



**Washington State
Liquor and Cannabis Board**

Date: July 5, 2023

To: David Postman, Board Chair
Ollie Garrett, Board Member
Jim Vollendroff, Board Member

From: Dr. Kathy Hoffman, Research Manager

Copy: William Lukela, Agency Director
Toni Hood, Agency Deputy Director
Becky Smith, Licensing Director
Chandra Brady, Director of Enforcement and Education
Justin Nordhorn, Policy and External Affairs Director

Subject: CR 102 regarding private club membership drives.

The Research Manager requests approval to file a rule proposal (CR 102) for the rulemaking related to private club membership drives. If approved for filing, the tentative timeline for this rule proposal is as follows:

July 5, 2023	Board is asked to approve filing proposed rules (CR 102). CR 102 filed with the Office of the Code Reviser. WSLCB webpage updated and notice circulated by GovDelivery distribution list. Formal comment period begins.
July 19, 2023	Notice published in the Washington State Register under WSR 23-14.
August 16, 2023	Public hearing held and formal comment period ends.
No earlier than August 30, 2023	Board is asked to adopt rules if no substantive changes are made (CR 103). Concise Explanatory Statement provided to individuals who offered written or oral comment at the public hearing or during the formal comment period, consistent with RCW 34.05.325. CR 103 and adopted rules are filed with the Office of the Code Reviser. WSLCB webpage updated and notice circulated by GovDelivery distribution list.
September 30, 2023	Rules are effective 31 days after filing, unless otherwise specified. See RCW 34.05.380(2)..

_____ Approve _____ Disapprove _____
David Postman, Chair Date

_____ Approve _____ Disapprove _____
Ollie Garrett, Board Member Date

_____ Approve _____ Disapprove _____
Jim Vollendroff, Board Member Date

Attachments: CR 102 Memorandum



CR 102 Memorandum

Regarding private club membership drives.

Date: July 5, 2023
Presented by: Dr. Kathy Hoffman, Research Manager

Background

On July 28, 2022, Keith Laurent, on behalf of the Vancouver Elks #823, submitted a petition for adoption, amendment, or repeal of a state administrative rule to the Washington State Liquor and Cannabis Board (Board). The petition requested that the Board amend WAC 314-40-040(6) to allow private clubs to add one additional membership drive per calendar quarter (for a total of eight per year) and host a membership drive on two consecutive days during one quarter per calendar year.

On September 14, 2022, the Board accepted the petition. Consistent with RCW 34.05.330(1)(b), the Board agreed to initiate the rulemaking process and begin collaboratively engaging with stakeholders and any interested members of the public to explore the possibility of allowing private clubs to add additional membership drives, host consecutive membership drives, or both.

Stakeholder Engagement

To develop potential rule language, a set of conceptual draft rules¹ was shared publicly through GovDelivery on May 3, 2023. As part of the collaborative rule development process, the messaging asked for stakeholder feedback and suggestions for revisions to the conceptual draft rules by March 17, 2023.²

Most of the feedback³ received was supportive in nature and did not include any specific suggestions for changes to the conceptual draft rule language. Based on the feedback received, the WSLCB did not make any changes to the conceptual draft rule language. The proposed rules are identical to the conceptual draft rules.

¹ The conceptual draft rules were developed by a WSLCB project team consisting of staff from the finance, enforcement and education, and licensing divisions.

² See Attachment A to this CR 102 Memo, GovDelivery message titled "Private Club Membership Drives: Feedback Requested on Draft Conceptual Rules" (May 3, 2023).

³ See Attachment B to this CR 102 Memo, table containing public feedback received May 3, 2023, to May 17, 2023.

Diversity, Equity, Inclusion and Belonging

The agency relies on a continuous policy analysis process centered on the overarching domains of stakeholder engagement and education. These are surrounded by continuous evaluation and framed by the following additional domains:

- Problem identification;
- Policy analysis;
- Strategy and policy development;
- Policy enactment; and
- Policy implementation.

To evaluate a problem and analyze its policy implications, the agency relies on a policy framing tool designed to view the problem and associated analysis through seven different criteria. These are:

- Diversity, equity and inclusion;
- Licensing Division impacts/perspectives;
- Public Safety (WSLCB Education and Enforcement) impacts/perspectives;
- Public Health/Prevention impact/perspectives;
- Feasibility (the likelihood that the policy can be successfully adopted and implemented);
- Economic and budgetary impacts, including a comparison of the costs to enact, implement, and enforce the policy with the value of the benefit; and
- A legal assessment to assure that the rule is authorized by statute.

Each of these criteria are reviewed under different analysis focus areas. The analysis:

CRITERIA	Analysis Focus
Diversity, Equity, Inclusion, and Belonging	<ul style="list-style-type: none"> • Diversity: Does the policy consider race and ethnicity, gender and gender identity, sexual orientation, socioeconomic status, language, culture, national origin, religious commitments, age, (dis)ability status and political perspectives across the authorizing environment? • Equity: Does the policy support the agency’s commitment to work actively in challenging and responding to bias, harassment, and discrimination? Does the policy extend the agency’s commitment to equal opportunity for all persons and does not discriminate on the basis of race, color, national origin, age, marital status, sex, sexual orientation, gender identity, gender expression, disability, religion, height, weight, or veteran status? • Inclusion: Does the policy support the agency’s commitment to pursuing deliberate efforts to respectfully honor and acknowledge different perspectives, where every individual feels a sense of inclusion that leverages collective capabilities? • Belonging: Does the policy identify and remove barriers that limit or prevent equity and justice for all, particularly for those who have been historically excluded and oppressed? Does the policy move toward replacing old systems with new systems that are just, equitable, diverse and inclusive for the benefit of all?

Responses to each of these analysis elements as they relate to this rule proposal are offered below:

Analysis Focus	Agency Response
<p>Diversity: Does the policy embodied in proposed rule consider race and ethnicity, gender and gender identity, sexual orientation, socioeconomic status, language, culture, national origin, religious commitments, age, (dis)ability status and political perspectives across the authorizing environment?</p>	<p>The agency recognizes that race, gender, sexual orientation, socioeconomic status, language, culture, national origin, religious commitments, age, ability and political perspectives are deeply connected. This understanding informs the agency's commitment to shifting repressive power dynamics and strengthening the influence of those most affected by the impact of such dynamics. That shift is represented in ways that the agency has worked to find ways for businesses to expand their operations, and to mitigate the economic impacts of the COVID-19 pandemic, while not placing the health of employees or customers at risk. These adjustments are framed in a way that reduce barriers to participation in the regulated market, while honoring the four pillars of public administration (economy, efficiency, effectiveness, and social equity),¹</p>
<p>Equity: Does the policy embodied in proposed rule support the agency's commitment to work actively in challenging and responding to bias, harassment, and discrimination? Does the policy extend the agency's commitment to equal opportunity for all persons and does not discriminate on the basis of race, color, national origin, age, marital status, sex, sexual orientation, gender identity, gender expression, disability, religion, height, weight, or veteran status?</p>	<p>Equal access to inequitable systems does not advance social equity. Disparities in structures and systems ensures barriers to access. By reverse engineering regulatory frameworks to align with statute, the agency has been able to proactively dismantle them, allowing the agency to enable conditions that can lead to social equity. These efforts are embedded in the agency's approach to rule and policy development. The policy represented in this rule proposal demonstrates the agency's continued commitment to regulation that supports socially equitable conditions by supporting business stability through regulatory expansion.</p>
<p>Inclusion: Does the policy embodied in the proposed rule support the agency's commitment to pursuing deliberate efforts to respectfully honor and acknowledge different perspectives, where every individual feels a sense of inclusion that leverages collective capabilities?</p>	<p>The policies embodied in this proposal were developed by the agency based on a rule petition and its suggested language. These policies were developed through an inclusive process that honored and leveraged community knowledge and capabilities to assure that all voices were heard, acknowledged, and included in the policy considerations.</p>
<p>Belonging: Does the policy embodied in proposed rule identify and remove barriers that limit or prevent equity and justice for all, particularly for those who have been historically excluded and oppressed? Does the policy move toward replacing old systems with new systems that are just, equitable, diverse and inclusive for the benefit of all?</p>	<p>Belonging is difficult to quantitatively measure. Cultivating a sense of belonging hinges on building trust and effective working relationships that support positive business outcomes. The cultivation process includes creating space for information sharing between regulators and those who are regulated or thinking about becoming part of the regulated community. The rule proposal supports a culture of belonging because it reflects the contributions and thinking of licensees, their representatives, and the communities in which those licensees conduct business, providing policy continuity and regulatory stability.</p>

Estimated Costs of Compliance

For the purpose of the minor cost analysis required by the Regulatory Fairness Act (chapter 19.85 RCW), the CR 102 form includes estimated costs of compliance with the proposed rules. The proposed rule revisions extend the number of days per quarter that a private club may hold membership functions from one to two days per calendar quarter and provide that membership drives may be held on two consecutive days, rather than one, per calendar year. The proposal also provides that there must be at least seven days between membership events. These proposed rule revisions are anticipated to support continuation, expansion, and sustainability of needed community service provision.

The agency anticipates that licensees will not incur additional compliance costs as a result of these rule revisions. The agency anticipates that licensees may need to spend a small amount of time (less than 30 minutes of administrative time) to apply for permitting for the additional membership drive days. The estimated costs of compliance and the relevant minor cost threshold estimates are described in the CR 102 form.

Rule Necessity

Amending WAC 314-40-040 is necessary to allow private clubs licensed under RCW 66.24.450 or 66.24.452 to add additional membership drives, host consecutive membership drives, or both.

Description of Rule Changes

Amended section. 314-40-040(6) related to recruiting and building club memberships. The proposed rule revisions include increasing public membership drive functions from one to two calendar days per calendar quarter; providing that membership drives may be held on two consecutive days per calendar years; and providing that there must be at least seven days between membership events.

Attachments:

Attachment A: GovDelivery message titled “Private Club Membership Drives: Feedback Requested on Draft Conceptual Rules”

Attachment B: Draft Conceptual Rule Comment Table



PROPOSED RULE MAKING

CR-102 (July 2022) (Implements RCW 34.05.320)

Do **NOT** use for expedited rule making

Agency: Washington State Liquor and Cannabis Board

Original Notice

Supplemental Notice to WSR _____

Continuance of WSR _____

Preproposal Statement of Inquiry was filed as WSR 23-08-040 ; or

Expedited Rule Making--Proposed notice was filed as WSR _____; or

Proposal is exempt under RCW 34.05.310(4) or 34.05.330(1); or

Proposal is exempt under RCW _____.

Title of rule and other identifying information: (describe subject) The Washington State Liquor and Cannabis Board (Board) proposes to amend WAC 314-40-040 to allow private clubs to add additional membership drives and host consecutive membership drives.

Hearing location(s):

Date:	Time:	Location: (be specific)	Comment:
August 16, 2023.	10:00 a.m.	All public Board activity will be held in a "hybrid" environment. This means that the public will have options for in-person or virtual attendance. The Boardroom at the headquarters building in Olympia (1025 Union Avenue, Olympia, WA 98504) will be open for in-person attendance. The public may also login using a computer or device, or call-in using a phone, to listen to the meeting through the Microsoft Teams application. The public may provide verbal comments during the specified public comment and rules hearing segments. TVW also regularly airs these meetings. Please note that although the Boardroom will be staffed during a meeting, Board Members and agency participants may continue to appear virtually	For more information about Board meetings, please visit https://lcb.wa.gov/Boardmeetings/Board_meetings

Date of intended adoption: No earlier than August 30, 2023 (Note: This is **NOT** the **effective** date)

Submit written comments to:

Name: Rules Coordinator

Address: P.O. Box 43080, Olympia WA 98504-3080

Email: rules@lcb.wa.gov

Fax: 360-704-5027

Other:

Assistance for persons with disabilities:

Contact Anita Bingham, ADA Coordinator, Human Resources Director

Phone: 360-664-1739

Fax: 360-664-9689

TTY: 7-1-1 or 1-800-833-6388

Email: anita.bingham@lcb.wa.gov

By (date) August 16, 2023

Other:

By (date) August 9, 2023

Purpose of the proposal and its anticipated effects, including any changes in existing rules: The purpose of this rule proposal is to extend the number of days per quarter that a private club may hold membership functions from one to two days per calendar quarter and provide that membership drives may be held on two consecutive days, rather than one, per calendar year. The proposal also provides that there must be at least seven days between membership events. The Board anticipates that the proposed rule changes will provide more opportunities for community service organizations, fraternal clubs, and other private clubs to recruit new members. The ability expand membership drives is anticipated to support continuation, expansion, and sustainability of needed community service provision.

Reasons supporting proposal: While this proposal was initiated as the result of a rule petition accepted on September 14, 2022, related to private club membership drives, there are additional reasons to support this proposal. Specifically, as a result of the COVID-19 pandemic and other limiting factors, community service organization membership has declined. The rule revision would provide more opportunity and flexibility to promote and recruit members. These organizations support and host a variety of community services, such as school supply drives, community health programs, high school scholarships, and community-specific fundraisers. Expanding membership will allow these organizations to continue and expand these activities.

Statutory authority for adoption: RCW 66.06.030; RCW 66.24.450.

Statute being implemented: RCW 66.06.030; RCW 66.24.450.

Is rule necessary because of a:

Federal Law?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Federal Court Decision?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
State Court Decision?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

If yes, CITATION:

Agency comments or recommendations, if any, as to statutory language, implementation, enforcement, and fiscal matters: None

Type of proponent: Private Public Governmental

Name of proponent: (person or organization) Washington State Liquor and Cannabis Board

Name of agency personnel responsible for:

	Name	Office Location	Phone
Drafting: Manager	Dr. Kathy Hoffman, Research	1025 Union Avenue, Olympia WA 98501	360-664-1622
Implementation: Licensing	Rebecca Smith, Director of	1025 Union Avenue, Olympia WA 98501	360-664-1753
Enforcement: Education and Enforcement	Chandra Brady, Director of	1025 Union Avenue, Olympia WA 98501	360-664-1726

Is a school district fiscal impact statement required under [RCW 28A.305.135](#)? Yes No

If yes, insert statement here:

The public may obtain a copy of the school district fiscal impact statement by contacting:

Name:
Address:
Phone:
Fax:
TTY:
Email:
Other:

Is a cost-benefit analysis required under [RCW 34.05.328](#)?

Yes: A preliminary cost-benefit analysis may be obtained by contacting:

Name:
Address:
Phone:
Fax:
TTY:
Email:
Other:

No: Please explain: Consistent with RCW 34.05.328(5)(a), these proposed rules are not subject to cost-benefit analysis requirements unless requested by the joint administrative rules review committee or voluntarily applied. Additionally, the proposed rules do not qualify as significant legislative rules under RCW 34.05.328(5).

Regulatory Fairness Act and Small Business Economic Impact Statement

Note: The [Governor's Office for Regulatory Innovation and Assistance \(ORIA\)](#) provides support in completing this part.

(1) Identification of exemptions:

This rule proposal, or portions of the proposal, **may be exempt** from requirements of the Regulatory Fairness Act (see [chapter 19.85 RCW](#)). For additional information on exemptions, consult the [exemption guide published by ORIA](#). Please check the box for any applicable exemption(s):

This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.061](#) because this rule making is being adopted solely to conform and/or comply with federal statute or regulations. Please cite the specific federal statute or regulation this rule is being adopted to conform or comply with, and describe the consequences to the state if the rule is not adopted.

Citation and description:

This rule proposal, or portions of the proposal, is exempt because the agency has completed the pilot rule process defined by [RCW 34.05.313](#) before filing the notice of this proposed rule.

This rule proposal, or portions of the proposal, is exempt under the provisions of [RCW 15.65.570\(2\)](#) because it was adopted by a referendum.

This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025\(3\)](#). Check all that apply:

[RCW 34.05.310](#) (4)(b)
(Internal government operations)

[RCW 34.05.310](#) (4)(e)
(Dictated by statute)

[RCW 34.05.310](#) (4)(c)
(Incorporation by reference)

[RCW 34.05.310](#) (4)(f)
(Set or adjust fees)

[RCW 34.05.310](#) (4)(d)
(Correct or clarify language)

[RCW 34.05.310](#) (4)(g)
((i) Relating to agency hearings; or (ii) process requirements for applying to an agency for a license or permit)

This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025\(4\)](#) (does not affect small businesses).

This rule proposal, or portions of the proposal, is exempt under RCW _____.

Explanation of how the above exemption(s) applies to the proposed rule: The proposed rules are exempt from the Regulatory Fairness Act's (RFA) Small Business Economic Impact Statement (SBEIS) requirement under RCW 19.85.025(4) because they do not impose more than minor costs to businesses as demonstrated below.

(2) Scope of exemptions: *Check one.*

The rule proposal is fully exempt (*skip section 3*). Exemptions identified above apply to all portions of the rule proposal.

The rule proposal is partially exempt (*complete section 3*). The exemptions identified above apply to portions of the rule proposal, but less than the entire rule proposal. Provide details here (consider using [this template from ORIA](#)):

The rule proposal is not exempt (*complete section 3*). No exemptions were identified above.

(3) Small business economic impact statement: *Complete this section if any portion is not exempt.*

If any portion of the proposed rule is **not exempt**, does it impose more-than-minor costs (as defined by RCW 19.85.020(2)) on businesses?

No Briefly summarize the agency's minor cost analysis and how the agency determined the proposed rule did not impose more-than-minor costs.

Estimated Cost of Compliance. The proposed rule revisions extend the number of days per quarter that a private club may hold membership functions from one to two days per calendar quarter and provide that membership drives may be held on two consecutive days, rather than one, per calendar year. The proposal also provides that there must be at least seven days between membership events. These proposed rule revisions are anticipated to support continuation, expansion and sustainability of needed community service provision.

The agency anticipates that licensees will not incur additional compliance costs as a result of these rule revisions. The agency anticipates that licensees may need to spend a small amount of time (less than 30 minutes of administrative time) to apply for permitting for the additional membership drive days.

According to the 2019 Occupational Employment Statistics (OES) Databook available in the Employment Security Department (ESD) labor market report library (<https://esd.wa.gov/labormarketinfo/report-library>), the average hourly wage in Washington State for Secretaries and Administrative Assistants, Except Legal, Medical, and Executive (using the Standard Occupational Classification (SOC) Code 43-6014) is \$21.31. Based on that data, the estimated cost for the administrative activity of familiarization with the rule revisions is \$10.66 [$\$21.31 \text{ avg. hourly wage} \times .5 \text{ hours} = \text{approximately } \10.66].

Minor Cost Threshold Estimates: The Board applied North American Industry Classification System (NAICS) codes 81341 for Civil and Social Organizations to estimate the minor cost thresholds for private clubs. According to the 2017 NAICS Manual (<https://www.census.gov/library/publications/2017/econ/2017-naics-manual.html>), civic and social organizations (81341) “comprises establishments primarily promoting the civic and social interests of their members. Establishments in this industry may operate bars and restaurants for their members.” There are no separate NAICS codes available for private clubs.

As shown in the table below, the estimated one-time cost of compliance for distilleries and craft distilleries (\$10.66) does not exceed the minor cost estimate for this industry (\$3,309.70), so a small business economic impact statement (SBEIS) is not required under RCW 19.85.030.

2017 Industry NAICS Code	Estimated Cost of Compliance	Industry Description	NAICS Code Title	Minor Cost Estimate - Max of 1%Pay, 0.3%Rev, and \$100	1% of Avg Annual Payroll . (0.01*AvgPay)	0.3% of Avg Annual Gross Business Income (0.003*AvgGBI)
81341	\$10.66	Civic and Social Organizations	Distilleries	\$3,309.70	\$3,309.70 2020 Dataset pulled from ESD	\$812.76 2020 Dataset pulled from DOR

Yes Calculations show the rule proposal likely imposes more-than-minor cost to businesses and a small business economic impact statement is required. Insert the required small business economic impact statement here:

The public may obtain a copy of the small business economic impact statement or the detailed cost calculations by contacting:

- Name:
- Address:
- Phone:
- Fax:
- TTY:
- Email:
- Other:

Date: July 5, 2023

Name: David Postman

Title: Chair

Signature:



WAC 314-40-040 Guest and courtesy cards—Visitors. (1) Guest cards are intended for invited guests residing outside of the immediate area.

(a) Guest cards shall be issued no more than three times per year for a period not to exceed (~~fourteen~~) 14 consecutive days, and must be numbered serially, with a record of the issuance of each such card to be filed in a manner as to be readily accessible to the agents of the board;

(b) Contestants in golf or tennis tournaments conducted on the grounds of a licensed club will be considered a visitor for the day(s) of the event.

(2) Visitors may be introduced when accompanied at all times by a member, who is not an on duty employee, and may remain as long as such member is present in the club. Any such visitor may only enjoy the privileges of the club six times in any one calendar year unless a different number of times is allowed in the club by-laws.

(3) Persons who are members in good standing of a national veterans organization may enjoy the privileges of any licensed club affiliated with any national veterans organization, and persons who are members in good standing of a national fraternal organization may enjoy the privileges of any club affiliated with that particular national fraternal organization if the bylaws of such clubs authorize reciprocal privileges. Subsections (1) and (2) of this section shall not apply to members of such organizations.

(4) Persons who are members in good standing of organizations licensed as private nonfraternal clubs may enjoy the privileges of other licensed nonfraternal clubs if the bylaws of such clubs authorize reciprocal privileges. Subsections (1) and (2) of this section shall not apply to members of such clubs.

(5) Courtesy cards may be issued to the adult members of the immediate family of any member with or without charge upon application being made to the club by the member.

(6) In order to recruit new members and build club membership, a private club may hold a public membership function for (~~one~~) two days per calendar quarter where club liquor may be given or sold to those attending as a part of the membership drive activities. The function must be advertised as a membership drive. (~~Membership drives may not be held on consecutive days.~~) A membership drive may be held on two consecutive days per calendar year. There must be at least seven days between membership events.

(7) A person issued a guest card by the club manager pursuant to subsection (1) of this section may introduce visitors into the club provided:

(a) The visitors are accompanied at all times by the sponsoring guest card holder;

(b) The visitors remain in the club only as long as the sponsoring guest card holder is present; and

(c) The house rules or bylaws of the club provide guest card holders the privilege of introducing visitors into the club.



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Private Club Membership Drives: Feedback Requested on Conceptual Draft Rules

Washington State Liquor and Cannabis Board sent this bulletin at 05/03/2023 02:16 PM PDT

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May 3, 2023

Private Club Membership Drives: Feedback Requested on Conceptual Draft Rules

The Liquor and Cannabis Board (LCB) is seeking public feedback on conceptual draft rules regarding a request to increase the number of Private Club Membership Drive events allowed each year. The request is to raise the number of events from one to two per calendar quarter and, in addition, allowing one two-day membership drive event per year.

Background

On Mar. 29, 2023, the LCB filed a preproposal statement of inquiry (CR 101) to consider creating rules in response to a rulemaking petition accepted by the Board on Sept. 14, 2022:

- [Notice to Stakeholders](#)
- [Memorandum](#)
- [CR 101 Filed as WSR 23-08-040 on March 29, 2023](#)
- [September 14, 2022 Board Response to Petition for Review](#)

The LCB invites and encourages feedback on the conceptual draft rules regarding private club membership drives which can be found [here](#).

This is not a rule proposal (CR 102). All feedback will be considered before a CR 102 rule proposal is developed. These are conceptual draft rules that are meant to invite public comment.

How to Provide Feedback

Please written feedback by email to rules@lcb.wa.gov by **May 17, 2023**.

More information is available on the [LCB Current Rulemaking Activity](#) webpage. If you have any questions regarding this announcement, please contact rules@lcb.wa.gov. To sign up to receive email announcements for all LCB rulemaking activities visit the agency's sign-up [page](#). There you can register to receive updates and announcements for a wide variety of agency topics.

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ATTACHMENT B

CR 102 Draft Rules—Private Club Membership Drives

Public feedback received May 3 through May 17, 2023 on the draft Private Club Membership drive rules circulated via gov delivery message on May 3, 2023. Comments received after May 17, 2023 are documented below.

Name	Date Received	Feedback	Response time	Response
<p>John McSweeney, mcsweeneyjw@yahoo.com</p>	<p>5/3/2023, 2:36 PM</p>	<p>Rule Coordinator,</p> <p>I am writing to you today on behalf of Shoreline Elks 1800 to express my full support for the amendment or adoption of rules that will allow private clubs to hold 2 membership drives per quarter with the possibility of having those 2 membership drives on consecutive days. Our ability as community service organizations to continue offering our services to our surrounding communities requires continued efforts at bringing in new members to our organizations.</p> <p>The ability to hold 8 membership drives, 2 per quarter, each year with the possibility of holding those quarterly drives on consecutive days will go a long way towards helping our success and continued longevity in supporting our communities.</p> <p>Thank you for your consideration.</p> <p>Sincerely,</p> <p>John McSweeney Shoreline Elks 1800 Past President Current Trustee/ Government Relations/ House Manager</p>	<p>5/19/23, 2:06 PM</p>	<p>Dear Mr. McSweeney:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board</p>

				<p>meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Gary Jackson, gary@sthilairecellars.net</p>	<p>5/3/23, 2:47 PM</p>	<p>Private clubs are struggling to attract and retain members. They all do a great deal for the communities in which they are located. Anything that can be done to enhance their membership is a huge benefit to our state.</p>	<p>5/19/23, 2:11 PM</p>	<p>Dear Mr. Jackson:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p>

				<p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Darel Maxfield, darel.maxfield@gmail.com</p>	<p>5/3/23, 2:48 PM</p>	<p>I am in support of this change. I do think further definition of section 6 needs to be implemented.</p> <p>(6) In order to recruit new members and build club membership, a private club may hold a public membership function two days per calendar quarter where club liquor may be given or sold to those attending as a part of the membership drive activities. The function must be advertised as a membership drive. A membership drive may be held on two consecutive days once per calendar year. There must be at least seven days between membership events.</p> <p>Does this mean:</p> <p>A. that any one of the proposed 8 membership drives can become a 2 day event, effectively giving the establishments 9 days in total per calendar year?</p> <p>B. that if in one quarter you decide to do a two day event, you have used up both of your membership days for that quarter?</p> <p>C. that there are in fact 8 single day events , 2 per quarter, AND a two day event one time per year, effectively giving 9 events, or 10 days, per calendar year.</p> <p>I would be in favor of option C personally. This provides the most flexible use of the limited membership drives and allows each</p>	<p>5/19/23, 2:22 PM</p>	<p>Dear Mr. Maxfield:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback.</p> <p>In response to your question below, the rule language is intended to reflect option B. as you presented it. Holding a 2-day membership drive during a given quarter uses BOTH of the two days allowed per quarter for membership drives, so, the two days allotted per quarter would be used up, and the club would need to wait until the next calendar quarter to have a membership drive. The 8 total days of membership drive allowed per year remains unchanged, this simply two of the membership drive days in a given quarter to be consecutive.</p> <p>If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p>

		<p>organization falling under these proposed rules to use the days to the best of their ability.</p> <p>this is a much needed change to the rules regarding membership drives, and how these rules affect our organizations</p> <p>Darel Maxfield 210-683-5357 darel.maxfield@gmail.com</p>		<p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Larry Good, larry@first.training</p>	<p>5/3/23, 3:01 PM</p>	<p>I think that the rule should be amended to allow for membership drives monthly, retain the request for two days back to back once per year.</p> <p>Respectfully,</p>	<p>5/19/23, 2:30 PM</p>	<p>Dear Mr. Good:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent,</p>

				<p>and accountable policies and rules that serve the public interest.</p> <p>Please visit the LBC's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Steve Henrikson, secretary@vfwpost4760.com</p>	<p>5/3/23, 4:14 PM</p>	<p>The petition requested that the Board amend WAC 314-40-040(6) to allow private clubs to add one additional membership drive per calendar quarter (for a total of eight per year) and host a membership drive on two consecutive days during one quarter per calendar year.</p> <p>The Sequim Veterans of Foreign Wars supports this proposed rule change. It would give us more opportunity and flexibility on</p>	<p>5/19/23, 2:36 PM</p>	<p>Dear Mr. Henrikson:</p> <p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public</p>

		<p>recruiting new members. The two day proposed change would be great during something like our irrigation festival or lavender festival that run 3-4 days each. They attract a large turnout of both local and other patrons. Sequim VFW Post 4760 supports the proposed rule change.</p> <p>Steve Henrikson, VFW Post 4760 Adjutant, VFW District 14 Commander</p>		<p>feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
Michelle Anderson, shellies4@netzero.com	5/3/23, 11:45 PM	<p>New private club rules.</p> <p>YES! I definitely think that Private clubs would be a good thing!!</p> <p>It's easier to monitor people if you know where they are and whom they are associated with.</p>	5/19/23, 2:48 PM	<p>Dear Ms. Anderson:</p> <p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p>

		<p>Private clubs would mean less people driving around under the influence too . Marijuana seems to have a shorter effect span than alcohol does too. About an hour.</p> <p>Better to have a place to go, just like a bar.</p> <p>A place to play video games and do their thing while the effects wear off sounds like a great solution!!</p> <p>Thank you for all you do! Let's keep this mom and pop cottage industry just THAT. SMALL business.</p> <p>Maybe no one can own more than 3 clubs, retail or processors?? There are already too many HUGE companies involved. Mom and Pop shops!</p> <p>Not marijuana Walmart!! Thank you!!</p>		<p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Ron Pfingsten, ron@pwpi.com</p>	<p>5/4/23, 7:21 AM</p>	<p>To whom it may concern,</p> <p>I would like to take this opportunity to express my complete support in an amendment proposed by Keith Laurent on July 28, 2022</p>	<p>5/19/23, 2:49 PM</p>	<p>Dear Mr. Pfingsten:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable</p>

		<p>to amend WAC 314-40-040(6). This proposal seeks to amend the existing definition by allowing private clubs to add one additional membership drive per quarter, to allow for a total of eight (8) per calendar year. In addition, the private clubs will be allowed to conduct such drives on two consecutive days during one quarter per calendar year.</p> <p>By adopting this proposal, these private clubs will be better enabled to promote membership and generate a greatly needed increase in the membership ranks. Many of these clubs are struggling to simply stay open, and staying open and healthy will help everyone involved - including Washington state. There can be no negative effect to any of the involved persons in adopting this amendment, and these clubs are in desperate need of membership enrollment. Please don't let more of these valuable and beloved clubs go out of existence.</p> <p>In summary, I am in full support of this proposal, and I respectfully request that this amendment be adopted for the health of the private clubs and the benefit of our great state.</p> <p>Thank you, Ron Pfingsten 4706 NW 179th St. Ridgefield, WA 98642 ron@pwpi.com (360)624-2111</p>	<p>and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
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<p>Jenn Anderson, eagles1744manager@gmail.com</p>	<p>5/4/23, 2:36 PM</p>	<p>To whom it may concern: Let it be known the elected officers, trustees and social room manager for the private club, Fraternal Order of Eagles Aerie #1744, of Stevenson, Washington fully supports the expansion of membership drives for private clubs in the state of Washington.</p> <p>Our private club raises tens of thousands of dollars to support people and activities in our small town community, which may otherwise not receive funds or donations - such as school supply drives, community health programs and high school scholarships. And while we enjoy a growing membership of over 500 local members, our fundraising opportunities are limited to what our relatively small number of active members can contribute. Expanding membership drives will enable our service organization to widen the community we reach for donations and programs we can serve.</p> <p>Please consider approving the expansion of allowable membership drives for private clubs in the state of Washington.</p> <p>Respectfully submitted on behalf of our elected officers, trustee and social room manager listed below.</p> <p>Worthy President Edison Key Worthy Vice President Mick Schneider Worthy Past President Wayne Coleman Worthy Secretary Rhonda McLane Worthy Treasurer Greg Sundby Worthy Chaplain Hilary Key Trustee Chairman Will Harryman Trustee Tracy Vanlaar Trustee Don McCaskell Trustee Jayne Borden Social Room Manager Jennifer Anderson</p>	<p>5/19/23, 2:56 PM</p>	<p>Dear Ms. Anderson, the elected officers and trustees of the Fraternal Order of Eagles Aerie #1744:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board</p>
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				<p>meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Laurel Waller, hotelcathlamet@gmail.com</p>	<p>5/4/23, 5:42 PM</p>	<p>Section 6 states for 2 days once a quarter and finishes with 2 days once a year. If they are different, it's not clear how they are different. It's hard to say whether one would follow the once a quarter or once a year rule.'</p> <p>Laurel Waller Hotel Cathlamet (360) 795-0100 69 Main Street, PO Box 370, Cathlamet WA 98612</p> <p>www.hotelcathlamet.com</p>	<p>5/19/23, 3:11 PM</p>	<p>Dear Ms. Waller:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. I appreciate your feedback that the language is not as clear as it could be. Two days of membership drive are allowed per calendar quarter, and there being four in a year, a total of eight days of membership drive allowed per year. Two of those 8 days are allowed to be consecutive ONCE a year, or during one of those four quarters. I know that is a lot of numbers in one paragraph, so please feel free to follow up if it still isn't clear.</p> <p>Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p>

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Dennis Dearing, djaydearing@gmail.com	5/5/23, 3:26 PM	<p>LCB,</p> <p>Being on a private island introduces interesting challenges. First our season is from Memorial Day Through Labor Day. If you own property on the island you can only be a guest of a club member twice in a lifetime. We have an event on Fridays during the season where we open the club to any island resident, its called Friday night social. In the past it has been a BYOB and appetizer. Now having the license we had hoped we could open the bar during these socials, we believe it would be a great draw to get people to join the club. The restrictions on membership drives extremely limits us in recruiting new members. We can't have drives during the winter since the few people that are here are already members. Our goal is to entice owners who are here for the summer as a getaway destination. The current rules would</p>	5/19/23, 3:38 PM	<p>Dear Mr. Dearing:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the</p>

		<p>only allow us to recruit on Memorial day and labor day or only have one on 4th of July. We are asking the board to think about private clubs that have unique situations like our seasonal operation where we could have other types of membership drives like the Friday night Social example I noted above.</p> <p>Thank you, Dennis Dearing Hat Island Yacht and Golf Club.</p>		<p>Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Debra Hoose, debrahoose823@gmail.com</p>	<p>5/8/23, 11:21 AM</p>	<p>Rule Coordinator, I am writing to you today to express my full support for the amendment or adoption of rules that will allow private clubs to hold 2 membership drives per quarter with the possibility of having those 2 membership drives on consecutive days. Our ability as community service organizations to continue offering our services to our surrounding communities requires continued efforts at bringing in new members to our organizations. The ability to hold 8 membership drives, 2 per quarter, each year with the possibility of holding those quarterly drives on consecutive days will go a long way towards helping our success and continued longevity in supporting our communities.</p> <p>Thank you for your consideration.</p>	<p>5/19/23, 3:46 PM</p>	<p>Dear Ms. Hoose:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking</p>

		<p>Debra Hoose, PER Vancouver Elks 823</p>		<p>activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Mike Harris, mharrissystems@gmail.com</p>	<p>5/11/23, 11:12 AM</p>	<p>To those concerned,</p> <p>Due to the limited opportunities associated with our climate, having additional membership drive events would help our club attract new members.</p> <p>This, in turn, would allow us to maintain our membership dues while augmenting our building and maintenance budget.</p> <p>Sincerely,</p> <p>Mike Harris 425.530.5943 Mtharrissystems@gmail.com</p>	<p>5/22/2023, 9:09 AM</p>	<p>Dear Mr. Harris:</p> <p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p>

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Ray McCabe, raymccabe@comcast.net	5/12/23, 8:48 AM	<p>Rules Committee:</p> <p>Due to the limited opportunities associated with our climate, having additional membership drive events would help our club to continue to add membership and also give our smaller yacht club the ability to improve our building with an increased maintenance budget and increased support to local charities.</p> <p>I recommend adding at least a second membership drive for non profits.</p>	5/22/2023, 9:13 AM	<p>Dear Mr. McCabe:</p> <p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent,</p>

		<p>Commodore Ray McCabe Camano Island Yacht Club RayMcCabe@Comcast.Net</p>		<p>and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Brian Buffington, brian.buffington@gmail.com</p>	<p>5/16/23, 12:21 PM</p>	<p>To whom it concerns,</p> <p>I'm emailing to show my support for the amendment to WAC 314-40-040(6) to allow private clubs to add one additional membership drive per calendar quarter (for a total of eight per year) and host a membership drive on two consecutive days during one quarter per calendar year.</p>	<p>5/22/2023, 9:31 AM</p>	<p>Dear Mr. Buffington:</p> <p>Thank you so much for providing your comment on draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p>

		<p>This amendment will help membership clubs in WA state grow their numbers via membership drives. These clubs are shrinking rapidly and closing up shop. They do so much charitable work in the community, across the state, and across the nation.</p> <p>Thanks for your close consideration.</p> <p>Brian.</p>		<p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Syd Nunez, xrayman1954@gmail.com</p>	<p>5/16/23, 12:40 PM</p>	<p>Greetings, My name is Sydney A Nunez, Past President of Bremerton Elks #1181. I wish to show my support for the proposed revision which would allow private clubs to increase the number of</p>	<p>5/22/2023, 9:33 AM</p>	<p>Dear Mr. Nunez:</p> <p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to</p>

		<p>membership drives we can have each year. We need as many opportunities as possible to appeal for more membership. Our ability to provide community service lies in how many members we can recruit, and we all benefit when this rule is as relaxed as possible. Thank you for all you do in the name of your constituents.</p> <p><i>"We are Better Together Than Alone"</i> <i>Have a nice day!</i> <i>Please confirm receipt.</i> Syd Nuñez, Bremerton Elks PER 747-225-1375 talk/text</p>		<p>reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
Michael Schrader, travlinman49@aol.com	5/16/23, 12:57 PM	To the Washington State Liquor and Cannabis Board:	5/22/23, 9:44 AM	Dear Mr. Schrader:

		<p>This email is a request that the WSLCB amend WAC 314-40-040 (6) to allow private clubs such as the Elks, Moose, Eagles, VFW, etc. to add an additional membership drive per quarter and host a membership drive on two consecutive days during one quarter per Calander year.</p> <p>Fraternal organizations are struggling for survival. Membership is the life blood of fraternal organizations. They assist our veterans, help the homeless and provide children's therapy just to name a few of their activities. Their members are a group of volunteers who devote their time and resources to helping our local communities. Please help them continue to serve our communities by adopting CR 101.</p> <p>Thank you,</p> <p>Michael Schrader 9001 NE 54th Street, Apt 105 Vancouver, WA 98662 360-839-6304</p>	<p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p>
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<p>Debra Raniero, draniero@gmail.com [COMMENT SUBMITTED AS PDF ATTACHED TO EMAIL]</p>	<p>5/17/23, 5:32 PM</p>	<p>From: William Phinizy, Commodore May 16, 2023 To the Washington State Liquor and Cannabis Board Subject: Petition for Adoption, Amendment, or Repeal of a State Administrative Rule - Private Club Membership Drives WAC 314-40-040(6). The Gig Harbor Yacht Club is incorporated in the state of Washington as Nonprofit Corporation with the sole purpose to continue as a prominent Northwest Yacht Club that promotes safe and knowledgeable boating while building lasting relationships through membership. By design, we are a fraternal organization that relies heavily on perpetuating membership in The Gig Harbor Yacht Club and as such are constantly working to maintain our member base as well as recruiting new members in an effort to not just maintain the member base but to increase over time our overall member base to ensure sustainability. The Board of Trustees for The Gig Harbor Yacht Club is very interested in joining in on and supporting the petition submitted by Mr. Keith Laurent on behalf of the Vancouver Elks #823 Lodge. The allowance for holding double the current number of membership drives throughout the year under our liquor license would be a huge benefit to The Gig Harbor Yacht Club in our ability to recruit new members more efficiently and ensure our organization's sustainability. Sincerely, [SIGNATURE] William Phinizy Commodore</p>	<p>5/22/23, 9:54 AM</p>	<p><i>LCB Policy & Rules Coordinators</i> Dear Ms. Raniero & Commodore Phinizy: Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email. The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest. Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest). The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW. Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p>
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				Thank you again for reaching out! <i>LCB Policy & Rules Coordinators</i>
CUT-OFF FOR COMMENTS				
Dane Kringstad, kringstadd@gmail.com	5/18/23, 6:49 AM	<p>My name is Dane Kringstad, I am the Coorespondent (secretary) for the forty et eight veterans club in Shelton club. We are the sponsors of the Mason County veterans club located in Shelton, Wa. Our club is comprised of veterans across multiple organizations (VFW, American Legion, VFW, etc), with the sponsoring club being the 40 et 8.</p> <p>More information can be found at: The Forty and Eight - What is the 40&8</p> <p>We fully endorse the preproposal statement of inquiry in adding a day per quarter; our quarterly membership drives has had an incredible impact on decreasing the impact of our membership.</p> <p>While we fully appreciate the local support private clubs like the Elks provide to their local communities and understand the difficulties in this day and age in recruiting new members; Veterans organizations struggles are far worse. In 2020, only 7% of the population in Washington State (Source, US Census and Veterans Administration) are eligible to become members. Between 2000 and 2020, Washington state has seen a decrease of 18% in the Veteran population and with the current aging status a significantly larger decrease will take place in the next 10 years. 2020 data from the VA shows that out of the 551,512 Veterans, 222,815 Service Members range from the WWII to the Vietnam era (Vietnam Veteran average age is 71); this will equate to a 40%</p>	5/22/23, 10:08 AM	<p>Dear Correspondent Kringstad:</p> <p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p>

		<p>deduction as these Veterans population continues to age.</p> <p>While our private club is just that, it is also an entrance point for Service Members to join and participate in in all of the great veteran programs in Mason county; raising money for local homeless veterans, recruiting volunteer Veteran Service Officers (who help process disabled veteran VA claims, etc.).</p> <p>Because of this, it would truly have a significant impact across the state if Veteran organizations would be allowed a monthly membership drive. This would allow us to advertise a set time frame every month to welcome veterans in (i.e. Third Saturday of each month). It would allow us to coordinate with groups like the Joint Base Lewis McCord (JBLM) transition team or Washington National Guard to provide this standardized time frame to discharging Service members, where veterans could come and check the club out and hopefully begin participating in all of the great things our clubs do to help local veterans.</p> <p>I hope you consider this additional as well to help us, help those that have served this country and would be available for any additional feedback!</p> <p>Dane Kringstad Correspondent, V-135 612-701-6476 'Quarante et huit'</p>		<p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Karen Helton, heltonks@gmail.com</p>	<p>5/18/23, 10:38 AM</p>	<p>To Whom it may Concern: I totally support the petition to increase the number of membership drives per year and have consecutive membership drive days during the year.</p> <p>Thank you</p>	<p>5/22/23, 10:11 AM</p>	<p>Dear Mr. Layton:</p> <p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to</p>

		<p>Roger Layton Member #131460 Elks Lodge #823</p>		<p>reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p> <p><i>LCB Policy & Rules Coordinators</i></p>
<p>Machine Werks, l_coder@hotmail.com</p>	<p>5/18/23, 2:10 PM</p>	<p>Sorry that this is a bit late. Our outlook on this situation is that, actually, we remember when we were only allowed once a year. Then, it</p>	<p>5/22/23, 10:28 AM</p>	<p>Dear Mr. Coder:</p>

		<p>went to twice a year. That was a perfect decision. But, allowing it to occur twice a quarter, we feel, takes away from the special availability. If the ability occurs twice a quarter, then we feel like the "specialty" would be no priority.</p> <p>Anyway, hope that that gave you a bit of another thought. However, we may be completely incorrect.</p> <p>Hope this helped.</p> <p>Machine Werks</p>	<p>Thank you so much for providing your comment on proposed draft rules on Private Club Membership Drives. Your input is valuable and we look forward to reviewing your feedback. If we have any questions we will follow up by email.</p> <p>The Washington State Liquor and Cannabis Board (LCB) relies on public feedback, and welcomes the opportunity to hear more from you! Public participation helps LCB develop inclusive, transparent, and accountable policies and rules that serve the public interest.</p> <p>Please visit the LCB's website for more information about Private Club Membership Drives and other current rulemaking activities. To get timely updates from LCB, please sign up to be on our GovDelivery email distribution list (select the Rulemaking option along with any other topic of interest).</p> <p>The LCB Board holds public meetings on Wednesdays at 10 a.m., twice monthly. Held both virtually and in-person, the meetings provide an opportunity for members of the public to address Board members during the Public Comment agenda item, or during scheduled Public Hearings held during the Board meetings. Board meetings are also broadcast live on the state's public access TV station TVW.</p> <p>Please visit LCB's Board meeting schedule and information webpage to learn more about observing or participating in a Board meeting. The next Board meeting will be held on May 24, 2023.</p> <p>Thank you again for reaching out!</p>
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