

RESTORATION OF WOODLEY PARK TERRAIN TO PRE-FESTIVAL CONDITION

As an official commitment to stewardship of the environment by the United States Army Corps of Engineers the following statement is part of their mission:

"The Corps integrates the management of diverse natural resource components such as fish, wildlife, forests, wetlands, grasslands, **soil**, air, and water with the provision of **public recreation opportunities**. The Corps conserves natural resources and provides public recreation opportunities that contribute to the quality of American life." (ER 1130-2-550 Section 2-1 Purpose Policy statement (page 12)).

We emphasize the word "soil" to focus on a specific deficiency in the AngelFest Draft Environmental Assessment.

Quoting from the EA (Section 2.3, page 2-13): "On Monday after the Festival, an eight (8) day breakdown period would begin. During that period, **the site would be restored** to its pre-Festival condition. Remediation of the site may include **turf replacement**, fence and parking lot barrier replacements, **and restoration of the cricket fields and other fields.**" (Emphasis added)

See also PLR-2 (page 4.3) "To reduce potential erosion, areas disturbed by the event would be **immediately returned to pre-event conditions by re-vegetating as appropriate**. As necessary to **restore prior conditions**, barren areas would be seeded and/or planted with native vegetation." (Emphasis added)

Nowhere in the Draft Environmental Analysis is this critical restoration process described or how a scientifically, unbiased determination of successful restoration will be accomplished.

Woodley Park's terrain is not just dirt with grass growing on it. It is a City of Los Angeles public asset to be preserved and protected. It is, in fact, a highly complex, biologically diverse ecosystem inhabited by burrowing small mammals and numerous bird species along with the invertebrates and other organisms needed to sustain the health of the soil itself. The creatures living in the soil are critical to soil health. They affect soil structure and therefore soil erosion and water availability. They can protect turf from pests and diseases. They are central to decomposition and nutrient cycling and therefore affect plant growth and amounts of pollutants in the environment. Finally, the soil is home to a large proportion of the world's genetic diversity. In addition to serving the public's need for low-impact recreation, it also supports, nourishes, protects, and buffers a designated Wildlife Reserve as defined in detail by the 2011 Sepulveda Basin Master Plan. The applicant is therefore obligated to restore any damage its event may cause to a higher degree of specificity and thoroughness than would obtain in a park not containing a Wildlife Reserve.

To return anything to a prior state mandates that the *original* state be fully understood. **To return a sensitive ecosystem to a prior state requires a detailed, well-documented basis of comparison. Such comparisons are not valid, certainly not in a court of law, unless performed with an objective, unbiased, scientific thoroughness.** The “Pre-Festival condition” of the park is not defined anywhere in the Draft Environmental Assessment, either generally or specifically. **All of Woodley Park must therefore be thoroughly studied prior to the event,** followed by post-event restoration and subsequent evaluation in a series of steps as suggested below:

- A detailed pre-festival scientific analysis of all botanical areas which could be possibly be impacted by festival events, including all public areas, “Talent and Production” areas, “The Beach” area, equipment storage, concessions, etc. must be performed by an independent, certified, team of professionals possessing the relevant skills, at the applicant’s expense, to determine the status of all flora, including trees, shrubs and turf areas. Photographs and core soil samples would be taken and recorded to determine the degree of compaction of the pre-festival subsoil throughout the site, especially in anticipated high-traffic areas. The samples must be subjected to analysis of the biological components of the soil including the amount and type of organic matter and life forms (arthropods, nematodes, etc.), hydrology, toxic components expected to be released from festival activities, and then reports must be prepared in sufficient detail for subsequent post-festival comparisons.
- Immediately post-festival, the same team would return to perform identical photographic and soil and botanical analysis and draft a comparison to prior conditions. This post-festival evaluation of damage to the park cannot be completed until after the promoters and their contractors have cleaned up all trash, removed equipment, hardware, Port- o-Johns, wires, cables, lights, trailers, generators and other hardware and rolling stock from the park.
- The team of experts would then work with applicant to prepare a comprehensive restoration plan, with the commitment to return the park to its former state as detailed in the original evaluation (and repeatedly specified in the EA). Parenthetically, by the time removal of festival trash and equipment is completed and the restoration plan devised, it is likely that a significant portion of “8 days” will have already passed.
- The restoration plan must specify the time-and-materials parameters for replanting of all damaged or stressed turf areas. Damaged turf must be removed and disposed of. All the bare areas must be prepared, so that the soil is no longer compacted beyond the original levels, and so that replacement turf or sod, once established, will lie even with the surrounding surface, and that normal biological life processes can take place in that soil and all previously-extant biological species can immediately begin to thrive.

- After turf is replanted or sod applied, it must be left undisturbed for at least three to four weeks in the case of casual use areas and much longer for the Cricket Fields. (Soccer fields, golf courses and baseball fields used for parking will also require lengthy restoration; in those cases return to public use will also extend beyond the 8-day period, but as they are not as ecologically sensitive as Woodley Park, they are not addressed herein.) All restoration areas must be cordoned/fenced off so park users do not disturb the restoration activities or affect the duration or outcome of the restoration efforts.
- All restoration areas must be watered at least twice daily for a period determined by the certified experts and as the weather conditions require for the turf/sod to become well established and sufficiently tolerant of typical use by the public to remain healthy and sustainable
- The team of experts must observe, photograph and document all activities to confirm that the measures outlined in the restoration plan are properly carried out to standards in keeping with the restoration of ecologically-sensitive terrain.
- Finally, on a to-be-determined schedule, another complete series of soil core sample tests must be performed to determine if the restoration activities have achieved the results anticipated and demonstrate that the festival site is truly restored to its original condition. The team of experts would consult with the Army Corps and LA R&P regarding final sign-off, certifying that restoration met “the way it was or better” standards and no adverse compromises were taken for expediency or expense reduction. The experts must have the authority to postpone any sign-off to assure the public’s assets are fully restored. The City and the Corps will at all times have access to the financial records occasioned by the remediation process.
- Some months following the implementation of the restoration plan, the experts would return to confirm there are no lingering effects directly resulting from the AngelFest event that require further action.

Clearly, the 8-day post-festival restoration period referred to in the EA (see citations above), is unrealistic, especially in the case of the Cricket Fields. Likely the process will require two or more months. During that time, the public’s customary use of the park would be limited in some areas and proscribed completely in others.

In non-playing-field areas of Woodley Park, where tens of thousands of people will have stood crammed together, jumped up and down (“mosh pit”), walked between attractions, to and from Port-o-Johns, food and parking areas, remediation of turf will also be needed. Areas that provide transition around the park will be taped off for a duration of many weeks and park users will be unable to move freely or enjoy the park’s amenities to an extent that is impossible to predict pre-festival. Yet the EA makes no mention of this denial of free access by the public.

There is no economically-sound way to prepare in advance for the restoration process, as the extent and nature of steps to be taken cannot be known in advance. The above time estimate doesn't take into account the possibility of rain before or during the event, in which case the restoration would be far more extensive and expensive. A bond sufficient to cover worst-case scenarios must be posted by the promoters. By way of comparison, Promoters in Chicago routinely spend well over \$230,000 to repair Grant Park after the Lollapalooza festival in a dry year, and even more when it rains - and Grant Park contains no ecologically sensitive wildlife area.

It is clear that the 8-day proposed take-down, restoration and return to customary public use that is referred to multiple times in the Environment Assessment is completely unrealistic and cannot be achieved. The level of effort and the time to perform the restoration is grossly undefined and underestimated, and consequently the rights of the public to enjoy Woodley Park as is customary will be violated. A valuable public asset – the true ecological value of the park's terrain – will be compromised or destroyed.