

**SANTA MONICA MOUNTAINS CONSERVANCY**

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May 11, 2026

Renata Ooms  
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**Inadequacy of Biological Reports through April 2026  
for Woodland Hills Country Club Golf Course Project  
CPC-2025-6505-DB-DRB-SPPC-PR-VHCA and VTT-84929-VHCA**

*Via Electronic Mail*

Dear Ms. Ooms:

As the principal biologist for the Santa Monica Mountains Conservancy, I have reviewed all the submitted biological reports for the subject Project including the April 1, 2026 *Further Amended Biologist Statement of Habitat and Biological Resources Assessment* (Bio Report) prepared by Hernandez Environmental Services. Collectively these reports abjectly fail to adequately assess and analyze the value of the Woodland Hills Country Club Golf Course (golf course) as State-listed threatened mountain lion habitat. As of the date of this letter, the Project record now shows that both the golf course and much of the adjacent Girard Tract is currently used by mountain lions as part of their habitat needs.

To begin with, the report preparer's methodology limited to a one-day daylight survey confined to the artificial boundary lines of the 19.9-acre proposed Project is completely insufficient to form any conclusions based on the presence or absence of mountain lion sign on that single day. For reference, in a random time and spatial check in the most heavily occupied mountain lion habitat in the Santa Monica Mountains it is improbable to detect said sign even with multiple survey days. The conclusion of no mountain lion habitat from a single day survey is further discredited because its analysis fails to consider how golf course maintenance activities, tracks and scratches from other wildlife species, and wind degrade or eliminate mountain lion sign. Turf does not capture footprints, and sand traps are raked and walked on by golfers.

The Bio Report treats the subject 19.9 acres as if it exists in a near biologically sterile vacuum. The analysis omits key information that sets the ecological context of the subject property. The Bio Report makes no reference to, or even possible existence of, the common photographic and eyewitness sightings of mountains lions in multiple locations within the Girard Tract. That

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deficiency is now compounded by the photographs and sworn declarations of mountain lion presence both in and adjacent to the golf course contained in the April 24, 2026 letter submitted to the record by the Channel Law Group, LLP.

The report preparers further fail to acknowledge and consider the content of the Santa Monica Mountains Conservancy's adopted *Eastern Santa Monica Mountains Land Protection Plan* which includes the *Big Wild – Topanga State Park Core Habitat Area Planning Map*. This Plan and Map show a mapped and numbered habitat block abutting the southern boundary of the golf course. The City Council voted to recognize these documents on November 22, 2022 (CF 21-1284). Subsequent habitat and habitat linkage mapping by the Conservancy submitted to the Project record on April 27, 2026 reveal a series of probable routes used by both mountain lions and their prey moving to and from the golf course. This mapping effort continues given the eminent connectivity threat of the subject Project.

Ignoring all the above information, the Bio Report makes the two following unsupported generalized assertions that golf courses are neither ideal habitat for sensitive animal species nor "typically considered wildlife movement or regional conductivity areas."

"Due to the project site being a golf course, these ornamental trees and shrubs would not be considered ideal habitat for Sensitive animal species. Sensitive animal species require specific native shrub and tree communities such as coastal sage scrub, chaparral, or riparian woodlands. Furthermore, the constant anthropomorphic use of the golf course would make a very unsafe environment for Sensitive species."

"The project site is a golf course. Though wildlife may use golf courses to forage, golf courses are typically not considered wildlife movement or regional conductivity areas. There is too much anthropomorphic disturbance, and it tends to expose Sensitive species to danger on a regular basis."

To begin with, these two Bio Report assertions fail to recognize that mountain lions commonly use less than "ideal" habitat--even sans specific native vegetation--and that local mountain lions (a sensitive species) are well adapted to regular anthropomorphic disturbance and that virtually no such disturbance occurs during the night on the golf course.

The Bio Report concludes that, "Ideal mountain lion habitat is described shaped by the species' need for cover, prey, space, water, and connectivity." As described below, the golf course offers all these species' needs except cover. Cover can be found 1,000 feet away in Serrania Park or other closer habitat patches. The golf course's resources come in just one of the above five ingredients shy of being ideal mountain lion habitat.

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The contiguous 94 acres of the golf course provides the following specific valuable and unique habitat resources for mountain lions. The subject 19.9-acre Project area on average has better or equivalent mountain lion habitat resources as does the remainder of the 94 acres. The golf course is a large, gently-sloping, movement-barrier-free open space area free of lighting or vehicle traffic except daytime golf cart usage. At night it is exceptionally dark and free of all direct human influence.

Mountain lions are ambush predators that mostly hunt at night. The golf course offers clear sightlines to identify prey and scores of trees to climb to ambush prey. This author on multiple locations has seen packs of coyotes both within and departing the golf course on multiple occasions in the last year. Mountain lions eat coyotes. Coyotes use the golf course as a rapid, safe, low caloric expenditure route to access scores of surrounding habitat patches and neighborhoods all along the golf course's perimeter.

Sworn declarations in the April 24, 2026 Channel Law Group, LLP letter include eyewitnesses of both deer in the golf course and mountain lions stalking deer in the golf course. Woodland Hills generally has the hottest temperatures in the City of Los Angeles. The irrigated golf course and its water features are a draw for mountain lions and many other wildlife species seeking evening relief from heat. For context, the only areas on the north slope of the Santa Monica Mountains between the 405 Freeway and Topanga Canyon Boulevard that provide year-round drinking water and similar heat relief are the subject golf course, the Braemar and Caballero Country Club golf courses, and the Encino Reservoir. The closest site, the Braemar Country Club golf course is approximately 2.5 miles as the crow flies and at least 4.5 miles overland from the Woodland Hills golf course.

The Bio Report fails to analyze the potential for wildlife to move to and from the golf course. It further fails to address how wildlife use the open, gentle golf course terrain as a broad habitat linkage or wildlife movement corridor to travel up to six-tenths of a mile from the southern golf course tip to Dumetz Road. The Bio Report does not address how mule deer, mountain lions, and bobcats get to the golf course from from Serrania Park (combination of City, Conservancy, State Parks open space) and the dirt Mulholland Drive area (City and Mountains Recreation and Conservation Authority open space).

For reference on July 18, 2022 a mountain lion (Collared P-89) was struck by a vehicle on the south side of the 101 freeway between Winnetka and De Soto Avenues. That lion had to have originated in the immediately above listed public open space areas and partially traveled in the Girard Tract. The Los Angeles Times, Daily News, and KTLA Channel 5 all ran stories about this mountain lion. This incident reveals both the occasional extreme drive of some mountains lions to move through neighborhoods seeking territory or safety from other lions.

The above mountain lion incident is indicative of the permeability of the Girard Tract and the capacity of the Serrania Park open space complex to offer core habitat values just east of the golf

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course for the course's entire north-south length. The Girard Tract has ideal residential neighborhood conditions for the movement of mountain lions. The streets are narrow, mostly not lit, and nighttime traffic is light. The terrain is undulating, fencing is sporadic, and mature native oak and walnut trees are plentiful. In addition, there are many undeveloped private lots, paper streets, and undeveloped dedicated walkways to enhance wildlife movement.

## **Conclusion**

Pursuant to Gov. Code Sections 65912.121 and 65913.4(a)(6)(J), a development project shall not be subject to the streamlined, ministerial review process if the development project is located on a site that is habitat for protected species. The applicant has not submitted sufficient evidence for the City to determine that the site is not a habitat for mountain lions, a protected species as defined. Such sufficient evidence is impossible to submit because the record shows that the site is habitat for the State-listed threatened Santa Monica Mountains mountain lion population – a protected species.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", with a long horizontal flourish extending to the right.

Paul Edelman

Deputy Director

Natural Resources and Planning