

PUBLIC RECORD DOCUMENT

August 14, 2026

To: Redondo Beach and Torrance Planning Commissions, Planning Departments and City Attorneys

From: Mark Nelson on behalf of StopBCHD.com

Subject: In the matter of the Demolition of Publicly-owned Facilities and Subsequent Redevelopment of Private Facilities on 514 N Prospect Ave, Redondo Beach CA

I am a 4-year volunteer on the Beach Cities Health District Community Working Group (CWG) and a 40-year veteran of engineering, planning, permitting, development, and expert testimony. I provide this document and analysis on behalf of the neighborhood coalition.

This document provides verified background facts to be entered in the record of the CUP, FEIR Amendments, and PCDR process for ANY project at the 514 N Prospect Ave site.

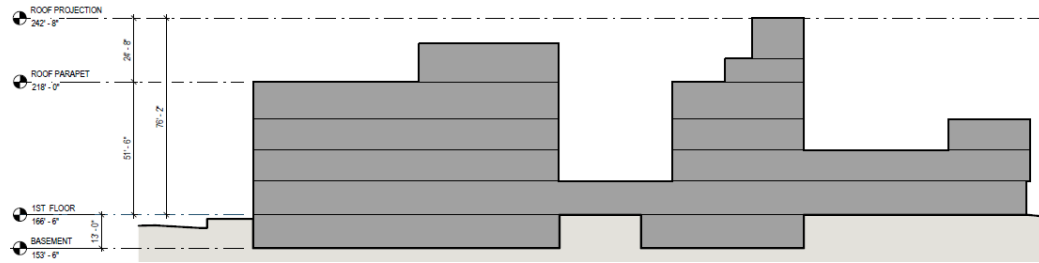
FACT: BCHD HAS REPEATEDLY MISLED THE PUBLIC REGARDING THE BUILDING HEIGHT

1. In 2022, BCHD filed a preliminary Conditional Use Permit (CUP) application with the City of Redondo Beach for the so-called Healthy Living Campus (HLC). The document was sponsored by **CEO Tom Bakaly** and **CEO Bakaly was listed as both the project owner and contact.**

BEACH CITIES HEALTH DISTRICT HEALTHY LIVING CAMPUS

514 NORTH PROSPECT AVENUE, REDONDO BEACH, CA 90277
OWNER CONTACT: BEACH CITIES HEALTH DISTRICT | TOM BAKALY | TEL: 310.374.3426, x118 | WWW.BCHD.ORG

2. On page 13/35 of the design drawing set submitted by Bakaly (dated 2/2/2022) the diagram clearly states and demonstrates a **51.5-foot height to the top of the Roof Parapet of the 4-story Hospital wings**. Thus, the 4-story buildings are 51.5-ft tall by statement of BCHD, its engineers and architects, and its pre-CUP filing. Further, its engineers and architects correctly declare the building to be 51.5-feet and the roof projections of mechanical rooms (<1% of floorspace) to be projections which cannot establish the height of the building.



3. In a July 3, 2025 EasyReader News story, **CEO Bakaly was quoted as providing the statement that the 4-story hospital building stood 60-feet tall.** That is false and contradicts CEO Bakaly's own permit filing to the City of Redondo Beach.
<https://easyreadernews.com/bchd-seeks-expressions-of-interest-for-campus-site>
4. In a June 8, 2026 EasyReader News story, **CEO Bakaly admitted that he did not know the height of the 4-story hospital wings** when asked by the reporter.
<https://easyreadernews.com/beach-cities-health-district-board-chooses-sunrise-to-evict-silverado-residents-in-one-year>

FACT: CURRENT BCHD FAR IS 0.58

5. The City Planning Department reported to the Council on January 20, 2026 that the FAR of the BCHD site was 0.58 <https://youtu.be/ZCVcP8UMvrg?t=12072>

FACT: THE BCHD PENTHOUSE IS ONLY 0.3% OF THE SITE'S ABOVE GROUND BUILDINGS

6. BCHD responded in a California Public Records response that the penthouse is 952-sqft. BCHD's Notice of Intent to file an EIR for the HLC stated that BCHD's site contained 312,900 sqft of buildings. By simple math, $952/312,900 \times 100\%$ is 0.3%.

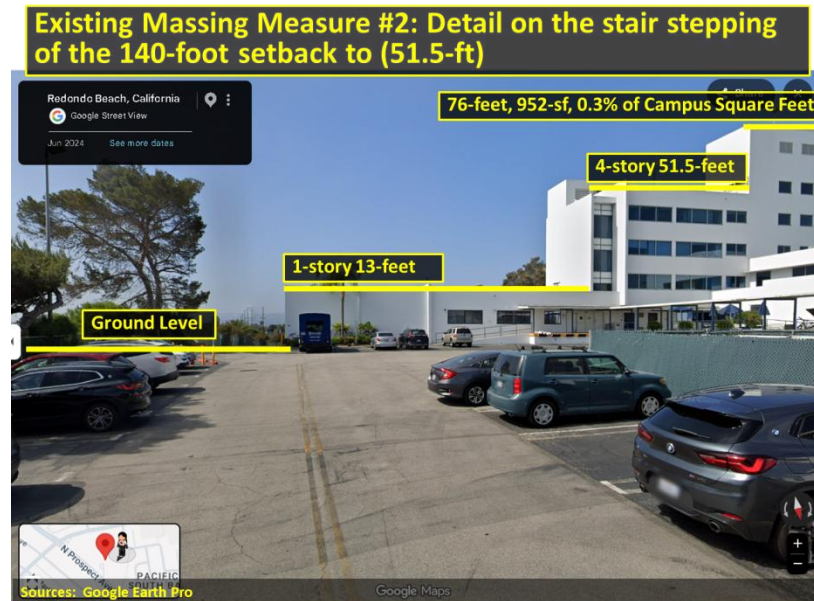
FACT: CURRENT SETBACKS FROM THE 51.5-FT TALL, 4-STORY HOSPITAL ARE 120-140 FEET

7. Using public resources, the distance from the nearest point of the 514 building's 4-story, 51.5-ft tall hospital wings exceeds 120-feet from the nearest BCHD lot line adjoining residential neighborhoods and extends to as much as 140 feet.



FACT: CURRENT BUILDINGS ARE STAIR STEPPED (WEDDING CAKE EFFECT) TO REDUCE MASS

8. The existing campus buildings are stair-stepped away from residential neighborhoods. Note the 0.3%, 952-sf penthouse. Even BCHD architect and engineering consultants refer to it as a “projection”, not a building height.



FACT: SEPARATE BUILDINGS ARE ALSO STAIR STEPPED TO REDUCE MASS

9. Separate buildings are also stair stepped, with shortest ones reducing perimeter mass.

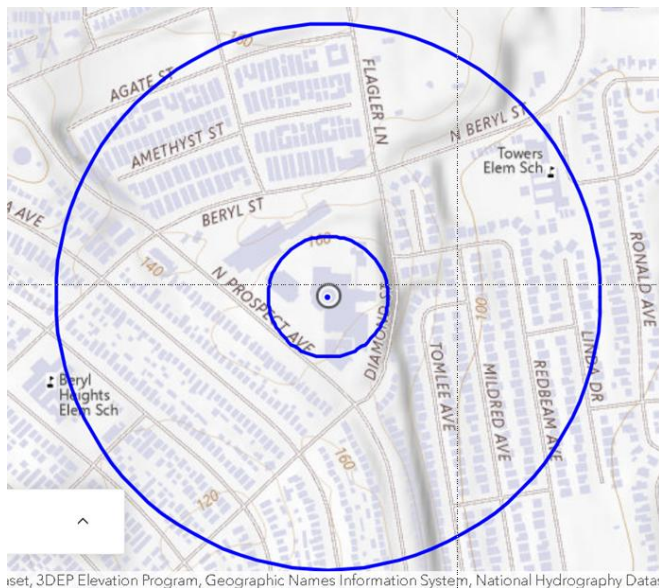
Existing Massing Measure #3: Detail on the stair stepping of the 120-foot setback (to 51.5-ft)

Despite the fact the 3-story 510 building is set nearly at the front lot line across from R-1 zoning, the building is built on a declining grade demonstrating attention to massing. Only 2-stories are visible against the 51.5-foot former hospital south tower.



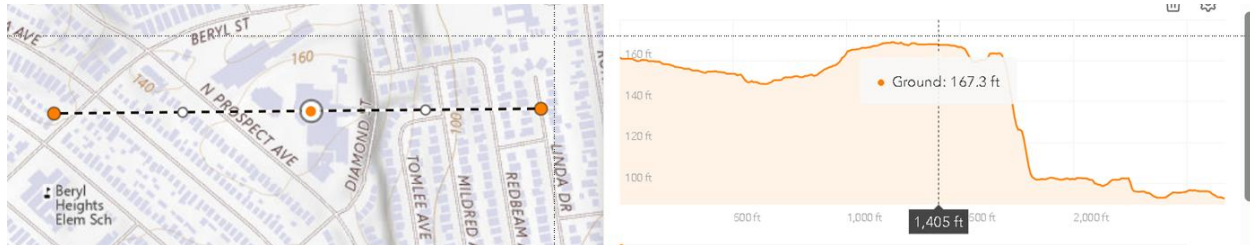
FACT: THE CERTIFIED FEIR REQUIRES CONSTRUCTION NOTICE OF ONE-FOURTH MILE DUE TO TOXIC EXHAUST/DUST AND UNMITIGATED NOISE IN EXCESS OF FEDERAL TRANSIT ADMINISTRATION MAXIMUM

10. Throughout the demolition and construction period, BCHD FEIR declares a noise profile exceeding FTA maximums. The FEIR also mandates a one-quarter mile area of public notice. See Table ES-1 of BCHD FEIR. The one-quarter mile zone is taken from USGS National Map and is the outermost ring.



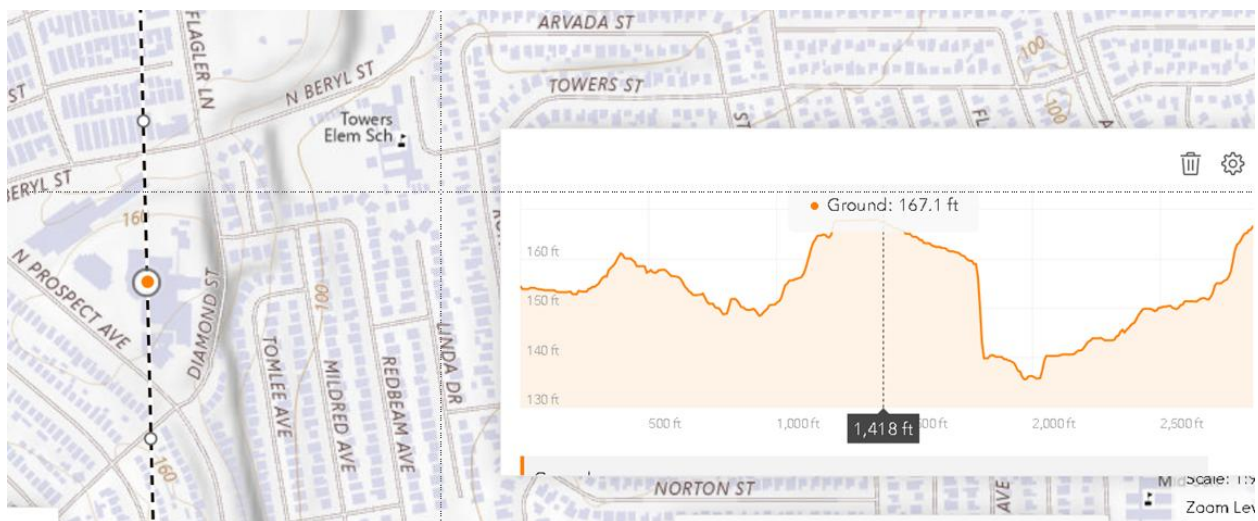
FACT: THE NATURAL TERRAIN OF THE SITE IS HIGHLY ELEVATED ABOVE THE SURROUNDING RESIDENTIAL HOUSING – THEREBY INCREASING NOISE TRANSMISSION AND PRIVACY LOSS

11. The elevated terrain of the site has an approximately 75-foot base height elevation above the Torrance residential zoned neighborhoods. Based on the BCHD provided information, that would make the 60-foot tall buildings approximately 135-feet above Torrance residential dwellings to the east. Note: “Ground” represents the BCHD base height of the 514 Building.



FACT: THE NATURAL TERRAIN OF THE SITE IS HIGHLY ELEVATED OVER THE SURROUNDING RESIDENTIAL HOUSING – THEREBY INCREASING NOISE TRANSMISSION AND PRIVACY LOSS

12. The elevated terrain of the site has an approximately 30-foot base height elevation above Redondo Beach residential zoned neighborhoods to the north, and a 20-foot base height elevation above Redondo Beach residential to the south. Based on the BCHD provided information, that would make the 60-foot tall buildings approximately 80-feet to 90-feet above Redondo Beach residential dwellings. Note: the steep drop off on the elevation curve is Beryl Street on the north and Diamond Street on the south.



FACT: “THE LOCATION OF THE BUILDINGS AND STRUCTURES SHALL RESPECT THE NATURAL TERRAIN OF THE SITE” (RBMC § 10-2.2502 (b)(2))

13. The “natural terrain” is an elevated site, with demonstrated steep drop off to surrounding residential properties. As demonstrated using USGS datasets above, the site is 20-feet above Redondo Beach property on the south and 30-feet above Redondo Beach property to the north. As also demonstrated, the site is up to 75-feet above Torrance property on the east and southeast. That area is commonly characterized by the streets Tomlee, Towers, Mildred, Deelane, Redbeam, Linda and Norton. The currently proposed 60-foot, 5-story buildings would be up to 135-feet above the Torrance properties and up to 90-feet above Redondo Beach properties.

FACT: “Purpose. Planning Commission Design Review is established to ensure compatibility ... to protect property values...” (RPMC § 10-2.2502 (a))

14. The property surrounding BCHD demonstrates a diminished value based on hedonic price modeling, the gold standard of litigation property valuation. It is the same methodology used by the major real estate price modeling companies such as CoreLogic (now Cotality). The “BCHD impact” is estimated at a nearly \$70M reduction of the surrounding property estimated value within one-quarter mile. The total property value within one-quarter mile of BCHD is nearly \$1.2B. The BCHD impact is a nearly 6% diminishment in value. As expected, property values closest to BCHD are reduced the most. The value reduction diminishes with increasing distance from BCHD.

The full expert report will be entered into the record at a future time.

Note: this devaluation impact near BCHD is based on the status quo – the current buildings, setbacks, heights, uses, etc. The proposed larger, taller, closer to the lot line development will very likely further diminish property values based on the literature and historic performance.

Property Value Summary (0.25-mile radius)			
Value	\$ 1,189,678,000		
BCHD Proximity Value Reduction (0.25mi)	\$ 69,849,822	5.9%	
SOURCES:			
Property Value: MelissaData (preferred vendor of BCHD's Market Study)			
BCHD Proximity Value Reduction: Expert-developed Hedonic Price Model using over 6,000 surrounding property values			

Title 10. Planning and Zoning

Chapter 2. ZONING AND LAND USE

Article 12. Procedures

§ 10-2.2502. Planning Commission Design Review.

(a) Purpose. Planning Commission Design Review is established to ensure compatibility, originality, variety, and innovation in the architecture, design, landscaping, and site planning of developments in the community. The provisions of this section will serve to protect property values, prevent the blight and deterioration of neighborhoods, promote sound land use, encourage design excellence, and protect the overall health, safety, and welfare of the City. The Planning Commission shall review:

(1) New construction, in all zones except for the W Waterfront and CC Catalina Corridor zones.

a. Any new commercial, industrial, mixed use or public development of any size on a vacant site involving more than 10,000 square feet of land;

b. Any new multi-family residential development containing 16 or more units on any lot and/or any new multi-family residential development do not meet the requirements of Section 10-2.2500(a).

(2) Addition, nonresidential. Any addition of gross floor area of 1,000 square feet or more, whether attached or detached, to an existing commercial, industrial, mixed use, or public development, on a site involving more than 10,000 square feet of land area.

(3) Addition, multi-family residential. Any addition of gross floor area of 1,000 square feet or more, whether attached or detached, to a multi-family residential development containing four or more units.

(4) Other. Other developments as referenced in Title 10, which due to their unique nature, require Planning Commission Design Review, or Harbor Commission Design Review as described in Section 10-5.2512.

(5) Waterfront zone, appealable area. Any development that is in the portion of the W Waterfront zone within the "appealable area" for Coastal Permits as defined in Section 10-5.2204(a)(1) and not exempt from Coastal Permit requirements pursuant to Section 10-5.2208(a).

(6) Waterfront and CC Catalina Corridor zones. Any new development in the W Waterfront Zone or in the CC Catalina Corridor zone on a site of two or more acres in area.

(7) Industrial flex (IF) overlay zone. Any new development in the Industrial flex (IF) zone. This excludes Affordable Housing Projects – Housing Element that meet the requirements of Section 10-2.2500(a).

(b) Criteria. The following criteria shall be used in determining a project's consistency with the intent and purpose of this section:

(1) User impact and needs. The design of the project shall consider the impact and the needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, private and common open spaces, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

(2) Relationship to physical features. The location of buildings and structures shall respect the natural terrain of the site and shall be functionally integrated with any natural features of the landscape to include the preservation of existing trees, where feasible.

(3) Consistency of architectural style. The building or structure shall be harmonious and consistent within the proposed architectural style regarding roofing, materials, windows, doors, openings, textures, colors, and exterior treatment.

(4) Balance and integration with the neighborhood. The overall design shall be integrated and compatible with the neighborhood and shall strive to be in harmony with the scale and bulk of surrounding properties.

(5) Building design. The design of buildings and structures shall strive to provide innovation, variety, and creativity in the proposed design solution. All architectural elevations shall be designed to eliminate the appearance of flat façades or boxlike construction:

a. The front façade shall have vertical and horizontal offsets to add architectural interest to the exterior of the building and where possible, bay windows and similar architectural projections shall be used.

b. The roof planes of the building, as well as the building shape, shall be varied where feasible, and a visible and significant roof line shall be used to soften the vertical mass.

c. Harmonious variations in the treatment or use of wall materials shall be integrated into the architectural design.

(6) Signs. Signs and sign programs shall meet the criteria established in Sign Regulation Criteria, Section **10-2.1802**.

(7) Consistency with residential design guidelines. The project shall comply with the Objective Residential Standards adopted by resolution of the City Council.

(8) Consistency with the Artesia and Aviation Corridors Area Plan. The project shall be consistent with the intent of the Artesia and Aviation Corridors Area Plan as adopted by resolution of the City Council.

(9) Conditions of approval. The conditions stated in the resolution or design considerations integrated into the project shall be deemed necessary to protect the public health, safety, and general welfare.

Such conditions may include, but shall not be limited to:

a. Changes to the design of buildings and structures;

b. Additional setbacks, open spaces, and buffers;

c. Provision of fences and walls;

d. Street dedications and improvements, including service roads and alleys;

e. The control of vehicular ingress, egress, and circulation;

f. Sign requirements or a sign program, consistent with the sign regulations criteria in Section **10-2.1802**;

g. Provision of landscaping and the maintenance thereof;

h. The regulation of noise, vibration, odor and the like;

i. Requirements for off-street loading facilities;

j. Removal of existing billboards on the site, subject to the findings required by Section 10-2.2006(B);

k. Such other conditions as will make possible the development of the City in an orderly and efficient manner and in conformity with the intent and purposes set forth in this chapter, the Artesia and Aviation Corridors Area Plan as adopted by the City Council, and the General Plan.

(c) Application.

(1) The applicant shall file with the Community Development Department a completed application in a form provided by the Community Development Department.

(2) The owner of record of the lot or parcel of property which is to be affected by the application shall file an affidavit authorizing the application on a form provided by the Community Development Department.

(3) Upon the filing of an application, the applicant shall pay a fee, as set forth by resolution of the City Council.

(d) Contents of application. In addition to the application and fee, a site plan, floor plan, and elevations of the project drawn to scale and dimensioned shall be submitted which include the following information as applicable:

(1) Existing topography and proposed grading;

(2) Existing trees with a trunk diameter of six inches or greater;

(3) All buildings and structures, and the uses within each room;

(4) Improvements in the public right-of-way, including location of sidewalk, parkway, curb, gutter, street width to centerline, and dedications;

(5) Exterior lighting;

(6) Easements;

(7) Off-street parking areas, including the stall striping, aisles, and driveways;

(8) The lot dimensions;

(9) Setbacks and spaces between buildings;

(10) Walls, fences, and landscaping and their location, height, and materials;

(11) Landscaping areas;

(12) Trash and recycling facilities;

(13) The architectural elevations of all sides of all structures depicting design, color, materials, textures, ornaments, or other architectural features;

(14) The location, dimensions, and design of all signs;

(15) A section of the building as it relates to the existing topography and proposed grading where the slope of the site is greater than four feet;

(16) Such other data as may be required to demonstrate that the project meets the criteria.

(e) Setting hearings. All applications shall be set for at least one public hearing before the Planning Commission in a timely fashion.

(f) Notice of public hearing before the Planning Commission. Notice of public hearing before the Planning Commission to consider an application for Planning Commission Design Review shall be given as follows:

(1) By publication at least once in a weekly newspaper of general circulation in the City not less than 10 calendar days prior to the date of the public hearing; and

(2) By mailing a written notice thereof, not less than 10 days prior to the date of such hearing to the applicant, to the owner of the subject property and to the owners of properties within 300 feet of the exterior boundary of the subject property or properties; such notices shall be sent by first class mail, with postage prepaid, using the addresses from the last adopted tax roll, if available; and

(3) By posting such notice in at least one prominent place on or about each parcel which is the subject of the proposed action, or upon utility poles or sticks along or about the street line of such parcel. In the event more than one parcel is the subject of such hearing, and such parcels comprise 200 or more feet of street frontage, at least one such notice shall be posted on or about the street line at intervals of not less than 200 feet, starting at either end of the subject properties where the property line intersects the street line.

(g) Appeal of decision of the Planning Commission. Decisions by the Planning Commission for the approval or denial of an application for Planning Commission Design Review shall be final and conclusive unless, by 5:00 p.m. of the tenth (10th) day following such decision (or of the next working day if the tenth (10th) day falls on a weekend or holiday):

(1) A written appeal on the form designated by the City is filed by any interested party with the City Clerk requesting a public hearing before the City Council stating the grounds for the appeal and all required fees for said appeal are paid in full; or

(2) The Mayor or a member of the City Council requests a public hearing before the City Council stating the grounds for the appeal. Provided however that the City Council member or Mayor requesting the appeal shall disqualify him or herself from hearing the appeal unless he or she can certify in writing that the appeal is being requested as a result of public interest in the decision to be reviewed and he or she has no predisposition against or in favor of the project. The City Council as a whole shall be prohibited from voting to appeal any matter in which they will sit as the reviewing body.

Such appeal, or City Council request for a public hearing, shall be set for a public hearing by the City Clerk in a timely fashion.

(h) Notice of public hearing before the City Council. Notice of public hearing before the City Council to consider an appeal of the decision of the Planning Commission shall be given pursuant to subsection (f) of this section.

(i) Decision of the City Council. The decision of the City Council on all applications shall be final and conclusive.

(j) Expiration. An approval granted pursuant to Planning Commission Design Review shall become null and void unless vested within 36 months after the date of the public hearing at which the vote was taken. Such time limits may be extended by the Planning Commission at a public hearing with notice given pursuant to subsection (f) of this section, upon the written request of the applicant and payment of a fee as set forth by resolution of the City Council. The request shall be filed with the Community Development Department prior to the expiration of the approval and shall include presentation of proof of an unusual hardship not of the applicant's own making. If an established

time limit for development expires, and no extension has been granted, the approval, and all rights and privileges established therein, shall be considered null and void.

(k) Revocation. After notice to the applicant and public hearing, the Planning Commission, subject to appeal to the City Council, may revoke or modify any Planning Commission Design Review issued on one or more of the following grounds:

(1) That the approval was obtained by fraud or misrepresentation;

(2) That the use for which such approval was granted has ceased for a period of at least 18 consecutive calendar months;

(3) That changed circumstances have rendered exercise of the approval as originally granted infeasible or inimical to the health, safety and welfare of the community;

(4) That there has not been substantial compliance with the terms and conditions of the approval;

(5) That exercise of the approval violates any State, Federal or local statute or regulation;

(6) That exercise of the rights under the approval is detrimental to the health, safety and welfare of the community;

(7) That exercise of the rights under the approval constitutes a nuisance.

At any hearing on revocation or modification the permittee and any other person whose property rights are affected by revocation, modification, or continuance of the exercise of rights under the approval, shall have the right to produce any arguments and introduce any evidence in support of their position.

(Ord. 2756 c.s., eff. January 18, 1996, as amended by Ord. 2812 c.s., eff. December 4, 1997; § 7, Ord. 2884 c.s., eff. May 2, 2002; § 6, Ord. 2911 c.s., eff. October 16, 2003, § 13, Ord. 2917 c.s., eff. October 21, 2003, § 5, Ord. 2957 c.s., eff. February 17, 2005, § 1, Ord. 3108 c.s., eff. February 8, 2013, § 5, Ord. 3188 c.s., eff. May 16, 2019, § 3, Ord. 3257 c.s., eff. August 17, 2023, Ord. 3259-23 c.s., eff. October 19, 2023, Ord. 3282-24 c.s., eff. December 12, 2024, and Ord. 3311-26 c.s., eff. June 11, 2026)