



CALIFORNIA  
NATIVE PLANT SOCIETY

May 24, 2016

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Submitted by email to: [AngelFest.2016@usace.army.mil](mailto:AngelFest.2016@usace.army.mil)

Re: AngelFest Comments.

Dear Deborah:

The California Native Plant Society has been active in the Sepulveda Basin Wildlife Areas Steering Committee since 1990. The California Native Plant Society is a state-wide organization dedicated to the preservation, conservation and enjoyment of California native plants and their habitats. The Los Angeles / Santa Monica Mountains Chapter is one of 35 regional chapters located around California.

The California Native Plant Society (CNPS) is strongly against the siting of Angelfest in the Sepulveda Basin, not just adjacent to, but including portions of the Wildlife Reserve. The potential for devastating harm to the plants and wildlife in the Reserve due to fire, trampling, and disturbance is in complete conflict with the goals of the Wildlife Reserve.

The federal directive for the Army Corps Sepulveda Basin is, in order,

- 1) flood control for the City of Los Angeles,
- 2) wildlife protection,
- 3) PASSIVE recreational activities compatible with numbers 1 and 2 above.

Clearly, the nearly one-month planning, execution, and clean-up of Angelfest does not align with a passive recreational activity. It sounds like an enterprise.

It is inconceivable that any portion of the existing Wildlife Area would be utilized for this event (1.1.4). Yet, portions of the North Wildlife Area are proposed to be prepared and

used for the event. Activities associated with this event will affect soil compaction, decrease permeability, and possibly ruin any native seed bank. Stages 2, 3 and 4 are in the Wildlife Reserve (the Wildlife Reserve should be completely off limits).

Furthermore, on page 4-28 (4.5.2.1 Overview), it states that “backstage operation would occur along existing walking paths” in the northwestern section of the Wildlife Area. It is unacceptable that any portion of the Wildlife Area be used for Festival activities. This appears to be a giant loophole that would allow the promoter to ignore protections for the Wildlife Area.

Also on page 4-28, first sentence of second paragraph states “Although limited trimming or mowing would occur, no direct removal of native habitat would occur during the setup or teardown of the Festival.” Nowhere in the document is there a description of “limited trimming.” Are certified arborists going to be hired to manage the trimming of existing native trees and shrubs? What are the specifications for trimming? Will there be a biologist on site to monitor such trimming? This is another loophole that will be taken advantage of: how does the promoter justify that areas will be restored to a “condition superior to their pre-production, pre-event status” if that includes reducing native vegetation by trimming? Will they come back and un-trim the plants?

## Restoration

Project proponent states that “immediately following the Festival and during breakdown activities all areas of the Proposed Project Site would be returned to pre-event conditions or better.” (2.3.4 page 2-34).

In the section on Environmental Commitments (4.1.5 page 4-3), item PLR-2 states that “as necessary to restore prior conditions, barren areas would be seeded and/or planted with native vegetation.” This commitment requires further clarification, including and not limited to:

- 1) use of native plants endemic to the San Fernando Valley and environs
- 2) establishment and maintenance plan, along with culpable party
- 3) request to partner with LA/SMM CNPS at a consultative level to ensure success of project.

In particular, seeding has not been shown to be effective in the Sepulveda Basin.

The Angelfest footprint encompasses hundreds (thousands?) of trees and shrubs. While promoters promise to restore “to pre-event conditions or better,” how will anyone know what needs to be restored if there is no landscape map that identifies at a minimum the species, height, and diameter-breast-height (DBH), with a georeferenced location for each existing tree or shrub.

CNPS strongly recommends that a Pre-Festival tree and shrub survey throughout the Proposed Project Site and all proposed parking areas in the Sepulveda Basin be conducted well-prior to any set up activities, and that tree and shrub survey be approved by CNPS.

The mitigation is not reasonable (BIO-6-6 page 4-35). One 15-gallon oak tree for each mature oak tree destroyed? And what if, during the event, all the trees are destroyed? Great, the promoter will plant a bunch of trees in another area and the people will lose the resources of Woodley I, II and III. Why are cottonwoods and other native trees not included?

Leaving the mitigation up to Recreations and Park (RAP) when currently RAP shows only limited capacity to manage the Wildlife Reserve is a recipe for no mitigation.

While BIO-6-6 states that RAP or Make Good Group will replace “damaged shrubs and trees,” there is no size indication for the replacement plants. Normally when a mature tree or shrub is destroyed, mitigation is 3:1 or 5:1, since the replacement plant will not be of the size of the plant destroyed. Nowhere is the mitigation described in detail.

Furthermore it is unclear in the “Thresholds of Significance” for Biological Resources (4.5 page 4-27) if it includes plants and animals currently residing in the Woodley I, II, and III (as opposed to within the defined Wildlife Area). There is plenty of wildlife habitat in the numbered Woodley Parks, and this buffer zone helps protect the actual Wildlife Area.

Unfortunately, people climb on trees. There is no doubt about that. Will there be a tree patrol? What is the project proponent’s proposal to keep people from climbing trees during the event?

4.5.2.7 (Protected Trees) (page 4-32) does not mention that there are protected trees in the grassy park areas of Woodley I, II and III, including sycamore and oak trees. This section does mention that “a ramp large enough for people and equipment is proposed through the cluster of valley oak trees leading to the “Beach State” (#4) in the unmaintained part of the park.” Not sure what is meant by “unmaintained part of the park,” as the CNPS has regularly managed for weeds in this section of the Wildlife Area. It is unreasonable to mitigate damage to these oak trees by planting replacements in other areas of the Wildlife Reserve. CNPS strongly objects to any activities taking place in the Wildlife Area which includes this cluster of valley oak trees. Furthermore, BIO-4 (page 4-34) that requires oak trees to be fenced with orange mesh snow drift fencing is not a satisfactory mitigation given that the only condition is to avoid these oak trees “as best practicable.” These trees are of tremendous value and should not be harmed at all; that is, they should be completely avoided and the stage moved.

BIO 6-6 (page 4-35) is not close to being reasonable mitigation. As mentioned before, limiting tree replacement to oak trees unduly limits the liability of the proponents if other trees, such as sycamores, box elder, native ash, cottonwoods are harmed. There is no

mention of shrubs. Replacing a full size tree with one 15 gallon tree is insufficient mitigation. 3:1 or 5:1 replacement would be more acceptable, even though CNPS believes NO TREES OR SHRUBS should be harmed because of such an event. Furthermore, it is wrong to limit the location of replacement plantings to the Wildlife Area north of Burbank Blvd. Replacements should be planted at the site of the destroyed vegetation.

It also seems that having the fox watch the henhouse is a bad idea: it is RAP that is promoting this event, and it is also RAP that is being tasked to make sure all the plants replaced survive. It seems that in the long run, trees and shrubs in the Proposed Project Site will eventually be destroyed, leaving RAP and the promoter with areas with less vegetation more conducive to big festivals, rather than a verdant park for the public to enjoy.

### Pyrotechnics, Fireworks

The wildlife reserve will be bone dry in October, the exact time of the year when the Santa Ana winds blow from north to south. A misdirected firework could end up in the wildlife reserve and start a fire that on a windy day – and we all know how hard and persistent the winds blow in the Basin – could leap Burbank Blvd. and the freeway, burning its way through the Sepulveda Pass and into Brentwood. Nowhere in the Angelfest proposal are there restrictions for pyrotechnics based on weather conditions.

The fireworks will scare the birds and make them have to fly around at night – they will be blinded by the AngelFest lights. Where will they go, at night? All the surrounding areas will be parking lots. The native plants in the Wildlife Area are there for the wildlife; since the early 1990's the wildlife lake has been a safe refuge every night – for over 30 years. Angelfest will ruin the wildlife area as a dependable sanctuary.

### Disturbance to the soil

Since 1990, CNPS has been active in eradicating and controlling weeds in the Sepulveda Basin. We have worked diligently to control the weeds in all of the areas within the boundary of the Angelfest footprint. Not only is your fence “protecting” the wildlife area going to result in hundreds of postholes being dug, but there is going to be a double fence! Even more disturbance. Disturbance is one of the main factors in weed germination. There is no mitigation for digging hundreds of post holes. As someone who has been out there every week for 5 years, I've seen what causes weed infestations, and disturbance leads the way. Imagine if Angelfest did this every year! Annual disturbance added to the list of the Wildlife Area's woes.

Even though PLR-4 (Environmental Commitments) sounds like a benefit, actually the fence posting will be a huge environmental disturbance for which there is no mitigation being offered.

In addition, there is no provision for sterile equipment. For example, the post hole diggers will bring heavy equipment into the Wildlife Area to dig holes for the double fence; each piece of equipment should be adequately cleaned to assure no introduction of weed seeds from other sites. Sterilized equipment is a necessary requirement.

Figure 7 shows where fabric covered double fencing will be installed. This diagram does not line up with the proposed Festival Site Plan (Figure 6). For example, it appears that the double fencing goes right through Stage 4.

### Crowd Control

Page 2-33 states that "The Sepulveda Basin Wildlife area would be accessible via pedestrian access. This is reiterated in page 1-10 (1.3) referring to the "southern (primary) portion of the Sepulveda Basin Wildlife Area" "would not be affected by the Proposed Action."

Scenario: Some kids Uber to Burbank and Woodley to get dropped off. They notice that the Wildlife Reserve is easily accessible across the woodcrete fences on the south side along Burbank. One of them sends out a Twitter message:

#FreeConcertAtWoodleyPark with instructions to get dropped off and enter wildlife reserve from the south (on Burbank) or the east (via the Overlook). Thousands of persons arrive, overwhelming police presence, trampling the Wildlife Reserve as they move around trying to get to a "good spot."

The only way to get to Stage 2 is by crossing Haskell Creek over a small bridge. CNPS is concerned that at the last minute the fire marshal will threaten to stop the show, but agree to continue if the bridge in the wildlife reserve can be used (conveniently if not foresightedly, the Angelfest footprint shows the bridge within its bounds).

On page 4-6 (4.2.5 Environmental Commitments), item WR-4 states that "There will be limited designated spots where attendees can pass through." This statement seems to contradict the previous sentence that states "A temporary six foot high chain-link fence will be installed around the Proposed Project Site to prevent debris from being tossed into Haskell Creek. Fencing along Haskell Creek and Woodley Creek, which are interior to the Proposed Project Site, will run along the length of the water features through the entirety within the Proposed Project Site, and *there would be no access by event staff or Festival attendees during the Festival.*" [Italics added.] Just where are these "limited designated spots where attendees can pass through?"

#### Additional Items:

Page 3-12 (3.6.1.1 Festival Site), third paragraph, describes the corn maze area as being dominated by Sahara mustard (*Brassica tournefortii*); that is not correct as Sahara mustard is not known to be found in the Basin. The mustards in question are likely to be *Brassica* spp. or *Hirshfeldia* sp.

We are not sure why ACOE would use a map from the early 1990's rather than a current map to show the Proposed Project Site (Fig. 3). Heck, the restrooms aren't even shown on this map. This map does not show the vegetation that is currently on the site.

The Basin has no prior record, except one Children's Day, of managing anywhere near the projected crowds of the festival. Children's Day was 60,000. The nearest other couple of events were in the 30,000 range and were cultural events with nothing akin to a rock concert and the associated activities, noise, inebriation, and potentially raucous behavior

The producer, Make Good Group, may have produced a large-scale concert in the past. However, it was big due to streaming via many countries and thus technologically and 'virtually' large. CNPS is concerned of their lack of production experience in a 'boots on the ground' concert of at least 65,000 attendees.

Albeit water features inherent in the Basin will be cordoned during Angelfest from encroachment, the protection from human and trash access does not preclude the concert from scrutiny of the Porter-Cologne Water Quality Act of the State of California administered locally by the Los Angeles Regional Water Quality Control Board. Angelfest, as planned, threatens water quality beneficial uses, including and not limited to: particulate and chemical deposition to water, vegetation, and wildlife by pyrotechnics, noise and vibrational disturbance to aquatic species and wildlife.

CNPS objects to the use of the model airplane fields as a parking lot. This area, while ruderal, has an increasing *Baccharis* shrub community, and the open field provides habitat for wildlife. Parking will compact the soil, likely result in the destruction of numerous shrubs, and degrade the habitat; disturbance caused by mowing and site set up will create perfect habitat for the introduction of new weeds brought in on car tires. There is no mitigation for replacement of damaged shrubs in this proposed parking area nor is there weed control in the future.



## CONCLUSION

Finally, Angelfest is being touted by promoters, City of Los Angeles, TreePeople, and other supporters as a vehicle 'that will help ignite and unite Angelenos to a greener, shadier, healthier, and a more water-secure Los Angeles.' In all likelihood, despite tabling and other educational efforts at the event, the impact of a concert of this scale will be moot and uninfluential: it is not being called Environmental Fest, it is not being called Ecology Fest. Make Good Group's offer to allow environmental groups set up tables is cold comfort to the wildlife that will be displaced during this event.

Angelfest clearly abrogates the permitted responsibilities of the agencies' granted responsibilities to protect both the environmental and anthropogenic resources of the Sepulveda Basin. The proposed production is not a fit legally and environmentally for the site.

The California Native Plant Society has made the Sepulveda Basin a focus of its restoration activities for decades. It is heart-wrenching to see such an out-of-scale use being promoted by the City of Los Angeles as a cure for lack of funding, when based on the City's answers, the funding will not be earmarked for the Wildlife Reserve per se, but for projects anywhere in the Basin and groups wanting access to the funds will have to submit proposals.

Angelfest is a nice idea, but the Sepulveda Basin is the wrong spot, and siting this giant concert directly adjacent to and encroaching on the Wildlife Reserve is an insult to all who have spent so many hours and years trying to make the Wildlife Reserve a sanctuary for native plants and wildlife.

While asking us to believe in their "goodness" and how much they "care for the environment", the potential damage and the miniscule mitigation proposed clearly reveals that it is the City's and the promoter's visions of dollars that is leading the way – not a concern to protect one of the very few remaining riparian habitats in Los Angeles.

Please reject the Angelfest proposal.

Sincerely,



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