington Oxnard Refinery.¹⁹

By 1953, the oldest son of Glywn Chase, Herbert Morley Chase, was general manager of the refinery.²⁰ Born in 1928, Morley Chase returned to the area following military service in the 1950s and served as plant manager, continuing to work in the industry for the next 60 years. Edgington Oxnard Refinery continued to provide asphalt products to Asia during the 1950s. Due to increased demand, the refinery began to expand during these years. In April 1954 they drilled a new well, Chase No. 2.²¹ In 1955, construction began on the largest tank (30,000-barrel) that is still on the site today. A number of incidents and accidents were noted at the facility over the decades it was operational. During the 1960s, the refinery expanded by purchasing other leases and interests. The name Tenby Inc. first appears in 1962; at that time the name represented both Chase Production Company and Edgington Refinery, but it appears Edgington was less involved in operations after this time. The expansion of operations continued into the early 1970s with the purchase of properties and mineral rights in the area.²²

The last well was drilled on the property in 1988 at the same time the Edgington Refinery in Long Beach was purchased by another company.²³ By 1995, the Tenby facility was the last operating refinery in the area (possibly the county).²⁴ The refinery

¹⁶ Ibid.
¹⁷ Ibid.
¹⁸ Ibid.
¹⁹ Ibid.
²⁰ Ibid.
²¹ Ibid.
²² Ibid.
²³ Ibid.
²⁴ Ibid.

was closed in 2011 and sold; Morley Chase died in 2013. The current property owner acquired the property in 2021.

Evaluation of Significance

The property was evaluated against the criteria for the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and as a County of Ventura Cultural Heritage Site.²⁵ Further, the refinery was evaluated under the context themes²⁶ of “Agriculture and Suburbs (1945-1965), subtheme 6E – Extractive Industry” established in the Historic Context Statement and Reconnaissance Survey for the Eastern Oxnard Plain.

National Register/State Register

According to the Historic Resources Report prepared for the property, as the site of one of the first wells on the Oxnard Plain and the last existing refinery in the Oxnard area, the property has the potential to be eligible for its association with the oil industry in California as well as expressing the importance of the industry to the development of Ventura County.²⁷ The period of significance for the refinery begins in 1952 with the drilling of El Rio No. 3 which prompted the involvement of Ralph Edgington and the expansion of the property. It ends in 1968, after the partnership with Edgington ended and after which no new tank series were added. During the refinery’s period of significance, Ventura County’s petroleum and associated industries were one of the primary sources of employment in the county.²⁸ Only agriculture was as important to the economic development of Oxnard during this time. By 1995, the facility was the last of its kind in the area. Given its association with the significant role oil played in the local economy, and the rarity of refinery sites, the Tenby Facility appears to meet National Register Criterion A and California Register Criterion 1.²⁹ However, while the Tenby Facility retains integrity of location and setting, the loss of materials has impacted the integrity of design, materials, workmanship feeling and association to the point where the district no longer retains integrity to convey its significance for eligibility for listing on the National or State Registers.³⁰

County of Ventura Landmark

²⁵ Ibid.

²⁶ Historic contexts are those patterns, themes, or trends in history by which a specific occurrence, property, or site is understood and its meaning (or significance) within history is made clear. (Office of Cultural Development, State of Louisiana, available at: <https://www.crt.state.la.us/cultural-development/historic-preservation/national-register/historic-contexts/index>)

²⁷ Kung, Laura Taylor, M.A. and Shannon Davis, M.A., RPH, ASM Affiliates, Inc, *Phase I Historic Resources Report for the Edgington Oxnard Refinery, Oxnard, Ventura County, California*, December 2020.

²⁸ Ibid.

²⁹ Ibid.

³⁰ Ibid.

The facility's status as one of the first oil and gas refineries in the area was found to reflect special elements of the County's engineering and social history (County Landmark Criterion 1) as it represents a major economic contribution to the region that is now scarce.³¹ The facility is closely associated with events that have made a significant contribution to the broad patterns of Ventura County and Oxnard history under the context theme of "Agriculture and Suburbs (1945-1965), subtheme 6E – Extractive Industry." Therefore, it appears to satisfy County Landmark Criterion 2.³² The refinery has lost its integrity of design, materials, workmanship, feeling, and association and therefore does not satisfy Criterion 6. However, since it is not required to meet an integrity threshold in order to be eligible as a Ventura County Landmark, the facility appears to be eligible as it satisfies Criteria 1 and 2.³³

Additionally, the Tenby Facility was determined eligible as a Ventura County Historic District because it has a significant concentration, linkage, and continuity of buildings and structures which are united historically by physical development. Boundaries for the potential historic district are represented by the survey area.³⁴ The survey of the Tenby Facility included the identification of 40 buildings and structures; in total, 34 of the identified resources, as well as the associated equipment, would be considered contributors to the district as they were built during the period of significance and retain sufficient integrity to convey the themes associated with the refinery.³⁵ The two non-contributors are the Fire Station which was built in 1983 and after the period of significance, tanks 701, 702, 1501 and 1502, which were built outside the period of significance, and the Shed, which does not retain sufficient integrity to convey its original use and association with the themes the district conveys.³⁶

Moreover, the Tenby Facility appears to be eligible as a Site of Merit if it is not designated as a landmark and is eligible as a Point of Interest if the integrity threshold is determined to be too low to meet landmark status.³⁷

VII. CHO ANALYSIS AND STAFF CONCLUSIONS:

The Ventura County Cultural Heritage Ordinance (CHO) Section 1366 requires that the Cultural Heritage Board issue a Certificate of Appropriateness (COA) in the case of proposed demolition activities at a potentially eligible Cultural Heritage Site. The COA is an authorization which indicates that any proposed action, including maintenance, alteration, restoration, rehabilitation, remodeling, addition, change of

³¹ Ibid
³² Ibid.
³³ Ibid.
³⁴ Ibid.
³⁵ Ibid.
³⁶ Ibid.
³⁷ Ibid.

use, demolition, subdivision, or relocation of a designated or potentially eligible Cultural Heritage Site will not adversely affect the designated Cultural Heritage Site's values or unduly compromise the eligibility of a potential site to become a designated Cultural Heritage Site.

CHB Staff concur with the Historic Resources Report's conclusion that the Tenby Facility appears eligible for County Landmark and County Historic District designation for its reflection of special elements of the County's engineering and social history and close association with events that have made a significant contribution to the broad patterns of Ventura County and Oxnard history.

However, CHO Section 1364-10 "Designation of Cultural Heritage Sites" states, in pertinent part, that the CHB shall "take steps necessary to preserve Cultural Heritage Sites when not in conflict with the public health, safety, and general welfare." Due to multiple issues cited in the Notice of Violation (CV19-0177), including the presence of dangerous, dilapidated or deteriorated structures due to inadequate maintenance, designation as a County Landmark or County Historic District would appear to be in conflict with public health, safety, and general welfare.

Per CHO Section 1366-3(d), the CHB may conditionally approve a COA, even though it does not meet the standards set forth in the CHO, if it can be demonstrated that failure to approve the COA will cause a hardship because of conditions peculiar to the structure or other feature involved, or damage to the property owner is unreasonable in comparison to the benefit conferred to the community. Based on the factors identified above, CHB Staff recommends the CHB approve the COA pursuant to CHO Section 1366-3(d) with the following recommendations, in combination with the recommendations provided by the CHB at your Board's July 26, 2021 hearing, in order to better conform to the *Secretary of the Interior's Standards and Guidelines (SOI Standards)*:

1. **Recommendation #1: HABS/HAER/HALS Photo Documentation.** Prior to demolition activities, the project applicant should submit photographic documentation of the property prepared to the Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER)/ Historic American Landscapes Survey (HALS) standards by a qualified professional familiar with HABS/HAER/HALS guidelines. A digital proof of the photo documentation should be provided to CHB Staff for approval and determination of consistency with *The Secretary of Interior's Guidelines for Architectural and Engineering Documentation*. The photo documentation should consist of the following:
 - As determined by the HABS/HAER/HALS professional, a sufficient number of photographic views so as to convey the property and its identified historic contributors following clearance of overgrowth and debris and removal of plywood coverings/obstructions;

- Photographs should include character-defining features. The historic consultant may assist in identifying features and views to be included in the photo documentation;
 - HABS/HAER/HALS standards will require the original negatives having a minimum size of 4"x5" and production of one set of large-format, black-and-white, film photography on 8.5 x 11 inkjet mount cards;
 - Photographs must include a photo key index and photo key map.
 - Submission of one set of digital scans in PDF digital form to CHB Staff;
 - Donation of final film negatives and prints to both the Library of Congress and Museum of Ventura County accompanied by the photo key index, photo key map, and written data report (historic resources report); and
 - Provide to CHB Staff a letter from the library/museum acknowledging receipt of the photo documentation.
2. **Recommendation #2: Cultural Heritage Site Designation.** The project applicant should apply for designation of their property as a County of Ventura Point of Interest. A commemorative plaque is recommended to be placed at the site by the applicant describing the site's historic significance, with review and comment to be provided by the CHB at a future date.
3. **Recommendation #3:** Retain the oil derrick on site to the extent feasible.
4. **Recommendation #4:** Create an interpretive program related to the historic significance of the site. As part of this program, the applicant should prepare aerial drone videography of the site prior to demolition of structures. Videography may be stored on the CHB website.

With implementation of the aforementioned recommendations, CHB Staff determined the project would be consistent with Ventura County Cultural Heritage Ordinance No. 4225 and better conform to the *SOI Standards*.

VIII. OPPORTUNITY TO SHOW HARDSHIP:

At the CHB public hearing on this matter, if desired, the property owner is provided the opportunity to present facts and evidence demonstrating a failure to grant the requested COA would cause an economic hardship as provided by CHO Section 1366-3(d).

IX. PUBLIC COMMENTS:

No public comment regarding this item has been received to date.

X. RECOMMENDED ACTIONS:

Pursuant to CHO Section 1366, the CHB may identify project modifications for the applicant's review and consideration. Staff is recommending the CHB take the following actions regarding the request:

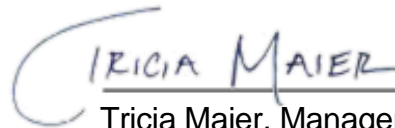
1. **CONDUCT** public hearing, **RECEIVE** oral and written testimony, and **CONSIDER** the Planning Division Staff report and all exhibits and attachments hereto;
2. **FIND** that the proposed project meets the requirements of the Ventura County Cultural Heritage Ordinance Section 1366-3(d); and
3. Based on the preceding evidence and analysis, **APPROVE** the Certificate of Appropriateness (Cultural Heritage Ordinance [CHO] § 1364-12) with any Cultural Heritage Board or Staff recommendations determined necessary to better conform to the *Secretary of the Interior's Standards*.

Prepared by:



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(805) 654-5042

Reviewed by:



Tricia Maier, Manager
Planning Programs Section
(805) 654-2464

Exhibits:

- Exhibit 1 – Assessor's Parcel Map
- Exhibit 2 – Site Plan
- Exhibit 3 – Detailed Site Plan
- Exhibit 4 – Survey DPR Form
- Exhibit 5 – Historic Resources Report completed by ASM Affiliates, Inc and dated December 2020
- Exhibit 6 – Derrick Assessment completed by Thomas and Beers, LLC and dated February 11, 2022