



March 30, 2025

**VIA E-MAIL**

American Center for Law & Justice  
c/o Nathan Moelker



American Center for Law & Justice  
c/o CeCe Heil



**King's Harbor Church Permit No. R95881**

Dear Mr. Moelker and Ms. Heil:

I write on behalf of the Los Angeles County ("County") Department of Beaches and Harbors ("DBH") regarding your letter dated March 6, 2025, regarding Permit No. R95881 issued to King's Harbor Church. In your letter, you raise concerns on behalf of the Church on the Beach and its co-pastors, Jason Flentye, Ron Chan, and Ritch Hansen, regarding DBH's beach use permit policy that you believe "singles out religious groups for disparate treatment." Further, you request that the County cease from "discriminating against Church on the Beach for its religious activity, and ...agree to allow the church to continue meeting pursuant to generally applicable LA County policy."

DBH acknowledges your comments and concerns about its permit policy and takes allegations of discrimination and disparate treatment seriously. The County adopted the Beach and Harbor Use Licensing Policy on August 23, 2011, which allows DBH to issue permits and charge fees for the use of facilities owned or managed by DBH. A copy of the policy is enclosed. The purpose of the policy is to regulate DBH-operated beach properties and facilities through the issue of use permits to ensure maximum public safety and enjoyment; effectively schedule and manage limited resources; balance competing interests; and generate revenue to offset beach operating costs. By ordinance of County Code 2.116.020, the Director of DBH is authorized to establish and enforce rules and regulations pertaining to the use of the harbors and beaches and determine the kind and extent of recreational programs to be carried out at the harbors and beaches.

To effectively schedule and manage an increasing number of permit requests and balance coastal access needs of competing groups, DBH had plans to implement a temporary informal policy to limit religious activities to six permits a year and waive permit fees of \$250 for two of the six permits at specific locations. On December 30, 2024, DBH issued Permit No. R95881 to King's Harbor Church ("Permittee") for weekly meetings between January 5, 2025, and June 29, 2025, at Redondo Beach - Del Mar without a fee.

Caring for Our Coast

♦ ♦ ♦  
**Gary Jones**  
Director

**Amy M. Caves**  
Chief Deputy Director

**Carol Baker**  
Deputy Director

**LaTayvius R. Alberty**  
Deputy Director



Mr. Moelker and Ms. Heil

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DBH acknowledges that its Beach and Harbor Use Licensing Policy and other policies pertaining to access to beach use, on its face and in application, must be content neutral and applied in the same manner regardless of the religious or non-religious nature of the activity. As such, DBH will immediately withdraw the temporary policy to limit permits for religious activities and continue to issue permits under its existing Beach and Harbor Use Licensing Policy, including charging a permit fee according to the fee schedule enclosed as Attachment A to the Beach and Harbor Use Licensing Policy unless otherwise authorized by the Board of Supervisors.

Lastly, we note that your client, Church on the Beach, is a 501(3)(c) nonprofit separate from King's Harbor Church. As such, please be advised that Church on the Beach will need to apply for a permit directly upon the expiration of Permit No. R95881.

Thank you for bringing your concerns to our attention. We hope this response resolves the issues raised in your letter.

Very truly yours,

A handwritten signature in cursive script that reads "Amy Caves".

Amy Caves

Chief Deputy Director

AC:CB:cl