

Communication from Public

Name: Kyle Nauman

Date Submitted: 01/12/2026 02:02 PM

Council File No: 25-1486

Comments for Public Posting: My name is Kyle Nauman and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. We are long term residents with small children and we this development will impact our family's safety in emergency and needs proper study! While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the

following comments regarding the proposed 4868 N Canoga Avenue project: **THIS IS NOT A RETAIL OR COMMERCIAL AREA:** The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review. **CONGESTION AND ROAD CONDITIONS:** The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable.

Communication from Public

Name: Dr. Aimee Carrillo Rowe

Date Submitted: 01/12/2026 01:11 PM

Council File No: 25-1486

Comments for Public Posting: Hello, I am a concerned Woodland Hills neighbor writing in opposition to the proposed housing development of the golf course. The area is home to birds and other wildlife, which should be studied before any construction begins. Traffic is already a concern in this area, so traffic mitigation would have to be provided by the developers. Finally, we are in a high fire risk area and fire safety must be carefully considered for any development. Thank you for considering my voice, Aimee Carrillo Rowe, PhD

Communication from Public

Name: Teri Engelberg, M.D.

Date Submitted: 01/12/2026 08:38 PM

Council File No: 25-1486

Comments for Public Posting: My name is Teri Engelberg and I live in the neighborhood surrounding the Woodland Hills Country Club. I have lived here for 23 years and am very concerned about the proposed development of the Country Club involving the construction of 398 units. I and many members of our community are extremely concerned about this impact this inappropriate, high-density development will have on our environmentally sensitive, fragile neighborhood. My primary concern is the safety issue. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. Even without the addition of 398 more units, and likely close to 800 more cars, residents are at high risk of being trapped should a fire occur. Canoga Ave., which is a residential street and not a commercial one, is the only outlet for all of us to escape to safety. As I'm sure all are aware, in last year's devastating Palisades fire, the only way many residents were able to escape the fire was to get out of their cars and try to walk to safety before their cars melted with them inside. If this development were to be approved, not only would traffic be completely stopped and auto outlets blocked, but less able people - those who are wheelchair bound, bedbound, walker-dependent - would be swallowed by flames as they sit in their cars, unable to escape. I have worked in a burn unit and treated severely burned patients - the ones who actually survived - it is devastating. Whoever approves this development will have blood on their hands. This area will become a deathtrap. Of course there is a need for more housing, and housing that is affordable. But this is not the place. In addition to the severe and real risks of residents being trapped in a fire, there are numerous other reasons this development should not be approved, many elucidated by other residents in their letters - loss of open space and harm to wildlife (the golf course is an integral part of the Santa Monica Mountains ecosystem), the fact that this is to a retail or commercial area, and the fact that this proposed development is inconsistent with the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public

hearing, or appeal, classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacent to single-family homes served by narrow sub-standard streets that function as evacuation routes. The intent of AB 211, AB 2243, and AB 893 are for underused commercial properties to be developed into dense housing without community review, to open green spaces in the center of Very High Fire Hazard Severity Zone neighborhoods. For this reason, a project such as this should never be allowed based on quick "ministerial" approval. Therefore, I am requesting that the Project undergo full CEQA review, including preparation of an Environmental Impact Report and an Evacuation Capacity Study.



ULTA Canoga Park CA
6500 Canoga Avenue
Canoga Park CA 91303
747-444-4515

Trans 4067 Date 12/6/25 Time 2:15 PM
Store 1636 Reg 4 Cashier Julianna

Item	Qty	Price	Amount
RADIANT HAIR COLOR KIT RAVENNA BROWN 814474023010		35.00	35.00
Subtotal			35.00
		TAX 9.7500%	3.41
		Tax Total	3.41
Total			38.41

AMERICAN EXPRESS 38.41
*****5009
Auth #: 839926
Transaction Type: Sale
Entry Method: Contactless
Auth Time: 2:15 PM
Trace Number: 40670403

Change 0.00

ULTA BEAUTY REWARDS
MEMBER NUMBER: 2913177143983

BASE POINTS EARNED	35
CURRENT POINTS BALANCE	87
REDEEMABLE POINTS	0
REDEEMABLE VALUE (\$)	0.00
POINTS EXPIRING	0



Sold Item Count = 1

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Communication from Public

Name: Michael McClellan

Date Submitted: 01/12/2026 02:19 PM

Council File No: 25-1486

Comments for Public Posting: My name is Michael McClellan, and I live in the neighborhood surrounding the Woodland Hills Country Club. I am writing to express my serious concerns regarding the proposed 398-unit development at the Woodland Hills Country Club property. I, along with many neighbors, believe this project is inappropriate for an environmentally sensitive hillside area located within a Very High Fire Hazard Severity Zone (VHFHSZ). The site is served by narrow, substandard streets that already experience congestion. In the event of a wildfire or other emergency, there is a real risk that evacuation routes could become gridlocked, potentially trapping residents. A single stalled or abandoned vehicle could render an entire road impassable. This is not a theoretical concern, it is a life-safety issue. While I understand and support the need for additional housing, the intent of AB 2011 was to encourage development along existing, appropriately zoned commercial corridors. That intent is already being fulfilled in places like Warner Center. The proposed development at 4868 N Canoga Avenue does not fit that purpose. Subsequent amendments—AB 2243 and AB 893—removed critical guardrails related to fire safety and specific plan consistency. These changes have enabled developers to bypass long-standing protections designed to safeguard residents in extreme fire zones. Nullifying specific plans and fire-zone standards in a VHFHSZ puts lives at risk and undermines thoughtful land-use planning. I respectfully request that the City comply with AB 747 by requiring a full Evacuation Capacity Study and a complete Environmental Impact Report (EIR). The developer asserts that AB 2011, AB 2243, and AB 893 allow for a 90-day ministerial approval without CEQA review, public hearing, or appeal by labeling Canoga Avenue a “commercial corridor.” This classification is highly questionable given the site’s A-1 Agricultural/Open Space zoning, its adjacency to single-family neighborhoods, and its reliance on narrow hillside streets that function as evacuation routes. Additional concerns include:

- Not a commercial corridor: The site’s zoning does not principally permit office, retail, or parking uses. The project requires a discretionary waiver to avoid mandatory sidewalk dedications, raising ADA compliance concerns and undermining its eligibility as a commercial corridor.

The site also exceeds 20 acres and lacks a tentative tract map,

further supporting the need for full EIR review. • Traffic and evacuation risk: Increased density will significantly worsen congestion on streets that are already inadequate for emergency evacuation. • Loss of open space and wildlife impacts: The golf course property is part of the Santa Monica Mountains ecosystem and supports protected habitat and wildlife, including bobcats and state-listed threatened mountain lions. The proposed buildings, nearly 900 parking spaces, vehicle headlights, and continuous lighting would create permanent, unmitigable biological impacts. • Inconsistency with existing specific plans: The project conflicts with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan, which remain valid and enforceable. It would also impact historic resources, including elements of the William Bell-designed golf course and protected trees. The intent of state housing laws was to redevelop underutilized commercial properties—not to convert open green space in the center of a Very High Fire Hazard Severity Zone into dense housing without public review. For these reasons, I respectfully urge the City to require full CEQA review, including an Environmental Impact Report and Evacuation Capacity Study, before any further consideration of this project. Thank you for your time and consideration.

Communication from Public

Name: Rebecca Streightiff

Date Submitted: 01/12/2026 02:21 PM

Council File No: 25-1486

Comments for Public Posting: I am submitting this comment to address the historical significance of the Woodland Hills Country Club site, also known as the former Girard Golf Course, and the risks of advancing major redevelopment before that significance has been properly verified and reviewed. This property is not an empty or generic site. It is a 94-acre historic designed landscape dating to 1925, associated with Victor Girard's original garden-suburb planning for Woodland Hills and the work of master golf-course architect William P. "Billy" Bell Sr. A formal Historic-Cultural Monument nomination has been submitted to the City's Office of Historic Resources, supported by extensive documentation addressing historic context, integrity, and eligibility under the City's own designation criteria. The existence of this nomination matters procedurally. Historic significance is not something that can be assumed away through application checkboxes or narrative assertions. Under the City's planning and environmental framework, potential historic resources must be identified and evaluated based on verified facts before approvals are advanced -- especially where redevelopment would permanently alter or destroy character-defining features. What concerns me is that fast-tracking redevelopment before the City has completed its evaluation of historic significance effectively forecloses that review. Once grading, tree removal, or site reconfiguration occurs, the very qualities that make a historic designed landscape legible are lost, and the opportunity for meaningful consideration disappears. This site's historic value is inseparable from its landscape: its original routing, topography, circulation patterns, long-established vegetation, and open-space character. Proceeding on the premise that no historic resource exists -- without completing the City's own verification and review processes -- places speed ahead of substance and undermines the purpose of historic and environmental safeguards. I am not asking the Committee to decide the merits of the Historic-Cultural Monument nomination today. I am asking that the City not allow fast-track processing to substitute for verification, and that historically significant properties receive the careful, transparent review required before irreversible decisions are made. Thank you for your time and consideration.

Communication from Public

Name: Jessica Marie

Date Submitted: 01/12/2026 02:38 PM

Council File No: 25-1486

Comments for Public Posting: I am a homeowner within the Girard Tract neighborhood. Like many, I was impacted by the Palisades Fire and feared for our safety as we anxiously awaited whether we would be under mandatory evacuation or not (We were under "Warning" for days). When the proposed development at the Woodland Hills Country Club site came across my radar, I looked into it with an open mind. Unfortunately what I found is gravely concerning. After reviewing the developer's 36-page filing for the proposed 398-unit project at 4868 N. Canoga Ave, it is clear that the application does not meet the objective eligibility requirements for ministerial approval under AB 2243. The filing relies on selective interpretations, unsupported assertions, and omissions that appear designed to bypass discretionary review rather than comply with the law's objective standards. Below are the reasons this project is ineligible for ministerial approval and must undergo full discretionary review, including CEQA, traffic analysis, infrastructure assessment, and public hearings. 1. MISAPPLICATION OF AB 2243 AND MISREPRESENTATION OF THE GIRARD TRACT SPECIFIC PLAN The developer claims the Girard Tract Specific Plan is invalid because it is over 25 years old. This is legally incorrect. A Specific Plan is a zoning ordinance adopted by the City Council and does not expire absent a sunset clause. AB 2243's definition of "Neighborhood Plan" does not nullify adopted Specific Plans. The Girard Tract Specific Plan remains fully enforceable and continues to regulate land use, height, and zoning. 2. THE SITE IS ZONED A1-1XL (AGRICULTURAL), NOT COMMERCIAL AB 2243 requires placement on a commercially zoned corridor. The A1 zone is agricultural. Accessory retail uses associated with a golf course do not constitute a primarily commercial zone. This mischaracterization alone disqualifies the project. 3. REQUIRED 70-FOOT RIGHT-OF-WAY IS NOT DOCUMENTED The filing claims Canoga Avenue has an "approximately 80-foot" right-of-way but provides no certified survey or Bureau of Engineering documentation. Approximate measurements do not satisfy objective standards. 4. FAILURE TO MEET THE 75% URBAN PERIMETER REQUIREMENT The developer improperly counts golf course land as "urban use." Golf courses are open space, not urban development. This interpretation

contradicts legislative intent and fails the objective criteria. 5. **VERY HIGH FIRE HAZARD SEVERITY ZONE — CRITICAL SAFETY FAILURES** The site is located in a Very High Fire Hazard Severity Zone (VHFHSZ). AB 2243 requires demonstrated compliance at the time of application, not deferral to plan check. The filing includes no wildfire evacuation analysis, no fire-access plan, no emergency ingress/egress analysis, and no documentation from LAFD. In a hillside VHFHSZ area with constrained roadways, this omission is severe and disqualifying. Fire safety and evacuation capacity cannot be deferred under a ministerial process. 6. **ENVIRONMENTAL REVIEW IS INCOMPLETE** The Phase I Environmental Assessment identifies a Recognized Environmental Condition (REC), yet no Phase II testing was performed. Given the site's long-term golf course use and known pesticide risks, this omission renders the environmental review incomplete. 7. **DENSITY BONUS INCENTIVES LACK REQUIRED EVIDENCE** The developer seeks extreme deviations, including increased height, minimal setbacks, and reduced building separation. No cost analysis, feasibility study, or substantial evidence is provided to justify these concessions as required by state law. 8. **LOT-LINE ADJUSTMENT NOT VERIFIED** The application relies on a lot-line adjustment that does not appear finalized or recorded. Without verification, all related density, access, and setback calculations are invalid. 9. **TRAFFIC, INFRASTRUCTURE, AND CITY SERVICES ARE IGNORED** The filing omits analysis of traffic congestion on Canoga Avenue, emergency access constraints, hillside street impacts, fire and police response capacity, water and sewer infrastructure, stormwater drainage, and cumulative construction impacts. These are precisely the impacts ministerial approval would bypass. **CONCLUSION & FORMAL REQUEST** Because the project fails multiple objective criteria required for AB 2243 eligibility—particularly critical fire hazard and evacuation requirements—and relies on unsupported claims and incomplete documentation, I respectfully request that the City: Reject ministerial processing under AB 2243 Determine the project ineligible for AB 2243 approval Require full discretionary review, including CEQA Require comprehensive analysis of fire hazards, evacuation, traffic, environmental contamination, infrastructure, and city services Require public hearings with meaningful community participation Thank you for your attention to these serious legal, environmental, and public safety concerns.

Communication from Public

Name: Jim Heimler

Date Submitted: 01/12/2026 02:39 PM

Council File No: 25-1486

Comments for Public Posting: I live in Woodland Hills, and I am concerned about the fast-tracking of proposed project at the Woodland Hills Country Club. I believe it compromises our neighborhood's fire safety. While I support housing development, it cannot come at the cost of lives. Each neighborhood needs safety issues reviewed, documented, input from all parties and then decisions can be made. The site lies within a Very High Fire Hazard Severity Zone. Given the increased density and our narrow streets, I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and a full Environmental Impact Report (EIR). beyond that the study of infrastructure needs to be analyzed. In Girard the city just doubled the number of homes allowed thru allowing 1 ADU for each home. there is no enforcement of existing road safety concerns. Cars project into roadways for months at a time. cars park under no parking signs, on street corners, or to close to fire hydrants every day. Delivery vehicle now have full use of all streets and block traffic at their will. landscaping is allowed to encroach into street paths. soil accumulates on down hills site onto streets without any clearing even on the collector streets. downhill sites have dug out hillsides under roadways causing street s to collapse. All this is done outside the laws in =place and the city even when notified do not enforce the laws. Let's not allow folks to make the situation any crazier, less safe until all these other issues are dealt with. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. This is not a commercial area. The site's "Open Space" zoning does not permit the proposed uses, and waiving sidewalk dedications would violate ADA requirements. The project also threatens to increase congestion on our substandard streets, where a single stalled vehicle could block evacuation routes. Folks are now parking anywhere they want, against the law. at a party many cars park blocking access, lanes, street corners with no city enforcement. Red Flag days there is no enforcement. The development would result in the loss of open space and harm

wildlife, disrupting the Santa Monica Mountains ecosystem and introducing significant light pollution. It is also inconsistent with the neighborhood's character and violates the Girard Tract and Mulholland Scenic Parkway Specific Plans. Additionally, it requires demolishing a historic site featuring a William Bell-designed course and protected trees. I am requesting the City follow AB 747 and require a full Evacuation Capacity Study and Environmental Impact Report. Sincerely, Regards, Jim Heimler, Architect jim@ecoistarchitect.com JAMES HEIMLER, ARCHITECT, INC. Phone (818) 648-5815

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Communication from Public

Name: Ann Marshall

Date Submitted: 01/12/2026 02:40 PM

Council File No: 25-1486

Comments for Public Posting: Public Comment for Council File: 25-1486 I SUPPORT THE MOTION SUBMITTED BY BOB BLUMENFIELD Ann Marshall, Jan. 12, 2026 My name is Ann Marshall, and I am a neighbor of the Woodland Hills Country Club. I am very concerned about the impact of the proposed development on the golf course site, and I am asking for a full, public review of the project because I do not believe that it qualifies for fast-tracked ministerial approval. This dense development will have a huge impact on the surrounding community and, I believe, exploits loopholes that would push high-density housing into areas never intended to be covered by AB2011 and AB2243. AB2011 states: “The Issue... .To meet state climate goals, new housing must be in developed areas that do not require long commutes and rely on low-emissions modes of travel like transit, biking, and walking.” “The Solution... With thousands of these commercial sites across California, this would allow production of new affordable housing units at scale, without changing the density or character of existing residential neighborhoods.” “Bill Specifics... Mixed-income housing will be focused along commercial corridors that are wide enough to accommodate density and new transit.” As stated, the bill is designed to be used to provide housing in already-dense COMMERCIAL sites close to public transit and jobs. If this site truly met the intent of the Bill, there would be no need to include 835 parking spaces. But the fact is that 2 bus routes on Ventura Blvd and 1 route on Topanga (both $\frac{3}{4}$ miles away) do not provide the quantity and quality of transit needed to make it reasonable for future residents to not have cars. That means that there would be an additional 835 cars trying to exit the property in an emergency. My house is 2 block south of the proposed main driveway to the development, meaning that I would be trapped behind all that traffic in an evacuation (likely to the north, away from the mountains). At my house, Canoga is only 2 lanes wide, barely 21’ across, and it only gets narrower as you go south; it is in no way a commercial corridor and cannot accommodate new density and transit. The area is a Very High Fire Hazard Severity Zone and within the Santa Monica Mountains Zone, so the odds of needing to evacuate at some point is high. The developers’ proposal states that “The Project Site is an urban infill site surrounded by urban uses” but that is very

misleading. It is in fact an open space in an area zoned A1-1XL (which means that it has an extra-limited height district overlay.) It is a 93 acre golf course with one clubhouse and related parking. The fact that the clubhouse has a restaurant and a pro shop (neither of which is open to the general public) does not make it a commercial/retail site. The golf course is surrounded by neighborhoods of single-family homes and has a maximum height restriction for buildings of 35'. Giving an Off-Menu Additional Incentive to allow a height of 60 ft. would drastically, an Off-Menu Additional Incentive to allow a 1 ft. side yard setback in lieu of 15 ft, and an Off-Menu Additional Incentive to reduce the required passageway between residential structures to 6 feet in lieu of 12 feet, would definitely change the character of the existing neighborhood. In short, the proposed development at the Woodland Hills Country Club does not meet the intent of AB2011 because it: • DOES NOT rely on low-emissions modes of travel like transit, biking, and walking • DOES change the density or character of existing residential neighborhoods • IS NOT on a commercial corridors wide enough to accommodate density and new transit Adding the Very High Fire Hazard Severity Zone risk and the loss of open space in the Santa Monica Mountains Zone just compounds the seriousness of this exploitative attempt to utilize AB2011 exponentially. I respectfully ask that this development proposal not be fast-tracked and not be granted the off-menu density bonuses. This project deserves to be reviewed and vetted by both professional and community stakeholders. Ann Marshall Woodland Hills resident

Public Comment for Council File: 25-1486

I SUPPORT THE MOTION SUBMITTED BY BOB BLUMENFIELD
Ann Marshall, Jan. 12, 2026

My name is Ann Marshall, and I am a neighbor of the Woodland Hills Country Club. I am very concerned about the impact of the proposed development on the golf course site, and I am asking for a full, public review of the project because I do not believe that it qualifies for fast-tracked ministerial approval. This dense development will have a huge impact on the surrounding community and, I believe, exploits loopholes that would push high-density housing into areas never intended to be covered by AB2011 and AB2243.

AB2011 states:

"The Issue...

...To meet state climate goals, new housing must be in developed areas that do not require long commutes and **rely on low-emissions modes of travel like transit, biking, and walking.**"

"The Solution...

With thousands of these **commercial sites** across California, this would allow production of new affordable housing units at scale, **without changing the density or character of existing residential neighborhoods.**"

"Bill Specifics...

Mixed-income housing will be focused along **commercial corridors that are wide enough to accommodate density and new transit.**"

As stated, the bill is designed to be used to provide housing in already-dense **COMMERCIAL** sites close to public transit and jobs. If this site truly met the intent of the Bill, **there would be no need to include 835 parking spaces.** But the fact is that 2 bus routes on Ventura Blvd and 1 route on Topanga (both $\frac{3}{4}$ miles away) do not provide the quantity and quality of transit needed to make it reasonable for future residents to not have cars. That means that there would be an additional 835 cars trying to exit the property in an emergency. My house is 2 block south of the proposed main driveway to the development, meaning that I would be trapped behind all that traffic in an evacuation (likely to the north, away from the mountains). At my house, Canoga is only 2 lanes wide, barely 21' across, and it only gets narrower as you go south; it is in no way a commercial corridor and cannot accommodate new density and transit. The area is a Very High Fire Hazard Severity Zone and within the Santa Monica Mountains Zone, so the odds of needing to evacuate at some point is high.

The developers' proposal states that "The Project Site is an urban infill site surrounded by urban uses" but that is very misleading. It is in fact an open space in an area **zoned A1-1XL** (which means that it has an **extra-limited height district overlay.**) It is a 93 acre golf course with one clubhouse and related parking. The fact that the clubhouse has a restaurant and a pro shop (neither of which is open to the general public) does not make it a commercial/retail

site. The golf course is surrounded by neighborhoods of single-family homes and has a maximum height restriction for buildings of 35'. Giving an Off-Menu Additional Incentive to allow a height of 60 ft. would drastically, an Off-Menu Additional Incentive to allow a 1 ft. side yard setback in lieu of 15 ft, and an Off-Menu Additional Incentive to reduce the required passageway between residential structures to 6 feet in lieu of 12 feet, would definitely change the character of the existing neighborhood.

In short, the proposed development at the Woodland Hills Country Club does not meet the intent of AB2011 because it:

- **DOES NOT rely on low-emissions modes of travel like transit, biking, and walking**
- **DOES change the density or character of existing residential neighborhoods**
- **IS NOT on a commercial corridors wide enough to accommodate density and new transit**

Adding the Very High Fire Hazard Severity Zone risk and the loss of open space in the Santa Monica Mountains Zone just compounds the seriousness of this exploitative attempt to utilize AB2011 exponentially.

I respectfully ask that this development proposal **not be fast-tracked** and **not be granted the off-menu density bonuses**. This project deserves to be reviewed and vetted by both professional and community stakeholders.

Ann Marshall
Woodland Hills resident

Communication from Public

Name: Michael McCollum

Date Submitted: 01/12/2026 02:45 PM

Council File No: 25-1486

Comments for Public Posting: Please see full letter attached. I write on behalf of numerous directly impacted homeowners and residents of Woodland Hills concerning the above-referenced Project to urge the City to reject the Project applicant's request for ministerial review under AB 2011 and AB 2243. For the reasons set forth herein, the Project must undergo full CEQA review, including preparation of an Environmental Impact Report ("EIR"). In the attached letter, I provide justification for this request under four broad categories:

- **Failure to Meet Objective Zoning and Location Standards:** The Project is ineligible for ministerial review because the site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" use (Gov. Code § 65912.121(a)), and the site fails the "commercial corridor" frontage requirements (Gov. Code § 65912.101(b)) because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review.
- **Disqualification via Statutory Exclusions (Historic & Environmental):** The Project is statutorily excluded from streamlined approval because "substantial evidence" exists that the development will impact historic resources, including the William Bell-designed course and protected pepper trees (Gov. Code § 65912.121(f)), and impact protected wetlands and habitat (Gov. Code § 65913.4(a)(6)), and because neighborhood plan does not allow multi-family residential on the site (Gov. Code § 65912.111(g)).
- **Prohibited Location within a Very High Fire Hazard Severity Zone:** The Project is impermissible in a Very High Fire Hazard Severity Zone (VHFHSZ) because the golf course constitutes a "vacant site" under the legislative intent of Gov. Code § 65912.111(h), and the Project fails to meet mandatory fire safety mitigation standards required for exemption.
- **Ministerial review is precluded by the requests for waivers, concessions, bonuses, and the tract application:** The Project, requiring a tract map change and multiple waivers, concessions and density bonuses, necessarily takes it out of ministerial review and instead triggers a full EIR review.



McCollum Counsel

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December 22, 2025

VIA EMAIL AND CERTIFIED MAIL

Karen Bass, Mayor
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Los Angeles, California 90012

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Reseda, California 91335
councilmember.blumenfield@lacity.org

Los Angeles Department of City Planning
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Planning.custodianofrecords@lacity.org

Office of Assemblyman Jesse Gabriel
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assemblymember.gabriel@asm.ca.gov
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Re: **Woodland Hills Country Club Golf Course 398-Unit Residential Project (CPC-2025-6505-DB-DRB-SPPC-PR-VHCA; VTT-84929-VHCA) 4868 Canoga Avenue (the "Project")**

Hon. Mayor Bass, Council Member Blumenfeld, and Director Bertoni:

I write on behalf of numerous directly impacted homeowners and residents of Woodland Hills concerning the above-referenced Project to urge the City to reject the Project applicant's request for ministerial review under AB 2011 and AB 2243. For the reasons set forth herein, the Project must undergo full CEQA review, including preparation of an Environmental Impact Report ("EIR").

In this letter, I provide justification for this request under four broad categories:

- **Failure to Meet Objective Zoning and Location Standards:** The Project is ineligible for ministerial review because the site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" use (Gov. Code § 65912.121(a)), and the site fails the "commercial corridor" frontage requirements (Gov. Code § 65912.101(b)) because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review.

- **Disqualification via Statutory Exclusions (Historic & Environmental):** The Project is statutorily excluded from streamlined approval because “substantial evidence” exists that the development will impact historic resources, including the William Bell-designed course and protected pepper trees (Gov. Code § 65912.121(f)), and impact protected wetlands and habitat (Gov. Code § 65913.4(a)(6)), and because neighborhood plan does not allow multi-family residential on the site (Gov. Code § 65912.111(g)).
- **Prohibited Location within a Very High Fire Hazard Severity Zone:** The Project is impermissible in a Very High Fire Hazard Severity Zone (VHFHSZ) because the golf course constitutes a “vacant site” under the legislative intent of Gov. Code § 65912.111(h), and the Project fails to meet mandatory fire safety mitigation standards required for exemption.
- **Ministerial review is precluded by the requests for waivers, concessions, bonuses, and the tract application:** The Project, requiring a tract map change and multiple waivers, concessions and density bonuses, necessarily takes it out of ministerial review and instead triggers a full EIR review.

Discussion

1. The site does not satisfy AB 2011’s mandatory “office, retail, or parking” zoning eligibility criteria

a. The current A-1 zoning does not support “parking” as a principally permitted use

AB 2011 requires that the site be located in a zone where office, retail, or parking are “principally permitted.” Gov. Code § 65912.121(a) states in pertinent part:

“A development project shall not be subject to the streamlined, ministerial review process... unless the development project is on a site that satisfies all of the following criteria:

(a) It is located within a zone where office, retail, or parking are principally permitted use.”

Here, this Project site is zoned A-1 (Agricultural) and designated as “Open Space” but permitting single-family residential under the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan.¹

¹ See, e.g., “Summary of Land Use” table, noting A-1 designation as “Open Space” or Single Family within the plan.

Although the applicant claims that parking is a “principally permitted” use, that argument is unsupported by the definition of the term under AB 2243 as applied to A-1 zoning and in this context.

Under Gov. Code § 65912.101(r), a “principally permitted use” is one that “may occupy more than one-third of the square footage of designated use on the site and does not require a conditional use permit, except that parking uses are considered principally permitted whether or not they require a conditional use permit.”

While the applicant contends parking is a principally permitted use under A-1 because it may be provided either as “accessory” or as a conditional use, this position flies in the face of the A-1 agricultural zone and the golf course usage and Open Space designation. A-1 does not authorize stand-alone parking lots or allow parking to occupy one-third of a 94-acre golf course. A-1 plainly does not list parking as an authorized use, and while 12.21.A.4 generally requires certain parking minimums across different use types, under no scenario would this requirement or any parking conditional use require or allow fully one-third of a 94-acre golf course designated as “Open Space” to be covered by a parking lot.

The problem with applicant’s argument is underscored by the fact that applicant must break the golf course site into smaller parcels via a separate vesting tract map application in order to be eligible for AB 2243 and 2011 because these laws do not apply to parcels over 20 acres (discussed further below). They do not apply to such large parcels for a reason: 94-acre golf courses would never be permitted to be 1/3 paved over for parking lots. Parking is not a “principally permitted use” for this zone or site.

b. The ancillary retail uses are not “principally permitted” retail uses

Apparently recognizing this, the applicant also tries to argue that various ancillary retail-like uses associated with A-1, including the Golf Course, constitute “principally permitted” “retail.” That argument fails for several reasons.

Section 12.05.A. does not allow “associated retail sales and retail services” related to a Golf Course as applicant claims. It is very strict as to golf courses, allowing: “Golf courses, except driving tees or ranges, miniature and pitch and putt courses having an average fairway length per hole of less than 125 yards, courses illuminated for nighttime play and similar uses operated for commercial purposes.” The code permits accessory uses and accessory buildings, but not “associated retail sales and retail services.” The “List of Uses Permitted in Various Zones” cited by Applicant provides after the permitted Golf Course language the following limitation: “only limited accessory clubhouse” and does not list any ancillary retail uses.

Applicant also references Nursery and Stand for Display and Sale of Agriculture Products as listed “retail” uses under A-1, but this too does not pass muster. Paragraph 13

clearly limits such commercial activity to a small area, allowing only for: “One stand for the display and sale of only those products produced upon the same premises, provided that the plan for the construction of such stand is approved by the Department of Building and Safety; that it does not exceed an area of two hundred (200) square feet; and that it is located not nearer than ten (10) feet to any street or highway.”

Section 12.05.A elsewhere makes clear that “retail” is expressly prohibited under this Agricultural A-1 zoning. It contemplates certain commercial activities associated with Home Occupations, but noticeably prohibits “Any use which disrupts, and is inconsistent with, the residential character of the neighborhood” and expressly prohibits “Retail sales.”

c. Zone A-1’s allowance for “one-family dwellings” renders it ineligible

Because Section 12.05.A.1 also allows for “One-Family dwellings” this A-1 zoning is ineligible. AB 2011 was clearly intended to apply to “sites currently zoned for commercial, retail, or parking uses” and not single-family residential. *See, e.g.*, City of Los Angeles Inter-Departmental Correspondence re Implementation of AB 2011 (2022) and SB 6 (2022), dated October 17, 2023. This is underscored by the fact that the law specifically requires that if a project is located within a neighborhood plan, the plan must allow for multifamily housing development on the site. (Gov. Code § 65912.111(g)).

Because A-1 and the Giard Tract plan only allows for single family residences (in addition to the enumerated agricultural and golf course uses) – and not multifamily – it plainly does not fall within the category of commercial, retail, or parking uses. Any zoning that could be developed only as sing-family homes necessarily cannot be one-third retail, commercial, or parking.

2. The Project fails multiple additional mandatory eligibility requirements

a. The site does not abut a “commercial corridor”

Gov. Code § 65912.121(c)(1) allows for exemption and ministerial review only if “The project site abuts a commercial corridor and has a frontage along the commercial corridor of a minimum of 50 feet.” Section 65912.101(b) defines “Commercial corridor”, in pertinent part, as “a highway that is not a freeway and that has either of the following: (1) For parcels in which any part of the parcel is zoned for a height limit of less than 65 feet, a right-of-way of at least 70 and not greater than 150 feet.”

Here, as the current zoning allows only for a height of 35 feet, the right-of-way must be at least 70 feet. However, as the applicant acknowledges, the existing street width of Canoga Ave. in the relevant location is only 46 feet, while an additional 30 feet of theoretical sidewalk cannot be developed due to the historic pepper trees (Historic Monument #93). In addition, the width of Canoga Ave. is even narrower in other parts of the street contained within the proposed project’s frontage.

But the applicant's required request for a discretionary waiver of the required full dedication due to the presence of these protected historic pepper trees necessarily means it does not satisfy the "commercial corridor" requirement and further means the application automatically triggers the full discretionary review process. The applicant cannot claim a ministerial right to build on a "commercial corridor" while simultaneously requiring a discretionary waiver to avoid building the mandatory commercial infrastructure (sidewalks) required of a "commercial corridor."

The fact that Canoga Ave. is so narrow and cannot be widened into a true "commercial corridor" due to the Historic Monument trees is especially problematic given that Canoga Ave. is the only artery into and out of the neighborhood and the project site and neighborhood are located in a Very High Fire Hazard Severity Zone (discussed further below).

b. The site is greater than 20 acres, and Applicant's parallel tract map application to divide the site requires a full EIR

Gov. Code § 65912.121(d) only allows for exemption and ministerial review if "the site is not greater than 20 acres, unless the site is a regional mall, in which case the site is not greater than 100 acres."

Here, even though the golf course property is 94 acres, the applicant seeks to skirt this important size limit by submitting a parallel vesting tentative tract map application seeking to break off 19.86 acres for the Project. Nowhere is this allowed for or contemplated in AB 2011 or 2243, and such a tactic clearly thwarts the purpose of this provision limiting application to smaller projects under 20 acres. The fact that the laws only allow ministerial review for larger sites that are "regional malls" is indicative of the type of sites these laws are intended for. They are not intended for open green spaces or golf courses.

The Project application acknowledges this at pages 31-36, noting that the tentative tract map must comply with Section 13B.7.3.E of Chapter 1A of the LA Municipal Code and then analyzing the 8 factors that require discretionary review. However, the application appears to argue that all of this should be reviewed ministerially. There is no basis for granting a ministerial review of these tract map issues, and, as set forth further below, the applicant's arguments on the tract map findings are incorrect and demand further fact finding.

c. The site does not meet the required 75% perimeter adjacency to "urban uses."

Gov. Code § 65912.121(e) allows for exemption and ministerial review only if "At least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses." Section 65912.101(t) defines "Urban uses" as "any current or former residential,

commercial, public institutional, public park that is surrounded by other urban uses, transit or transportation passenger facility, or retail use, or any combination of those uses.” Notably, even though the Legislature added in AB 2243 “public park” to the definition of “urban uses,” it did not include golf course or private golf course.

At least 60% of the proposed Project site is carved out of (*i.e.* surrounded by and borders) the existing private golf course.

To qualify for AB 2243, at least 75% of the site’s perimeter must adjoin parcels developed with “urban uses”



40%

Adjoins parcels developed with “urban uses”

60%

Borders open space/agricultural zoned areas

A private golf course on A-1 agricultural zoned land does not fall within this definition of “urban use.” The applicant argues that the golf course and its “associated retail sales and retail services, including a club house, bar & restaurant, event center, pro shop, and associated parking” satisfy this definition, but for the reasons discussed above, they do not constitute commercial or retail use. This definition also does not hinge on “permitted” use, but rather actual use, requiring a review of the actual use of the specific land bordering each portion of the site. As is evident from the above diagram, approximately 60% of the proposed site borders open grass on the existing golf course rather than the required “urban use.”

The obvious reason for this requirement in AB 2011 and 2243 is to ensure exemptions are only given to projects appropriately located within or adjacent to existing urban uses even if they are abutting a public park (which would obviously be preserved because it is public government land). By contrast, the laws are not intended to allow private owners of golf courses designated as “Open Space” within community plans – and around which entire neighborhoods have been developed – to cannibalize these open green spaces.

d. The Project site does not satisfy requirements in subparagraphs (B) to (K) of paragraph (6) of subdivision (a) of Section 65913.4, including

protected wetlands, unmitigated Very High Fire Severity Zone risks, protected habitats, and documented historical preservation.

Gov. Code § 65912.121(e) sets out additional requirements, stating that as a condition of exemption and ministerial review that the project site “satisfies the requirements specified in paragraph (6) of subdivision (a) of Section 65913.4, exclusive of clause (iv) of subparagraph (A) of paragraph (6) of subdivision (a) of Section 65913.4.”

Many of those provisions are not satisfied.

i. The site contains recognized Wetlands

Section 65913.4(6) requires that “development is not located on a site that is any of the following: ... (C) Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 June 21, 1993)” Although the applicant submits a “Biological Resources Assessment” from a company in Lake Elsinore that conclusory states without any facts or analysis that “[t]here are no wetlands on the project site that meet the definition of the United States Fish and Wildlife Service Manual, part 660 FW 2 (June 21, 1993),” the Santa Monica Mountain Conservancy (whose property is only 900 feet away from the project site) disagrees, and has submitted a letter detailing the existence of wetlands on the site and informing that they “are included in the United States Fish and Wildlife Service’s National Wetland Inventory.”

The mere existence of this valid dispute is sufficient to remove the project from ministerial review.

ii. The site is within a very high fire hazard severity zone and does not comply with applicable mitigation standards, including Section 4290 of the Public Resources Code

The statute clearly removes from ministerial review projects like this, which are located within Very High Fire Hazard Severity Zones unless they comply with all applicable fire safety mitigation standards. Although the applicant claims this is satisfied because the project itself will *eventually* meet applicable fire safety standards, this is not enough, and this issue cannot be punted without full review upfront. This issue is discussed in further detail below.

iii. The site includes lands identified for conservation.

The statute also removes from ministerial review “(I) Lands identified for conservation in an adopted natural community conservation plan pursuant to the Natural Community Conservation Planning Act (Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code), habitat conservation plan pursuant to the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), or other adopted natural resource protection plan.”

Although the applicant states conclusory that the project site does not “include land identified for conservation pursuant to the Natural Community Conservation Planning Act,” the statute also includes lands identified for conservation in any “other adopted natural resources protection plan.” Here, the Santa Monica Conservancy has stated that the project “is located well within the Santa Monica Mountains Zone established by the Legislature in 1980 (Public Resource Code Section 33105).” (December 15, 2025 letter). The Conservancy further notes that “No project approaching even five acres [let alone nearly 20 acres] within the City of Los Angeles portion of the Zone have been approved in the last quarter century.”

The mere existence of this valid dispute is sufficient to remove the project from ministerial review.

iv. The site contains habitat for protected species

The statute removes from ministerial review projects on sites with “(J) Habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).

The applicant appears to overlook this issue within the application.

The letter submitted by the Santa Monica Mountains Conservancy states, however, that the site is readily accessible to “State-listed threatened evolutionary significant mountain lions, bobcats and great foxes.” (December 15, 2025 letter, p. 3).

Although the applicant’s Biologist Statement states that “The project site consists of a maintained golf course surrounded by residential development and does not connect to any adjacent undeveloped land” and thus “it is not likely the project site serves a function in local wildlife movement,” the statement fails to point out that the site is less than 900 feet from the Conservancy’s property that abuts Serrania Park.” The biologists appear to have spent one day on the golf course property, and did not interview any of the residents who are intimately familiar with the wildlife in the neighborhood and who would attest that they regularly observe various endangered species, including endangered birds and mountain lions in the neighborhood and on the course.

As the Conservancy states in its letter, “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.”

The applicant’s Biologist Statement fails to address these species, including the mountain lions and bobcats and great foxes, but nevertheless acknowledges that, “A total

of 13 sensitive habitats have the potential to occur on the project site, including Cismontane Woodland, Riversidean Alluvial Fan Sage Scrub, Southern California Coastal Lagoon, Southern California Steelhead Stream, Southern Coast Live Oak Riparian Forest, Southern Coastal Salt Marsh, Southern Cottonwood Riparian Forest, Southern Mixed Riparian Woodland, Southern Riparian Scrub, Southern Sycamore Alder Riparian Woodland, Southern Willow Scrub, Valley Needlegrass Grassland, and Valley Oak Woodland.” (p. 5)

The Biologist Statement also acknowledges that “A total of 57 wildlife species are listed as state and/or federal Endangered, Threatened and Candidate were identified to have a potential to occur on the project site.” (p. 5) It also states, “A total of 57 wildlife species are listed as state and/or federal Endangered, Threatened and Candidate (sic) were identified to have a potential to occur on the project site.”

Lastly, the Biologist Statement describes, “The project site contains indigenous trees and shrubs. An inventory of trees and shrubs on site should be conducted by a tree expert to determine which trees and shrubs are protected under the City’s ordinance. Per Section 46.00 of Article 6 of the Los Angeles Municipal Code “No protected tree or shrub may be relocated or removed except as provided in Article 7 of Chapter I of the Code.” (p. 6).

The applicant’s Tree Report then identifies at least 150 indigenous native oak and sycamore trees throughout the golf course (not including the historic pepper trees along the street), but conveniently concludes none of these trees are protected because “All oaks and sycamores present within the Project Area were intentionally planted as part of past landscaping and are therefore not considered protected by the City.” (p.3). This conclusion is unsupported by any documentary evidence related to the planting of these trees, and the pictures of these trees, many of which are massive and very mature oak trees consistent with similar trees throughout the neighborhood, clearly belie this conclusion. Indeed, many of the golf course’s holes weave around the massive trees, suggesting the trees pre-dated the holes. Residents of the neighborhood who have similar large oak trees on their properties report, based on consultation with professional arborists, that these trees often are two-to-three hundred years old.

Lastly, even if these trees were planted as part of the golf course 100 years ago (and the evidence is overwhelming that they were not), that is not the standard under the LA protected tree ordinance. They do not fall under the ordinance’s narrow exception for “trees or shrubs planted or grown as a part of a planting program” ,which is clearly intended for more recent widespread planting programs like street beautification or reforestation projects, not legacy landscaping at an historic golf course.

The tree report thus identifies numerous beautiful and mature native oak and sycamore trees that would clearly fall under the city’s tree protection program but which are slated for destruction as part of the Project.

It is not surprising that a 94-acre 100-year-old golf course next to the Santa Monica mountains would pose a myriad of problems related to habitats for protected plant and wildlife species, and these issues clearly preclude ministerial review for the Project.

e. The Project requires demolition of an historic site and landscaping structures

Gov. Code § 65912.121(f) allows for exemption and ministerial review only if “The development is not located on a site where either of the following apply: (1) The development would require the demolition of a historic structure that was placed on a national, state, or local historic register.”

This provision makes sense, since CEQA provides that a categorical exemption “shall not be used for a project which *may* cause a substantial adverse change in the significance of historical resource.” Cal Code Regs. Tit. 14 § 15300.2(f). And the test is not that the impact is certain, only that there be “substantial evidence” of the significant impact. *Hillside Pres. v. City of Berkeley*, 60 Cal. 4th 1086, 1098 (2015).

Indeed, the applicant acknowledges it cannot demolish historic resources through only ministerial review, which is why it requests an exemption from the dedication width to protect the historic pepper trees along the street.

Beyond the pepper trees, the Woodland Hills Country Club golf course is well documented as a prime example of the work of legendary golf course designer Billy Bell, described as “among the elite of golf’s Golden Age of design.”² His designs have been described as follows:

“Bell employed his trademark lacey-edged bunkers with strategy and temptation in mind. These artistic, three dimensional multi-bayed bunkers were used as fairway cross hazards and naturally flowed away from greens. He favored rolling, undulating green surfaces strategically linked to hole locations and approaches allowing the golfer to work the ball on to the green. Bell was a master at using drainage paths in his design decisions, allowing natural hazards and fairway movement to shine. Trees were used, but sparingly, mostly to accent the aesthetics of the surrounding area.”³

The Woodland Hills Country Club remains one of only a few lasting examples of this golden era golf course, and the Club itself touts this historic legacy, stating on its

² <https://williambellsociety.wordpress.com/bell-legacy/> which is linked from the Woodland Hills Country Club’s website at <https://www.woodlandhillsc.org/golf>

³ The fact that Bell designed his courses to follow natural hazards and only “sparingly” used trees to accent the surrounding aesthetics further undercuts the applicant’s tree expert’s theory that all of the native species trees were planted.

website that it has “a stunning 18-hole course nestled in a quiet, tree-lined canyon on the south side of the San Fernando Valley. Designed in 1925 by renowned architect William "Billy" Bell Sr., the course stands alongside his other acclaimed works, including Bel-Air Country Club, Saticoy Country Club, and La Cumbre.”

Indeed, the golf course is listed on the website of Historic Places LA, which describes its important legacy as a course designed by Bell, and notes that “it is possible that landscape features such as brooks with river stone pedestrian bridges still exist.”⁴ The Historic Places LA page also describes the importance of the golf course within the broader “early development of the San Fernando Valley” as well as its “association with notable developer, Victor Girard” who developed the club and surrounding area to feature getaway “mountain cabins” in what was then known as the town of Girard.” Although this historic resource register states “it appears that it may meet significant criteria [for historic preservation],” the registry recommends “additional analysis” be undertaken because “surveyors could not enter the property to evaluate integrity or identify contributors and non-contributors.”

Given these facts, and since it appears the applicant (which is the owner of the golf course) has prevented full historic surveying from taking place, the applicant cannot now argue that this Project (bulldozing this historic golf course), should be exempt from appropriate review for historically protected sites and structures.

f. The neighborhood plan does not permit multifamily housing on the site.

Gov. Code § 65912.121(g) allows for exemption and ministerial review for projects located on a site within a neighborhood plan only if the “neighborhood plan applicable to the site permitted multifamily housing development on the site.”

Here, the Girard Tract neighborhood plan does not permit multifamily housing on the site.

Although the application argues this is not a valid “neighborhood plan” by relying on the definition of “neighborhood plan” to require the plan “have been adopted by a local government before January 1, 2024, and within 25 years of the date that a development proponent submits and application pursuant to this chapter,” the Girard Tract Specific Plan cites updates as recent as **May 2003**, only 22 prior to the application date.

https://planning.lacity.gov/odocument/67a0e6c4-8693-4981-907d-5385f39d2e56/Girard_Tract_Specific_Plan_.pdf \

⁴ <https://historicplacesla.lacity.org/report/26a0e583-8907-479d-8ee0-c62653a3428a>

Section 8.

URGENCY CLAUSE

The City Council finds and declares that this Ordinance is required for the immediate protection of the public peace, health and safety. This Ordinance will prevent potentially irreversible development to occur which create problems of excessive and inappropriate densities in this hillside area and include traffic safety and congestion caused by narrow streets. The intensity of development currently could overtax the City's ability to provide adequate police, fire and sanitation services to the detriment of the health and safety of City residents. Therefore, this Ordinance shall become effective upon publication pursuant to Section 281 of the Los Angeles City Charter.

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Updated May 2003

3. Significant fire safety concerns mandate a full EIR

The applicant acknowledges the elephant in the room, which is that the project is located in a “Very High Fire Hazard Severity Zone,” but then downplays and ignores this issue throughout the application.

Residents of this neighborhood have faced two mandatory fire evacuations just in the last year alone, and our entire city witnessed the tragic destruction of whole communities directly south of Woodland Hills on the other side of the same hills in the Palisades fire, during which roads were severely clogged and water resources overtaxed, significantly impeding fire suppression and evacuation efforts.

In this Woodland Hills community, owing to its older development as a rustic setting for weekend homes set on small lots among the oak trees in the hills, the roads are significantly narrower than in the Palisades. Canoga Ave., which is where this project is proposed to front, and which is already much narrower than the required dedication needed for a “commercial corridor,” serves as the only significant road for ingress into and egress

out of large swaths of small, narrow streets winding throughout hills and canyons of the neighborhood.

As explained below, several provisions within AB 2243 and 2011 block ministerial exemption for projects within Very High Fire Hazard Severity Zones.

a. Section 65913.4(6)(D) prevents projects in very high fire hazard severity zones

Section 65913.4(6)(D) requires that the proposed development not be “Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within the state responsibility area, as defined in Section 4102 of the Public Resources Code.” Although the applicant argues this provision does not apply because the Project “has been designed to comply with adopted fire hazard mitigation measures pursuant to existing building code standards in Chapter 7A” and “will also be reviewed for compliance with applicable fire mitigation measures through the LADBS plan check process and LAFD site-plan access requirements,” this position is woefully inadequate.

Section 65913.4(6)(D) specifically requires as a condition of exemption that the project comply with “existing building standards or state fire mitigation measures applicable to the development, including but not limited to” various standards listed therein. One identified standard is Section 4290 of the Public Resources Code, which requires various community fire safety measures, including adequate “road standards for fire equipment access”; “minimum private water supply reserves for emergency fire use,” “fuel breaks and greenbelts,” and “measures to preserve undeveloped ridgelines to reduce fire risk and improve fire protection.” Section 4290.5 requires the Board to survey local cities and subdivisions in very high fire hazard severity zones “without a secondary egress route that are at significant fire risk” and develop appropriate recommendations for “creating secondary access” to subdivisions and “improvements to the existing access road” and “other additional fire safety measures.”

Here, the addition of nearly 400 units on the primary artery road leading into and out of a dense subdivision in a designated Very High Fire Hazard Severity Zone raises significant concerns with each of the above-referenced fire mitigation questions. The project is placing additional strain on Canoga Ave., despite the applicant acknowledging it cannot increase the width of Canoga Ave. to the required dedication, thereby worsening the problem of insufficient road width for fire equipment access and evacuation from not only the project but also the broader surrounding subdivision. The project is eliminating the natural fuel breaks and greenbelts as well as the undeveloped ridge lines provided by the existing golf course terrain. The project will also place significant additional strains on the water supply available for fire suppression within the neighborhood.

None of these issues are addressed in the application, and they require a full EIR, complete with sufficient fire safety analysis and findings. These issues cannot be overlooked or kicked down the road by way of a ministerial review. Casually ignoring

these concerns particularly in light of the recent tragic fires would pose a grave danger to thousands of people living in the neighborhood.

b. Section 65912.111(h) prohibits application to “vacant sites” within very high fire hazard severity zones

Section 65912.111(h) prohibits exemption and ministerial review “For a vacant site” unless the site “is not within a very high fire hazard severity zone...”

Although there is no definition in this statute of “vacant site,” the applicant cites other instances of this term in another code, as well as in a June 10, 2020 memo from the California Department of Housing and Community Development.⁵ Each of these definitions define a vacant site as being “without any houses, offices, buildings, or other significant improvements on it.”

Here, the applicant’s proposed project site, by specifically excluding the clubhouse and parking lot, fails the test. Nothing in these examples would suggest that the grass and trees of a golf course constitute “other significant improvement” akin to the other enumerated examples of “houses, offices, building.” Applicant cannot parcel up the golf course site to avoid other problems, but then argue the entire site should be considered as a whole in order for it not to be considered “vacant.”

Nor would it make sense that such a definition would apply in this context, where the statute is concerned with allowing significant development by ministerial review (*i.e.* without adequate EIR) in vacant land located in a very high fire hazard severity zone. The applicant’s argument is inconsistent with the purpose of the statute and its’ use of “vacant site.”

c. The Project’s requested height and density bonus concessions require discretionary health and safety review, which include fire safety findings

The project requests drastic height and density bonus concessions pursuant to California Gov. Code § 69515-55918 and LAMC 12.22A.37(e-f).

Section 69515(d)(1) states a city “shall grant the concession or incentive requested by the applicant unless the city... makes a written finding, based upon substantial evidence, of any of the following . . . (B) The concession or incentive would have a specific, adverse impact, as defined in paragraph (2) subdivision (d) of Section 65589.5, upon public health and safety ...” Section 65589.5(d)(2) provides the evidentiary standard for this finding as “a significant, quantifiable, direct, and unavoidable impact, based on objective, identified

⁵ chrome-extension://efaidnbnmnibpcjpcglclefindmkaj/https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf

written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.”

Because the Project seeks significant height and density bonus concessions, the city can and indeed must consider the public health and safety concerns, and it cannot make this consideration and make these required evidentiary findings through a ministerial process. A full EIR review must take place, particularly considering the above-described fire safety concerns with this Project’s location in a Very High Fire Hazard Severity Zone.

4. The required tentative tract map findings require full EIR

The applicant acknowledges that the tract map analysis requires detailed factual findings, but requests that this be made ministerially. There is no support for this approach, and these findings require a full EIR.

Furthermore, as set forth below, the proposed Project does not satisfy those required findings.

a. The Project is inconsistent with applicable General and Specific Plans

The Project application overlooks the fact that the site is specially designated as an “Open Space” under the **Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan**. That community plan notes that “Open space provides the community with important physical benefits and environmental protection” and that “there are two classifications for Open Space, publicly owned and privately owned open space.” (p.III-11) The plan notes the lack of Open Spaces within the district, particularly within the hillside areas south of Ventura Blvd.:

“Ten Neighborhood Parks, six Community Parks, and two Regional Parks serve the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area. Additionally, one private golf course is in the Community Plan Area. The plan area, with its diverse topography, limits the placement of park sites south of Ventura Boulevard. Thus those neighborhood parks located south of Ventura Boulevard offer limited recreational facilities for hillside homeowners. The community parks serve a much wider interest range due to the lack of sites in the hillside areas of the plan area. While the existing parks satisfy the needs of the current residents, the community is still deficient in the number of neighborhood parks.” (p. III-11).

Accordingly, the plan has as objective 4-1, the policy to “Preserve the existing recreational facilities and park space. Program: by maintaining the Open Space zone and land use designation, existing parks and recreation facilities are protected.”

The plan thus states that “addition, expansion and/or improvement of needed local parks throughout the Community should be accelerated, where feasible,” and calls for

“continued development of Equestrian, Hiking and Bicycle Trails” as well as “continued efforts to establish State and local park sites within the hillside areas.” (P.I-6) It also contains the objective of preserving existing open space resources and developing new open space resources, including “passive and visual open space which provides a balance to the urban development of the Plan Area,” noting in particular that the plan map “designates areas for open space, thus protecting them from encroachment from more intense uses.” (Objective 5-1, p. III-12).

Here, the Project is inconsistent with this plan because it seeks to destroy a key Open Space in a hillside community south of Ventura Blvd.

The Project sits in the heart of the **Girard Tract**, and is inconsistent with the Girard Tract Specific Plan. That plan, which designates the golf course as A-1 and the surrounding lots as single-family, notes that the Girard Tract was originally created to be used for building small summer houses, or secondary residences, not for primary residences” with existing streets that are “narrow and substandard” and thus that more recent “overdevelopment is resulting in densities that are excessive and inappropriate for a hillside area.”

Here, the Project is inconsistent with this plan because it seeks to develop dense housing in the midst of the Girard Tract’s single family housing, and remove the Open Space golf course around which those homes were planned.

In addition, the Project is also inconsistent with the **Mulholland Scenic Parkway Specific Plan**, which only allows for single-family dwellings and significantly limits nighttime lighting. (p.7). It only allows for a discretionary use if it “protects the prominent ridges, streams, and environmentally sensitive areas, and the aquatic, biologic and topographic features therein.” It also specifically states that “No oak tree shall be removed, cut down or moved without the prior written approval of the Director” and only allows for the removal after the Director finds that said removal would not cause soil erosion or increased flow of surface waters and that “the oak tree is not located within reference to other trees or monuments in such a way as to acquire a distinctive significance at said location.” (p.11). The plan also requires archeological and paleontological surveys for any grading more than 50 cubic yards per 5,000 square feet of lot area. (p. 11) It also limits grading, requires viewshed protection, and limits building heights.

Here, the Project is inconsistent with this plan as well because it violates all of these provisions and objectives.

In sum, the Project is inconsistent with all three of the local plans’ stated objectives of preserving critical open spaces particularly in the hillside areas, limiting density in the hillside areas, and limiting density and light pollution and protecting ridges, streams, and environmentally sensitive areas and aquatic, biologic and topographic features within the Mulholland scenic parkway.

b. The design and improvement of the proposed subdivision are inconsistent with the applicable General and Specific Plans

For the reasons noted above, the density, size, and design of the proposed subdivision are also inconsistent with the plans.

c. The site is not physically suitable for the proposed type of development

The site is not physically suitable for the proposed development because the site is a designated “Open Space” and it has served as the open space heart of this neighborhood for 100 years, which was specifically designed and built around it. As explained above, the extreme fire hazard of the area also precludes such a dense development on the only major arterial road leading into and out of the neighborhood. The site also contains numerous protected oak trees, most of which are slated to be destroyed by the Project.

d. The site is not physically suitable for the proposed density of the development

As discussed above, the density is inconsistent with the surrounding neighborhood of single-family homes, and poses an extreme fire hazard.

e. The design of the subdivision and the proposed improvements are likely to cause serious public health problems

The removal of a significant Open Space reduces the public’s access to important physical benefits associated therewith. The Project also poses significant fire hazards and associated risks to public health.

f. The design of the subdivision and proposed improvements will conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision

The application does not provide information about whether there are any public easements, stating instead that this will be evaluated during plan check. However, this is insufficient for purposes of analyzing this issue. The size of the golf course property and its close proximity to the Santa Monica Mountains zone likely impacts several easements and other pathways for public access to nature.

g. The design of the proposed subdivision will not provide for future passive or natural or cooling opportunities in the subdivision

The Project is inconsistent with this finding most notably because it calls for the destruction of large swaths of green space and over a hundred mature, large trees, which provide natural cooling effects not just for the project but for the surrounding subdivision and neighborhood. The density of the proposed Project also contributes to heat buildup and capture.

Conclusion

While it may be that specific cities and communities might decide through community engagement and deliberation to convert some portions of an underperforming golf course into housing to help alleviate our housing crisis, the blunt instruments of AB 2011 and 2243 are most definitely not the appropriate mechanisms for doing this. This is because these laws are designed for converting underutilized commercial and retail zones along commercial corridors, and they remove any and all input and decision-making from the surrounding community.

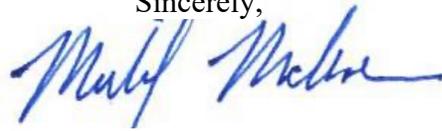
It is particularly inappropriate to use these laws to eliminate an historic legacy green Open Space located in the heart of a single-family residence neighborhood in wooded hills close to the Santa Monica Mountains Conservancy lands and within an extremely High Risk Fire Severity Zone.

For this reason, the Project application fails on nearly every element of the test under these laws for streamlined ministerial review:

- The site, being zoned Agricultural which permits a golf course and single-family homes and is a legacy Open Space, is not suitable because it is not one that allows for predominant commercial, retail or parking uses;
- The primary street next to the site is also consequently too narrow to constitute a “commercial corridor”;
- The actual site (*i.e.* the full golf course) far exceeds the 20-acre maximum size, without undergoing necessary tract map changes that require full review;
- The site does not satisfy the 75% urban use adjacency requirement;
- The Project runs afoul of numerous protections for wetlands, endangered species, and protected habitats and requires bulldozing dozens of protected native trees;
- The Project requires demolition of a legacy historic resource; and,
- Most important, the Project raises significant fire safety concerns related to road capacity and size, water supply, and removal of ridgelines, fuel breaks and protective green belts.

Based on the foregoing, my clients respectfully request the City require a full EIR review, prior to any further action with respect to the Project, and we also formally request this letter be included in the administrative record.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael McCollum". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael McCollum, Esq.

Communication from Public

Name:

Date Submitted: 01/12/2026 09:56 AM

Council File No: 25-1486

Comments for Public Posting: I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. THIS IS NOT A RETAIL OR COMMERCIAL AREA: The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor"

frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review.

CONGESTION AND ROAD CONDITIONS: The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable.

LOSS OF OPEN SPACE AND HARM TO WILDLIFE: The site contains recognized and protected habitat for protected species and wetlands. The golf course as a whole, 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 including bobcats. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting and human presence impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and grey 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.

INCONSISTENT WITH THE SPECIFIC PLAN: Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protect

Communication from Public

Name: Julie Clary

Date Submitted: 01/12/2026 10:29 AM

Council File No: 25-1486

Comments for Public Posting: My name is Julie Clary, and I live in the neighborhood surrounding the Woodland Hills Country Club. I am writing to express my deep concern about the proposed 398-unit development at 4868 N. Canoga Avenue. This project is being pushed forward under state housing laws in a way that disregards the real and serious dangers facing our community. The site lies within a Very High Fire Hazard Severity Zone and is located in a hillside area served by narrow, substandard streets that function as evacuation routes. Many of us who live here have experienced how quickly traffic grinds to a halt during emergencies, especially during recent wildfire events. In a fire, a single disabled or abandoned vehicle could block an entire roadway and trap residents. Adding hundreds of new households to this area without studying evacuation capacity puts lives at risk. Like many in our neighborhood, I have personally struggled with fire danger and insurance issues, and I know how vulnerable this area already is. It is frightening to think that such a dense development could be built here without any meaningful review of how people would actually get out in an emergency. While I understand the urgent need for housing in Los Angeles, AB 2011 and its later amendments were meant to promote housing along existing commercial corridors — not to override fire safety rules, specific plans, and environmental protections in open-space and hillside neighborhoods. Warner Center and other true commercial areas are already absorbing large amounts of high-density development. The Woodland Hills Country Club site is not a commercial corridor. It is zoned Agricultural/Open Space and sits next to single-family homes and wildlife habitat. The golf course is also an important part of the Santa Monica Mountains ecosystem. It provides habitat and movement corridors for wildlife including bobcats, birds of prey, and other sensitive species. The proposed project would bring intense, around-the-clock lighting, traffic, and human activity into an area that has functioned as open green space for decades. These impacts are permanent and cannot be mitigated away. The project is also inconsistent with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan, which were adopted to protect this hillside and scenic area. Those plans were thoughtfully designed to balance development with safety, environmental protection, and

neighborhood character. They should not be wiped out by a fast-track ministerial approval. I am asking the City to follow AB 747 and require a full Evacuation Capacity Study and Environmental Impact Report. State housing laws should not be used to bypass basic safety, environmental review, and public input when a project poses such obvious risks. Please do not allow this development to move forward without full CEQA review. Our lives, our homes, and our environment are too important to sacrifice for a rushed approval process. Thank you for considering the voices of the people who actually live here.

Communication from Public

Name: Britta Couris
Date Submitted: 01/12/2026 10:31 AM
Council File No: 25-1486

Comments for Public Posting: My name is Britta Couris and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. Many of my friends and colleagues lost their homes, all their belongings, were displaced indefinitely and are still unable to rebuild. We sat packed for a week looking at the horizon as flames crested the hills, not sure if we were next. Fire is no longer a rare occurrence. Much like the King tides of recent weeks, they are now part of our survival plan. It is terrifying. WE cannot look away when the winds and fires and floods are out of sight. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial

approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga Avenue project: **THIS IS NOT A RETAIL OR COMMERCIAL AREA:** The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review. **LOSS OF OPEN SPACE AND HARM TO WILDLIFE:** The site contains recognized and protected habitat for protected species and wetlands. The golf course as a whole, 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 including bobcats. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting and human presence impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and grey 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 intent of AB 2011, AB 2243, and AB 893 are for underused commercial properties to be developed into dense housing without community review, not open green spaces in the center of Very High Fire Hazard Severity Zone neighborhoods. For the above reasons, a project such as this should never be allowed based on quick "ministerial" approval. Therefore, I am requesting that the Project undergo full CEQA review, including preparation of an Environmental Impact Report and an Evacuation Capacity Study.

Communication from Public

Name: james Bergman

Date Submitted: 01/12/2026 10:38 AM

Council File No: 25-1486

Comments for Public Posting: A project of this size and density in this area makes no sense. It is an area of primarily single-family homes. It is in a fire risk area that is dangerously close to the Santa Monica Mountains National Recreation Area. It is in an area whose road access will be drastically impacted by high number of new commuters. This project has is being rushed through with no input from the community and little concern for the impact on the community or the natural environment. What a rare and great opportunity for other more positive options for both the community and environment.

Communication from Public

Name: Thomas Clary

Date Submitted: 01/12/2026 10:39 AM

Council File No: 25-1486

Comments for Public Posting: My name is Thomas Clary, and I'm a resident of the neighborhood surrounding the Woodland Hills Country Club. I'm writing because I'm genuinely alarmed by the 398-unit development proposed for 4868 N. Canoga Avenue. Let me be blunt: this project is being fast-tracked in a way that ignores the reality of living in this area. We're in a Very High Fire Hazard Severity Zone. Our streets are narrow and were never designed to handle mass evacuations. We all remember the Palisades Fire all too well and understand exactly what I'm talking about—traffic locks up almost immediately. One stalled car, one panicked driver blocking a lane, and people are trapped. The idea of adding hundreds more households without even studying whether we can safely evacuate is reckless. The thought of a high-density project going in here without any real analysis of emergency egress is, frankly, terrifying. I get that LA desperately needs housing. But AB 2011 was designed to encourage development along commercial corridors—not to bulldoze fire safety rules and environmental protections in hillside neighborhoods zoned for open space. Warner Center is right there, already absorbing massive high-density projects. That's where this kind of development belongs. The country club site is zoned Agricultural/Open Space. It borders single-family homes and wildlife habitat. It's not a commercial corridor by any reasonable definition. And let's talk about what we'd be losing. This golf course isn't just grass—it's part of the Santa Monica Mountains ecosystem. Bobcats move through here. Birds of prey hunt here. It's functioned as green space for decades, providing habitat connectivity that you can't just "mitigate" with landscaping. The 24/7 lighting, traffic, and activity from a 398-unit complex would permanently destroy that. This project also directly conflicts with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan—plans that were carefully crafted to protect this exact type of hillside and scenic area. Those plans exist for a reason. They shouldn't be erased by a ministerial rubber stamp. I'm asking the City to do what AB 747 requires: conduct a full Evacuation Capacity Study and Environmental Impact Report. State housing laws were never meant to let developers skip basic safety review and public input when a project carries this level of risk. Please don't approve this without full CEQA review. Our safety, our

homes, and this environment are worth more than a streamlined approval process. Thank you for hearing from the people who actually live with these consequences.

Communication from Public

Name: Philippe Til

Date Submitted: 01/12/2026 10:40 AM

Council File No: 25-1486

Comments for Public Posting: This construction project doesn't solve the housing crisis. It only makes things worse with more traffic, less parking (we already have parking lots with less than the required amount of spaces at the nearest grocery stores). Besides, all developers find loopholes where they promise affordable housing and in the end find a way to cancel it. This will ruin property values and will only increase risk of accidents, deaths, thefts, traffic and more.

Communication from Public

Name: Philippe Til

Date Submitted: 01/12/2026 10:51 AM

Council File No: 25-1486

Comments for Public Posting: My name is Philippe Til and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. I've already seen my insurance rates skyrocket, ability to find parking reduced and seen an increase in near-miss accidents in traffic. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the

following comments regarding the proposed 4868 N Canoga Avenue project: **THIS IS NOT A RETAIL OR COMMERCIAL AREA:** The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review. **CONGESTION AND ROAD CONDITIONS:** The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable.

Communication from Public

Name: Harmony Chisholm

Date Submitted: 01/12/2026 11:58 AM

Council File No: 25-1486

Comments for Public Posting: My name is Harmony Chisholm and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. The day the Palisades Fire began last year, I had a sinking feeling about it immediately. The intensity of the Santa Ana winds and the consistent increase in acreage swallowed up by fire throughout the day felt reminiscent of the Camp Fire that destroyed the town of Paradise, CA. My hometown. As the day progressed, areas that were closer to our neighborhood were falling under yellow and red evacuation zones. All I could think about were the horrific stories I remembered hearing in real-time of family and friends fleeing Paradise along fire lined streets during the Camp Fire. That day, my phone was flooded with calls, texts, and Facebook messages from people I know trying to connect with loved ones to make sure they were safe. People including my cousins, family friends of over 50 years, elderly parents of various friends, girlfriends who are teachers and principals at schools escorting carloads of school children-the list of people I personally know were literally fleeing for their lives was extensive. I couldn't help but compare those memories to what could realistically happen to my neighborhood if the winds shifted during the Palisades Fire. Understanding the absolute chaos we would experience trying to escape the narrow spaghetti bowl streets and two lanes of Canoga Ave to safety with thousands of neighbors if the winds brought the fire into our neighborhood terrified me. As soon as the area of Topanga that lines Mulholland on the south border of my neighborhood went under an evacuation warning, I packed up my car with my daughter, dog, and all of our evacuation bags. We said goodbye to our house and left the area to stay with my in-laws near LAX not knowing if we would have a home and neighborhood to come

back to. I felt overwhelming heartbreak for my family, all of my neighbors & this nature filled area I love so much. This experience highlights that the proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable. Adding amendments (AB 2243 and AB 893) that remove remaining guardrails with respect to fire safety and allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. Allowing this proposed development is incredibly negligent and life threatening to thousands of LA residents by the public officials and legislators who are supposed to be advocating for and protecting us. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. A project such as this should never be allowed based on quick "ministerial" approval. Therefore, I am requesting the City follow AB 747 and that the Project undergo full CEQA review requiring a full Evacuation Capacity Study and Environmental Impact Report. Harmony C.

Communication from Public

Name: Ethan Emery

Date Submitted: 01/12/2026 11:59 AM

Council File No: 25-1486

Comments for Public Posting: Subject: Public Comment – Fire Safety and Environmental Review Must Not Be Fast-Tracked (CF 25-1486) Good afternoon Chair and Committee Members, My name is Ethan Emery, I am speaking today out of concern for public safety and the integrity of environmental review. I want to be clear at the outset: I am not opposed to housing. Los Angeles needs housing, and it needs housing that is responsibly planned and located. But no housing policy should require the City to overlook real fire danger or bypass environmental review in high-risk areas. The proposed Woodland Hills Country Club project is located in a Very High Fire Hazard Severity Zone and is served by narrow hillside streets that already function as evacuation routes. Fire risk in this area is not hypothetical. Many residents here have experienced evacuations, road closures, and emergency conditions during recent fires. Fast-tracking a large development without full review of evacuation capacity, emergency access, and cumulative fire impacts puts lives at risk. Fire safety concerns cannot be separated from environmental review. Environmental reports are the mechanism by which evacuation constraints, terrain limitations, vegetation conditions, and cumulative hazards are evaluated together. Skipping or deferring that analysis removes the very tools decision-makers need to determine whether a project can be built safely in this location. The site also contains mature native trees, including oak species that are protected under Los Angeles law. These trees are not incidental landscaping. They are regulated environmental resources that affect grading limits, fire behavior, and site design. Their presence must be verified and evaluated as part of environmental review, not assumed away in order to qualify for fast-track processing. Applicant-prepared reports should not substitute for complete and verified City review, especially where fire risk and protected natural resources are involved. Once development proceeds, the consequences of inadequate analysis cannot be undone. Streamlining laws were never intended to override fire safety, environmental protections, or common-sense planning in high-hazard areas. At a minimum, projects of this scale and risk must undergo full, transparent environmental review before any approvals move forward. I respectfully urge the Committee to ensure that fire safety analysis and environmental review, including review of protected oak

trees, are completed thoroughly and openly and are not bypassed in the name of speed. Thank you for your time and consideration.

Communication from Public

Name: Laurie Sharrigan

Date Submitted: 01/12/2026 12:13 PM

Council File No: 25-1486

Comments for Public Posting: Thank. you for the opportunity to express how deeply we need your help to stop a dangerous development that threatens our community and the open green space our city so desperately needs. Let me say that I'm in favor of increased housing for our city...but housing that is responsibly developed with the whole community considered. The current owners of the Woodland Hills Country Club are attempting to exploit housing bills AB 2011. and AB2243. and AB. 893. for a fast track. development in a VERY HIGH FIRE HAZARD SEVERITY ZONE (VHFHSZ) . Under AB 2011, sites in these extreme fire zones are only allowed if the city has adopted special, enhanced wildfire safety measures for new housing in these areas. I seriously fear that such a reckless development threatens not only my home but my personal safety. I do not have to imagine the very real dangers: I saw the Palisades fire from my home in Woodland Hills. This proposed development will also close down a community golf course, end its hundred year greenspace conservancy, cut down its many ancient oak trees, and destroy the wildlife corridor for countless animals and native plants adjacent to the Santa Monica Conservancy. The property is zoned A1-1XL and designated open space in the community Plan. The developer is ignoring this designation by using AB 2011 to ram through his development permit. Finally, this development will seriously threaten our community with devastating flooding by blocking the natural mountain drainage basin from the Top of Topanga Canyon to the LA River that runs right through the center of the golf course. Please do Not fast track this development.

Communication from Public

Name: cliff lucas

Date Submitted: 01/12/2026 12:48 PM

Council File No: 25-1486

Comments for Public Posting: I would like to comment on the possible building of 398 homes on the space that is now Woodland Hills Country Club. We live up Canoga about 1 mile from this site. In the last few years we have been evacuated twice due to the proximity of fires in the Topanga Canyon fire zone area. There are really only two ways out from this neighborhood. The first is Mulholland Dr. to Topanga Canyon. The other is down Canoga toward Dumetz, Ventura Blvd., etc. Evacuatinig out via Topanga has been difficult due to the high volume of traffic coming North from the Topanga Canyon area as well as incoming fire departments moving to the fire site. That leaves Canoga as the major evacuation route. It's a narrow street with one lane in an one out. The addition of 398 families will only add to the already major traffic. In additioin, the streets around the projected site are all narrow and certainly won't allow for speedy evacuations when the order comes.

Communication from Public

Name: Gregory B Leger

Date Submitted: 01/12/2026 06:43 PM

Council File No: 25-1486

Comments for Public Posting: My name is Gregory Leger and I live across the street from the Woodland Hills Country Club, in fact our home is on the corner of Ibanez Ave. and Palencia Ave. and we would be surrounded by the proposed development. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. We recently move to Woodland Hills from Roseville, CA and can specifically relate to the concerns about being unable to escape a rapidly expanding fire. Roseville was one of the towns that the Paradise Fire victims evacuated to and have heard many of the horrifying stories from the survivors. The stories the told are very similar to stories told by the most resent fire in LA County. Why the government of LA County would approve a proposal that would endanger county residents is alarming. The above is one of the many reasons this project should NOT be fast track. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report.

Communication from Public

Name: Debra Dickerson

Date Submitted: 01/12/2026 06:46 PM

Council File No: 25-1486

Comments for Public Posting: I have a home on the golf course and have lived here since 2003. I personally see no benefits to the neighborhood or the community with this development. There will be problems with fire safety, noise, water use, destruction of nature, and increased traffic. The only people who will benefit from this will be the developers, not the people in the neighborhood, and not the potential new residents.

Communication from Public

Name:

Date Submitted: 01/12/2026 07:03 PM

Council File No: 25-1486

Comments for Public Posting: Dear City Planning Department Members, I live in Woodland Hills and I am concerned about the fast-tracking of proposed project at the Woodland Hills Country Club. The current owners of the Woodland Hills Country Club are depending on the conditions outlined in housing bills AB 2011 & AB 2243 & AB 893 to track-track a 400-unit development in a highly residential community within a canyon setting. As Councilman Blumenfield expresses in his motion, this area is anything but a “commercial corridor”. It is hard for me to believe that the bills authors intended the use of these laws to circumvent local input, infrastructure review, and zoning requirements in the manner in which the owners have proposed. It should also be noted that this area is within a designated Very High Fire Hazard Severity Zone (VHFHSZ). If you drive the streets, you will see how this building could cause major congestion issues during an emergency such as was seen during the Palisades fire. Under AB 2011, sites in these extreme fire zones are only allowed if the city has adopted special, enhanced wildfire safety measures for new housing in these areas. None of this has occurred for the current project. Also, the current project does not specify what is to become of the remaining acreage which is currently part of the original parcel. How can just one section of the parcel be developed without full disclosure of the entire project? This proposed development will cut down many ancient oak trees, and destroy a 100-year-old green space adjacent to the Santa Monica Mountains Conservancy which has remained a wildlife corridor for countless Canada Geese, bobcats, coyotes, red-headed woodpeckers, and the loved squirrels. Please do not approved this development to be fast-tracked. It requires, and its location deserves, more thought to the infrastructure needs and environmental impacts. Thank you for your thoughtful consideration and actions on this request. Sincerely, A concerned local resident

Communication from Public

Name: Josh Saltsman

Date Submitted: 01/12/2026 08:20 PM

Council File No: 25-1486

Comments for Public Posting: Draft Language for Public Comment for Council File: 25-1486
My name is Josh Saltsan and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga

Avenue project: THIS IS NOT A RETAIL OR COMMERCIAL AREA: The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review. CONGESTION AND ROAD CONDITIONS: The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable. INCONSISTENT WITH THE SPECIFIC PLAN: Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protected pepper trees. The intent of AB 2011, AB 2243, and AB 893 are for underused commercial properties to be developed into dense housing without community review, not open green spaces in the center of Very High Fire Hazard Severity Zone neighborhoods. For the above reasons, a project such as this should never be allowed based on quick "ministerial" approval. Therefore, I am requesting that the Project undergo full CEQA review, including preparation of an Environmental Impact Report and an Evacuation Capacity Study.

Communication from Public

Name: Ryan Lastimosa
Date Submitted: 01/12/2026 08:24 PM
Council File No: 25-1486
Comments for Public Posting: Traffic and crime have been rising in our area. A multi housing development where the golf course is will only add to the congestion. What our community needs is more park space and open areas to breathe. I am against adding more housing to this area as it can cause more harm than good.

Communication from Public

Name: Betty Ann Zetz

Date Submitted: 01/11/2026 12:17 PM

Council File No: 25-1486

Comments for Public Posting: As an 83 old I cannot fathom that we would be subject to our beautiful canyon & wildlife & fires that we now cannot get out in time..The destruction of this sanctuary for commercial & residential building is horrible for Woodland Hills & beyond! All the empty apts & townhouses where affordable housing could be within reach for lower to middle class families would benefit them greatly..The traffic is terrible already & putting more stress on the police, fire dept. hospitals & the noise factor would be unheard of..Leave Woodland Hills alone & take care of the families that already live here & our wild life...Plus the Woodland Hills Country Club is sitting on sacred ground from the indigenous people..There has to be another way instead of the owners of the Country Club who have dubious financial backgrounds to proceed over the community by AB2011 & more...Blessings..

Communication from Public

Name: Nicole Kraake

Date Submitted: 01/11/2026 02:43 PM

Council File No: 25-1486

Comments for Public Posting: ctly as written. Public Comment – PLUM Committee Agenda Item 26-001 4868 North Canoga Avenue – Planning Case CPC-2025-6505 Re: Protected Oak Trees / Disclosure Integrity I respectfully urge the PLUM Committee to halt, reject, or substantially amend the motion under consideration because it advances a framework that allows inaccurate project disclosures regarding protected oak trees to be cured later by applicant-funded tree reports. That approach is legally flawed and places the City at significant procedural and enforcement risk. This is not a policy preference issue. It is a disclosure integrity and legal compliance issue. Under long-standing City law and CEQA, protected oak trees are threshold biological resources. Their presence and potential impacts must be fully and accurately disclosed at the outset of the entitlement process (CEQA Guidelines §§ 15124, 15125). When a project description claims “no protected trees” or “no oak impacts,” but later arborist or tree reports acknowledge the presence of oaks, protected root zone encroachment, or mortality risk, the initial disclosure is defective. Tree reports do not cure defective disclosures (CEQA Guidelines § 15162; § 15088.5). Disclosure comes first. Analysis follows. Not the other way around. Allowing oak impacts to be identified, reframed, or minimized only after project design is fixed deprives decision-makers and the public of a meaningful opportunity to evaluate avoidance alternatives, contrary to CEQA’s requirement for a stable and accurate project description (CEQA Guidelines § 15124). It also undermines the City’s ability to make defensible findings under the Protected Tree Ordinance and related provisions of the Los Angeles Municipal Code. Under LAMC § 17.02, oak trees indigenous to Southern California are designated Protected Trees based on species and size. Their presence alone triggers regulatory requirements, including verification, clearance, and permitting, under LAMC §§ 12.21 and 17.05, regardless of zoning classification or entitlement pathway. Intent or design purpose is not a criterion under the ordinance. Decisions based on incomplete or inaccurate disclosures are procedurally vulnerable and legally unsustainable, and may require recirculation or supplemental environmental review where significant new information is disclosed after public review (CEQA Guidelines § 15088.5). This concern is amplified where City leadership has

publicly emphasized the importance of tree protection initiatives. Such public commitments heighten the responsibility to ensure that City actions strengthen tree protections in practice, not weaken them through procedural shortcuts. Public trust depends on consistency between stated values and land-use outcomes. If the City proceeds by elevating applicant-funded tree reports over accurate, early disclosure of protected oak impacts, it risks:

- Invalidating downstream environmental review (CEQA Guidelines §§ 15124, 15162)
- Triggering mandatory supplemental or recirculated CEQA analysis (CEQA Guidelines § 15088.5)
- Undermining enforcement of the Protected Tree Ordinance (LAMC §§ 17.02, 12.21, 17.05)
- Exposing the City to avoidable legal challenge, writ relief, and remand

I therefore respectfully urge the PLUM Committee to:

- Reject any motion language that allows tree reports to substitute for accurate project disclosure
- Require full and explicit disclosure of protected oak trees and impacts at the earliest stage of review (CEQA Guidelines §§ 15124–15125)
- Affirm that inaccurate or misleading disclosures invalidate downstream analysis (CEQA Guidelines § 15162)
- Preserve oak protections as a hard legal constraint, not a negotiable design variable (LAMC §§ 17.02, 12.21, 17.05)

Once mature oak trees are lost, the harm is permanent. No mitigation ratio, condition, or after-the-fact report can undo that damage. This is the moment for the City to uphold the integrity of its own laws and the public trust they are meant to protect. Thank you for your consideration. Submitted by: Nicole Kraake Resident Dumetz Rd. Woodland Hills

Communication from Public

Name: Kathy Cairo

Date Submitted: 01/11/2026 03:00 PM

Council File No: 25-1486

Comments for Public Posting: My name is Kathy Cairo and I live in Woodland Hills, where there is proposed development of 398 units at 4868 N Canoga Avenue, on the site of the Woodland Hills Country Club. I have deep concerns about the request by developers to use AB 2011 and its amendments to allow ministerial approval without the usual CEQA review, public hearing or appeal of this development, and ask that you not allow this fast track approval. Here is why: — The project is in a Very High Fire Hazard Severity Zone in a hillside area with narrow streets. When there is a fire, evacuation from this area will be slow and difficult as things stand now; one abandoned car could make Canoga Avenue south of the proposed development's exit impassable for residents, the fire department and other emergency responders. Adding the inhabitants of 398 new units without study and planning will endanger them and the current residents. - Canoga Avenue is being called a commercial corridor simply because it is 70 feet wide. It is not a commercial corridor by the other criteria required by AB 2011 and its amendments. South of Ventura, it lacks the retail and office buildings of a commercial corridor. South of the proposed main exit of the development, Canoga Avenue becomes a winding narrow street with stop signs and without sidewalks; it ends at Mulholland. - The Woodlands Hills Country Club has A1 Agricultural and Open Space designation; this is also not compatible with its being part of a commercial corridor. In addition, it has other value: it absorbs rainwater, which helps prevent flooding, and it supports wildlife from the nearby mountains. I would add that Woodland Hills has accepted high-density development in Warner Center, where there are actual commercial corridors. The Woodland Hills Country Club is in a very different place. Development of this scale in such a place without CEQA review, public hearing or appeal is not what AB 2011 was meant to permit, and is a misuse of the law. Please do not allow it.

Communication from Public

Name: John Alexenko

Date Submitted: 01/11/2026 03:41 PM

Council File No: 25-1486

Comments for Public Posting: My name is John and I live in Woodland Hills near the Country Club. With regard to the proposed 398-unit development at the Woodland Hills Country Club: I am deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. Residents could be trapped by clogged traffic in the event of a fire or flooding. This is one of several disturbing aspects of the proposed project. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration as we did in the Palisades disaster last year, just over the hill. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga Avenue project: THIS IS NOT A RETAIL OR COMMERCIAL AREA: The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements

because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review.

LOSS OF OPEN SPACE AND HARM TO WILDLIFE: The site contains recognized and protected habitat for protected species and wetlands. The golf course as a whole, 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 including bobcats. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting and human presence impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and grey 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. Not to mention the annoyance to humans.

INCONSISTENT WITH THE SPECIFIC PLAN: Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protect. Please reject this project and keep the wonderful resource of our neighborhood by possibly making it a public course. Thank you for your immediate attention to this very important matter.

John Alexenko Woodland Hills resident

Communication from Public

Name: Cynthia Wands

Date Submitted: 01/12/2026 03:36 PM

Council File No: 25-1486

Comments for Public Posting: My name is Cynthia Wands and I have lived in the neighborhood surrounding the Woodland Hills Country Club for more than 30 years. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. I watched the Palisades Fire nearly destroy our community. From my house I watched the panic as the wildfire nearly incinerated our neighborhood - roadway access was not adequate for the fire support or the evacuation of the Woodland Hills/Topanga/Mullholland communities. This Very High Fire Hazard Severity Zone can not support this additional housing. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial

approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga Avenue project. This residential neighborhood has a diverse population of families, and a whole spectrum of lesser to higher value homes that make up a unique community. We deserve to be given the oversight of an EIR that accurately represents the characteristics of this proposed project. The proposed project is an environmental nightmare that would cause great harm to the area. Please listen to these community comments. **THIS IS NOT A RETAIL OR COMMERCIAL AREA:** The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. **CONGESTION AND ROAD CONDITIONS:** The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable. **LOSS OF OPEN SPACE AND HARM TO WILDLIFE:** The site contains recognized and protected habitat for protected species and wetlands. **INCONSISTENT WITH THE SPECIFIC PLAN:** The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protect

Communication from Public

Name: John and Kathleen Allee

Date Submitted: 01/12/2026 03:46 PM

Council File No: 25-1486

Comments for Public Posting: My name is John Allee and I live with my wife, Kathleen, in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: We join many members of our community who are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed “fast track” project. Only one year ago, we were on high alert, with our cars packed to the gills, due to the proximity of the Palisades Fire, and were a mere half-mile from the voluntary evacuation zone. We have grave concerns about the safety of our neighborhood should this development go ahead as planned. We hope that the city council will do everything in its power to work with the developers to come up with a plan for the property that makes sense for all and not simply roll over to allow this thoughtless fast-track experiment.

Communication from Public

Name: Preston Ukra

Date Submitted: 01/12/2026 02:51 PM

Council File No: 25-1486

Comments for Public Posting: My name is Preston and I live in the neighborhood surrounding the Woodland Hills Country Club. I am writing to express my deep concern regarding the proposed 398 unit development at the Woodland Hills Country Club. Many members of our community believe this project is inappropriate for this location and poses serious risks to public safety, environmental integrity, and neighborhood livability. The project site is located in a Very High Fire Hazard Severity Zone in a non conforming hillside area with narrow and substandard streets. These streets already experience congestion and serve as critical evacuation routes. In the event of a wildfire, there are well founded fears that residents could be trapped by traffic clogged egress. Even a single disabled or abandoned vehicle could make evacuation impossible. This is a foreseeable and life threatening risk. In the community where we live, nearly all of us have experienced serious difficulties obtaining homeowners insurance. Our insurance premiums have more than doubled, and two of our neighbors were unable to renew their policies because their insurance companies discontinued coverage. They were forced to rely on the California FAIR Plan. During the most recent fire season, two neighbors did not have any insurance coverage at all. These real conditions show how vulnerable this area already is to fire risk and how irresponsible it would be to significantly increase density without full review. While I understand the importance of providing housing, AB 2011 and its subsequent amendments were intended to apply to underutilized existing commercial corridors, not open green space in environmentally sensitive and fire prone hillside neighborhoods. High density development is already occurring in the Warner Center commercial corridors, which aligns with the intent of AB 2011. The proposed development at 4868 North Canoga Avenue does not. Amendments including AB 2243 and AB 893 removed critical guardrails related to fire safety and allowed developers to override adopted Specific Plans. These changes enable projects to bypass common sense protections designed to protect residents, wildlife, and historic resources. In a severe fire zone, such shortcuts place lives at risk. I request that the City comply with AB 747 by requiring a full Evacuation Capacity Study and a comprehensive Environmental Impact Report. The developer claims state housing laws allow ninety day

ministerial approval without CEQA review or public hearing by classifying Canoga Avenue as a commercial corridor. This classification is flawed. The site is zoned Agricultural Open Space, is adjacent to single family homes, and is served by narrow streets that function as evacuation routes. The site is not a true commercial area. Its zoning does not principally permit office retail or parking uses. The project relies on a discretionary waiver to avoid sidewalk dedications, raising serious ADA accessibility concerns. The site also exceeds twenty acres and lacks a tentative tract map, which independently requires full CEQA review. The golf course contains habitat and wetlands and is an important part of the Santa Monica Mountains ecosystem supporting raptors, bobcats, and other wildlife. The proposed project would introduce continuous lighting from multi story buildings, extensive parking, vehicles, and street lighting, creating permanent and unmitigable biological impacts. The Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan remain valid and enforceable. The project is inconsistent with both and would impact historic resources including the William Bell designed golf course and protected pepper trees. The intent of AB 2011, AB 2243, and AB 893 was to redevelop underused commercial properties, not to allow rapid approval of dense development on open green space in a Very High Fire Hazard Severity Zone. For these reasons, I respectfully request full CEQA review including an Environmental Impact Report and a comprehensive Evacuation Capacity Study before any further consideration of this project. Thank you for your time and consideration.

Communication from Public

Name: Anthony Jackson

Date Submitted: 01/12/2026 04:18 PM

Council File No: 25-1486

Comments for Public Posting: My name is Anthony Jackson and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. When the Palisades fire raged in January 25', my family and I were advised by a friend that works on wildfires to evacuate. We left in the middle of the night but our exit on Canoga Ave was blocked due to a fallen tree limb. Luckily, we were able to re-route down Topanga Blvd and there were not many more cars in the road. However, this experience informs my decision that more time and planning must be made to ensure safety in case of emergencies when it comes to the new development. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing

laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga Avenue project: **THIS IS NOT A RETAIL OR COMMERCIAL AREA:** The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review. **CONGESTION AND ROAD CONDITIONS:** The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable. **INCONSISTENT WITH THE SPECIFIC PLAN:** Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic res

Communication from Public

Name: Kristin Dudley

Date Submitted: 01/12/2026 04:29 PM

Council File No: 25-1486

Comments for Public Posting: My name is Kristin Dudley and I live in the neighborhood of the Woodland Hills Country Club. I have lived here 31 years. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I am deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. I am fearful for myself, family, and neighbors which could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga Avenue project: THIS IS NOT A RETAIL OR COMMERCIAL AREA: The site's A-1 Agricultural zoning and "Open Space"

designation does not principally permit “office, retail, or parking” and the site fails the “commercial corridor” frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review.

LOSS OF OPEN SPACE AND HARM TO WILDLIFE: The site contains recognized and protected habitat for protected species and wetlands. The golf course as a whole, 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 including bobcats. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting and human presence impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and grey foxes. That level of light emittance within the Zone, and in proximity to abundant open public and private open space, would be a permanent, significant biological impact.

INCONSISTENT WITH THE SPECIFIC PLAN: Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protect

Communication from Public

Name: Diane Brittain

Date Submitted: 01/12/2026 04:43 PM

Council File No: 25-1486

Comments for Public Posting: Regarding the proposed 398-unit development at the Woodland Hills Country Club: My name is Diane Brittain, and I live in a neighborhood near the Woodland Hills Country Club. My family, along with many of our neighbors, are deeply concerned about the impact this oversized and unsuitable development will have in a Very High Fire Hazard Severity Zone (VHFHSZ) located in a non-conforming hillside area with extremely narrow streets. There are legitimate fears that residents could become trapped on traffic clogged roads with no viable evacuation route during another wildfire. During last year's fires, our neighborhoods were placed under a "prepare to evacuate" warning as flames crested the hilltops after burning through the coastal regions and Topanga area, then descending into the west end of the San Fernando Valley. We could see the flames, smell the smoke, and watch massive plumes rising over the ridgelines. The possibility of being trapped again under similar conditions is only one of several alarming aspects of this proposed project. The project would significantly increase congestion in a neighborhood already served by substandard, narrow streets—many only 1.5 car widths wide. In an emergency evacuation, a single abandoned vehicle could block an entire road, creating a life-threatening situation for residents. These same bottlenecks could also prevent Fire Department vehicles from entering the area to protect the community. Recent amendments (AB 2243 and AB 893) have removed critical fire safety guardrails and allow developers to override a carefully designed specific plan. This has enabled projects that disregard common sense protections, fire zone designations, and long-standing planning mandates intended to safeguard residents. The dangers inherent in a severe fire zone already place lives at risk; these risks should not be compounded by poor judgment or insufficient review from public officials and legislators who are supposed to protect the community. I fully understand the importance of providing housing. However, AB 2011 and its subsequent amendments were intended for existing commercial corridors, not for open space or agricultural land in high-risk fire zones. Significant high-density development is already underway in the appropriate commercial corridors of Warner Center—exactly the type of location envisioned by AB 2011. The proposed development at 4868 N Canoga Avenue does

not meet that intent. I am requesting that the City comply with AB 747, which requires a full Evacuation Capacity Study and a complete Environmental Impact Report (EIR). The developer asserts that state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a “commercial corridor” despite its Agricultural/Open Space zoning and adjacency to single family homes accessed by narrow, substandard streets that function as evacuation routes. Additional concerns regarding the 4868 N Canoga Avenue proposal include: THIS IS NOT A RETAIL OR COMMERCIAL AREA -- The site’s A 1 Agricultural zoning and Open Space designation do not permit office, retail, or parking uses. The site also fails to meet “commercial corridor” frontage requirements, as the applicant seeks a discretionary waiver to avoid mandatory sidewalk dedications. Avoiding sidewalk dedications due to historic trees would violate the Americans with Disabilities Act (ADA), which requires accessible public routes—including sidewalks—connecting streets to bus stops. The golf course parcel also exceeds 20 acres without a tentative tract application, which independently triggers the need for a full EIR. LOSS OF OPEN SPACE AND HARM TO WILDLIFE -- The site contains recognized habitat for protected species and wetlands. The golf course, with its mature trees and water features, is an integral part of the Santa Monica Mountains ecosystem, supporting raptors and small to medium sized mammals such as bobcats. The proposed project’s multi story buildings, nearly 900 parking spaces, vehicle headlights, and extensive lighting would introduce a 24-hour commercial level light footprint into an area used by state listed threatened mountain lions, bobcats, and gray foxes. This level of light pollution in a sensitive habitat area would create a permanent, unmitigable biological impact. The intent of AB 2011, AB 2243, and AB 893 is to allow underused commercial properties to be redeveloped into housing without community review—not to open green space in the heart of a VHFHSZ neighborhood. For all of these reasons, a project of this magnitude should never be approved through a rapid ministerial process. I am therefore requesting that the City require a full CEQA review, including preparation of an Environmental Impact Report and a comprehensive Evacuation Capacity Study.

Communication from Public

Name: Mac Mak

Date Submitted: 01/12/2026 09:32 PM

Council File No: 25-1486

Comments for Public Posting: I strongly oppose the proposed 398-unit development at 4868 N. Canoga Avenue. 1. This is an inappropriate high-density project in a Very High Fire Hazard Severity Zone, surrounded by narrow streets that already function as evacuation routes. In a wildfire, residents will likely be trapped by traffic with serious risk to their lives. 2. AB 2011 was intended for existing commercial corridors. This location has neither 'commercial' (all residential) nor 'a corridor' (turns into a very narrow street just 100 yards father with no sidewalk). The City must comply with AB 747 by requiring a full Evacuation Capacity Study and an Environmental Impact Report. The developer's claim of ministerial approval improperly labels this site as a "commercial corridor," despite its A-1 zoning, adjacency to single-family homes, and reliance on narrow evacuation streets. AB 2011 was never intended to urbanize open green space in extreme fire zones without public review. This project must undergo full CEQA review, including an EIR and evacuation analysis. 3. High-density housing is already being built in appropriate locations like Warner Center. The heavy impact of this development is yet to be felt and will only worsen the already congested 101/Canoga intersection. There are other open areas available for development. There is also the entire high desert with hardly any population there. 4. This project conflicts with adopted specific plans, threatens historic resources, destroys open space, and causes unmitigable impacts to wildlife habitat. 5. Amendments AB 2243 and AB 893 removed critical safety guardrails, allowing developers to bypass fire protections, specific plans, and public review. Applying these laws here undermines public safety and common sense. This is all making California more like a banana republic or some communist state.

Communication from Public

Name:

Date Submitted: 01/12/2026 09:38 PM

Council File No: 25-1486

Comments for Public Posting: This plan is ill thought out regarding available and proposed infrastructure and support for a high volume of occupants. Every street near and around the proposed space is two lanes and near a school in all directions. There is not enough space to add 400-1200 occupants including their cars and space needs, especially when balancing the safe operations of our local schools. Most importantly fire services, in an exceedingly high fire zone, will be forced to conduct disrupted operations. Further there are not enough retail nor public services to support this expanded population. Where will these residents shop for groceries, park their cars, drive to work, go to the post office, or seek emergency services?? We need more housing but not in this condensed of a space without detrimentally impacting all existing residents.

Communication from Public

Name: Laura

Date Submitted: 01/12/2026 10:20 PM

Council File No: 25-1486

Comments for Public Posting: My name is Laura and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga Avenue project: THIS IS NOT A RETAIL OR COMMERCIAL

AREA: The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review.

CONGESTION AND ROAD CONDITIONS: The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable.

LOSS OF OPEN SPACE AND HARM TO WILDLIFE: The site contains recognized and protected habitat for protected species and wetlands. The golf course as a whole, 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 including bobcats. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting and human presence impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and grey 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.

INCONSISTENT WITH THE SPECIFIC PLAN: Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protect

Communication from Public

Name: Thomas Owens
Date Submitted: 01/11/2026 07:34 PM
Council File No: 25-1486

Comments for Public Posting: My name is Thomas Owens and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. THIS IS NOT A RETAIL OR COMMERCIAL AREA: The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office,

retail, or parking” and the site fails the “commercial corridor” frontage requirements because the Applicant requires a discretionary waiver to avoid mandatory sidewalk dedications. The discretionary waiver to avoid mandatory sidewalk dedications due to historic trees will violate the Americans with Disabilities Act (ADA) under federal law which requires clear, accessible public routes, including sidewalks, connecting streets to bus stops. The golf course site is also larger than 20-acres without the tentative tract application, which also necessarily requires full EIR review. CONGESTION AND ROAD CONDITIONS: The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable. The intent of AB 2011, AB 2243, and AB 893 are for underused commercial properties to be developed into dense housing without community review, not open green spaces in the center of Very High Fire Hazard Severity Zone neighborhoods. For the above reasons, a project such as this should never be allowed based on quick "ministerial" approval. Therefore, I am requesting that the Project undergo full CEQA review, including preparation of an Environmental Impact Report and an Evacuation Capacity Study. Thank you for taking the time to consider this. Best regards, Thomas Owens 22111 Dumetz Rd. Woodland Hills Towens149@gmail.com

Communication from Public

Name: Marcia Israel

Date Submitted: 01/11/2026 08:01 PM

Council File No: 25-1486

Comments for Public Posting: My name is Marcia Israel and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed development. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. **LOSS OF OPEN SPACE AND HARM TO WILDLIFE:** The site contains recognized and protected habitat for protected species and wetlands. The golf course as a whole, 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 including bobcats. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting and human presence impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and grey 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. INCONSISTENT WITH THE SPECIFIC PLAN: Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protected pepper trees.

Communication from Public

Name: Katherine Stark

Date Submitted: 01/12/2026 07:58 AM

Council File No: 25-1486

Comments for Public Posting: Public Comment for Council File: 25-1486 My name is Katherine Stark. I am an active Realtor, grew up by the off of Morro Drive and currently live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: I and many members of our community are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. My family and I lived in Bell Canyon from 2003-2018 when the Woolsey Fire took our home and many others throughout Bell Canyon, Calabasas and Malibu. You might recall the Paradise Fire was happening in and around the same time as Woolsey. Residents couldn't get out of the community. Many lives were lost! We had a similar situation just last year in the Pacific Palisades Fire. The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could be life threatening and cause the entire road to be impassable. The Palisades Fire of 2025 is a case in point! The perils that exist in a severe fire zone put all residents' lives at risk! We do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high-density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow

90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to single-family homes served by narrow substandard streets that function as evacuation routes. THIS IS NOT A RETAIL OR COMMERCIAL AREA. The intent of AB 2011, AB 2243, and AB 893 are for underused commercial properties to be developed into dense housing without community review, not open green spaces in the center of Very High Fire Hazard Severity Zone neighborhoods. For the above reasons, a project such as this should never be allowed based on quick "ministerial" approval. Therefore, I am requesting that the Project undergo full CEQA review, including preparation of an Environmental Impact Report and an Evacuation Capacity Study. LOSS OF OPEN SPACE AND HARM TO WILDLIFE: The site contains recognized and protected habitat for protected species and wetlands. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting and human presence impact in an area that is accessible to State-listed threatened evolutionarily significant mountain lions, bobcats and grey 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. There is currently a Wildlife Corridor in Bell Canyon/Ventura County. Shouldn't there be a similar study done for the Woodland Hills Country Club and surrounding area? INCONSISTENT WITH THE SPECIFIC PLAN: Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protected pepper trees. Best Regards, Katherine Stark
Coldwell Banker Realty KatherineStarkRE@gmail.com
818-590-8847

Communication from Public

Name: Jami

Date Submitted: 01/12/2026 05:03 PM

Council File No: 25-1486

Comments for Public Posting: Re: Council File 25-1486 – Public Comment My name is Jami, and I live in the neighborhood surrounding the Woodland Hills Country Club. I am also a disabled veteran and a parent, and my family’s safety during wildfire emergencies depends directly on the reliability of our evacuation routes. I am submitting comment regarding the proposed 398-unit development at 4868 N Canoga Avenue. This project raises serious concerns related to zoning consistency, fire safety, environmental review, and compliance with state and local law. The project site is located within a ****Very High Fire Hazard Severity Zone (VHFHSZ)****¹ and is served by narrow hillside streets that function as evacuation routes. For families like mine, evacuation is not theoretical. During severe fire conditions, traffic congestion, limited mobility, and delayed access can quickly become life-threatening. Adding hundreds of new residents and vehicles to already constrained roadways would significantly increase risk for existing residents, including those with disabilities, children, and older adults. The applicant asserts eligibility for ministerial approval under AB 2011, yet the property carries A-1 Agricultural zoning, an Open Space designation, and does not function as a legitimate commercial corridor as contemplated by the statute. This classification appears inconsistent with both the eligibility criteria and legislative intent of AB 2011.² The applicant is also requesting discretionary waivers, including relief from sidewalk dedication requirements. Once discretionary action is required, the project should no longer qualify as ministerial and should not bypass environmental review under CEQA.³ These waivers further raise concerns related to ADA accessibility requirements, particularly where safe, accessible routes are essential during emergency conditions.? I am requesting that the City comply with AB 747, which requires analysis of evacuation capacity and wildfire risk when approving qualifying housing projects in fire hazard areas.? At a minimum, this project warrants a full Evacuation Capacity Study and preparation of an Environmental Impact Report (EIR) due to its scale, location, and potential impacts. Additionally, the project appears inconsistent with adopted local planning documents, including the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan, both of which remain valid and enforceable and were adopted to

protect public safety, environmental resources, and community character. For families like mine who already live with the reality of fire risk, it is essential that large-scale projects in high-hazard areas receive full review rather than expedited approval. I respectfully request that this project not proceed through ministerial approval and that comprehensive legal, environmental, and public safety review be required. Sincerely, Jami Woodland Hills Resident Disabled Veteran and Advocate Footnotes ¹ CAL FIRE Fire Hazard Severity Zone Maps; Public Resources Code §§ 4201–4204. ² California Government Code §§ 65912.110–65912.132 (AB 2011 – Affordable Housing and High Road Jobs Act). ³ California Environmental Quality Act (CEQA), Public Resources Code § 21000 et seq.; ministerial projects are exempt only where no discretionary judgment is exercised. ⁴ Americans with Disabilities Act (ADA), 42 U.S.C. § 12101 et seq.; see also DOJ ADA Standards for Accessible Design regarding accessible routes in public rights-of-way. ⁵ AB 747 (2023), codified in Government Code § 66312, requiring consideration of evacuation capacity and wildfire risk for certain housing developments in fire hazard areas.

Communication from Public

Name: Howard
Date Submitted: 01/12/2026 05:18 PM
Council File No: 25-1486

Comments for Public Posting: My name is Howard, and I live in the neighborhood surrounding the Woodland Hills Country Club. I am writing to express serious public safety concerns regarding the proposed 398-unit development at the Woodland Hills Country Club. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ), within a hillside area served by extremely narrow, substandard streets that already function as evacuation routes. In the event of a wildfire, there is a real and foreseeable risk that residents could become trapped due to traffic congestion and limited egress. This alone makes the proposed development inappropriate for this location. I raise these concerns from personal experience. As a journalist, I have covered major California wildfires, including the Palisades Fire and the Camp Fire in Paradise. I have witnessed evacuation failures, gridlocked roads, abandoned vehicles, and people trapped with no safe way out. The devastation in Paradise is a tragic reminder of what happens when development is approved without fully accounting for evacuation capacity in high-fire-risk areas. I am deeply concerned that similar conditions exist here. While I support the need for housing, AB 2011 was intended to apply to true commercial corridors. The proposed site at 4868 N. Canoga Avenue is agricultural/open space in nature, surrounded by single-family neighborhoods and dependent on narrow hillside roads not designed for high-density traffic or emergency evacuation. Applying AB 2011 and its amendments (AB 2243 and AB 893) in this context undermines critical fire-safety protections and specific plans that exist to protect human life. I respectfully request that the City comply with AB 747 by requiring a full Evacuation Capacity Study and Environmental Impact Report. Allowing this project to proceed through expedited ministerial approval without CEQA review, public hearing, or appeal places residents at unacceptable risk in a Very High Fire Hazard Severity Zone. The intent of state housing laws was to redevelop underutilized commercial properties — not to fast-track dense residential development in open space surrounded by fire-prone neighborhoods. Public safety must take precedence. Thank you for your time and consideration.
Sincerely, Howard Photojournalist

Communication from Public

Name: Heath Kline

Date Submitted: 01/12/2026 05:28 PM

Council File No: 25-1486

Comments for Public Posting: I am Heath Kline, Treasurer, WHIP Chair, and VANC Representative of the Woodland Hills-Warner Center Neighborhood Council, speaking on behalf of VANC. About VANC: The Valley Alliance of Neighborhood Councils represents all 34 San Fernando Valley Neighborhood Councils, advocating before City Council as one unified voice on issues affecting our communities. On the anniversary of the Altadena and Palisades fires, VANC voted to support Councilmember Blumenfield's motion CF-1486. Why this matters: A developer claims state housing streamlining laws allow 398 units to be approved ministerially within 90 days in a Very High Fire Hazard Severity Zone—bypassing CEQA review, fire safety evaluation, public hearings, and community input entirely. VANC Chair Linda Gravani's attached letter details six critical studies needed before this untested legal interpretation potentially establishes citywide precedent: legal analysis of state law applicability, fire hazard compliance, fire suppression infrastructure capacity, evacuation impact assessment, stormwater drainage effects, and guaranteed community review. Without City Council action on CF25-1486, approval may proceed based on untested legal interpretation with no opportunity for community input—potentially establishing citywide precedent for developments in our most fire-vulnerable areas.

Valley Alliance of Neighborhood Councils

VANC

Alliance of the 34 San Fernando Valley Neighborhood Councils

Established March 03, 2003 by Jill Banks Barad-Hopkins

January 11, 2026

Page 1 of 3

Reference: Council File 25-1486

TO: Mayor Bass

Council Member Eunisses Hernandez
Council Member Adrin Nazarian
Council Member Bob Blumenfield
Council Member Nithya Raman
Council Member Katy Yaroslavsky
Council Member Imelda Padilla
Council Member Monica Rodriguez
Council Member Marqueece Harris-Dawson
Council Member Curren D. Price Jr.
Council Member Heather Hutt
Council Member Traci Park
Council Member John Lee
Council Member Hugo Soto-Martinez
Council Member Ysabel J. Jurado
Council Member Tim McOsker
Deputy Mayor Community Engagement, Vahid Khorsand
LA City Planning
LA Fire Department
LA Dept of Transportation
LA City Attorney

Greetings:

During the January 8, 2026 of the Valley Alliance of Neighborhood Councils (VANC), the valley leaders voted to support the motion submitted by Council Member Bob Blumenfield in Council File 25-1486.

After a discussion of the issues and concerns presented by the Planning, Land Use and Mobility Committee of the Woodland Hills Warner Center

Continued on page 2

Neighborhood Council, VANC supports their requests that the City Council, Department of City Planning, Los Angeles Fire Department, LA Department of Transportation, and the City Attorney address the following:

1. **LEGAL ANALYSIS:** Provide a legal analysis of whether state housing streamlining laws (AB2011, AB2243, AND AB893) apply to the proposed project at the Woodlad Hills Country Club and to similarly situated sites citywide, including whether the 90-day ministerial approval timeline applies or whether CEQA review is required
2. **FIRE HAZARD:** Evaluate the project's compliance with development standards for Very High Fire Hazard Severity Zones:
3. **FIRE SUPPRESSION INFRASTRUCTURE:** Request that LADWP and LAFS evaluate whether existing fire hydrants on surrounding hillsides will have adequate water pressure and flow capacity to support fire suppression, given the increased density, and vice versa.
4. **EVACUATION AND EMERGENCY ACCESS:** Request LAFD and LADOT evaluation of the proposed development's impact on evacuation capacity, time to evacuate and ability for first-responder access, given that the site is served by two canyon roads that also serve as evacuation routes
5. **HYDROLOGY:** Evaluate the project's impact on stormwater absorption and drainage capacity, given that the development would replace permeable open space with impervious surfaces
6. **COMMUNITY REVIEW:** Provide an opportunity for the Neighborhood Council and community review after these analyses are completed and made public

BACKGROUND:

Residents of Woodland Hills and the surrounding hillside communities-along with the Santa Monica Mountains Conservancy, which has worked for decades to protect these wildland-adjacent areas – face a proposed 398-unit development on a site designated **Very High Fire Hazard Severity Zone**. This site is located within one-half to one mile of brush-laden hillsides in Santa Monica Mountains Conservancy-designated nature areas.

THE ISSUE

The developer asserts that state housing streamlining laws (AB2011, AB2243, AB893) allow ministerial approval within 90 days-without CEQA review, public hearing, or appeal. The community has no forum to raise questions about fire hazard compliance, hydrant capacity, evacuation impacts, or stormwater absorption. The eligibility claim rests on several provisions in state law:

- "Commercial corridor" is defined by a 70-foot right-of-way---not by the roadway width, zoning, use, or neighborhood character.
- The 20-acre stie itself is zoned A1 Agricultural

- Seventy-five percent of the project site perimeter adjoins urban uses
- Specific Plans over 25 years old can be bypassed, which would nullify protections for the Mulholland Scenic Parkway and the Girard Tract
- Single-family zoning exceptions apply where parking is permitted, regardless of whether a Conditional Use Permit is required.
- Ministerial approval eliminates CEQA review, evacuation and first-responder access evaluation, public hearings, Planning Commission review, appeals, and community input

WHY THIS MATTERS NOW

With City Council action on CF25-1486, the community receives answers to its concerns and the City completes legal and safety evaluation before an irreversible decision. Without action, approval may proceed based on an untested legal interpretation, with no opportunity for community input, potentially establishing citywide precedent.

REQUEST

The Valley Leaders of VANC along with the Woodland Hills-Warner Center Neighborhood Council requests that the City Council

1. Approve the motion in CF25-1486 as submitted initially
2. Direct the City Attorney and Planning Department to complete the legal analysis within 30 days.

As defined in Article IX of the Los Angeles City Charter, the role of Neighborhood Councils include advisory responsibility for land-use matters affecting their communities. The Valley Leaders of VANC take this responsibility very seriously and support all efforts to protect our stakeholders.

VANC is looking forward to your response.

Respectfully submitted



Linda Gravani, Chair

Vanc34.chair@gmail.com

818-481-0714

Communication from Public

Name: Noelle

Date Submitted: 01/12/2026 05:31 PM

Council File No: 25-1486

Comments for Public Posting: My name is Noelle and I live in the neighborhood surrounding the Woodland Hills Country Club. Regarding the proposed 398-unit development at the Woodland Hills Country Club: we, members of the immediate area, are deeply concerned about the impact this inappropriate, high density development will have on our environmentally sensitive, fragile neighborhood. The project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a non-conforming hillside area with very narrow streets. There are very well founded fears that residents could be trapped by traffic clogged egress in the event of a fire. This is one of several disturbing aspects of the proposed project. The entire area has been affected by the fires- it is extremely difficult to get home insurance and adding a significant increase in homes within a fire zone is irresponsible. Developing in the hills - right in the middle of a high fire risk area- and knowingly moving people into a potentially dangerous area is reckless. While I understand the importance of providing housing to our community, I believe that AB 2011 and its subsequent Amendments should be limited to actual, existing, commercially zoned corridors, as intended. There is a lot of high density development currently taking place in the actual commercial corridors of Warner Center, and that location seems to be in keeping with the original intent of AB 2011. The proposed development at 4868 N Canoga Avenue is clearly not. Adding amendments (AB 2243 and AB 893) which removed any remaining guardrails with respect to fire safety and which allow for nullification of a thoughtfully designed specific plan, has enabled developers to circumvent common sense and the protections of fire zone designations and specific plan mandates designed to protect people. The perils that exist in a severe fire zone put all resident's lives at risk, we do not need this compounded by poor judgement and lack of full consideration and review from the public officials and legislators who are supposed to be advocating for and protecting us. I am requesting the City follow AB 747 requiring a full Evacuation Capacity Study and Environmental Impact Report. The developer claims state housing laws (AB 2011, AB 2243, AB 893) allow 90-day ministerial approval without CEQA review, public hearing, or appeal—classifying Canoga Avenue as a "commercial corridor" despite Agricultural/Open Space zoning and adjacency to

single-family homes served by narrow substandard streets that function as evacuation routes. I would also like to add the following comments regarding the proposed 4868 N Canoga Avenue project: **THIS IS NOT A RETAIL OR COMMERCIAL AREA:** The site's A-1 Agricultural zoning and "Open Space" designation does not principally permit "office, retail, or parking" and the site fails the "commercial corridor" frontage requirements. **CONGESTION AND ROAD CONDITIONS:** The proposed project will increase congestion in the neighborhood where there are many substandard narrow streets that are only 1.5 cars wide. If there was an emergency fire evacuation, a single abandoned car could create disaster for everyone. **LOSS OF OPEN SPACE AND HARM TO WILDLIFE:** The site contains recognized and protected habitat for protected species and wetlands. The golf course as a whole, 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 including bobcats. The mass concentration of lighting the proposed project would bring with multi-story buildings, almost 900 parking spaces, headlights from the 900 cars, and street lighting. The project essentially proposes a 24-hour shopping mall level of direct lighting that would be a permanent, significant biological impact. **INCONSISTENT WITH THE SPECIFIC PLAN:** Girard Tract Specific Plan is still relevant and enforceable and the project is "inconsistent" with both the Girard Tract Specific Plan and the Mulholland Scenic Parkway Specific Plan. The Girard Tract Specific Plan cites updates as recent as May 2003, only 22 years prior to the application date. The Project requires demolition of an historic site and landscaping structures. There is substantial evidence that the development will impact historic resources, including the William Bell-designed course and protected pepper trees. The intent of AB 2011, AB 2243, and AB 893 are for underused commercial properties to be developed into dense housing without community review, NOT open green spaces in the center of Very High Fire Hazard Severity Zone neighborhoods. For the above reasons, a project such as this should never be allowed based on quick "ministerial" approval. Therefore, I am requesting that the Project undergo full CEQA review, including preparation of an Environmental Impact Report and an Evacuation Capacity Study. Thank you!

Communication from Public

Name: Brooke

Date Submitted: 01/12/2026 05:32 PM

Council File No: 25-1486

Comments for Public Posting: I live in Woodland Hills on Canoga Avenue. The proposed development on the current Woodland Hills Golf Course has me deeply concerned. I implore the council to reconsider any fast-tracking of this development and acknowledge the need to conduct a full Fire Evacuation Capacity study as well as a thorough Environmental Impact Study given the location in the canyon and nature of the surrounding neighborhoods. Woodland Hills supports new developments of many kinds that serve the community. Squeezing high density housing in to a high fire risk area that is already congested and lacking in proper infrastructure is risky and irresponsible. The responsibility now lies with the city council to take action in proving the safety and feasibility of this proposed development, maintaining a level of trust and cooperation with the communities you represent.

Communication from Public

Name: Alyssa Dickerson
Date Submitted: 01/12/2026 05:42 PM
Council File No: 25-1486

Comments for Public Posting: This is an outrageous interpretation of this assembly bill. Not what it was intended for and not what it should be used for. For shame! I was raised in this area and have recently returned and purchased a home right near my parents. While this is a beautiful neighborhood, these roads cannot handle any more cars. This is not a public area which allows for easy in/out access. We had tree trimming on our street today, and we were blocked in for hours. Imagine if there was a fire. When a tree falls during heavy rain storms and flooding occurs, it is extremely difficult to evacuate now. More people and more cars will only endanger our residents. The wildlife in this area is beautiful and necessary to our eco-system. The thought of the destruction of their homes is sickening. These trees have been here for 100+ years. This section of nature needs to be preserved, not paved for cheap-looking and unnecessary apartments. This is not an urban area with retail establishments, wide streets, and bus routes. It is the exact opposite. It is a small, quiet, and removed area of Los Angeles, with family homes, wild animals, and as much traffic as can be handled. This project deserves to be quashed for so many reasons. Pick any reason and throw it out.

Communication from Public

Name:

Date Submitted: 01/12/2026 06:00 PM

Council File No: 25-1486

Comments for Public Posting: The proposed 398-unit development at Woodland Hills Country Club is a gross misuse of what was supposed to be a law to help individuals. This project is a money grab by an already disgraced developer with questionable morals and ill intent. More congestion on already windy roads (referred to by locals as "Spaghetti Canyon") will not only inconvenience residents and put local wildlife, children, and pets at risk from more motorists, but will make evacuations in case of fire near impossible. The winding, narrow roads are already frequently blocked by trash trucks, service trucks, people moving, delivery drivers, residents and guests double-parking illegally, and garbage cans and trees partially blocking lanes. Adding more traffic will severely endanger residents in cases of emergency. They want to cut down tagged and numbered oak trees to complete this project. They want to remove open area spaces that are being used by coyotes, migrating geese, ducks, rabbits, squirrels, raccoons, bobcats, and more for breeding, nesting, and safety. The impact this will have on the native life is immeasurable and any project in this area should not be excused from an environmental impact study. Residents opposed a previous projected development for high-income homes to be built in this area. The nature of the housing project is not what is concerning to residents. It is the impact on safety and the environment. This open-area should not be developed without adequate research on how such development would impact resident safety and wildlife. Protected oak trees should not be cut down without proper studies. The residents of our neighborhood protect our trees, we bring in arborists when trees are diseased, we use landscaping to prevent water build up on roots, we reinforce trees during periods of high winds. This developer wants to come in and destroy what we all actively work to protect in an obvious money grab. This should not be allowed.