

## Memorandum

To : The Conservancy  
The Advisory Committee

December 15, 2025

From :  Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Director

Subject: **Consideration of resolution authorizing an opposition comment letter to the City of Los Angeles for proposed 398-unit Canoga Canyon Project within the Woodland Hills Country Club golf course, Woodland Hills.**

### Staff Recommendation:

That the Conservancy adopt the attached resolution authorizing an opposition comment letter to the City of Los Angeles for proposed 398-unit Canoga Canyon Project within the Woodland Hills Country Club golf course, Woodland Hills.

### Legislative Authority:

Section 33211 of the Public Resources Code.

### Background:

On approximately November 21, 2025 an application was submitted to the City of Los Angeles to construct 298 residences on a 20-acre portion of the Woodland Hills Country Club Golf Course. The land is zoned A-1 and is designated as Open Space. The application seeks to bypass all CEQA review and all public hearing under the umbrella of AB 2011 and AB 2243. Staff and the community strongly disagree. The project is in the Santa Monica Mountains Zone. A draft opposition letter for consideration is attached.

Attached:

[SMMC letter 398 unit Woodland Hills project](#)

[Project Zoomed Out showing SMMC Zone boundary](#)

[Project Close Up](#)

[Comprehensive Community Email to City](#)

[Daily News Article](#)

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 15, 2025

Karen Bass, Mayor  
Vince Bertoni, Director of Planning  
City of Los Angeles  
200 N. Spring Street  
Los Angeles, California 90012

**Woodland Hills Open Space-Designated Golf Course 398-Unit Residential Project**  
**CPC-2025-6505-DB-DRB-SPPC-PR-VHCA**  
**VTT-84929-VHCA 4868 Canoga Avenue**

Hon. Mayor Bass and Director Bertoni:

As a California Environmental Quality Act (CEQA) trustee agency for the Santa Monica Mountains Zone, the Santa Monica Mountains Conservancy offers the following reasons why the City must not process the proposed 20-acre mixed income residential project in Woodland Hills without a regular review under CEQA. Per the attached exhibit, the proposed project is located well within the Santa Monica Mountains Zone established by the Legislature in 1980 (Public Resource Code Section 33105).

Public Resource Code Section 33001 states:

The Legislature hereby finds and declares that the Santa Monica Mountains Zone, as defined in Section 33105, is a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations; that, as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, it provides essential relief from the urban environment; that it exists as a single ecosystem in which changes that affect one part may also affect all other parts; and that the preservation and protection of this resource is in the public interest.

Because of the Zone's unique resource value that benefits millions of residents, proposed development within the Zone warrants the highest level of scrutiny to protect resources to the greatest extent practicable. No project approaching even five acres within the City of Los Angeles portion of the Zone have been approved in the last quarter-century. Nonetheless the ecological capacity of the City of Los Angeles portion of the Zone located east of Topanga Canyon Boulevard has significantly diminished in that quarter-century

with many current ongoing threats. Each open space property, or portion thereof, in the Zone contributes to its level of ecological function.

The proposed 20-acre project would essentially be as large as the developed portion of the Taft High School campus but jammed into a Santa Monica Mountains canyon full of trees and free of all lighting. The subject property is rung by numbered habitat blocks (see attached) in the Conservancy's adopted *Big Wild – Topanga State Park Core Habitat Planning Map* recognized by a City Council resolution. The subject property is less than 900 feet from the Conservancy's property that abuts Serrania Park. In short, core habitat ecological values in those two parks are located less than 300 yards from the subject property. The whole golf course with its trees and water features is an integral portion of the Santa Monica Mountains ecosystem, particularly for raptors and small to medium sized mammals. Both the golf course water features located due south and west of the clubhouse, and in the central drainage leading to Dumetz Road, are included in the United States Fish and Wildlife Service's National Wetland Inventory. Both are slated to be partially eliminated.

The proposed high density project site on agriculturally zoned land is now a boundaryless island within a single 94-acre parcel designated as Open Space by the City. The project proposal offers zero insight into what would or could become of the remaining 74 acres. Unless the project description adequately addresses the permanent fate of those 74 acres, the project environmental review is clearly being piecemealed. The Conservancy believes that reliance on AB 2011 requires a legally defined parcel of which the boundaries match the project site. The project must first proceed with a Tract Map approval, and perhaps recordation, before AB 2011 can even attempt to be applied. The proposed tract map needs full CEQA review as a first step.

The environmental fate of the full 94 acres within the Zone, and that of all the properties that abut the 94 acres, are at stake, not just 20 acres proposed for the project which does not exist in a vacuum. A full Environmental Impact Report (EIR) that addresses the full 94-acre parcel as an integral part of the project, and the project's potential impacts on surrounding parcels, is mandatory to provide decisionmakers with Alternatives that can reduce environmental impacts and increase public benefits.

That EIR must address the mass concentration of lighting the proposed project would bring with uniformly multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and ubiquitous street and drive lane lighting. The baseline condition of the 94 acres is free of all lighting. The proposed level of lighting would have a permanent, significant adverse effect on natural resources for a considerable radius determined by surrounding topography and the adjacent project housing type. The project essentially

Hon. Karen Bass and Director Bertoni  
CPC-2025-6505-DB-DRB-SPPC-PR-VHCA  
December 15, 2025  
Page 3

proposes a 24-hour shopping mall level of direct impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and great foxes. That level of light emittance within the Zone, and in proximity to abundant open public and private open space, would be a permanent, unmitigable significant biological impact. The required EIR will allow for project alternatives that substantially reduce this lighting impact on wildlife resources.

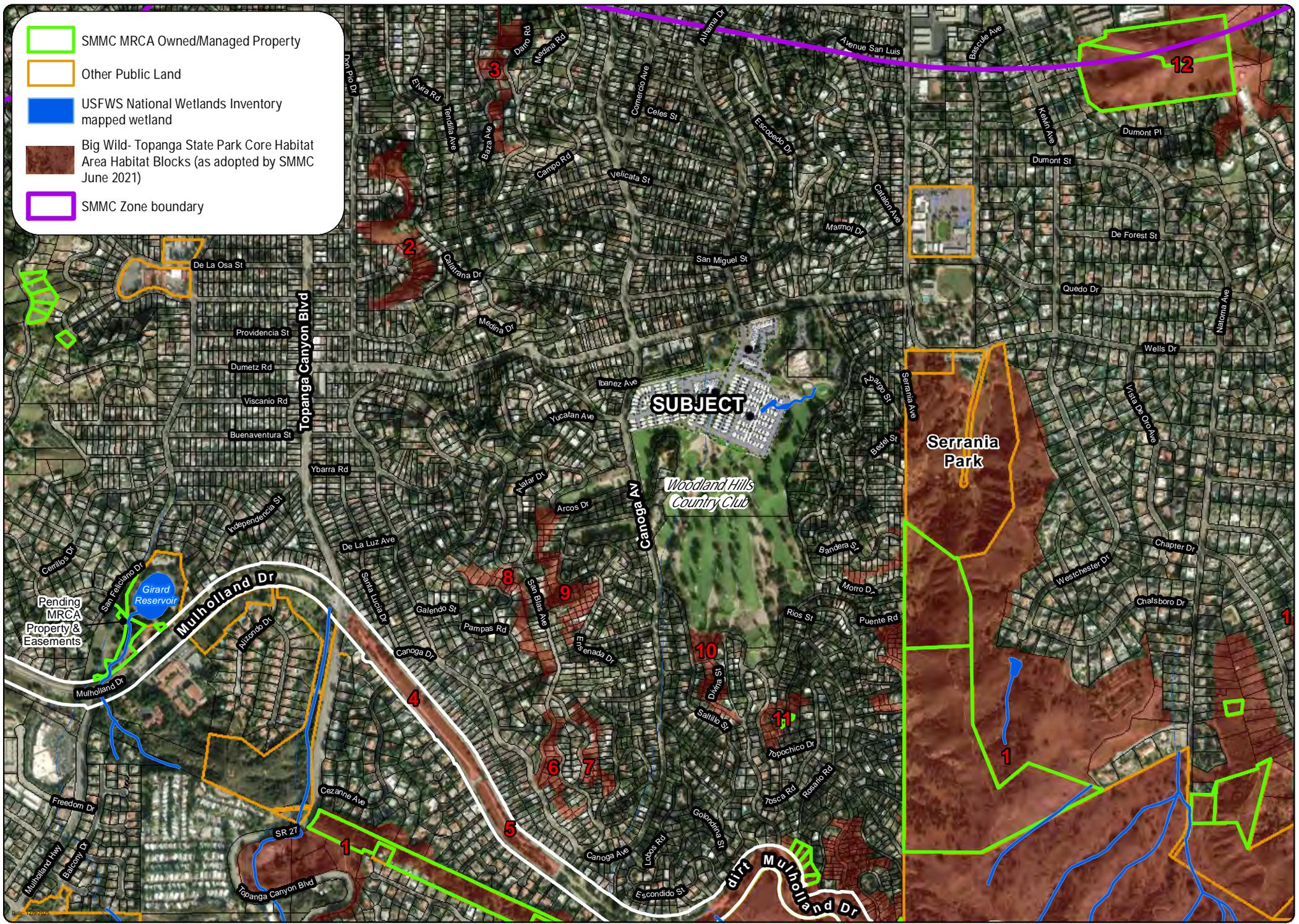
The sensitivity of the subject 94 acres is further illustrated by its majority being within the outer corridor of the Mulholland Scenic Parkway Specific Plan. The subject 20-acre proposed development footprint lies in the geographic heart of the Girard Tract Specific Plan. The mass concentration of lighting and vehicles from the proposed project is antithetical to the spirit of both Specific Plans to maintain community integrity and resource values. The proposed project is completely incongruous with the surrounding land uses. If housing is proposed for the site, that housing must be more congruous with the resources of the Santa Monica Mountains Zone that benefits all of Los Angeles. The Conservancy stands in full opposition to both the proposed project and the City's consideration of any level of review less than an Environmental Impact Report with alternatives.

Please direct all future questions and documents to Paul Edelman, Deputy Director for Natural Resources and Planning at the above letterhead address.

Sincerely,

STEVE VERES  
Chairperson

-  SMMC MRCA Owned/Managed Property
-  Other Public Land
-  USFWS National Wetlands Inventory mapped wetland
-  Big Wild- Topanga State Park Core Habitat Area Habitat Blocks (as adopted by SMMC June 2021)
-  SMMC Zone boundary



**398 Unit Mixed Income Housing Development Project**  
 CPC-2025-6505-DB-DRB-SPPC-PR-VHCA, VTT-84929-VHCA

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