



Washington State
Liquor and Cannabis Board

Date: January 7, 2026

To: Jim Vollendroff, Chair
Ollie Garrett, Board Member
Pete Holmes, Board Member

From: Daniel Jacobs, Policy & Rules Coordinator

Copy: Will Lukela, Director
Toni Hood, Deputy Director
Becky Smith, Director of Licensing and Regulation
Larry Grant, Director of Education and Enforcement
Justin Nordhorn, Director of Policy and External Affairs
Kevin Walder, Policy & Rules Manager

Subject: **Request for approval of final rules (CR 103) implementing Second Substitute House Bill (2SHB) 1515 regarding Expanded Alcohol Service Areas.**

The Director’s Office requests that the Board adopt the final rules and approve the CR 103 to amend several rules in Title 314 WAC and create several new rules in [Chapter 314-02 WAC](#) to implement 2SHB 1515 ([chapter 361, Laws of 2025](#)), which expanded permissible public alcohol consumption in various ways.

The Board has been briefed on the rule development background and public comment received for this rulemaking project. A CR 103 memorandum, CR 103 form, concise explanatory statement, and rule text are attached.

If approved, the concise explanatory statement will be sent to everyone who provided public comment or testimony, the CR 103 form and rule text will be filed with the Code Reviser, and the new rule language will be effective February 7, 2026.

____ Approve ____ Disapprove _____
Jim Vollendroff, Chair Date

____ Approve ____ Disapprove _____
Ollie Garrett, Board Member Date

____ Approve ____ Disapprove _____
Pete Holmes, Board Member Date

Attachments: CR 103 Memorandum
Concise Explanatory Statement
RDS-6450.5
RDS-6451.2
RDS-6403.11
RDS-6407.8
RDS-6410.6
RDS-6404.7
RDS-6405.3
RDS-6411.6
RDS-6452.4
RDS-6306.3
RDS-6728.1



CR 103 Memorandum

Implementing Second Substitute House Bill (2SHB) 1515 Regarding Expanded Alcohol Service Areas

Date: January 7, 2026
Presented by: Daniel Jacobs, Rules & Policy Coordinator

Background

[Second Substitute House Bill \(2SHB\) 1515 \(chapter 361, Laws of 2025\)](#) passed in the Washington state legislature during the 2025 legislative session and became effective July 27, 2025. Most of the provisions of 2SHB 1515 are codified at [RCW 66.24.800](#).

2SHB 1515 created three new liquor authorizations available to local governments to expand existing common areas where patrons of liquor licensees can consume alcohol. Each of the three different liquor authorizations has different requirements and expands permissible alcohol consumption areas in slightly different ways. See [RCW 66.24.800\(1\)-\(4\)](#).

For ease of reference, the Liquor and Cannabis Board (LCB) is referring to the three authorizations as follows:

- 1) expanded outdoor alcohol service authorization [RCW 66.24.800\(1\)](#),
- 2) civic campus authorization [RCW 66.24.800\(2\)](#), and
- 3) fan zone authorization [RCW 66.24.800\(4\)](#).

The three authorizations have different expiration dates. The expanded outdoor alcohol service and civic campus authorizations expire December 31, 2027. See [RCW 66.24.800 – Finding – Intent \(3\)](#). But the fan zone authorization is specifically designed for use during the FIFA World Cup in the summer of 2026, and it therefore is only to be issued during June or July 2026, when the state of Washington, and Seattle specifically, [is scheduled to host several high-profile soccer matches](#) that are expected to garner international attention, and hopefully tourism revenue.

However, 2SHB 1515 did not have a delayed or specified effective date. The provisions therefore became effective July 27, 2025. Even the fastest standard rulemaking would not have been able to get final rules effective by July 27, 2025. Therefore, the LCB issued a policy statement ([PS25-01, WSR 25-17-040, filed August 13, 2025, effective August 27, 2025](#)) to explain the requirements

licensees need to meet to obtain the legally permitted authorizations before rule language was finalized.

2SHB 1515 also required participants of the civic campus and fan zone authorizations to file a joint operating plan with the LCB, with specific required elements. See [RCW 66.24.800\(2\)\(b\)\(v\)](#).

2SHB 1515 required the LCB to impose fees on liquor licensees and local governments applying for one of these authorizations “in order to cover but not exceed the board's administrative and enforcement costs related to activities authorized [by 2SHB 1515].” [RCW 66.24.800\(5\)](#).

2SHB 1515 expanded the LCB’s statutory rulemaking authority to “[i]mpos[e] reasonable requirements on licensees' operations of alcohol service areas and the sale, service, and consumption of alcohol authorized [in 2SHB 1515].” [RCW 66.08.030\(22\)](#).

2SHB 1515 also changed the statutory requirements for caterer licenses ([RCW 66.24.690](#)), special occasion licenses ([RCW 66.24.380](#)) and the prohibition against carrying an open container in public ([RCW 66.44.100](#)) to allow caterers, special occasion licensees, and members of the public to participate in the newly allowed activities.

2SHB 1515 required cities that are obtaining the civic center authorization to submit a report to the LCB and legislature by January 1, 2027. See [RCW 66.24.810](#). Any local government that obtains any of the three authorizations is required to do a public engagement review and submit a report detailing the results to the LCB. See [RCW 66.24.820](#).

Additionally, [Second Substitute Senate Bill \(2SSB\) 5786, chapter 343, Laws of 2025](#), changed the application fees for special occasion licenses and caterers licenses, and while those applicable rules are open for this rulemaking, the LCB is making the appropriate fee changes in the corresponding rules to align the rule language with the amended statutory language.

The CR-101 was filed on May 7, 2025, as [WSR 25-10-103](#). Public comment on the CR-101 was [open from](#) May 7, 2025 until June 7, 2025. During that time, the LCB received one comment from the Seattle Department of Transportation.

Stakeholder Engagement

The project team consists of representatives from the Attorney General’s Office, Enforcement & Education division, Licensing division, the Finance division, IT, Communications, Public Health Liaison and Legislative liaison.

Following many project team meetings, [draft rule language](#) was posted on the LCB website and circulated via [gov delivery message](#) on August 1, 2025, along with invitations to stakeholder engagements to be held on August 20 (recording [here](#)) and August 22, 2025 (recording [here](#)). This [Powerpoint presentation](#) was presented during the stakeholder engagement sessions.

Following the stakeholder engagement sessions, LCB staff engaged in several conversations with staff from Washington cities, legislators, and major trade groups on how the language was developing positively, and where there was room for improvement.

A [second draft](#) of rule language was circulated on October 3, 2025, publicized via a [second gov delivery message](#) sent on October 9, 2025.

The CR-102 was filed on November 5, 2025 ([WSR 25-22-104](#)) with the rule changes identified in the tables below. One written comment was submitted following the filing of the CR-102 and prior to the public hearing held on December 11, 2025.

The comment was submitted by the Washington Association for Substance misuse and Violence Prevention (WASAVP) and raised several public health concerns and made several recommendations for proposed rule language. Some of the recommendations for new or amended rules are untenable due to the limitations of the statutory language. Some of the recommendations are already included in the statute and rule. The comment is responded to substantively in the concise explanatory statement.

During the public hearing held December 11, 2025 ([Recording](#)), one person provided testimony on behalf of WASAVP and the testimony mirrored concerns raised in the letter.

Following the hearing, three written comments were submitted on the CR-102. The comments expressed support for the rulemaking and requested adoption of the rules as proposed.

Rule Necessity & Description of Rule Changes

The rule necessity and description of rule changes are all described in detail in the CR-102 filing ([WSR 25-22-104](#)) and the [CR-102 memo](#).

Variance between proposed rule (CR 102) and final rule:

The following minor change has been made to the proposed rule:

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WAC 314-03-211 – Civic campus authorization			
Section	Proposed Rule (CR 102)	Final Rule (CR 103)	Reason for Change
(2)(b)	Seven of these 25 events may be multiday events. A multiday event cannot exceed 14 days.	Seven of these 25 events may be multiday events. A multiday event cannot exceed 14 consecutive days.	Points of clarification were raised during public comment period.

Rule Implementation (RCW 34.05.328(3)(a))

Informing and Educating Persons Impacted by the Rule (RCW 34.05.328(3)(b))

To help inform and educate persons impacted by the rule, the LCB will:

- Email notice with the adoption materials to persons who commented on the rules, the rule making and licensee distribution lists, and the general LCB GovDelivery list;
- Post rule adoption materials, including final rule language, response to comments, final analysis (Concise Explanatory Statement), and any other relevant documents on the rulemaking webpage for public access.

Promoting and Assisting Voluntary Compliance (RCW 34.05.328(3)(c))

LCB will promote and assist voluntary compliance through technical assistance.

- LCB staff are available to respond to phone and email inquiries about the rules.
- Agency leadership and staff have actively participated in rule development and revisions and are familiar with the final product. Internal and external education efforts to share knowledge and assure consistent application of rule will be supported.
- Rule and guidance documents will be available on the LCB website.
- LCB will use available and customary resources to disseminate materials and information to all persons impacted by the rules.

These actions are designed to inform and educate all persons impacted by the rules to support and promote voluntary compliance.

Training and Informing LCB Staff

Several LCB staff responsible for implementing these adopted rules work directly with impacted parties and are already familiar with the nuances of the rule changes. Additional internal guidance documents may be prepared as necessary. The LCB will also consider:

- Provision of internal and external training and education, as needed. potentially including webinars, training, and videos if appropriate;

- Coordinating and centrally locating decisions to assure consistency between agency, staff, and industry.

Rule Effectiveness Evaluation (RCW 34.05.328(3)(d))

After the rule becomes effective, the LCB will evaluate the effectiveness of this rule in the following ways, including but not limited to:

- Monitoring questions received after the effective date of this rule, and adjusting training and guidance accordingly;
- Monitoring the number of enforcement actions, including type, resolution, and the outcome;
- Monitoring the number of requests for rule language revisions or changes;
- Monitoring the number of requests for rule interpretation;
- Monitoring licensee feedback including, but not limited to, the number of requests for assistance.



RULE-MAKING ORDER

PERMANENT RULE ONLY

CR-103P (December 2017)

(Implements RCW 34.05.360)

Agency: Washington State Liquor and Cannabis Board

Effective date of rule:

Permanent Rules

- 31 days after filing.
 Other (specify) _ (If less than 31 days after filing, a specific finding under RCW 34.05.380(3) is required and should be stated below)

Any other findings required by other provisions of law as precondition to adoption or effectiveness of rule?

- Yes No If Yes, explain: .

Purpose: The Washington State Liquor and Cannabis Board (Board) has created six new rules as follows to implement 2SHB 1515, chapter 361, Laws of 2025:

WAC	Name
314-03-210	Expanded outdoor alcohol service authorization
314-03-211	Civic campus authorization
314-03-212	Fan zone authorization
314-03-213	Joint operating plan
314-03-214	Public engagement review
314-03-215	Licensee sharing alcohol service area with nonlicensee

The Board has also amended the following seven rules to implement 2SHB 1515, chapter 361, Laws of 2025:

WAC	Name
314-02-112	Caterers License
314-03-200	Outside or Extended Alcohol Service
314-05-020	Special occasion license
314-05-025	Application process for special occasion license
314-05-030	Requirements for special occasion license events
314-29-025	Group 2 regulatory violations
314-29-030	Group 3 regulatory violations

Additionally, Second Substitute Senate Bill (2SSB) 5786, chapter 343, Laws of 2025, changed the application fees for special occasion licenses and caterers licenses, and while those applicable rules are open for this rulemaking, the LCB is making the appropriate fee changes in the corresponding rules to align the rule language with the amended statutory language.

Citation of rules affected by this order:

New: WAC 314-03-210; WAC 314-03-211; WAC 314-03-212; WAC 314-03-213; WAC 314-03-214; WAC 314-03-215
 Repealed:
 Amended: WAC 314-02-112; WAC 314-03-200; WAC 314-05-020; WAC 314-05-025; WAC 314-05-030; WAC 314-29-025; WAC 314-29-030
 Suspended:

Statutory authority for adoption: RCW 66.08.030, RCW 66.24.380, RCW 66.24.690, RCW 66.24.710, RCW 66.24.800, RCW 66.24.810, RCW 66.24.820, RCW 66.44.100, RCW 66.98.070

Other authority: Second Substitute House Bill (2SHB) 1515, chapter 361, Laws of 2025; Second Substitute Senate Bill (2SSB) 5786, chapter 343, Laws of 2025

PERMANENT RULE (Including Expedited Rule Making)

Adopted under notice filed as WSR 25-22-104 on November 5, 2025_ (date).

Describe any changes other than editing from proposed to adopted version: The following minor change is described below:

WAC 314-03-211 – Civic campus authorization			
Section	Proposed Rule (CR 102)	Final Rule (CR 103)	Reason for Change
(2)(b)	Seven of these 25 events may be multiday events. A multiday event cannot exceed 14 days.	Seven of these 25 events may be multiday events. A multiday event cannot exceed 14 consecutive days.	Points of clarification were raised during public comment period.

If a preliminary cost-benefit analysis was prepared under RCW 34.05.328, a final cost-benefit analysis is available by contacting:

Name: Daniel Jacobs, Rules & Policy Coordinator
 Address: 1025 Union Avenue SE, Olympia WA 98501
 Phone: 360-480-1238
 Fax: 360-664-3208
 TTY:
 Email: rules@lcb.wa.gov
 Web site: www.lcb.wa.gov
 Other:

**Note: If any category is left blank, it will be calculated as zero.
 No descriptive text.**

**Count by whole WAC sections only, from the WAC number through the history note.
 A section may be counted in more than one category.**

The number of sections adopted in order to comply with:

Federal statute:	New	___	Amended	___	Repealed	___
Federal rules or standards:	New	___	Amended	___	Repealed	___
Recently enacted state statutes:	New	6	Amended	7	Repealed	

The number of sections adopted at the request of a nongovernmental entity:

New	___	Amended		Repealed	___
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The number of sections adopted on the agency’s own initiative:

New	6	Amended	7	Repealed	
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The number of sections adopted in order to clarify, streamline, or reform agency procedures:

New	___	Amended	___	Repealed	___
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The number of sections adopted using:

Negotiated rule making:	New	___	Amended	___	Repealed	___
Pilot rule making:	New	___	Amended	___	Repealed	___
Other alternative rule making:	New	6	Amended	7	Repealed	

Date Adopted: January 7, 2026

Signature:

Place signature here

Name: Jim Vollendroff

Title: Board Chair

WAC 314-02-112 Caterer's license. (1) A caterer's license allows the licensee to sell spirits, beer, and wine by the individual serving for consumption on the premises at a catered event location.

(2) The catered event location must be owned, leased, or operated by:

(a) The holder of the caterer's license; or

(b) The sponsor of the event for which the catering services are being provided.

(3) The caterer licensee is responsible for all areas of a location where alcohol is sold, served, consumed, or stored(~~(, except when the caterer is operating as described in chapter 361, Laws of 2025)~~).

(4) If the catered event is open and advertised to the public, the event must be sponsored by a nonprofit society or organization as defined in RCW 66.24.375, except as permitted in RCW 66.24.800 (3)(b), (effective until December 31, 2027).

(a) A registered nonprofit holding a public or civic event may invite a caterer to provide alcohol service at a location within the parameters of the event.

(b) If attendance at the catered event is limited to members or invited guests of the sponsoring individual, society, or organization, the requirement in subsection (2) of this section does not apply.

(5) A spirits, beer, and wine caterer licensee must have the ability to serve at least four complete meals. A commissary kitchen, licensed by the city and/or county health department, shall be maintained in a substantial manner as a place for preparing and cooking complete meals. The caterer licensee must maintain the kitchen equipment necessary to prepare the complete meals required under this section. The complete meals must be prepared at the licensed commissary kitchen premises. "Complete meal" is defined in WAC 314-02-010.

(6) A beer and wine caterer licensee must have the ability to provide minimum food service. A commissary kitchen shall be maintained in a substantial manner as a place for preparing and cooking minimum food service. The caterer licensee must maintain the kitchen equipment necessary to prepare minimum food service required under this section. The minimum food service must be prepared at the licensed commissary kitchen premises. "Minimum food service" is defined in WAC 314-02-010.

(7) Licensees holding a caterer's license may share a commissary kitchen under the following conditions:

(a) Each licensee has their own secure area for their own liquor stock. Liquor stock cannot be shared.

(b) If using a shared commissary kitchen, each applicant/licensee must provide a sketch of the commissary kitchen to licensing indicating the separate secured area for each licensee.

(8) The applicant must provide the liquor and cannabis board with a copy of their commissary kitchen license issued by the city or county health department.

(9)(a) The licensee is required to send a list of scheduled catered events to their regional enforcement office on the first of each month. The licensee must provide the following information:

(i) Date of the catered events;

(ii) Time of the catered events; and

(iii) Place and location of catered events.

(b) Any changes to the information provided to the board must be reported to the regional enforcement office 72 hours prior to the catered event.

(10) For events at a civic campus authorized under WAC 314-03-211 or events at fan zone authorized under WAC 314-03-212, participating caterers must attest to joint responsibility as submitted by the campus operator or the local authority.

(11) A caterer's license holder is not allowed to cater events at a liquor licensed premises, except as permitted in RCW 66.24.800 (3)(b), (effective until December 31, 2027).

~~((11))~~ (12) The holder of the caterer's license may store liquor on other premises operated by the licensee if the licensee owns or has a leasehold interest at the other premises. Documentation must be provided to the board showing the licensee owns or has a leasehold interest in the property.

~~((12))~~ (13) All employees that sell or serve alcohol must hold MAST permits.

~~((13))~~ (14) The annual fee for the caterer's license is as follows:

(a) The annual fee for beer is ~~((\$200))~~ \$300;

(b) The annual fee for wine is ~~((\$200))~~ \$300; ((and))

(c) The annual fee for beer and wine is \$600; and

(d) The annual fee for a combined spirits, beer, and wine is ~~((\$1,000))~~ \$1,500.

WAC 314-03-200 Outside or extended alcohol service. (1) A licensee must request approval from the board's licensing division for ongoing outside alcohol service or extended indoor alcohol service. Any language in this rule referring to outdoor alcohol service applies also to extended indoor alcohol service.

(2) **Outdoor alcohol services in privately owned spaces.** For outdoor alcohol service located in privately owned spaces, a licensee must meet the following requirements:

(a) The licensee must have legal authority to use the outdoor alcohol service area including, but not limited to, ownership or leasehold rights;

(b) The licensee must have a building that provides indoor dining or production in order to qualify for an outdoor alcohol service area;

(c) The outdoor alcohol service area must be contiguous to the licensed business or located on the same property or parcel of land as the licensed business;

(d) The outdoor alcohol service area must have an attendant, wait staff, or server dedicated to the area when patrons are present;

(e)(i) Interior access to the licensed premises from the outdoor alcohol service area is not required. However, unless there is (A) interior access to the licensed premises from the outdoor alcohol service area, or (B) an unobstructed direct line of sight from inside the licensed premises to the outdoor alcohol service area, an employee with a mandatory alcohol server training (MAST) permit under chapter 314-17 WAC must be in the outdoor alcohol service area at all times that patrons are present, in order to monitor alcohol consumption. This requirement is in addition to the requirement in (d) of this subsection that the outdoor alcohol service area must have an attendant, wait staff, or server dedicated to the area when patrons are present;

(ii) If the interior access is from an area classified by the board as off limits to any person under the age of 21, people under the age of 21 are prohibited in the outside or extended alcohol service area;

(f) If there are food service requirements for the licensee, then the required food service must be available in any outdoor or extended alcohol service area;

(g) The outdoor alcohol service area must be enclosed with a permanent or movable barrier a minimum of 42 inches in height. However, the board may grant limited exceptions to the required 42 inch high barrier for outdoor alcohol service areas if the licensee has permanent boundaries for the outdoor alcohol service area, but may not grant limited exceptions to beer gardens, standing room only venues, or permitted special events;

(h) Openings into and out of the outdoor alcohol service area cannot exceed 10 feet. If there is more than one opening along one side, the total combined opening may not exceed 10 feet; and

(i) Licensees must comply with local building codes, local health jurisdiction requirements, department of labor and industries requirements, and any other applicable laws and rules.

(3) **Outdoor alcohol services in public spaces.** For outdoor alcohol service located in public spaces, a licensee must request approval from the board's licensing division and meet the following requirements:

(a) The licensed business must have a permit from their local jurisdiction allowing the business to use the public space as a service area, such as a sidewalk cafe permit or other similar outdoor area permit authorized by local regulation;

(b) The licensee must have a building that provides indoor dining or production in order to qualify for an outdoor alcohol service area;

(c) (i) Except as provided in (c) (ii) of this subsection, the outdoor alcohol service area must be enclosed with a permanent or movable barrier a minimum of 42 inches in height.

(ii) Licensees with outdoor alcohol service areas contiguous to the licensed premises may use a permanent fence-free demarcation of the designated alcohol service area for continued enforcement of the boundaries, instead of a permanent or movable barrier a minimum of 42 inches in height. The permanent fence-free demarcation used must be:

(A) At all boundaries of the outdoor alcohol service area;

(B) At least six inches in diameter; and

(C) Placed no more than 10 feet apart;

(iii) The exception identified in (c) (ii) of this subsection does not apply to beer gardens, standing room only venues, and permitted special events, all of which must always have a permanent or movable barrier a minimum of 42 inches in height;

(d) Openings into and out of the outdoor alcohol service area cannot exceed 10 feet. If there is more than one opening along one side, the total combined opening may not exceed 10 feet;

(e) The outdoor alcohol service area must have an attendant, wait staff, or server dedicated to the area when patrons are present;

(f) If there are food service requirements for the licensee, then the required food service must be available in any outdoor or extended alcohol service area; and

(g) Licensees must comply with local building codes, local health jurisdiction requirements, department of labor and industries requirements, and any other applicable laws and rules.

(4) For multiple licensees to share an outdoor alcohol service area, the licensees must request approval from the board's licensing division and meet the following requirements:

(a) The licensees' property parcels or buildings must be located in direct physical proximity to one another. For the purposes of this subsection, "direct physical proximity" means that the property parcels or buildings are physically connected or touching each other along a boundary or at a point;

(b) (i) If the shared outdoor alcohol service area is located on public space, the licensees sharing the space must meet all of the requirements in subsection (3) of this section and shared use of the outdoor service area must be authorized by the licensees' local jurisdiction permits; or

(ii) If the shared outdoor alcohol service area is located in a privately owned space, the licensees sharing the space must meet all of the requirements in subsection (2) of this section and must have legal authority to share use of the outdoor service area including, but not limited to, ownership or leasehold rights;

(c) The licensees must maintain separate storage of products and separate financial records for the shared outdoor alcohol service area. If licensees share any point of sale system, the licensees must keep complete documentation and records for the shared point of sale system showing clear separation as to what sales items and categories belong to each respective licensee;

(d) The licensees must use distinctly marked glassware or serving containers in the shared outdoor alcohol service area to identify the source of any alcohol product being consumed. The distinctive markings may be either permanent or temporary. Any temporary markings must remain on the glassware or serving containers through the duration of use by the customer;

(e) The licensees must complete an operating plan for the shared outdoor alcohol service area. The operating plan should demonstrate in general how responsibility for the outdoor alcohol service area is shared among the licensees. Licensees are required to submit the operating plan to the board's licensing division at the time of application or alteration and must keep documentation of an up-to-date plan available for inspection on premises; and

(f) Consistent with WAC 314-11-065, a licensee may not permit the removal of alcohol in an open container from the shared outdoor alcohol service area, except to reenter the licensed premises where the alcohol was purchased. Signage prohibiting the removal of alcohol in an open container must be visible to patrons in the shared outdoor alcohol service area.

(5) If multiple licensees use a shared outdoor alcohol service area as described in subsection (4) of this section, all participating licensees are jointly responsible for any violation or enforcement issues unless it can be demonstrated that the violation or enforcement issue was due to one or more licensee's specific conduct or action, in which case the violation or enforcement action applies only to those identified licensees.

(6) The definitions in this subsection apply throughout this section unless the context clearly requires otherwise.

(a) "Alcohol service" means service of liquor as defined in RCW 66.04.010.

(b) "Contiguous" means touching along a boundary or at a point.

(c) "Sidewalk cafe" means a designated seating area on the sidewalk, curb space, or other public space where a business provides table service and seating for their patrons during business hours.

(7) This rule does not apply to outdoor or expanded alcohol service authorized by RCW 66.24.800 (effective until December 31, 2027).

NEW SECTION

WAC 314-03-210 Expanded outdoor alcohol service authorization.

(1) Definitions:

(a) "Alcohol service area" means an area in which liquor may be sold, served, and consumed as authorized under Title 66 RCW and rules of the board.

(b) "Licensee" means one or more of the following, as licensed under Titles 66 RCW and 314 WAC:

(i) Beer and wine restaurant;

(ii) Spirits, beer, and wine restaurant;

(iii) Tavern;

(iv) Domestic winery;

(v) Domestic brewery;

(vi) Microbrewery;

(vii) Distillery; or

(viii) Snack bar.

(c) "Local jurisdiction" means a city, town, county, or port authority.

(2) The expanded outdoor alcohol service authorization described in this rule allows licensees within a local jurisdiction to share an expanded outdoor alcohol service area with other licensees subject to the requirements of this rule.

(a) This rule does not apply to outdoor or expanded alcohol service as described in WAC 314-03-200.

(b) Licensees may share use of an expanded outdoor alcohol service area with businesses that do not engage in the sale or service of alcohol, subject to the requirements in WAC 314-03-215.

(c) Licensees participating in expanded outdoor alcohol service must notify the board. Licensees participating may designate a primary licensee to provide notification of participation to the board.

(d) All participating licensees are jointly responsible for any violation or enforcement issues unless it can be demonstrated that the violation or enforcement issues was due to one or more licensee's specific conduct or action, in which case the violation or enforcement applies only to those identified licensees.

(3)(a) The authorization described in this rule may include the entire local jurisdiction, or a specific area or areas of the local jurisdiction.

(b) A county can only be approved for the authorization in this rule as to unincorporated areas of the county.

(4) A local jurisdiction that requests approval from the board for an expanded outdoor alcohol service authorization, as described in this rule, shall submit documentation of the following with its request:

(a) How local resources will be allocated regarding the expanded outdoor alcohol service area, including law enforcement patrols, to ensure safe operations of activities, the safety of the community, consistent with RCW 66.24.800 (1)(d)(i), and compliance with WAC 314-11-015;

(b) How services will be allocated or provided to keep the expanded outdoor alcohol service area clean and free of litter or other remnants of the use of public space for expanded outdoor alcohol service, consistent with RCW 66.24.800 (1)(d)(ii); and

(c) Identifying maximum distance apart for openings into and out of the expanded outdoor alcohol service area. If a local jurisdiction

does not specify maximum distances in their application, then openings cannot exceed 10 feet wide.

(5) Local jurisdiction is responsible for updating the board on changes to their authorized area or areas designated for the expanded service.

(6)(a) All expanded outdoor alcohol service areas must be enclosed by one of the following:

(i) A permanent or movable barrier, at a minimum height determined by the local jurisdiction (naturally sloped conditions approximating a barrier of the minimum height determined by the local jurisdiction or greater will satisfy this requirement). If a local jurisdiction does not specify a minimum height in their application, then a minimum barrier height of 42 inches applies; or

(ii) Permanent fence-free demarcation.

(b) Licensees must notify the board which boundary options identified in (a) of this subsection will be used.

(c) A permanent fence-free demarcation, as described in (a)(ii) of this subsection, must comply with the following:

(i) At least six inches in diameter;

(ii) Placed no more than 10 feet apart; and

(iii) Visible at night.

(7) An employee of the licensee with a mandatory alcohol server training (MAST) permit under chapter 314-17 WAC must always be assigned to the expanded outdoor alcohol service area when patrons are present in order to monitor alcohol consumption, but is not required to be inside the alcohol service area at all times that patrons are present. Neither the inability of a licensee to adequately see an alcohol service area nor the failure of a licensee to adequately monitor an alcohol service area will be considered acceptable grounds for the mitigation of an administrative violation notice issued for any violation of the requirements in this section or other applicable sections of Title 314 WAC.

(8) A local jurisdiction approved for an expanded outdoor alcohol service authorization consistent with this rule must submit the results of a public engagement review consistent with WAC 314-03-214.

(9) The fee for a local jurisdiction to request the expanded outdoor alcohol service area shall be \$1,700 per application.

(10) The authorization described in this rule is effective until December 31, 2027.

NEW SECTION

WAC 314-03-211 Civic campus authorization. (1) Definitions:

(a) "Alcohol service area" means an area in which liquor may be sold, served, and consumed as authorized under Title 66 RCW and rules of the board.

(b) "Campus operator" means the person who has primary responsibility for making managerial or executive decisions relating to operations and activities at a publicly owned civic campus or the person's designee.

(c) "Licensee" means one or more of the following, as licensed under Titles 66 RCW and 314 WAC:

(i) Beer and wine restaurant;

(ii) Spirits, beer, and wine restaurant;

(iii) Tavern;

(iv) Domestic winery;

(v) Domestic brewery;

(vi) Microbrewery;

(vii) Distillery;

(viii) Snack bar;

(ix) Special occasion licensees under RCW 66.24.380; or

(x) Caterer licensed under RCW 66.24.690. A caterer license may be issued to an applicant for this event if the sponsor of the event for which the catering services are being provided is not a society or organization as defined in RCW 66.24.375, if license and regulatory requirements are otherwise met.

(d) "Publicly owned civic campus" or "civic campus" means the buildings, facilities, grounds, lands, and spaces owned by a city and designated as a city center, and used for civic, arts, cultural, sports, and other community and family events and activities, being not more than 100 acres in size on July 27, 2025.

(2) The civic campus authorization described in this rule allows a city with a population of more than 220,000 to obtain approval from the board to expand alcohol service during events on a publicly owned civic campus in the city, subject to the requirements in this rule.

(a) A city may be authorized for no more than 25 events per year.

(b) Seven of these 25 events may be multiday events. A multiday event cannot exceed 14 consecutive days.

(3) Multiple licensees located on a civic campus in a city that has been approved for the civic campus authorization may share an alcohol service area encompassing the entire civic campus, or part of the civic campus, subject to the following requirements:

(a) The board approves of the perimeter enclosing the alcohol service area;

(b) Security and physical barriers are provided at all entry points to the event;

(c) The campus operator notifies the board at least 60 days before the event begins;

(d) Signage is conspicuously posted during the event notifying the public that the area is in use as an expanded alcohol service area and public notice of the upcoming use of the area as an expanded alcohol service area was conspicuously posted at least seven days in advance; and

(e) All participating licensees submit a joint operating plan to the board for approval, consistent with the requirements in WAC 314-03-213.

(f) If businesses that do not engage in the sale or service of alcohol are located within the perimeter of the approved alcohol service area, licensees must also follow all requirements in WAC 314-03-215.

(4) Multiple licensees located on a civic campus in a city that has been approved for the civic campus authorization may share an indoor alcohol service area at certain times authorized by the campus operator, subject to the following requirements:

(a) The campus operator notifies the board at least 60 days before the date licensees intend to begin operating the shared indoor alcohol service area;

(b) The campus operator ensures security and physical barriers are provided at all entry points to the indoor alcohol service area; and

(c) The licensees submit a joint operating plan to the board for approval, consistent with the requirements in WAC 314-03-213.

(5)(a) All participating licensees sharing an alcohol service area under subsection (3) or (4) of this section are jointly responsible for any violation or enforcement issues unless it can be demonstrated that the violation or enforcement issue was due to one or more licensee's specific conduct or action, in which case the violation or enforcement applies only to those identified licensees.

(b) Participating licensees will be required to confirm their participation by attesting to joint responsibility.

(6) While a licensee is operating under the civic campus authorization identified in this rule, they may engage in the following:

(a) Operate without a permit from their local jurisdiction that may otherwise be required to allow the business to use the public space as an alcohol service area;

(b) Share an alcohol service area with another licensee:

(i) Without individually requesting approval from the board; and

(ii) Regardless of whether the licensees' property parcels or buildings are in direct physical proximity to one another; and

(c) Sell and serve alcohol to customers from an alcohol service area without offering food service menu options, except that any required food service must still be provided within the licensed premises, and in any preexisting alcohol service area operated by the licensee under Title 314 WAC that does not rely on RCW 66.24.800, if the preexisting alcohol service areas remains in place during an event.

(7)(a) At the board's discretion, failure to provide the board notice as required in subsection (3)(c) of this section or failure to post signage as required in subsection (3)(d) of this section may be cause for denial of approval of events conducted under this rule.

(b) At the board's discretion, failure to post signage as required in subsection (3)(d) of this section can be cause for denial of license of the participating licensees or denial of participation in future events under this rule.

(8) A city approved for a civic campus authorization consistent with this rule must submit a report to the legislature and the board by January 1, 2027, consistent with RCW 66.24.810.

(9) The fee for a qualifying city to request the civic campus authorization described in this rule is \$1,500 per application.

(10) The authorization described in this rule is effective until December 31, 2027.

NEW SECTION

WAC 314-03-212 Fan zone authorization. (1) Definitions:

(a) "Alcohol service area" means an area in which liquor may be sold, served, and consumed as authorized under Title 66 RCW and rules of the board.

(b) "Fan zone" means a city, town, county, or port authority that has been designated as a fan zone or host city from an international self-regulatory governing body of a sports association, or a nonprofit organization authorized by such an entity.

(c) "Licensee" means one or more of the following, as licensed under Titles 66 RCW and 314 WAC:

(i) Beer and wine restaurant;

(ii) Spirits, beer, and wine restaurant;

(iii) Tavern;

(iv) Domestic winery;

(v) Domestic brewery;

(vi) Microbrewery;

(vii) Distillery;

(viii) Snack bar;

(ix) Special occasion licensees under RCW 66.24.380; or

(x) Caterer licensed under RCW 66.24.690. A caterer license may be issued to an applicant for this event if the sponsor of the event for which the catering services are being provided is not a society or organization as defined in RCW 66.24.375, if license and regulatory requirements are otherwise met.

(2) (a) The fan zone authorization described in this section allows a fan zone to obtain approval from the board for expanded outdoor and indoor alcohol service for liquor licensees within an area or areas of the jurisdiction.

(b) The fan zone authorization may be used to allow expanded alcohol sales and service only during a single multiday event in each fan zone in either the month of June or July 2026.

(3) Multiple licensees located within an area of a fan zone approved under this rule for expanded alcohol service may share an alcohol service area encompassing the entire approved area or areas, during the event, subject to the following requirements:

(a) The board approves of the perimeter enclosing the alcohol service area;

(b) Security and physical barriers are provided at all entry points to the event;

(c) The applicable fan zone, through a designated official or primary licensee, notifies the board at least 60 days before the event begins;

(d) Signage is conspicuously posted during the event notifying the public that the area is in use as an expanded alcohol service area and public notice of the upcoming use of the areas as an expanded alcohol service area was conspicuously posted at least seven days in advance; and

(e) All participating licensees submit a joint operating plan to the board for approval, consistent with the requirements in WAC 314-03-213. A designated contact or primary licensee may submit the joint operating plan and site map clearly identifying alcohol service areas on behalf of all participating licensees.

(4)(a) Licensees may share use of an expanded alcohol service area under this rule with businesses that do not engage in the sale or service of alcohol, subject to the requirements in WAC 314-03-215.

(b) All participating licensees are jointly responsible for any violation or enforcement issues unless it can be demonstrated that the violation or enforcement issues were due to one or more licensee's specific conduct or action, in which case the violation or enforcement applies only to those identified licensees.

(c) Participating licensees will be required to confirm their participation by attesting to joint responsibility.

(5) While a licensee is operating under the fan zone authorization identified in this rule, they may engage in the following:

(a) Operate without a permit from their local jurisdiction that may otherwise be required to allow the business to use the public space as an alcohol service area;

(b) Share an alcohol service area with another licensee:

(i) Without individually requesting approval from the board; and

(ii) Regardless of whether the licensees' property parcels or buildings are in direct physical proximity to one another; and

(c) Sell and serve alcohol to customers from an alcohol service area without offering food service menu options, except that any required food service must still be provided within the licensed premises, and in any preexisting alcohol service area operated by the licensee under Title 314 WAC that does not rely on RCW 66.24.800, if the preexisting alcohol service areas remains in place during an event.

(6) A fan zone approved for a fan zone authorization consistent with this rule must submit the results of a public engagement review consistent with WAC 314-03-214.

(7) The fee for a local jurisdiction to request approval for a fan zone authorization is \$3,900 per authorization.

(8) The authorization described in this rule is effective until August 1, 2026.

NEW SECTION

WAC 314-03-213 Joint operating plan. (1) Definition:

"Alcohol service area" means an area in which liquor may be sold, served, and consumed as authorized under Title 66 RCW and rules of the board.

(2) (a) Consistent with WAC 314-03-211, civic campus authorization, a joint operating plan must be submitted to the board by all participating licensees. The joint operating plan must contain all the elements required in this rule. A campus operator, designated contact, or primary licensee may submit the joint operating plan and site map clearly identifying alcohol service areas on the behalf of all participating licensees.

(b) Consistent with WAC 314-03-212, fan zone authorization, a joint operating plan must be submitted to the board by all participating licensees. The joint operating plan must contain all the elements required in this rule. A designated contact or primary licensee may submit the joint operating plan and site map clearly identifying alcohol service areas on the behalf of all participating licensees.

(3) The joint operating plan must be submitted in the following format:

(a) Electronically; and

(b) At least 60 days in advance of the event.

(4) Consistent with RCW 66.24.800 (2) (b) (v), the joint operating plan must contain the following:

(a) How the licensees will prevent the sale and service of alcohol to persons under 21 years of age;

(b) How the licensees will prevent the sale and service of alcohol to persons who appear to be intoxicated;

(c) The ratio of alcohol service staff to the anticipated number of attendees;

(d) The ratio of security staff to the anticipated number of attendees;

(e) Training provided to staff who serve, regulate, or supervise the service of alcohol including that MAST training, consistent with chapter 314-17 WAC, is required for all such staff;

(f) The licensees' policy on the number of alcoholic beverages that will be served to an individual patron per transaction not to exceed a maximum of two alcoholic beverages allowed to be sold or served to an individual patron during one transaction;

(g) Explanation of the alcoholic beverage containers that will be used to ensure they are significantly different from containers used for nonalcoholic beverages;

(h) Barriers or demarcations to be used for an alcohol service area or event perimeter;

(i) Explanation of how licensees will prevent the removal of alcohol in an open container from the alcohol service area or event perimeter, consistent with WAC 314-11-065; and

(j) How licensees will maintain separate storage of products and separate financial records. If licensees share any point of sale system, they must show how they will independently maintain complete documentation and records for the shared point of sale system showing clear separation as to what sales items and categories belong to each respective licensee.

(5) The joint operating plan must also include a map of the alcohol service area. At a minimum, the map shall include a north arrow indicator and identify the following:

- (a) Locations where alcohol will be sold or served;
- (b) Barriers or permanent fence-free demarcations;
- (c) Any sloped areas, if applicable;
- (d) Entrances and exits; and
- (e) Public streets adjacent to the alcohol service area.

NEW SECTION

WAC 314-03-214 Public engagement review. (1) Consistent with RCW 66.24.820, a city, town, county, or port authority that has been approved by the board for expanded alcohol service consistent with WAC 314-03-210, 314-03-211, or 314-03-212, shall conduct a public engagement review by September 1, 2026, consistent with the requirements in this rule.

(2) The public engagement review shall, at a minimum, include contacting the following individuals and entities in the area where expanded alcohol sales and service occurred or is occurring, to gain a balanced understanding of how the activities were or are being experienced by people in the community:

- (a) Local organizations;
- (b) Individual residents;
- (c) Businesses; and
- (d) Others in the local community.

(3) The public engagement review required by this rule must include examining, at a minimum, the following:

(a) Whether adequate local resources, including law enforcement patrols in the area, were or are provided during times that expanded alcohol service was or is offered, to ensure community safety;

(b) Whether services were or are provided to keep the area of the jurisdiction in which the activities occurred or are occurring clean and free of litter or other remnants of the use of public spaces for expanded alcohol service; and

(c) The costs and benefits to the community of expanded alcohol sales and service perceived by residents throughout the community.

(4) The results of a public engagement review conducted consistent with this rule shall be submitted to the board by September 1, 2026.

NEW SECTION

WAC 314-03-215 Licensee sharing alcohol service area with nonlicensee. (1) Definitions:

(a) "Alcohol service area" means an area in which liquor may be sold, served, and consumed as authorized under Title 66 RCW and rules of the board.

(b) "Nonlicensee" means a business does not have an active license or permit issued by the board.

(2)(a) Pursuant to RCW 66.24.800, certain liquor licensees may share use of an alcohol service area with businesses that do not engage in the sale or service of alcohol, subject to the requirements in this rule, and Titles 66 RCW and 314 WAC.

(b) Only licensees authorized for expanded alcohol service consistent with WAC 314-03-210, 314-03-211, or 314-03-212 may share the expanded alcohol service area with a nonlicensee.

(3) A primary contact or licensee must notify the board of the following prior to sharing an alcohol service area with a nonlicensee:

(a) A floor plan of the shared alcohol service area, identifying where the licensee and nonlicensees are;

(b) How alcoholic beverages served by the licensee will be kept in unique beverage containers; and

(c) Where licensee liquor will be stored and how access to that liquor will be exclusive to licensees and their employees.

(4) All participating licensees are jointly responsible for any violation or enforcement issues, unless it can be demonstrated that the violation or enforcement issues were due to one or more licensee's specific conduct or action, in which case the violation or enforcement applies only to those identified licensees.

(5) This section expires on December 31, 2027.

AMENDATORY SECTION (Amending WSR 20-20-038, filed 9/30/20, effective 10/31/20)

WAC 314-05-020 Special occasion license. (1) Consistent with RCW 66.24.380, a special occasion license allows a nonprofit organization to sell, at a specified date, time, and place:

(a) Spirits, beer, and wine by the individual serving and wine by the bottle for on-premises consumption, except that wine by the bottle or in original, unopened containers may not be sold for on-premises consumption at events pursuant to RCW 66.24.800 (expires December 31, 2027), WAC 314-03-211 (expires December 31, 2027), or WAC 314-03-212 (expires August 1, 2026); and

(b) Spirits, beer, and wine in original, unopened containers for off-premises consumption.

(2) (a) Special occasion licensees may have no more than ~~((twelve))~~ 12 days of events per calendar year (see RCW 66.24.380(1) for an exception for agricultural fairs).

(b) Events pursuant to authorized civic campus and fan zones as referenced in WAC 314-03-211 and 314-03-212 do not count towards the limitation in (a) of this subsection.

(3) (a) The fee for the special occasion license is ~~((sixty dollars))~~ \$90 per day, per event. Multiple alcohol service locations at an event are an additional ~~((sixty dollars))~~ \$90 per location.

(b) The fee is \$185 per day, per event, for civic campus and fan zone events pursuant to WAC 314-03-211 and 314-03-212. Multiple alcohol service locations at an event are an additional \$185 per location.

(4) A special occasion license is a retail liquor license. Non-profit organizations must comply with applicable retail liquor license requirements when operating under the special occasion license.

AMENDATORY SECTION (Amending WSR 20-20-038, filed 9/30/20, effective 10/31/20)

WAC 314-05-025 Application process for a special occasion license. (1) Special occasion applications should:

(a) Be submitted at least ~~((forty-five))~~ 45 days prior to an event where no minors will attend;

(b) Be submitted with an application addendum at least ~~((sixty))~~ 60 days prior to an event where the applicant requests minors in attendance and for events for civic campus and fan zones pursuant to WAC 314-03-211 and 314-03-212; or

(c) Applications submitted less than the required ~~((forty-five or sixty))~~ 45 or 60 days prior to the event might not be approved.

(2) Special occasion applications must include:

(a) Documentation verifying that the organization is a registered nonprofit with the Washington secretary of state or with the Internal Revenue Service;

(b) The name of any winery that will be taking orders at the event and accepting payment for wine of its own production to be delivered at a later date; and

(c) Any additional relevant information requested by the board.

(3) Consistent with RCW 66.24.010(8), the board must send a notice to the local authority for each application received, unless the

local authority has received authorization for civic campus or fan zone events pursuant to WAC 314-03-211 or 314-03-212. The local authority has (~~twenty~~) 20 days to respond or request an extension for good cause.

(4) The board may conduct a criminal history check on the organization's officers and/or managers.

(5) (a) Special occasion licenses may be denied for reasons including, but not limited to, those outlined in chapter 314-07 WAC. Denials are subject to the provisions of the Administrative Procedure Act, chapter 34.05 RCW.

(b) At the board's discretion, repeat violations at events on civic campuses and fan zones pursuant to WAC 314-03-211 and 314-03-212 within a two-year period can be cause for denial of a license under this rule, or participation in future events.

AMENDATORY SECTION (Amending WSR 20-20-038, filed 9/30/20, effective 10/31/20)

WAC 314-05-030 Requirements for special occasion license events.

(1) The special occasion license must be posted at each alcohol service area at the event.

(2) Consistent with RCW 66.28.070, all spirits, beer, and wine purchased for the event by the special occasion licensee may only be purchased in the manufacturer's approved container or package from the following:

- (a) A licensed off-premises retailer;
- (b) A distributor;
- (c) A distillery or craft distillery;
- (d) A domestic brewery or microbrewery;
- (e) A winery; or

(f) A certificate of approval holder with a direct shipping to Washington retailer endorsement.

(3) Consistent with RCW 66.28.310, special occasion licensees are allowed to pay for beer, wine, and spirits used for the special occasion event immediately following the end of the event.

(4) Consistent with RCW 66.28.040, alcohol may be donated to special occasion licensees registered as 501(c)(3) and 501(c)(6) for the event as follows:

(a) In state breweries and beer certificate of approval holders may donate beer;

(b) In state wineries and wine certificate of approval holders may donate wine;

(c) An accredited representative of a distiller, manufacturer, importer, or distributor of spirituous liquor may donate spirits.

(5) Alcohol may not be provided, or advertised as being provided, to the public free of charge at the special occasion event.

(6) Alcohol may not be sold, or advertised as being sold, below the manufacturer's cost at the special occasion event.

(7) If alcohol is auctioned at the event, the final sale price may not be below the manufacturer's cost.

(8) If tickets are sold for the special occasion event and the ticket fee includes alcohol for event attendees, the ticket must be sold directly by the nonprofit organization and may not be sold by a third party. In order to ensure alcohol is not being given away or

sold below the manufacturer's cost, if the ticket fee includes alcohol the total ticket fee must be above the manufacturer's cost of the included alcohol.

(9) Consistent with RCW 66.24.375, no portion of the profits from special occasion events may be paid directly or indirectly to members, officers, directors, or trustees of the nonprofit organization except for services performed for the organization.

(10) Wineries, breweries, and distilleries participating in a special occasion event may pay booth fees to the special occasion licensee. Booth fees must be uniform for all participating wineries, breweries, and distilleries.

(11) Breweries may provide installation of draft beer dispensing equipment for a special occasion event.

(12) Pouring or dispensing may be provided at any type of special occasion event by wineries, distilleries, or spirits distributors.

(13) Pouring or dispensing may be provided by breweries at a beer tasting exhibition or judging event. A beer tasting exhibition or judging event must be sponsored by the special occasion licensee and have at least three breweries represented that are pouring samples.

(14) Consistent with RCW 66.24.380, the sale, service, and consumption of alcohol must be confined to a designated area, unless the event is pursuant to RCW 66.24.800 (expires December 31, 2027).

(15) If a special occasion event is held at an establishment that has a liquor license, the following applies, unless the event is pursuant to RCW 66.24.800 (expires December 31, 2027):

(a) The special occasion event must be in a designated area of the licensed premises separate from areas open to the general public;

(b) The licensed premises' liquor cannot be sold or served in the designated special occasion event area;

(c) The liquor licensee cannot charge for the liquor purchased and brought by the special occasion licensee for service at the event;

(d) The liquor licensee must sign the special occasion application acknowledging that they will not sell or serve their liquor at the event and giving permission for the special occasion licensee to bring and sell their liquor at the liquor licensed premises; and

(e) The special occasion event cannot be held at a premises where the liquor license will be suspended by the board on the date(s) of the scheduled event.

WAC 314-29-025 Group 2 regulatory violations. Group 2 violations are violations involving general regulation and administration of retail or nonretail licenses.

Violation Type	1st Violation	2nd Violation in a two-year window	3rd Violation in a two-year window	4th Violation in a two-year window
Club liquor to the public. WAC 314-40-010	5-day suspension or \$500 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Employee under legal age or without required mandatory alcohol server training permit. RCW 66.44.316 RCW 66.44.318 RCW 66.44.340 RCW 66.44.350 WAC 314-11-040 WAC 314-11-045 Chapter 314-17 WAC	5-day suspension or \$500 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
<u>Failure to assign MAST trained employee to an expanded alcohol service area.</u> <u>RCW 66.24.800</u> <u>WAC 314-03-210</u> <u>WAC 314-03-211</u> <u>WAC 314-03-212</u>	<u>5-day suspension or \$500 monetary option</u>	<u>5-day suspension or \$1,500 monetary option</u>	<u>10-day suspension or \$3,000 monetary option</u>	<u>Cancellation of license</u>
Failure to follow 11:00 p.m. entertainment rules. WAC 314-02-025(2)	5-day suspension or \$500 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Hours of service: Sales, service, removal, or consumption of alcohol between 2:00 a.m. and 6:00 a.m. WAC 314-11-070	5-day suspension or \$500 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Keg registration: Failure to properly register kegs. RCW 66.28.200 RCW 66.28.210 WAC 314-02-115	5-day suspension or \$500 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Spirituos liquor not sold by the individual drink. RCW 66.24.400 WAC 314-02-015 (1)(a)	5-day suspension or \$500 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Food service: Required food service not available. WAC 314-02-035 WAC 314-02-0411 WAC 314-02-065 WAC 314-02-075	5-day suspension or \$250 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Hours of operation: Failure to meet required hours of operation. WAC 314-02-015(2)	5-day suspension or \$250 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license

Violation Type	1st Violation	2nd Violation in a two-year window	3rd Violation in a two-year window	4th Violation in a two-year window
NSF check: Payment by a retail licensee for alcohol purchases. WAC 314-13-020	5-day suspension or \$250 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Premises not open to the general public while liquor is sold, served, or consumed. WAC 314-11-072	5-day suspension or \$250 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Sampling and/or cooking class violations. WAC 314-02-105	5-day suspension or \$250 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Substituting, tampering, improper labeling, unlawful removal, possession, or unauthorized sale of liquor. WAC 314-11-065 WAC 314-11-080 WAC 314-16-020	5-day suspension or \$250 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license
Advertising: Advertising violations other than those involving prohibited practices between a nonretail and a retail licensee. Chapter 314-52 WAC.	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Hotel/motel honor bar violation. WAC 314-02-080	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Inventory: Inventory below required amount. WAC 314-02-100 WAC 314-02-105	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Lighting: Inadequate lighting. WAC 314-11-055	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Liquor purchased from unauthorized source or sale below cost in violation of liquor law or rule. WAC 314-11-085 WAC 314-13-010 WAC 314-13-040	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Private club violations: Club regulations other than club liquor to the public. Chapter 314-40 WAC	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Records: Improper recordkeeping. WAC 314-11-090 WAC 314-11-095 WAC 314-12-135	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Retailer/nonretailer violation: Violation on the part of a retail licensee that involves a nonretail licensee, other than group four violations.	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension

Violation Type	1st Violation	2nd Violation in a two-year window	3rd Violation in a two-year window	4th Violation in a two-year window
Signs: Failure to post required signs. WAC 314-11-060	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension
Unauthorized alterations, change of trade name, or added activity. WAC 314-02-025 WAC 314-02-125 WAC 314-02-130	5-day suspension or \$100 monetary option	5-day suspension or \$500 monetary option	10-day suspension or \$1,000 monetary option	20-day suspension

AMENDATORY SECTION (Amending WSR 22-13-054, filed 6/8/22, effective 7/9/22)

WAC 314-29-030 Group 3 license violations. Group 3 violations are violations involving licensing requirements, license classification, and special restrictions.

Violation Type	1st Violation	2nd Violation in a two-year window	3rd Violation in a two-year window	4th Violation in a two-year window
True party of interest violation. RCW 66.24.010(1) WAC 314-12-030	Cancellation of license			
Failure to furnish required documents. WAC 314-12-035	Cancellation of license			
Misrepresentation of fact. WAC 314-12-010	Cancellation of license			
Misuse or unauthorized use of liquor license (operating outside of license class, lending or contracting license to another person/entity). Chapter 66.24 RCW WAC 314-02-015 WAC 314-02-041 WAC 314-02-045 WAC 314-02-065 WAC 314-02-070 WAC 314-02-075 WAC 314-02-090 WAC 314-02-095 WAC 314-02-100 WAC 314-02-105 WAC 314-02-110 WAC 314-12-030	5-day suspension or \$1,500 monetary option	Cancellation of license		
Operating plan: Violations of a board-approved operating plan. WAC 314-03-060 <u>WAC 314-03-211</u> <u>WAC 314-03-212</u> WAC 314-16-270 WAC 314-16-275	5-day suspension or \$500 monetary option	7-day suspension or \$1,500 monetary option	10-day suspension with no monetary option	Cancellation of license
Sale of alcohol in violation of a board-approved local authority restriction. Chapter 66.24 RCW	5-day suspension or \$500 monetary option	7-day suspension or \$1,500 monetary option	10-day suspension with no monetary option	Cancellation of license
Sale of alcohol in violation of a board-approved alcohol impact area restriction. WAC 314-12-215	5-day suspension or \$500 monetary option	7-day suspension or \$1,500 monetary option	10-day suspension with no monetary option	Cancellation of license
Catering endorsement violation. WAC 314-02-060 WAC 314-02-061	5-day suspension or \$250 monetary option	5-day suspension or \$1,500 monetary option	10-day suspension or \$3,000 monetary option	Cancellation of license



Notice of Permanent Rules – 2SHB 1515 – Expanded Alcohol Service Areas

Concise Explanatory Statement

This concise explanatory statement concerns the Washington State Liquor and Cannabis Board's (LCB) adoption of amendments to existing rules and creation of new rules in [Chapter 314-02 WAC](#) to implement Second Substitute House Bill (2SHB) 1515 ([chapter 361, Laws of 2025](#)), which expanded permissible public alcohol consumption in various ways.

The Administrative Procedure Act (RCW 34.05.325(6)) requires agencies to complete a concise explanatory statement before filing adopted rules with the Office of the Code Reviser. The concise explanatory statement must be provided to any person upon request, or from whom the LCB received comment.

The LCB appreciates and encourages your involvement in the rule making process. If you have questions, please e-mail at rules@lcb.wa.gov.

Background and reasons for adopting these rules:

[Second Substitute House Bill \(2SHB\) 1515 \(chapter 361, Laws of 2025\)](#) passed in the Washington state legislature during the 2025 legislative session and became effective July 27, 2025. Most of the provisions of 2SHB 1515 are codified at [RCW 66.24.800](#).

2SHB 1515 created three new liquor authorizations available to local governments to expand existing common areas where patrons of liquor licensees can consume alcohol. Each of the three different liquor authorizations has different requirements and expands permissible alcohol consumption areas in slightly different ways. See [RCW 66.24.800\(1\)-\(4\)](#).

For ease of reference, the Liquor and Cannabis Board (LCB) is referring to the three authorizations as follows:

- 1) expanded outdoor alcohol service authorization [RCW 66.24.800\(1\)](#),
- 2) civic campus authorization [RCW 66.24.800\(2\)](#), and
- 3) fan zone authorization [RCW 66.24.800\(4\)](#).

The three authorizations have different expiration dates. The expanded outdoor alcohol service and civic campus authorizations expire December 31, 2027. See [RCW 66.24.800 – Finding – Intent \(3\)](#). But the fan zone authorization is specifically designed for use during the FIFA World Cup in the summer of 2026, and it therefore is only to be issued during June or July 2026, when the state of Washington, and Seattle specifically, [is scheduled to host several high-profile soccer matches](#) that are expected to garner international attention, and hopefully tourism revenue.

However, 2SHB 1515 did not have a delayed or specified effective date. The provisions therefore became effective July 27, 2025. Even the fastest standard rulemaking would not have been able to get final rules effective by July 27, 2025. Therefore, the LCB issued a policy statement ([PS25-01, WSR 25-17-040, filed August 13, 2025, effective August 27, 2025](#)) to explain the requirements licensees need to meet to obtain the legally permitted authorizations before rule language was finalized.

2SHB 1515 also required participants of the civic campus and fan zone authorizations to file a joint operating plan with the LCB, with specific required elements. See [RCW 66.24.800\(2\)\(b\)\(v\)](#).

2SHB 1515 required the LCB to impose fees on liquor licensees and local governments applying for one of these authorizations “in order to cover but not exceed the board's administrative and enforcement costs related to activities authorized [by 2SHB 1515].” [RCW 66.24.800\(5\)](#).

2SHB 1515 expanded the LCB’s statutory rulemaking authority to “[i]mpos[e] reasonable requirements on licensees’ operations of alcohol service areas and the sale, service, and consumption of alcohol authorized [in 2SHB 1515].” [RCW 66.08.030\(22\)](#).

2SHB 1515 also changed the statutory requirements for caterer licenses ([RCW 66.24.690](#)), special occasion licenses ([RCW 66.24.380](#)) and the prohibition against carrying an open container in public ([RCW 66.44.100](#)) to allow caterers, special occasion licensees, and members of the public to participate in the newly allowed activities.

2SHB 1515 required cities that are obtaining the civic center authorization to submit a report to the LCB and legislature by January 1, 2027. See [RCW 66.24.810](#). Any local government that obtains any of the three authorizations is required to do a public engagement review and submit a report detailing the results to the LCB. See [RCW 66.24.820](#).

Additionally, [Second Substitute Senate Bill \(2SSB\) 5786, chapter 343, Laws of 2025](#), changed the application fees for special occasion licenses and caterers licenses, and while those applicable rules are open for this rulemaking, the LCB is making the appropriate fee changes in the corresponding rules to align the rule language with the amended statutory language.

The project team consists of representatives from the Attorney General’s Office, Enforcement & Education division, Licensing division, the Finance division, IT, Communications, Public Health Liaison and Legislative liaison.

Following many project team meetings, [draft rule language](#) was posted on the LCB website and circulated via [gov delivery message](#) on August 1, 2025, along with invitations to stakeholder engagements to be held on August 20 (recording [here](#)) and

August 22, 2025 (recording [here](#)). This [Powerpoint presentation](#) was presented during the stakeholder engagement sessions.

Following the stakeholder engagement sessions, LCB staff engaged in several conversations with staff from Washington cities, legislators, and major trade groups on how the language was developing positively, and where there was room for improvement.

A [second draft](#) of rule language was circulated on October 3, 2025, publicized via a [second gov delivery message](#) sent on October 9, 2025.

Reasons for adopting the rule language:

The final rule language amends the following existing rules:

WAC	Name
314-02-112	Caterers License
314-03-200	Outside or Extended Alcohol Service
314-05-020	Special occasion license
314-05-025	Application process for special occasion license
314-05-030	Requirements for special occasion license events
314-29-025	Group 2 regulatory violations
314-29-030	Group 3 regulatory violations

It also creates the following new rules:

WAC	Name
314-03-210	Expanded outdoor alcohol service authorization
314-03-211	Civic campus authorization
314-03-212	Fan zone authorization
314-03-213	Joint operating plan
314-03-214	Public engagement review
314-03-215	Licensee sharing alcohol service area with nonlicensee

Incorporating Statutory Directions into Rule Language

The new rule language, to the maximum extent possible, copies statutory language verbatim, or explicitly refers to the new statutory language. No new terms have been defined in rule. The closest to a new definition is determining how long a multiday event will be. While earlier drafts of the rule language proposed a multiday event to last no more than seven days, following stakeholder feedback, the rule language defines a multiday event as no more than 14 consecutive days.

Allowing Existing Rules and Frameworks to Guide to the Extent Possible

There are several instances where the statute dictates that certain restrictions existing in other rules about outdoor or expanded alcohol service shall not apply to these new authorizations, such as regarding barriers, entrances and exits, and how employees are to monitor the expanded outdoor alcohol service area. See [RCW 66.24.800\(1\)](#).

The rule language only identifies minimum height of barriers and maximum width of entrances as applying when the local jurisdiction does not have an applicable standard. For these standards, the rule language uses existing standards from [WAC 314-03-200](#). Where maximum numbers of drinks are determined to be set by the Board, the rule language mirrors existing standards established for sports entertainment facilities. See [WAC 314-02-058\(1\)\(d\)\(v\)](#).

Joint Operating Plan

While statutory language granted the Board the authority to add required elements to the joint operating plan, the rule only adds three requirements not specifically identified in statute.

First, licensees must identify how they will ensure compliance with existing laws and regulations prohibiting the removal of alcohol from the alcohol service area or event perimeter. This requirement is like existing language in [WAC 314-03-200\(4\)\(f\)](#).

Second, licensees must maintain separate records, as is already required in statute and rule. Language is also borrowed from [WAC 314-03-200\(4\)\(c\)](#).

Third, licensees must submit a map of the proposed alcohol service area, with the following identified: a north arrow indicator, where alcohol will be purchased and served, the location of any barriers, entrances and exits, and adjacent public streets. This is meant to be analogous to other existing floor plan requirements for other licensees and will help the Board visualize where the alcohol service area will be for purposes of mapping and to enable the public to better understand how their local jurisdiction will be impacted.

Sharing Service area with non-licensees

This rule language is important to the Board because this is not something that the Board has historically permitted in other regulations, and the rule language strives to reinforce that this is not a practice that the Board is currently interested in expanding to other license types.

Fee Determination Discussion

During the 2025 legislative session, Board staff met with legislative staff and identified the costs that 2SHB 1515 would impose on the Board to administer and attempted to get specified fees included in the bill language. In identifying the specified fees, Board staff calculated the costs that implementation of 2SHB 1515 would impose on the Board

and determined fees for local governments and licensees that would cover these costs. These specified fees did not get included in the final language of 2SHB 1515.

[RCW 66.24.800\(5\)](#) states the Board must impose a fee on certain licensees and local governments “in order to cover but not exceed the Board’s administrative and enforcement costs related to activities authorized under [2SHB 1515].”

In calculating fees that would meet this definition, the Board used the same calculations that were used in discussions with legislative staff, and identified the additional costs to implement the relevant provisions of 2SHB 1515 as follows:

Special Occasion Licensees	\$185 per day
Local Government – Expanded Outdoor Alcohol Service Authorization	\$1,700 per authorization
Local Government – Civic Center Authorization	\$1,500 per event
Local Government – Fan Zone Authorization	\$3,900 per event

Rulemaking history for these adopted rules:

CR 101 – filed May 7, 2025, as [WSR #25-10-103](#)

CR 102 – filed November 5, 2025, as [WSR #25-22-104](#)

Public hearing held December 11, 2025

The effective date of the final rule language is February 7, 2026.

Written Public Comments:

One public comment was submitted on the proposal in the time leading up to the public hearing:

1. Scott Waller, Washington Association for Substance misuse and Violence Prevention (WASAVP), submitted an email with a letter attached on December 9, 2025.

Email accompanying letter:

Attached are the comments, concerns, and recommendations from the Washington Association for Substance misuse And Violence Prevention (WASAVP) regarding the current CR 102 for 2SHB 1515 – modernizing alcohol service.

We believe that the libation zone portion of this bill is not well thought out, especially as it pertains to the effect of these rules on populations that will be excluded from these community events where alcohol is served. We further believe that LCB’s vision requires it to provide greater consideration of the health and safety implications of the proposed rule. We have submitted recommendations that would clarify what is allowed for these community events. We believe that our recommendations would positively enhance the public safety of people in cities and counties holding “libation zone” events.

One note of clarification – in the interest of brevity we did not include references and source materials. However, we are happy to share our source material and references upon request.

Letter:

Introduction

The Washington State Association of Substance Misuse and Violence Prevention (WASAVP) initially offered mild support for HB 1515, which aimed to create a celebration space for the FIFA World Cup events in Seattle in June and July 2026. This is an important event as the World Cup occurs every four years, and this will be the first time since 1994 that the U.S. is hosting it with Mexico and Canada.

The original focus of the bill was to allow major cities in Washington State to host World Cup events because they have the resources to manage large crowds. Seattle Center representatives demonstrated a successful history of creating indoor and outdoor gatherings where alcohol is served while ensuring safety at the same time.

Why This Matters to WASAVP

Uncontrolled alcohol consumption presents multiple public health risks

WASAVP and public health have a broader definition of safety than what happens within the borders of a particular event site. We are concerned about the impacts of events serving alcohol, including increased car crashes, violence, and youth access to alcohol due to relaxed regulations. According to a Washington State Patrol report, alcohol-heavy events can lead to a 30% rise in DUI arrests.

WASAVP became strongly opposed to HB 1515 as it expanded to allow communities across the state – regardless of size - to host numerous events with relaxed alcohol service regulations. Many plans for these events are being drafted by breweries and distilleries aiming to profit from the relaxed rules, and these plans lack proper oversight. The situation worsened when the bill was amended to include a sunset clause at the end of 2027, about 18 months after the World Cup.

There still exists an opportunity to prioritize public health and safety in the implementation of HB 1515's "libation zones." By developing rules that focus on the health and safety of the public, it is possible to minimize the risks associated with largely unregulated alcohol sales in these zones across the state.

Prevention and Public Health Concerns and Recommendations

Our comments will focus entirely on "libation zones." There are five areas (explained below) where we think the current rules could be demonstratively improved to reduce public health risks.

1. The line of demarcation between alcohol service areas and non-alcohol service areas needs to be more robust than what is contained in the proposed “rule.” The current draft rule suggests eliminating the 42-inch barrier requirement for all “libation zone” events.

The draft rule proposes waiving for all “libation zone” events the current WAC requirement for a 42-inch barrier between alcohol service areas and non-alcohol service areas. Specifically, the draft rule would allow for on-the-ground markers, called “turtles,” to define this boundary, if they are at least six inches in diameter, no more than 10 feet apart, and visible at night. However, we do not consider these markers effective because most of the domed turtles are only about one inch tall, making them easy to miss and posing a risk that people could accidentally enter the alcohol service area.

Additionally, the requirement for markers to be visible at night raises concerns. This typically means using reflective turtles, which require a light source to reflect. While Seattle Center is well-lit, other locations like city parks in Lyle, Goldendale, or Tenino may not have sufficient lighting.

Arguments for waiving the 42-inch barrier focus on cost and ease of access. But there is virtually no cost to doing this right. A 1,000-foot roll of 3-inch yellow “caution” tape, which can serve as a visible barrier at the required height, costs less than \$10 on Amazon. In contrast, each reflective “turtle” costs over \$10, and places like Seattle Center might need hundreds of them. Having a 42-inch barrier does not impede access to an outdoor alcohol service area, as openings can be created for entry and exit.

Instead of waiving the 42-inch barrier requirement entirely, we urge LCB to require applicants to obtain a variance from that regulation. Applicants must show that their on-the-ground markers are necessary for a specific reason and that they provide adequate separation between alcohol service and non-alcohol service areas. For example, they could enhance the visibility of markers by adding flags or flashing beacons.

Recommendation:

Keep the existing regulation that requires a 42-inch barrier and allow cities to apply for a variance on a case-by-case basis.

2. Each “libation zone” plan from cities or counties submitted to the LCB for review and approval should require set-aside of a non-alcohol-service area.

The purpose of “sip and stroll” alcohol service, or “libation zones,” is to allow local breweries, distilleries, wineries, and alcohol licensees to increase their sales. Proponents would not seek reduced regulations if they were happy with the current situation.

Many people will be excluded from participating in these community events due to alcohol service standards being relaxed. Individuals in recovery may avoid the events due to triggers from witnessing heavy drinking. Families wanting to protect their children from such exposure may also feel left out unless there’s a designated no-alcohol area.

Additionally, those from cultures or religions that prohibit alcohol consumption could be excluded.

Further, Washington State and the nation have made significant strides in reducing youth alcohol consumption, largely due to three factors: 1) effective prevention and public health programs, 2) policies that recognize how seeing adults drink freely normalizes alcohol use for youth, and 3) changing attitudes toward alcohol among 21–40-year-olds.

Recommendation:

Each city’s plan should include a no-alcohol service area that provides access to food, non-alcoholic drinks, and entertainment options like what's offered in the alcohol service area.

3. Each "libation zone" plan submitted by cities or counties to the LCB for review and approval must include a backup plan for potential reductions in local law enforcement and other municipal services needed for the event.

There may be adequate law enforcement available through local departments at the time that the libation zone application is made to LCB. But, by the time the event rolls around, any number of officers might have left the force due to budget cuts, retirement, injuries or illness, voluntary or involuntary departures from the police force, and vacations. The same with sanitation services.

Recommendation:

Requiring cities and counties to have a “Plan B” for their libation zone events will help to ensure that the events can be held as safely as possible.

4. Each "libation zone" plan submitted by cities or counties to the LCB for review and approval should describe a consistent system that will be used to regulate the number of drinks an individual can consume in these areas.

Seattle Center staff believe their “experiment” with alcohol service in non-beer garden areas (done with LCB's support) shows that people drink less because they don’t feel rushed to consume drinks quickly. However, we doubt their ability to provide an unbiased assessment of an event they promoted for policy change.

The problem is that there’s no standard way to track how much alcohol each person consumes. If vendors are spread out, someone could easily visit multiple vendors and have several drinks.

One potential solution is for attendees to wear a QR code patch during the event. Each drink they buy would be recorded in a database, allowing vendors to track how much alcohol each person has consumed and decide if they should sell more.

For smaller events, a wristband system could be used, where participants buy wristbands that allow for two alcoholic drinks each. Vendors would mark off the wristband every time a drink is purchased. Once the limit is reached, the person would need to buy another wristband and wear all wristbands they have purchased that day.

Recommendation:

Require all libation zone plans to detail how overconsumption of alcohol will be avoided in the “sip and stroll” environment.

5. There needs to be an evaluation component attached to the implementation of these rules.

Since HB 1515 does not provide funding for evaluation, we propose that the LCB’s research section develop and implement an evaluation plan. This plan should track the amount of alcohol served, the number of negative incidents after libation zone events, and other relevant factors. The goal is to analyze whether these events have had a neutral or positive impact, as their supporters believe. Without this objective information, the legislature will be considering an extension of the relaxed alcohol service rules in 2027 without any solid evidence. Moreover, relying on a report from Seattle Center staff, who organized and benefited from the events, is not a legitimate evaluation.

Recommendation:

Task LCB’s Research Division with the responsibility for developing and implementing a study of the effects of libation zones on public safety.

Conclusion

LCB’s Vision Statement reads, Promote public safety, public health, and trust through fair administration, education, and enforcement of liquor, cannabis, tobacco, and vapor laws.”

We offer these recommendations to LCB in the spirit of helping the agency reach its vision.

For more information of if you have questions, please contact Linda Thompson, President, Washington Association for Substance misuse And Violence Prevention (WASAVP), (509) 922-8383, lthompson@gssac.org.

LCB response:

The LCB hears the concerns raised by the comment from WASAVP. 2SHB 1515 was passed by the Washington state legislature and signed by the Governor, and the policy goals identified by 2SHB 1515 have been determined by those state government representatives. The LCB will respond to the recommendations in the order they are presented. The comment refers to “libation zones”, and the LCB’s response assumes that this term refers to all three authorizations, as that term is not used in either statute or rule.

1. Barriers

The rule language in WAC 314-03-210 does not propose “eliminating” the 42-inch barrier requirement. The statutory language in [RCW 66.24.800\(1\)\(b\)\(i\)](#) states that “All outdoor alcohol service areas may be enclosed, at the licensee’s discretion, by means of a permanent or movable barrier or by means of a permanent fence-free demarcation[.]” Licensees are given statutory permission to freely choose between a permanent or moveable barrier and a permanent fence-free demarcation.

The existing 42 inch barrier requirement for outdoor consumption areas comes from [WAC 314-03-200](#), and the use of 42 inches specifically is contained in other rules around barrier requirements for spirits, beer, and wine restaurants ([WAC 314-02-025](#)) and nightclubs ([WAC 314-02-037](#)). However, new proposed language in [WAC 314-03-200](#) clarifies that the rules around outside or extended alcohol service areas are separate and distinct from the rule language for the new authorizations.

The comment explains that use of caution tape is cheaper and can be done at 42 inches. However, caution tape would not qualify as a permanent fence-free demarcation, as it is not permanent, and has historically not been considered as qualifying as a sufficient barrier for purposes of WAC 314-03-200.

The rule language defers to local jurisdiction regarding barrier height. If the local jurisdiction allows barriers to be 24 inches for these barriers, then that height will be sufficient. If the local jurisdiction does not address the required height, then the 42-inch requirement applies. This is not a waiver of the 42 inch requirement, but rather a show of deference to local jurisdictions regarding what works best for their community.

2. Non-alcohol Service Area.

The LCB does not regulate the service of non-alcohol or entertainment generally, and it is not clear that the rulemaking authority extends to require creation of an alcohol-free zone within these areas.

3. Addressing potential reductions in services.

[RCW 66.24.800\(1\)\(d\)](#) already requires the local jurisdiction to submit documentation addressing how local resources will be allocated to ensure safe experience and address increased sanitation needs. Staff reductions are an inevitable possibility in all areas of employment, and it is unclear how rulemaking would address this possibility without regulating local employment decisions that are arguably not within the LCB’s rulemaking authority.

4. Regulating the number of drinks served.

[RCW 66.24.800\(2\)\(b\)\(v\)\(D\)](#) requires the joint operating plan submitted to address “the licensees’ policy on the number of alcoholic beverages that will be served to an individual patron during one transaction, subject to a limit determined by the [LCB].” The rule language in WAC 314-03-213(4)(f) sets a limit of two alcoholic beverages per

transaction, consistent with the limit identified for sports entertainment facilities in [WAC 314-02-058\(1\)\(d\)\(iv\)](#). How the licensees will enforce this policy will be left to the licensees and rulemaking does not generally get into the granular to require the use of wristbands and how those wristbands will be used. Compliance with overservice laws in [RCW 66.44.200](#) and [WAC 314-16-150](#) remain unchanged, regardless of the number of drinks sold.

5. Requiring evaluation.

[RCW 66.24.810](#) requires cities that use the civic campus authorization to report to the legislature and LCB on the results of these events. [RCW 66.24.820](#) requires all local jurisdictions which use any of the authorizations to conduct a public engagement review that identifies required stakeholder engagement and reporting these results to the LCB and the legislature. WAC 314-03-214 mirrors the language of [RCW 66.24.820](#). All LCB rulemaking identifies plans for implementation review, and this rulemaking will be no different.

Three public comments were submitted on the proposal following the public hearing:

1. Josh McDonald, Executive Director, Washington Wine Institute

To: Washington State Liquor and Cannabis Rules Team,
From: Washington Wine Institute
Re: CR 102 comments implementing 2SHB 1515

Please accept these as the official comments on these CR 102 draft rules from the Washington Wine Institute. We want to thank the great work of Kevin Walder, Daniel Jacobs, and your Rules team on the proposed CR 102 implementing 2SHB 1515 Expanding Outdoor Alcohol Service. The current CR 102's draft rules are well done. The rules as written currently stay within the framework of 2SHB 1515's statutory allowances and requirements and do their best to provide clarity to how these various outdoor alcohol service events will take place.

The CR 102 language as drafted does an excellent job helping us understand how our Washington wineries will be able to utilize these new outdoor alcohol service allowances in all three format[s] allowed under HB 1515; multi-licensee outdoor events through 2027, civic campus outdoor events during the World Cup 2026, and fan zones outdoor events located in the designated cities across our state. **We support these rules as written and hope they will be adopted following the current timeline.** 2026 is only a few weeks away, and all licensees including every Washington winery will need as much time as possible to understand how these new event allowances fit into their world and the opportunities created to participate in these local events to help introduce more people to Washington wine.

In closing, please know that your Washington wine industry is experiencing significant challenges in the current economic climate. We are seeing too many winery closures, a downturn in customer traffic and sales, a shrinking distribution market, and trying our best to keep afloat in these difficult times. We are grateful for the continued partnership of our main state regulator in the WSLCB and look forward to working with your

licensing, enforcement, and customer service teams to host as well as participate in these new outdoor alcohol service events in responsible, local community supportive ways driving economic growth for both the hospitality industries and our local communities.

LCB Response: The LCB appreciates the feedback and strives to engage in rulemaking that is responsive to stakeholder input.

2. Sean DeWitz, State Government Affairs Manager, Washington Hospitality Association

The Washington Hospitality Association appreciates the opportunity to comment on the CR-102 draft rules implementing 2SHB 1515, Expanding Outdoor Alcohol Service. We extend our thanks to the WSLCB Rules team for the thoughtful, transparent work reflected in this rule package. We support the rules as drafted.

The provisions of 2SHB 1515 were carefully negotiated during the 2025 legislative session after substantial discussion among lawmakers, community representatives, public-safety organizations, and industry partners. The final legislation was designed to modernize Washington's hospitality environment responsibly, bringing restaurant and event opportunities more in line with those available in neighboring states, while preserving the strong safety and educational commitments expected by local communities. We are pleased to see that the CR-102 draft rules accurately reflect this balanced and deliberate legislative intent.

A key pillar of the negotiated statute was preserving local control over how outdoor alcohol service is implemented. The rules maintain that commitment while providing the clarity necessary for restaurants, bars, hotels, and event organizers to effectively utilize the outdoor service formats authorized under 2SHB 1515. These rules, as drafted, have significant economic potential and strong expectations on responsible service, community education, and public safety protections.

At a time when hospitality businesses are still facing elevated costs, staffing challenges, and shifting consumer patterns, the ability to offer well-regulated outdoor service creates much-needed economic opportunity and alignment with practices already common in the surrounding states. We appreciate that this rulemaking honors the approach negotiated with the Legislature, modernizing operations without compromising safety, enforcement visibility, or community trust.

Washington Hospitality Association values the long-standing partnership with LCB. We look forward to continued collaboration with your licensing, enforcement, and education teams as these outdoor service allowances take effect.

Thank you again for your work and for maintaining a rulemaking process rooted in public safety, local engagement, and legislative consistency.

LCB Response: The LCB appreciates the feedback and strives to engage in rulemaking that is responsive to stakeholder input.

3. Daniel Olson, Executive Director, Washington Brewer’s Guild

Please accept these as the Washington Brewers Guild’s official comments on the CR-102 draft rules related to the implementation of 2SHB 1515. We want to express our appreciation to Kevin Walder, Daniel Jacobs, and the entire Rules team for their thoughtful work on this rule package. The CR-102 draft stays true to the statutory intent of 2SHB 1515 while providing clear, workable guidance for how the new outdoor alcohol service allowances will function in practice.

The proposed language does an excellent job outlining how Washington breweries may participate in the three formats authorized under 2SHB 1515: multi-licensee outdoor events through 2027, civic campus events during the 2026 World Cup, and designated fan-zone events in host communities across the state. We support the rules as currently drafted and hope they move forward on the planned timeline. With 2026 fast approaching, breweries will need as much lead time as possible to understand the new opportunities, plan responsibly, and participate meaningfully in these events that showcase Washington craft beer to new audiences.

We also want to underscore the challenging climate Washington’s craft breweries are operating in. Many breweries are facing rising costs, declining on-premise traffic, tightening distribution channels, and increased financial pressure. Even long-standing breweries are struggling to navigate this economic moment. That is why we value our ongoing partnership with the WSLCB and your dedication to working collaboratively with licensees. We look forward to continuing that partnership as breweries prepare to host and participate in outdoor events under these new allowances—events that can strengthen local hospitality sectors, drive economic activity, and connect communities with Washington’s world-class craft beer.

Thank you again for your work and for considering our comments.

LCB Response: The LCB appreciates the feedback and strives to engage in rulemaking that is responsive to stakeholder input.

Testimony at Public Hearing:

The following testimony was provided during the public hearing held December 11, 2025:

1. Scott Waller, Board Member, WASAVP

Thank you. Good morning. My name is Scott Waller and I'm a board member with the Washington State Association for Substance Misuse and Violence Prevention or WASAVP.

My organization represents more than 200 community coalitions and organizations involved in providing prevention services across the state and the thousands of individuals who volunteer their time in support of those coalitions and organizations to make their communities healthier and safer places to live, work and play.

WASAVP has specific concerns and recommendations regarding these draft rules

Recommendation one: Keep the existing regulations requires a 42 inch barrier and allow cities to apply for a variance on a case by case basis.

We see no reason for abandoning this rule. But could see a reason why something less than a 42 inch barrier could be needed on a case by case basis. The primary argument supporting what we have called invisible lines of demarcation have focused on cost and ease of access. We think those arguments do not hold water as a thousand foot 3 inch wide roll of yellow plastic caution tape can be purchased online for less than \$10 and it will arrive at your address the next morning. \$10 is not a big deal. Meanwhile, each of the six inch reflective turtle devices will cost a minimum of \$10 each. And the Seattle Center will need hundreds of those. Cost. I don't think so. Ease of access is also easily fixed by having multiple breaks in the barrier to allow entrance and exit. We just think people should be able to make a clear choice about entering a sip and stroll libation zone rather than arriving in one by accident.

Recommendation two. Each city's plan should include a no-alcohol service area that provides access to food, non-alcoholic drinks and entertainment options like what's offered in the alcohol service area.

The purpose of sip and stroll alcohol service, or libation zones, is to allow local breweries, distilleries, wineries and alcohol licensees to increase their sales. Proponents would not seek reduced regulations if they were happy with the current situation. Many people will be excluded from participating in these community events due to alcohol service standards being relaxed individuals in recovery may avoid the events due to triggers from witnessing heavy drinking. Families wanting to protect their children from such exposure may also feel left out unless there's a designated no-alcohol zone. Additionally, those from cultures or religions to prohibit alcohol consumption could be excluded.

Recommendation three. Each city's plan should include a no alcohol service area that provide, Oops, sorry, Should include a Plan B for their plan for enforcement and sanitation and that sort of thing.

We think that we are in a very, very tight budget situation and submitting a plan that's approved in March could, for an event that's going to happen in August, by the time that August event comes around, those city budgets could be dramatically different, particularly in law enforcement due to everything from reducing force due to budget cuts, retirement entries or illness, voluntary or involuntary departures from the police force and vacations. Same with sanitation services. There needs to be a contingency plan put in this about how they're going to reduce the size of the event if they have to reduce the size of the law enforcement force.

Recommendation Four. Each libation zone plan should describe a consistent system that will be used to regulate the number of drinks an individual can consume in these areas.

The problem is that there's no standard way to track how much alcohol each person consumed. So, if vendors are spread out, someone could easily visit multiple vendors and have several drinks and actually be served to over consumption and no one would

be able really to step into that 'cause they didn't witness the consumption themselves. So we think that that should be addressed. And finally, Recommendation 5. We think that the LCB's research division should be tasked with responsibility for developing and implementing a study of the effects of libation zones on public safety.

The problem here is that there's no standard way to track how much alcohol each person consumes. If vendors are spread out, someone could easily spread easily visit multiple vendors and there was no funding set aside to actually study the impact of this pretty large policy change, and the assumption is that in 2027, the legislature is going to consider whether to make these rules permanent and without some type of without some type of a study in place, talking about what the impacts actually were, they're going to be making largely uninformed choices, or at least choices based on testimony from people who actually stood to gain from the events themselves.

So, in conclusion, LCB's vision statement reads: Promote public safety, public health and trust through the administration, education and enforcement of liquor, cannabis, tobacco and vapor laws.

We offer these recommendations and have submitted them in written form. To the LCB, in the spirit of helping the agency reach its vision. Thank you very much.

LCB response: These comments mirror the written comments submitted by WASAVP and are substantively responded to above.

Changes to Proposed Rule Language (CR-102):

WAC 314-03-211 – Civic campus authorization			
Section	Proposed Rule (CR 102)	Final Rule (CR 103)	Reason for Change
(2)(b)	Seven of these 25 events may be multiday events. A multiday event cannot exceed 14 days.	Seven of these 25 events may be multiday events. A multiday event cannot exceed 14 consecutive days.	Points of clarification were raised during public comment period.

Attachment: Public Comments Before and After Public Hearing

From: [Scott Waller](#)
To: [LCB DL Rules](#)
Subject: WASASVP comments/concerns re CR 102 for HB 1515 libation zones
Date: Tuesday, December 9, 2025 1:12:56 PM
Attachments: [WASAVP Comments on Draft Rules for HB 1515.docx](#)

External Email

Good afternoon,

Attached are the comments, concerns, and recommendations from the Washington Association for Substance misuse And Violence Prevention (WASAVP) regarding the current CR 102 for 2SHB 1515 – modernizing alcohol service.

We believe that the libation zone portion of this bill is not well thought out, especially as it pertains to the effect of these rules on populations that will be excluded from these community events where alcohol is served. We further believe that LCB's vision requires it to provide greater consideration of the health and safety implications of the proposed rule. We have submitted recommendations that would clarify what is allowed for these community events. We believe that our recommendations would positively enhance the public safety of people in cities and counties holding "libation zone" events.

One note of clarification – in the interest of brevity we did not include references and source materials. However, we are happy to share our source material and references upon request.

Please contact Linda Thompson, President, Washington Substance misuse And Violence Prevention (WASAVP), (509) 922-8383, lthompson@gssac.org.

Scott Waller
Tumh2o99@comcast.net
(360) 701-8658



WASAVP Comments on Draft Implementation Rules for HB 1515 – Modernizing Alcohol Service

Introduction

The Washington State Association of Substance Misuse and Violence Prevention (WASAVP) initially offered mild support for HB 1515, which aimed to create a celebration space for the FIFA World Cup events in Seattle in June and July 2026. This is an important event as the World Cup occurs every four years, and this will be the first time since 1994 that the U.S. is hosting it with Mexico and Canada.

The original focus of the bill was to allow major cities in Washington State to host World Cup events because they have the resources to manage large crowds. Seattle Center representatives demonstrated a successful history of creating indoor and outdoor gatherings where alcohol is served while ensuring safety at the same time.

Why This Matters to WASAVP

Uncontrolled alcohol consumption presents multiple public health risks

WASAVP and public health have a broader definition of safety than what happens within the borders of a particular event site. We are concerned about the impacts of events serving alcohol, including increased car crashes, violence, and youth access to alcohol due to relaxed regulations. According to a Washington State Patrol report, alcohol-heavy events can lead to a 30% rise in DUI arrests.

WASAVP became strongly opposed to HB 1515 as it expanded to allow communities across the state – regardless of size - to host numerous events with relaxed alcohol service regulations. Many plans for these events are being drafted by breweries and distilleries aiming to profit from the relaxed rules, and these plans lack proper oversight. The situation worsened when the bill was amended to include a sunset clause at the end of 2027, about 18 months after the World Cup.

There still exists an opportunity to prioritize public health and safety in the implementation of HB 1515's "libation zones." By developing rules that focus on the health and safety of the public, it is possible to minimize the risks associated with largely unregulated alcohol sales in these zones across the state.



WASAVP Comments on Draft Implementation Rules for HB 1515 – Modernizing Alcohol Service

Prevention and Public Health Concerns and Recommendations

Our comments will focus entirely on “libation zones.” There are five areas (explained below) where we think the current rules could be demonstratively improved to reduce public health risks.

- 1. The line of demarcation between alcohol service areas and non-alcohol service areas needs to be more robust than what is contained in the proposed “rule.” The current draft rule suggests eliminating the 42-inch barrier requirement for all “libation zone” events.**

The draft rule proposes waiving for all “libation zone” events the current WAC requirement for a 42-inch barrier between alcohol service areas and non-alcohol service areas. Specifically, the draft rule would allow for on-the-ground markers, called “turtles,” to define this boundary, if they are at least six inches in diameter, no more than 10 feet apart, and visible at night. However, we do not consider these markers effective because most of the domed turtles are only about one inch tall, making them easy to miss and posing a risk that people could accidentally enter the alcohol service area.

Additionally, the requirement for markers to be visible at night raises concerns. This typically means using reflective turtles, which require a light source to reflect. While Seattle Center is well-lit, other locations like city parks in Lyle, Goldendale, or Tenino may not have sufficient lighting.

Arguments for waiving the 42-inch barrier focus on cost and ease of access. But there is virtually no cost to doing this right. A 1,000-foot roll of 3-inch yellow “caution” tape, which can serve as a visible barrier at the required height, costs less than \$10 on Amazon. In contrast, each reflective “turtle” costs over \$10, and places like Seattle Center might need hundreds of them. Having a 42-inch barrier does not impede access to an outdoor alcohol service area, as openings can be created for entry and exit.



WASAVP Comments on Draft Implementation Rules for HB 1515 – Modernizing Alcohol Service

Instead of waiving the 42-inch barrier requirement entirely, we urge LCB to require applicants to obtain a variance from that regulation. Applicants must show that their on-the-ground markers are necessary for a specific reason and that they provide adequate separation between alcohol service and non-alcohol service areas. For example, they could enhance the visibility of markers by adding flags or flashing beacons.

Recommendation:

Keep the existing regulation that requires a 42-inch barrier and allow cities to apply for a variance on a case-by-case basis.

2. Each “libation zone” plan from cities or counties submitted to the LCB for review and approval should require set-aside of a non-alcohol-service area.

The purpose of "sip and stroll" alcohol service, or "libation zones," is to allow local breweries, distilleries, wineries, and alcohol licensees to increase their sales. Proponents would not seek reduced regulations if they were happy with the current situation.

Many people will be excluded from participating in these community events due to alcohol service standards being relaxed. Individuals in recovery may avoid the events due to triggers from witnessing heavy drinking. Families wanting to protect their children from such exposure may also feel left out unless there's a designated no-alcohol area. Additionally, those from cultures or religions that prohibit alcohol consumption could be excluded.

Further, Washington State and the nation have made significant strides in reducing youth alcohol consumption, largely due to three factors: 1) effective prevention and public health programs, 2) policies that recognize how seeing adults drink freely normalizes alcohol use for youth, and 3) changing attitudes toward alcohol among 21–40-year-olds.

Recommendation:

Each city's plan should include a no-alcohol service area that provides access to food, non-alcoholic drinks, and entertainment options like what's offered in the alcohol service area.



WASAVP Comments on Draft Implementation Rules for HB 1515 – Modernizing Alcohol Service

- 3. Each "libation zone" plan submitted by cities or counties to the LCB for review and approval must include a backup plan for potential reductions in local law enforcement and other municipal services needed for the event.**

There may be adequate law enforcement available through local departments at the time that the libation zone application is made to LCB. But, by the time the event rolls around, any number of officers might have left the force due to budget cuts, retirement, injuries or illness, voluntary or involuntary departures from the police force, and vacations. The same with sanitation services.

Recommendation:

Requiring cities and counties to have a "Plan B" for their libation zone events will help to ensure that the events can be held as safely as possible.

- 4. Each "libation zone" plan submitted by cities or counties to the LCB for review and approval should describe a consistent system that will be used to regulate the number of drinks an individual can consume in these areas.**

Seattle Center staff believe their "experiment" with alcohol service in non-beer garden areas (done with LCB's support) shows that people drink less because they don't feel rushed to consume drinks quickly. However, we doubt their ability to provide an unbiased assessment of an event they promoted for policy change.

The problem is that there's no standard way to track how much alcohol each person consumes. If vendors are spread out, someone could easily visit multiple vendors and have several drinks.

One potential solution is for attendees to wear a QR code patch during the event. Each drink they buy would be recorded in a database, allowing vendors to track how much alcohol each person has consumed and decide if they should sell more.

For smaller events, a wristband system could be used, where participants buy wristbands that allow for two alcoholic drinks each. Vendors would mark off the wristband every time a drink is purchased. Once the limit is reached, the person



WASAVP Comments on Draft Implementation Rules for HB 1515 – Modernizing Alcohol Service

would need to buy another wristband and wear all wristbands they have purchased that day.

Recommendation:

Require all libation zone plans to detail how overconsumption of alcohol will be avoided in the “sip and stroll” environment.

5. There needs to be an evaluation component attached to the implementation of these rules.

Since HB 1515 does not provide funding for evaluation, we propose that the LCB’s research section develop and implement an evaluation plan. This plan should track the amount of alcohol served, the number of negative incidents after libation zone events, and other relevant factors. The goal is to analyze whether these events have had a neutral or positive impact, as their supporters believe. Without this objective information, the legislature will be considering an extension of the relaxed alcohol service rules in 2027 without any solid evidence. Moreover, relying on a report from Seattle Center staff, who organized and benefited from the events, is not a legitimate evaluation.

Recommendation:

Task LCB’s Research Division with the responsibility for developing and implementing a study of the effects of libation zones on public safety.

Conclusion

LCB’s Vision Statement reads, Promote public safety, public health, and trust through fair administration, education, and enforcement of liquor, cannabis, tobacco, and vapor laws.”

We offer these recommendations to LCB in the spirit of helping the agency reach its vision.

For more information of if you have questions, please contact Linda Thompson, President, Washington Association for Substance misuse And Violence Prevention (WASAVP), (509) 922-8383, lthompson@gssac.org.

From: josh@wwi.wine
To: [LCB DL Rules](#)
Subject: HB 1515 CR 102 Rulemaking Comments
Date: Thursday, December 11, 2025 11:19:00 AM

External Email

To: Washington State Liquor and Cannabis Rules Team,
From: Washington Wine Institute
Re: CR 102 comments implementing 2SHB 1515

Please accept these as the official comments on these CR 102 draft rules from the Washington Wine Institute. We want to thank the great work of Kevin Walder, Daniel Jacobs, and your Rules team on the proposed CR 102 implementing 2SHB 1515 Expanding Outdoor Alcohol Service. The current CR 102's draft rules are well done. The rules as written currently stay within the framework of 2SHB 1515's statutory allowances and requirements and do their best to provide clarity to how these various outdoor alcohol service events will take place.

The CR 102 language as drafted does an excellent job helping us understand how our Washington wineries will be able to utilize these new outdoor alcohol service allowances in all three format allowed under HB 1515; multi-licensee outdoor events through 2027, civic campus outdoor events during the World Cup 2026, and fan zones outdoor events located in the designated cities across our state. **We support these rules as written and hope they will be adopted following the current timeline.** 2026 is only a few weeks away, and all licensees including every Washington winery will need as much time as possible to understand how these new event allowances fit into their world and the opportunities created to participate in these local events to help introduce more people to Washington wine.

In closing, please know that your Washington wine industry is experiencing significant challenges in the current economic climate. We are seeing too many winery closures, a downturn in customer traffic and sales, a shrinking distribution market, and trying our best to keep afloat in these difficult times. We are grateful for the continued partnership of our main state regulator in the WSLCB and look forward to working with your licensing, enforcement, and customer service teams to host as well as participate in these new outdoor alcohol service events in responsible, local community supportive ways driving economic growth for both the hospitality industries and our local communities.

Kind Regards

Josh McDonald

Executive Director
WA Wine Institute



From: [Sean DeWitz](#)
To: [LCB DL Rules](#)
Subject: HB 1515 CR 102 Rulemaking Comments
Date: Thursday, December 11, 2025 3:26:03 PM

External Email

The Washington Hospitality Association appreciates the opportunity to comment on the CR-102 draft rules implementing 2SHB 1515, Expanding Outdoor Alcohol Service. We extend our thanks to the WSLCB Rules team for the thoughtful, transparent work reflected in this rule package. We support the rules as drafted.

The provisions of 2SHB 1515 were carefully negotiated during the 2025 legislative session after substantial discussion among lawmakers, community representatives, public-safety organizations, and industry partners. The final legislation was designed to modernize Washington's hospitality environment responsibly, bringing restaurant and event opportunities more in line with those available in neighboring states, while preserving the strong safety and educational commitments expected by local communities. We are pleased to see that the CR-102 draft rules accurately reflect this balanced and deliberate legislative intent.

A key pillar of the negotiated statute was preserving local control over how outdoor alcohol service is implemented. The rules maintain that commitment while providing the clarity necessary for restaurants, bars, hotels, and event organizers to effectively utilize the outdoor service formats authorized under 2SHB 1515. These rules, as drafted, have significant economic potential and strong expectations on responsible service, community education, and public safety protections.

At a time when hospitality businesses are still facing elevated costs, staffing challenges, and shifting consumer patterns, the ability to offer well-regulated outdoor service creates much-needed economic opportunity and alignment with practices already common in the surrounding states. We appreciate that this rulemaking honors the approach negotiated with the Legislature, modernizing operations without compromising safety, enforcement visibility, or community trust.

Washington Hospitality Association values the long-standing partnership with LCB. We look forward to continued collaboration with your licensing, enforcement, and education teams as these outdoor service allowances take effect.

Thank you again for your work and for maintaining a rulemaking process rooted in public safety, local engagement, and legislative consistency.

Kind regards,

Sean DeWitz
State Government Affairs Manager
Washington Hospitality Association
| C 701-306-1989 | wahospitality.org

From: [Daniel Olson](#)
To: [LCB DL Rules](#)
Subject: HB 1515 CR 102 Rulemaking Comments
Date: Thursday, December 11, 2025 3:56:36 PM

External Email

To: Washington State Liquor and Cannabis Rules Team
From: Washington Brewers Guild
Re: CR 102 comments implementing 2SHB 1515

Please accept these as the Washington Brewers Guild’s official comments on the CR-102 draft rules related to the implementation of 2SHB 1515. We want to express our appreciation to Kevin Walder, Daniel Jacobs, and the entire Rules team for their thoughtful work on this rule package. The CR-102 draft stays true to the statutory intent of 2SHB 1515 while providing clear, workable guidance for how the new outdoor alcohol service allowances will function in practice.

The proposed language does an excellent job outlining how Washington breweries may participate in the three formats authorized under 2SHB 1515: multi-licensee outdoor events through 2027, civic campus events during the 2026 World Cup, and designated fan-zone events in host communities across the state. We support the rules as currently drafted and hope they move forward on the planned timeline. With 2026 fast approaching, breweries will need as much lead time as possible to understand the new opportunities, plan responsibly, and participate meaningfully in these events that showcase Washington craft beer to new audiences.

We also want to underscore the challenging climate Washington’s craft breweries are operating in. Many breweries are facing rising costs, declining on-premise traffic, tightening distribution channels, and increased financial pressure. Even long-standing breweries are struggling to navigate this economic moment. That is why we value our ongoing partnership with the WSLCB and your dedication to working collaboratively with licensees. We look forward to continuing that partnership as breweries prepare to host and participate in outdoor events under these new allowances—events that can strengthen local hospitality sectors, drive economic activity, and connect communities with Washington’s world-class craft beer.

Thank you again for your work and for considering our comments.

Daniel Olson

Executive Director | Washington Brewers Guild
425-501-1626
<http://www.washingtonbrewersguild.org>