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**EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN  
DIRECTOR'S INTERPRETATION**

September 8, 2026

Initiated By:  
Director of Planning

**CASE NO.: DIR-2026-4632-DI  
SPECIFIC PLAN IMPLEMENTATION  
CEQA NO.: N/A**

**Alcoholic Beverage Authorization Procedures in the  
NI(EC), HJ(EC), HR(EC), MU(EC), and NMU(EC) zones  
within the Exposition Corridor Transit Neighborhood  
Plan Area**

Location: Exposition Corridor Transit Neighborhood Plan  
(Specific Plan)  
Council Districts: 5, 10, and 11  
Community Plan Area: West Los Angeles, Palms - Mar Vista  
- Del Rey, and West Adams - Baldwin Hills - Leimert  
Land Use: Various  
Zone: Various

**DETERMINATION**

Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.7.H, Section 13B.4.6, and the Exposition Corridor Transit Neighborhood Plan (Ordinance No. 186,402), I hereby:

**Determine** the Director's Interpretation is not a "project" as defined by CEQA Guidelines, Section 15378; FIND, based on the whole of the record, the Director's Interpretation was assessed in Exposition Corridor Transit Neighborhood Plan ("Expo TNP" or "the Plan") EIR (Case No. ENV-2013-622-EIR; SCH No. 2013031038), and pursuant to CEQA Guidelines Sections 15162, no subsequent or supplemental EIR is required.

**Interpret** that the Expo TNP does not preclude the utilization of administrative alcohol authorization procedures, including but not limited to the Restaurant Beverage Program (“RBP” or “the Program”) described in LAMC Sections 12.22-A.34 and A.35, as a valid application of the Plan regulations, and that administrative alcohol authorization procedures may be used in the NI(EC), HJ(EC), HR(EC), MU(EC), and NMU(EC) zones within the Expo TNP, insofar as the administrative alcohol authorization procedures are otherwise allowed in commercial and industrial zones. However, the Plan limitations on the percentage of total floor area that an alcohol-serving establishment may occupy in a Project within certain Expo TNP zones still apply.

## **AUTHORITY**

Pursuant to Section 13B.4.6 of the Los Angeles Municipal Code (“LAMC”), the Director of Planning (“Director”) has authority to interpret Specific Plans when there is a lack of clarity in the meaning of their regulations. Additionally, Section 1.1.6 of the Expo TNP grants the Director the authority to initiate and issue written interpretations of the Specific Plan’s regulations when there is a lack of clarity in the meaning of the regulations. Furthermore, Section 2.2.1.B of the Expo TNP provides the Director with the authority to determine uses that are substantially similar to those listed in Table D and would not result in additional impacts beyond what was analyzed as part of the Specific Plan.

## **BACKGROUND**

### Exposition Corridor Transit Neighborhood Plan Zones and Uses

The Expo TNP was developed as a result of a 2012 grant to the City of Los Angeles from the Los Angeles County Metropolitan Transportation Authority (“Metro”) in order to encourage infill development and a mix of uses proximate to five Exposition Line Light Rail Transit stations, which now constitute much of the westernmost extension of the Metro E Line, and across portions of City Council Districts 5, 10, and 11. The Expo TNP became effective on December 26, 2019. Among the sixteen items listed among the purposes of the Expo TNP in Section 1.1.2, two of the first three are to “direct commercial development near transit stations” and to “expand and strengthen the economic base of the City and generate tax revenue to fund key City services.”

In order to accommodate and promote these and other goals, many, but not all, sites within the Expo TNP area were rezoned. The new zones established by the Expo TNP were New Industry-NI(EC), Hybrid Industrial: Jobs Emphasis-HJ(EC), Hybrid Industrial: Residential Emphasis-HR(EC), Mixed-Use: Commercial/Residential-MU(EC), Neighborhood Mixed-Use: Commercial/Residential-NMU(EC), and Multiple Dwelling-R3(EC). The new zones were applied in a manner consistent with the pre-existing development patterns—with the NI(EC), HJ(EC), and HR(EC) zones replacing the previous industrial zoning and the MU(EC) and NMU(EC) zones replacing the prior commercial zoning. The new Expo TNP zones provide additional development incentives, such as increased height and floor area, along with a rebalancing of the ratios of allowable uses within a Project. Nonetheless, the new zoning would otherwise allow for development and uses substantially similar to what was allowed under the prior zoning.

The Expo TNP lists the allowable uses and limitations in these new commercial and industrial zones on Table D. One of the uses listed on Table D is “On-Site Alcohol Sales,” which Plan section 1.1.3 defines as “[a]ny establishment licensed by the Department of Alcoholic Beverage Control to sell or otherwise dispense alcoholic beverages for consumption on the establishment’s premises.” Further, each use on Table D is classified as one of the following: “not permitted,” “permitted,” “permitted with limitations,” or “conditional.” In nearly all new zones, “On-Site Alcohol Sales” is shown as “conditional.” Separately, in specified industrial zones—NI(EC) and HJ(EC)—the total floor area within a Project that can be allocated to an establishment with “on-site alcohol

sales” would also be limited to twenty percent. According to the corresponding description for a “conditional” use, such use is “permitted subject to the approval of a Conditional Use Permit adhering to the procedures in LAMC 12.24.”

#### Conditional Uses under LAMC Section 12.24

Conditional uses for the sale and dispensing of alcoholic beverages are generally described in LAMC Sections 12.24-W.1 and 12.24-X.2, which both require a decision through a Conditional Use Permit procedure described in LAMC Section 13B.2. Since March 1, 1977, the City of Los Angeles had regulated the sale and service of alcoholic beverages for on-site consumption as a conditional use requiring approval from a Zoning Administrator. To balance the economic benefits of allowing alcohol sales and service against public health and safety impacts, the City regulated certain aspects of alcohol sales and service, including the location, type, time, and manner of an establishment’s operation. Before a decision would be made, the Zoning Administrator would consider public testimony, either written or brought forward at a public hearing, as well as unique site and neighborhood characteristics.

However, in laying out the applicability of the Conditional Use Permit procedures, LAMC Section 12.24-A introduces the “Conditional Use Permit and Other Similar Quasi-Judicial Uses” section of the Zoning Code with the following: “These procedures apply only to uses in zones when not permitted by right.” Consistent with the LAMC as written at the time, the Expo TNP’s description of a Conditional Use Permit to allow the sale and service of alcoholic beverages for on-site consumption would have been required of every new establishment seeking to do so because no by right administrative procedures yet existed. As such, the by right allowances within LAMC Section 12.24 did not yet apply.

#### Application of Later Zoning Code Amendments to the Expo TNP

Subsequent to when the Expo TNP took effect in 2019, the City adopted two ordinances that would render unenforceable the Expo TNP’s description of “conditional” without those ordinance changes being accounted for in the application of the Plan.

First, Process and Procedures (Ordinance No. 187,712) has been in operation since January 22, 2024. The ordinance amended the LAMC to reorganize the rules related to the administration of zoning and land use decisions. As a result of this ordinance, the procedures for a Conditional Use Permit were moved to LAMC Section 13B.2 and out of LAMC Section 12.24. The reference to LAMC Section 12.24 remains in the text of the Expo TNP.

The other ordinance, the Restaurant Beverage Program (RBP, Ordinance. No. 187,402), went into effect earlier, on March 31, 2022. After more than forty years of regulating alcohol sales and service through the Conditional Use Permit procedures described earlier, a clear enough pattern of common project types and conditions of approval emerged that allowed the City to adopt RBP. RBP allows certain bona fide sit-down restaurants meeting strict development, operating, and good-neighbor conditions to obtain an alcohol authorization through a by right administrative procedure that is typically less time-intensive and more cost-effective than a Conditional Use Permit process for individual restaurants. An alcohol authorization under RBP is only allowed in those areas of the City where the Program is adopted through a City Council Resolution procedure, which includes periods of public deliberation and public hearings, including input from residents, business operators, other regulatory and enforcement agencies, and elected offices.

City Council adopted the RBP authorizing map for Council District 5 on May 27, 2022, followed by the maps for Council Districts 10 and 11 on May 31, 2022—all three of which would cover the whole of the Expo TNP area with a by right administrative alcohol authorization procedure.

## **DISCUSSION**

### Zone Equivalency for the Purpose of Regulating Alcoholic Beverage Sales, Service, and Consumption

The LAMC code sections for both the RBP and the Conditional Use Permit procedures to allow alcohol sales, service, and consumption specifically enumerate the zones in which their procedures are allowable. For both types of procedures, those zones consist of the same range of commercial and industrial zones: CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3. In fact, on all sites within the Expo TNP that retain the prior zoning, RBP has already been an available alternative to a Conditional Use Permit procedure.

For the purpose of regulating alcoholic beverage sales, service, and consumption, the Expo TNP follows the LAMC. Despite the fact that LAMC Sections 12.22-A.34 (RBP - General), A.35 (RBP-Alcohol Sensitive Use Zone), and 12.24-W.1 (Conditional Use for Alcoholic Beverages) do not reference the new Expo Plan zones, Table D in the Expo TNP nonetheless references the Conditional Use Permit process in LAMC Section 12.24 because all Plan zones that conditionally allow “On-Site Alcohol Sales” are fundamentally commercial and industrial zones.

Insofar as the Plan regulates procedures, RBP promotes the goals of the Expo TNP, is already an available option within the Plan area, and is a conditional administrative alcohol authorization procedure allowable in the same range of zones as a Conditional Use Permit for alcohol sales, service, and consumption under LAMC Section 12.24-W.1.

## **CEQA FINDINGS**

The Director’s Interpretation is not a “project” as defined by CEQA Guidelines Section 15378 because it constitutes an administrative activity to assist in the implementation of the Exposition Corridor Transit Neighborhood Plan (Ordinance No. 186,402), which became effective on December 26, 2019, and does not change the allowed uses under the plan. Even if it were found to be a project, the Director’s Interpretation was assessed in the Exposition Corridor Transit Neighborhood Plan EIR (Case No. ENV-2013-622-EIR; SCH No. 2013031038) (“EIR”), and, pursuant to CEQA Guidelines Sections 15162, no new supplemental nor subsequent EIR is required because the interpretation does not change the project and will not result in any new or more severe significant impacts that were not assessed in the EIR. Any future use of an administrative alcohol authorization procedure, such as RBP, in the Plan area will be consistent with the uses already occurring there, including restaurants that sell and serve alcoholic beverages for on-site consumption. It is not foreseeable that the Director’s Interpretation would induce more activity nor disincentive activity.

## **DETERMINATION**

By the authority of LAMC Section 11.5.7.H, LAMC Section 13B.4.6, Expo TNP Section 1.1.6, and Expo TNP Section 2.2.1.B, I hereby determine that an administrative alcohol authorization approved under RBP is substantially similarly to an approval under LAMC Section 12.24-W.1 or X.2 for a Conditional Use Permit insofar as the development, operational, and administrative standards required for the alcohol authorization, such as those in RBP, are maintained. However, the Plan limitations on the percentage of total floor area that an alcohol-serving establishment may occupy in a Project within the NI(EC) and HJ(EC) Expo TNP zones still apply.

By the authority of LAMC Section 11.5.7.H, Section 13B.4.6, and Expo TNP Section 1.1.6, I also hereby determine that, for the purpose of applying alcohol-related regulations, the NI(EC), HJ(EC), and HR(EC) zones in the Expo TNP are equivalent to M zones, and the MU(EC) and

NMU(EC) zones are equivalent to C zones—where LAMC Sections 12.22-A.34, A.35 and 12.24-W.1 make reference to the following zones: CR, C1, C1.5, C2, C4, C5, CM, M1, M2, and M3.

Where a City Council Resolution has adopted RBP as a by right procedure to authorize the sale, service, and consumption of alcoholic beverages in the Expo TNP area, an alcohol authorization through RBP may be sought for establishments on sites zoned NI(EC), HJ(EC), HR(EC), MU(EC) and NMU(EC).

Any Conditional Use approved for the sale, service, and consumption of alcoholic beverages remains enforceable, insofar as the approval otherwise remains active and valid.

#### **APPEAL PERIOD - EFFECTIVE DATE**

The determination in this matter will become effective on September 23, 2026 unless an appeal therefrom is filed with the Department of City Planning on or before that date. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at <http://planning.lacity.org>. Department of City Planning public offices are located at:

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The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.



VINCENT P. BERTONI, AICP  
Director of Planning

CW:SR:JB