

Lake Chelan Recreation, Inc.
dba Lake Chelan Boat Company / Lady of the Lake
P.O. Box 186
Chelan, WA 98816

January 23, 2019

Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Public Comments regarding TS-180677 Backcountry Travels LLC ferry application - Opposed

To whom it may concern,

Lake Chelan Recreation, Inc. dba Lake Chelan Boat Company submits the following comments in regards to all information submitted to the UTC on behalf of Backcountry Travels, LLC's certificate application under Docket TS-180677. Lake Chelan Recreation, Inc. strongly opposes the application.

The decision to drop the protest initially filed was based on the enormous costs (mainly attorney and staff time) involved in a formal protest of this application. LCRI management feels this was a prudent decision based on the costs that would ultimately fall on passengers/public served. The decision was also based on the understanding that this certificate application will still be subject to full scrutiny by the UTC regulations/laws.

Abbreviations used in this document:

LCRI - Lake Chelan Recreation, Inc.	LCBC - Lake Chelan Boat Company
BT, LLC - Backcountry Travels, LLC	NPS - National Park Service
F.Pt - Field's Point	NCL - North Cascades Lodge (NPS Concession in Stehekin)
USFS - U.S. Forest Service	

EXHIBIT A - 1998 Hearing No B-78659 document attached: We respectfully request that the UTC review James Courtney's certificate request, Hearing No B-78659, S.B.C. Order No 549 dated August 4, 1998. It was a similar request, and the certificate was denied. In 1997, the year this case was based on, the passenger ridership was 10,219 more one-ways than 2018 (or equivalent of 5109.5 round trips), and it was determined then that there was no unmet need for additional commercial passenger service on Lake Chelan.

We suggest that the findings of fact and conclusions should be the same in regards to Backcountry Travels, LLC's application. The most significant of those are:

- Lake Chelan Recreation Inc, dba Lake Chelan Boat Company holds certificate B-34 which authorizes it to provide service between the points proposed for service in Stehekin Boat Service's (Backcountry Travels, LLC's) application.

- Lake Chelan Boat Company has not failed or refused to furnish reasonable and adequate service to the traveling public on Lake Chelan, nor has it failed to provide the service described in its certificate or tariffs.
- There is no unmet need for commercial passenger service on Lake Chelan. Existing schedules, capacity and quality of service are adequate to satisfy the demonstrated needs of the traveling public. The public convenience and necessity do not require the proposed service.
- Stehekin Boat Service's (Backcountry Travel, LLC's) proposed operations, if approved, would affect adversely Lake Chelan Boat Company's existing operations.

EXHIBIT B - page 9 Hearing No B-78659 S.B.C. Order No. 549, is also similar and significant:

When Stehekin Boat Services (Jim Courtney) proposed they would offer "specialized services" the Commission ruled this was "incorrect". Further, "Stehekin Boat Service seeks to provide service identical in all material respects to the service Lake Chelan Boat Company offers. The facts that Applicant's proposed service offers a different schedule for passenger and light freight transport between identical termini on Lake Chelan and may appeal to only limited segments of the traveling public (i.e., Stehekin residents and overnight guests who stay at Stehekin, according to applicant), rather than to all travelers, does not make it "specialized"."

EXHIBIT C - 2018 Lake Chelan Boat Co - Capacity vs Passenger Count shows that public convenience and necessity does not require the proposed service.

Lake Chelan Boat Company is fulfilling service appropriate for the ridership, and continues to balance providing adequate off-season ferry service while maintaining reasonable year-round fares. Lake Chelan Boat Company has not failed or refused to furnish reasonable and adequate service or failed to provide the service described in its certificate or tariffs. This 2018 passenger count chart shows that LCBC is providing adequate service. During the highest ridership months (from April through October) when there is the most potential for tourism growth, there is substantial ridership availability.

If ridership increased during low ridership months, LCBC's scheduled days would increase with the demand. Therefore, additional service is not necessary, as there is no substantial unmet need that warrants a duplicating service.

Additionally, if it was determined due to increased opportunities and traffic, or if the UTC felt that LCBC was under serving and additional runs were justified, LCBC would increase its scheduled runs. The manner in which the service is regulated and how the allowed profit margin is determined by the UTC, there is no loss to LCBC for running additional service. If there is an increase in runs that result in financial losses, rates increase. With that said, it is important to note again, running additional losing runs puts a financial burden on the majority of passengers that travel the seven months of April through October (90.24% of traffic). Note: The five months of Nov-March represent 9.76% of the annual traffic.

Per RCW 81.84.020 Backcountry Travels, LLC must show that the existing certificate holder, Lake Chelan Recreation, Inc. has failed or refused to furnish reasonable and adequate service or has failed to provide the service described in its certificate or tariffs: BT, LLC has not.

EXHIBIT D - Analysis of financial affect on LCBC: Analysis of Traffic loss/financial losses to Lake Chelan Boat Company with proposed Backcountry Travels LLC's service.

Per Exhibit D, the loss of passenger income to LCBC would be between \$225,449 and \$283,887. This exhibit shows the negative financial affect BT, LLC's service, which is proposing to serve identical routes with no proof of new customers, would have on LCRI's current service.

If this certificate was granted, it would have a detrimental financial effect on Lake Chelan Boat Company's service and thus on the passenger rates and the schedules LCBC provides now, and would provide in the future. We base this on the fact that BT, LLC provides no proof that their passenger traffic would be "new additional" passengers. Thus, it is based on the control of boat ticket sales through local businesses, residents, and other avenues to take passengers away from Lake Chelan Boat Company.

A list of cabins that have opened since 1999 (52 units) and future possible cabin availability (57 units) does not prove increased ridership. Fifty-two of these units have been available for years and mostly only open during the summer season, thus the renters of those accommodations are current LCBC passengers. The potential 57 units to open in the future have yet to happen. Suggestions that the NPS Concessionaire (NCL) would expand services is an unproven suggestion. To date since 2006, the NCL operation has not proven to expand visitation from November through March, and has even had complete closure periods. They are in a complete closure period at this time, leaving no services at all in Stehekin (January 2019).

Facts being misstated by BT, LLC, and public comments by poorly informed potential riders

1. Here are the facts on what is called "severely cuts back ferry schedule" and references that LCBC only runs 3 days per week in the off season or non-peak season.

EXHIBIT H - Lady of the Lake 2018 Year Round Sailing Schedule:

Facts: January 1 - March 31 is the only period that boat service is cut to 3 days per week. This is due to very low ridership and lack of visitor services in Stehekin. At best, NCL opens during boat time for lunch during this time, and that has been intermittent since 2006.

LCRI's published sailing schedule shows substantial service and is as follows:

January 1 - March 31:	Lady Express runs 3 days a week - Capacity 110 (due to weather)
April 1 - April 30:	Lady Express runs 5 days a week - Capacity 130
May - June 15:	Lady of the Lake II runs Daily - Capacity 289 and Lady Express runs Sat, Sun, Mon on Memorial Day Weekend-Increasing total Capacity to 419
June 16-September 22nd:	Lady Express and the Lady of the Lake II run Daily - Capacity total 419
October 16-October 31:	Lady Express runs 5 days a week - Capacity 130

November 1-December 31: Lady Express runs 4 days a week - Capacity 110 (due to weather)

2. Mr. Courtney's statement that travel is currently underserved by the sole provider is not factual, it is his opinion based on people suggesting "they will take advantage of the new services". Further public comments in regards to supporting daily service are based on desire, not on knowledge of what the cost increases would be to them or the viability of BT,LLC's service.

Facts: [EXHIBIT C - 2018 Lake Chelan Boat Co - Capacity vs Passenger Count](#)

3. Mr. Courtney's statement that "We intend to offer a vessel that will substantially reduce travel time across Lake Chelan" and public comments inferring that LCBC service is too slow are not factual.

Facts: LCRI's Lady Express travel time is shorter. The following is departure times from F.Pt to Stehekin for comparison:

BT,LLC proposes (not proven) depart F.Pt 1:00pm, arrive Stehekin 2:45pm = 1 hour 45 minutes
LCRI Lady Express (June-Sept) depart F.Pt 9:20am, arrive Stehekin 11:00am = 1 hour 40 minutes
LCRI Lady Express (Nov-Apr) depart F.Pt 10:50am, arrive Stehekin 12:30pm = 1 hour 40 minutes

4. Mr. Courtney's statement "The service currently provided by the Lady of the Lake is geared toward sight-seeing tourists who never leave the boat, freight transportation and summer tourism because the service runs only three days per week during non-peak months", and public comments in this regard are not true.

Facts: The truth is the only time passengers never leave the boat is when they have nothing to do but stand outside the boat in the freezing cold at the Stehekin Landing with nowhere to go. This happens only when NCL in Stehekin closes intermittently during Jan, Feb, March. When this happens LCBC crews allow passengers to stay on board during the layover in Stehekin. This is happening right now. NCL has closed completely for an undetermined time (January of 2019)

During all other times of the year, all passengers leave the boat every day. They take the Rainbow Falls bus tour, the Stehekin Pastry shuttle, rent bicycles/other items from Discovery Bikes and from the Courtney Log Cabin rentals, visit the NPS Golden West Visitor Center and local Craft Shop, visit Karl's Organic Garden, eat at NCL, enjoy short hikes, or simply stroll the Stehekin Valley road, etc.

LCBC serves a wide variety of passenger types, from families and individuals staying overnight at local accommodations/camping, day or long-haul hikers, residents, cabin owners, commuters, etc. LCBC serves all types of passengers to the up lake regions of the lake, including Stehekin. It is not simply a sight-seeing service. However, it should be noted by all who depend on the service, the importance of this segment of the ridership, as they heavily contribute financially to being able to provide the service at the current level and pricing.

5. Mr. Courtney's statement "The decisions as to scheduling made by the Lady of the Lake have caused an unnatural depression of economic prosperity in the Stehekin area which relies heavily on tourism", and public comments made in this regard are far from the truth. LCRI disagrees with the notion that "A second passenger service on Lake Chelan will be a boon to local economy".

Facts: see [EXHIBIT E - Stehekin Business Operations and LCBC Boat Schedule/Capacity](#)

LCRI's sailing schedule provides 5 day a week service into Stehekin in April and from October 16-31. In between those dates daily service is available and most dates two boats run per day. The months of April, May and October are far more lucrative for tourism than November through March. Stehekin businesses have not expanded their tourism industry opportunities during these busy shoulder months, even though it is the time of the year when travel to our region (Chelan area) and Stehekin are still very popular.

The majority of visitors to our area are from the West side of the mountains (WA), which require traveling over mountain passes. During the months of January through March, road and weather conditions greatly affect visitation to Chelan and Stehekin. Enjoyment of the outdoors is much more challenging. Why does BT, LLC think expanding service during the more weather challenging time of the year is so crucial to the Stehekin business owners, when they currently under serve busy season visitors?

Furthermore, the work force in general (potential visitors) have much more flexible work schedules than years ago. Even in our very slowest service months of Jan, Feb, March, a family (party) could go to Stehekin on a Friday, enjoy the beautiful peaceful Stehekin Valley in a cabin or at NCL, and come out on a Monday (as long as they are open and available). Holden Village (Port of Lucerne) operates a very successful business during these month with the current sailing schedule.

LCBC transportation schedules are not the reason Stehekin tourism is not thriving. If Stehekin tourism is to expand, businesses must remain open and advertise.

6. LCRI was able to expand boat services when it held the NPS Concession Contract to operate NCL, because NCL was open year round. This proves LCRI's willingness to expand if passenger counts warrant it.

No concessionaire after 2006 has offered services that warrant continued expanded service. [EXHIBIT F - NPS Document, NCL Frequently Asked Questions](#) explains the closures and reduced NCL contract obligations that occurred after 2006. This is why, and when the boat schedule changes for the timeframe of January through March started. In addition, the current NPS (NCL) Concession Contract does not require more services in this timeframe or the slower season. Mr. Courtney's belief that the NCL restaurant and hotel business will be able to stay open all year long, as it did when the concession was held by the owner of Lake Chelan Boat Company, is not an informed statement. Per [Exhibit F](#), it is noted that in 2008 "Potential bidders commented that the very large operational costs associated with winter operations didn't balance small amount of revenue produced." Therefore, there were no bidders on that prospectus, nor were expanded services required in any future contract or in the current concession contract.

7. BT,LLC's application notes on Item 15 that Mr. Courtney has "No commercial ferry experience."

To LCRI's knowledge he has been a partner or owner in a Stehekin based business that operates horseback trips, and his parents operate Stehekin Valley Ranch with rustic overnight accommodations and meals. What are the parallels between horseback trips or the family business and a commercial ferry service?

8. Public comments indicating that LCBC rates are too expensive: There is a lack of transparency in the public information put out by BT,LLC as some tout LCBC's service as being "too expensive" and looking forward to better prices.

Facts: BT,LLC submitted rates of \$39 per one way, or \$78 round trip. LCBC rates for the same route is \$24 one way or \$40.50 round trip. From June 15-September 22, the Lady Express is the service with the closest comparable and its rates during that time are \$37 one way, or \$61 round trip. Under all scenarios, LCBC's service is less expensive. Regarding commuter packs, a person must only travel 5 round trips in a year (10 one ways) to purchase tickets in their name. If a person does not travel at least 5 round trips per year is it appropriate to get a discount while other riders pay full fare?

9. Comments regarding the inconveniences of living in the remote Stehekin Valley:

There are many comments in regards to the inconvenience of living in Stehekin, and the convenience that a daily year round service would provide to the very small segment of ridership that resides in Stehekin. This is very understandable. Of course daily service would be nice, not sustainable, but nice. Stehekin residents and cabin owners are very fortunate to be able to live in, and visit such a secluded and beautiful place. With that decision comes some inconveniences. Daily service for this segment of ridership should not fall financially on the backs of others (96.2% of the ridership). Stehekin commuter traffic represents approximately 3.8% of the ridership. Currently, of the 116 Stehekin commuter ticket holders, approximately 57 live in the valley full time and 59 do not. Approximately 17 of the 57 who live in the valley full time have second homes in Chelan, Manson or Wenatchee (within 40 miles).

10. Chelan Seaplanes (Float Plane Service) [EXHIBIT G - picture of Chelan Seaplanes website on 1/4/19](#): Chelan Seaplanes lost its port on the lake when Sunset Marina was built in their past location a few years ago. Since that time the owner has been working to secure a Chelan landing area. Lake Chelan waterfront property is extremely expensive and transportation locations are difficult to find. However, Chelan Seaplanes is confident it has a location secured for 2020 and per their website expects to be back operating in 2020.

11. Traveling times: [EXHIBIT I - Chelan Sunrise and Sunset times](#) shows the daylight times, along with LCBC's latest Field's Point departure times and earliest Field's Point arrival (return) times:

Many public comments state that LCBC schedules are not convenient for their needs to travel to the boat for up lake travel and for travel home during daylight hours on their return. LCBC's schedules during the times of the year when 90.24% of passengers travel allow for this.

From April through October when 90.24% of the annual traffic travels, boat departure times from Field's Point range from 9:20am, 9:45am, 10:50am and return times range from 1:45pm, 3:10pm, 4:45pm. During this time of the year, daylight is sufficient to travel, at a minimum, 3 hours away (slightly less in October).

During Nov, Dec, Jan, Feb, March (9.76% of traffic) F.Pt departure is 10:50am and return is 3:10pm. Both of these are reasonable travel times.

Further, when a person travels to a destination such as Stehekin, it should not be expected to be a daytrip from home to Stehekin, if you live a long distance (such as Oregon) from Field's Pt. If traveling some during hours of dark is required, that is what we all face at times when traveling.

12. Public comments in regards to the boats being full are misleading. We would challenge these statements with providing a date. With two boats running daily from mid-June to late-September, over 400 seats are available each day.

Commuters, residents, late comers, and those who have not pre-purchased tickets during busy times, may be stating their desire to walk up on any day and get on board the Lady Express (not the Lady of the Lake II). LCRI cannot hold (save) seats from the public on the Lady Express each day just in case a commuter, resident, or rider has not planned ahead.

The Lady Express can fill up during the busiest of days, but those planning in advance will secure seats. If they cannot travel on the Lady Express, the Lady of the Lake II holds 289 passengers and is always an option, aside from some years on Memorial Day Weekend (due to group bookings) when it may fill to capacity.

13. Some supporters of BT,LLC's proposal complain of the noisy and workboat type vessels that we operate. We have vessels built for safety above all else, and we receive compliments often about the comfort of our boats. The Lady of the Lake has a 4.5 star rating with both Google and TripAdvisor, with specific compliments about the comfort of the vessels.

Per RCW 81.84.020 (2)

Applicant must prove that they possess adequate financial resources to operate the proposed service for at least one year.

LCRI is aware that commission staff has determined that BT,LLC passes this test. However, LCRI offers the following concerns in that regard:

Backcountry Travel LLC's application is presented with minimal financial planning, with no recognition of the reduced fares they are proposing for children and commuters. They have not clearly addressed the issues of experienced operators, a backup boat for safety and reliability, an overnight docking facility/fueling/sewage disposal sites (or full costs for those items), and are proposing a sailing schedule that is unrealistic for the demand.

1. BT,LLC calculated all passenger fares at the full adult fare of \$39 one-way. There are no calculations for half fare children rates and 10% discounted commuter rates (a targeted group), nor have reduced rates to Lucerne or other lesser destinations been presented, which has been mandated for LCBC's service. These items should be part of the calculations, which would reduce BT,LLC's income. This would require their passenger counts to be higher, or rates to be higher. Note: Stehekin Commuter passengers are 14.5% November through March, 2.8% April through October, and 3.8% of LCBC annual passengers.

2. LCRI believes the ridership numbers are overstated for the timeframe of November through March based on the number of passengers carried by LCBC during that time of the year. BT,LLC states it used conservative numbers. LCBC's 2018 total passenger count, to all destinations, for the 5 months of Jan, Feb, March, Nov, and Dec was 5,834. BT,LLC is proposing to take 3,016 of those, leaving 2,818 for the LCBC service.

However, more significant is when looking only at Stehekin passengers (the passengers BT,LLC's schedule caters to) during Nov through March, LCBC's 2018 total passenger count was 3,319. With BT,LLC suggesting they will carry 3,016, that would have LCBC running into Stehekin for 5 months to carry a total of 303 passengers (an average of 60.6 total passengers per month).

If this service were allowed, it would be appropriate for LCBC to discontinue running during that time of the year. That would present many issues from all services from Chelan, freight, food, and mail deliveries to name a few.

We suggest that BT,LLC's offer to run daily during this very slow time of the year, and focusing on that timeframe is a way to acquire a certificate. Due to true traffic and viability we believe BT,LLC would move toward only providing service during the profitable time of the year in future years if allowed. Proposing to run daily November through March is unrealistic, even with an increase in traffic, and puts an even higher cost burden on the high season passengers, especially if two services are running. There are approximately 70-80 residents in Stehekin during the timeframe of Nov through March, who travel occasionally. This is the focus of the service BT,LLC is proposing during that time, at least until more visitor opportunities were to occur.

Further, Stehekin commuters represent 14.5% of the traffic November through March (commuter/reduced fare passengers). The concept that commuters want to pay twice as much during that time (BT,LLC's proposed rates) and/or that they will travel more often, thus causing higher counts, is a leap of faith. Stehekin commuters and residents have generally been very price sensitive. LCBC challenges the concept of over-serving a very small segment of users (November through March) at the expense of the majority of passengers who already financially support the service.

3. How were the passenger counts for the 7 months of April through October established? If they are simply numbers of guests and current customers of Courtney businesses (predominantly Cliff Courtney's Stehekin Valley Ranch) and commuters, then BT,LLC is simply taking passengers from LCBC's current service. If BT,LLC's service is allowed, LCBC Passenger numbers would decrease and fares would increase, unless there is an increase in new traffic.

4. What costs have been calculated for back up boat service when the boat experiences breakdowns?

5. The statement is made by BT, LLC that it will use existing facilities owned by local businesses for maintenance, fueling, pumping, servicing and mooring of the vessel. LCRI questions that \$500 a month or \$6000 per year is a sufficient line item for lakeside fuel storage, pumping and moorage not only in Stehekin but fees to the NPS and USFS for use of the docks on the lake that BT, LLC proposes using. LCRI is not sure what "This will further promote local business that already specializes in these services" means. The main (only?) gasoline fueling facility in Stehekin is at NCL. We question that NCL has the capacity to provide fuel for this boat service without putting an undue burden on them. What businesses in Stehekin specialize in maintenance, pumping, servicing and moorage that BT, LLC's service believes it would enhance?

6. What is the experience of the Captain the boat? Have appropriate wages been attached to that experienced staff? We understand that Public Safety is another dimension of regulatory fitness, which goes to the experience of Captains and back up boat abilities to ensure safe passage.

Safety of Passengers, Crew and Vessels: Changes made to the service on Lake Chelan should recognize the importance of assuring safety of the passengers, crew and vessel. Lake Chelan waters can go from very calm, to very stormy quickly and without warning, and can be very dangerous. There are no roads for rescue services to reach vessels in distress, and there are limited areas to safely moor a vessel in the upper reaches of Lake Chelan. The water temperatures are below what a person could tolerate.

Lake Chelan Boat Company operates with the mindset that there is always a vessel at the dock (fueled and ready to go), and/or another vessel on the water running a schedule, that could assist a vessel in distress. All vessels have two operating engines at all times, with an additional working engine in storage for each vessel, to be available if an engine breaks down. This allows LCBC to continue with dependable and safe service. Engines do break down when they are used, so this happens periodically.

We contend that the risks of allowing this service to operate and struggle/fail on the backs of the rates that passengers would ultimately pay for both services is a wrong decision.

Consequences of jeopardizing the future strength of passenger service on Lake Chelan:

Backcountry Travels LLC's proposed operations, if approved, would affect adversely Lake Chelan Boat Company's existing operations.

If a smaller service is allowed to pick off current passengers from the larger service just by offering a slightly different schedule, how will the UTC turn down the next applicant that has a slightly different twist on serving the same area? Some examples would be the NPS concessionaire in Stehekin, Holden Village, and Manson. Would history not repeat itself?

It would seem that if the UTC believed Stehekin was being underserved by way of complaints, the need/desire vs. the cost of that need/desire would be analyzed, and if it was determined that more service was justified, LCRI could be asked to fill that need. Rates and schedules would be adjusted, and a strong service would remain in place.

LCBC's level of service requires a significant investment. If Lake Chelan Boat Company's service ceased to exist, a new service provider, of necessary size to meet the demand, would need to purchase very expensive land, an operable dock for all water levels, a facility with storage buildings, an office, parking, a railway car to pull vessels for inspection and repairs, fuel storage and fueling abilities for all water levels, not to mention large commercial vessels to operate the service at the current level. The rates for that service would look entirely different than the service the public enjoys today under the current conditions.

In closing, if over service does occur due to the decisions of the UTC, it would be out of LCRI's control, and LCRI would be forced to follow through appropriately with rate and schedule changes. We hope that those with vision of the past and the future prevail with the correct decision.

Thank you for your time and consideration of our comments. We request that information in regards to this application continue to be sent to cindy@ladyofthelake.com and/or P.O. Box 186, Chelan, WA 98816.

Thank you for your time.

Sincerely,

Jack Raines

Jack Raines, President

Lake Chelan Recreation, Inc.

EXHIBIT A

SERVICE DATE

AUG 04 1998

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of)	
)	HEARING NO. B-78659
JAMES COURTNEY d/b/a STEHEKIN)	
BOAT SERVICE)	
)	S.B.C. ORDER NO. 549
for a Certificate of Public Convenience and)	
Necessity to Operate Vessels in Furnishing)	COMMISSION DECISION AND
Passenger and Freight Service.)	ORDER DENYING REVIEW;
)	AFFIRMING AND ADOPTING
)	INITIAL ORDER
.....))	

NATURE OF PROCEEDING: James Courtney, d/b/a Stehekin Boat Service, applied for a Certificate of Public Convenience and Necessity to operate vessels in furnishing passenger and freight service on Lake Chelan. The authority requested overlaps that held by Lake Chelan Recreation, Inc. d/b/a Lake Chelan Boat Company under Certificate No. B-34. Lake Chelan Boat Company protests the application.

INITIAL ORDER: Administrative Law Judge Dennis J. Moss entered an Initial Order on June 22, 1998. The Initial Order would deny the application.

ADMINISTRATIVE REVIEW: Stehekin Boat Service seeks administrative review. It asks the Commission to reverse the essential findings of fact and conclusions of law set forth in the Initial Order and to grant Stehekin Boat Service's application.

COMMISSION: The Commission denies the Petition for Administrative Review, affirms, and adopts the Initial Order. Stehekin Boat Service failed to carry its burden to show the existing certificate holder, Lake Chelan Boat Company, has failed or refused to furnish reasonable and adequate service or has failed to provide the service described in its certificate or tariffs. Stehekin Boat Service failed to demonstrate the public convenience and necessity require the proposed service. Stehekin Boat Service failed to carry its burden to show it has the financial resources to operate the proposed service for at least twelve months. RCW 81.84.020 therefore requires us to deny Stehekin Boat Service's application.

APPEARANCES: Michael D. Duppenhaler, Registered Practitioner, Seattle, represents Applicant, Stehekin Boat Service. Kenneth Hobbs, Attorney, Seattle, represents Protestant, Lake Chelan Boat Company. Ann E. Rendahl, Assistant Attorney General, Olympia, represents the Commission Staff.

We agree with the Initial Order that this evidence reflects adversely on Applicant's general fitness to provide the proposed service. We do not decide whether this would be an adequate basis, standing alone, to deny the application. That analysis is unnecessary because Stehekin Boat Service otherwise failed to carry its burdens and clear the statutory hurdles for entry to passenger ferry service on Lake Chelan.

FINDINGS OF FACT

1. On July 3, 1997, James Courtney d/b/a Stehekin Boat Service filed an application for a certificate of public convenience and necessity to operate a commercial ferry service between points on Lake Chelan, Washington.

2. Lake Chelan Recreation, Inc. d/b/a Lake Chelan Boat Company holds Certificate No. B-34 which authorizes it to provide service between the points proposed for service in Stehekin Boat Service's application. Lake Chelan Boat Company protested the application on July 28, 1997.

3. Lake Chelan Boat Company has not failed or refused to furnish reasonable and adequate service to the traveling public on Lake Chelan, nor has it failed to provide the service described in its certificate or tariffs.

4. There is no unmet need for commercial passenger ferry service on Lake Chelan. Existing schedules, capacity, and quality of service are adequate to satisfy the demonstrated needs of the traveling public. The public convenience and necessity do not require the proposed service.

5. Stehekin Boat Service failed to show it has the financial resources to operate the proposed service for at least twelve months or that it otherwise is financially fit and prepared to operate commercial passenger ferry service on Lake Chelan.

6. Stehekin Boat Service's proposed operations, if approved, would affect adversely Lake Chelan Boat Company's existing operations.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the subject matter of this application and the parties pursuant to RCW 80.01.040 and RCW 81.84.005, *et seq.*

2. The Commission is not empowered to grant a certificate of public convenience and necessity to Stehekin Boat Service to operate in territory already served by existing certificate holder Lake Chelan Boat Company, because the existing certificate holder neither "has failed or refused to furnish reasonable and adequate

service" nor "has failed to provide the service described in its certificate or tariffs." RCW 81.84.020(1). Stehekin Boat Service's application accordingly must be denied.

3. The Commission must not grant Stehekin Boat Service a certificate for commercial passenger ferry service for the public use for hire between fixed termini or over a regular route upon the waters within Washington State, including Lake Chelan, because Applicant failed to show the public convenience and necessity require the service proposed. RCW 81.84.010.

4. Applicant's failure to demonstrate it is financially fit and financially able to operate the proposed service for at least twelve months requires that the application be denied. RCW 81.84.020(2).

ORDER

IT IS ORDERED That Application No. B-78659 by James Courtney d/b/a Stehekin Boat Service for a certificate of public convenience and necessity to operate vessels in furnishing passenger and freight service on Lake Chelan, Washington is denied.

DATED at Olympia, Washington and effective this 3 day of ^{August} ~~July~~ 1998.



ANNE LEVINSON, Chair



RICHARD HEMSTAD, Commissioner



WILLIAM R. GILLIS, Commissioner

NOTICE TO PARTIES:

This is a final order of the Commission. In addition to judicial review, administrative relief may be available through a petition for reconsideration, filed within 10 days of the service of this order pursuant to RCW 34.05.470 and WAC 480-09-810, or a petition for rehearing pursuant to RCW 80.04.200 or RCW 81.04.200 and WAC 480-09-820(1).

may be constructed at some indefinite future time. This is not substantial competent evidence from which increased demand for passenger ferry service can be inferred.

The balance of Stehekin Boat Service's argument against the Initial Order's third finding of fact and underlying analysis is somewhat less focused. Applicant states the principle that "[w]here the supporting shipper testifies that it is aware of the Protestants [sic] services and they demonstrates [sic] that the applicants [sic] specialized services are better suited to their [sic] requirements it supports that the existing service is not adequate." Petition at 3. Applicant's suggestion that Stehekin Boat Service proposes to offer "specialized services" is incorrect. Stehekin Boat Service seeks to provide service identical in all material respects to the service Lake Chelan Boat Company offers. The facts that Applicant's proposed service offers a different schedule for passenger and light freight transport between identical termini on Lake Chelan and may appeal to only limited segments of the traveling public (i.e., Stehekin residents and overnight guests who stay at Stehekin, according to Applicant), rather than to all travelers, does not make it "specialized." ★

The only distinct service Applicant proposes, compared to what Lake Chelan Boat Company offers, is the year around transportation of pets. Before Stehekin Boat Service filed its application, Lake Chelan Boat Company offered pet transportation only during the off-season.² The Initial Order analyzes this point thoroughly. We reexamine the evidence and agree with the Initial Decision that "problems associated with [Lake Chelan Boat Company's] animal shipment policy are infrequent and isolated. Shippers . . . have alternatives Animals, including pets, can be shipped via barge, tour boat, or float plane on a year around basis . . ."

We further agree with the Initial Order that Stehekin Boat Service's willingness to transport pets during the summer months does not make its proposed service "materially different from that presently available in terms of the nature or quality of service." The customer class that might be defined in part by a desire to ship pets during the summer season is not large enough to make that feature of the proposed service consequential to our analysis of the existing service's adequacy. The difference between the two pet policies is particularly a matter of small consequence given that several pet transportation alternatives exist to meet shipper's needs.

The other aspect of Stehekin Boat Service's argument that its supporting shipper witnesses demonstrated "special needs" unfulfilled by Lake Chelan Boat Company relates exclusively to the question of daily schedules. The Initial Order

² We follow our usual practice and do not consider Lake Chelan Boat Company's decision, first announced at hearing, to offer year around pet transportation.

2018 Lake Chelan Boat Co - Capacity vs Passenger Count

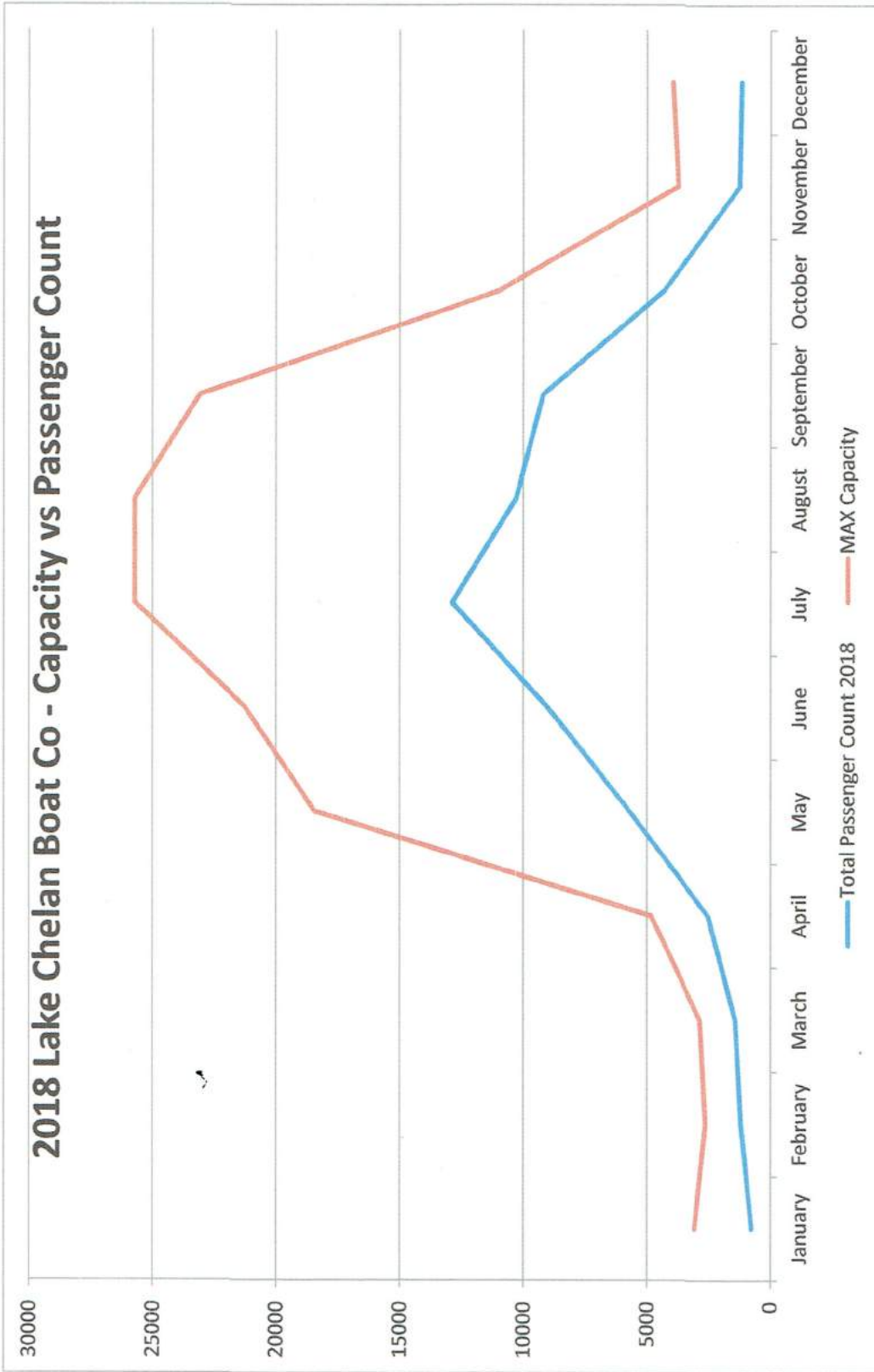


EXHIBIT D

EXHIBIT D - Analysis of financial affect on LCBC

Analysis of Traffic loss/financial losses to Lake Chelan Boat Company with proposed Backcountry Travels LLC service.

Loss to Lake Chelan Boat Company range between \$225,449. and \$283,887.

Condition: using BT, LLC projected passenger counts

	Passengers lost		Income loss to Current Service LCRI		
	BT, LLC Projected Pass. Count One Way	BT, LLC Counts Converted to Round Trip	LCBC Passenger Round Trip Rate	LCBC Projected Lost Income	
Jan-18	596	298	40.50	12,069.00	
Feb-18	580	290	40.50	11,745.00	
Mar-18	620	310	40.50	12,555.00	
Apr-18	600	300	40.50	12,150.00	
May-18	340	170	40.50	6,885.00	
Jun-18	900	450	61.00	27,450.00	** Stehekin Valley Ranch guests primarily travel
Jul-18	1,240	620	61.00	37,820.00	** on the Lady Express, and the Lady Express
Aug-18	1,240	620	61.00	37,820.00	** is the most comparable, therefore the Lady
Sep-18	1,040	520	61.00	31,720.00	** Express Round Trip rate is used
Oct-18	520	260	40.50	10,530.00	** in June, July, August and September.
Nov-18	600	300	40.50	12,150.00	
Dec-18	620	310	40.50	12,555.00	
	8,896	4,448		225,449.00	
	160	13th month			
	9,056				
	39.00	Rate to any destination			
	353,184.00	Income overstated-no consideration for lesser rates for children, commuters, lesser distances?			
	1,900.00	Projected Freight Income (7600 lbs freight at .25 cents per lb)			
	355,084.00	TOTAL Projected Income per Back Country Travels, LLC submission to UTC			

Condition: changing June, July, Aug. & September passenger counts to the maximum capacity

	Passengers lost		Income loss to Current Service LCRI		
	BT, LLC Projected Pass. Count One Way	BT, LLC Counts Converted to Round Trip	LCBC Passenger Round Trip Rate	LCBC Projected Lost Income	
Jan-18	596	298	40.50	12,069.00	** Stehekin Valley Ranch guests primarily travel
Feb-18	580	290	40.50	11,745.00	** on the Lady Express, and the Lady Express
Mar-18	620	310	40.50	12,555.00	** is the most comparable, therefore the Lady
Apr-18	600	300	40.50	12,150.00	** Express Round Trip rate is used
May-18	340	170	40.50	6,885.00	** in June, July, August and September.
Jun-18	960	480	61.00	29,280.00	(Maint 5 days) or 6?
Jul-18	1984	992	61.00	60,512.00	** 15 days at 32 per day RT or 64 OW = 960
Aug-18	1984	992	61.00	60,512.00	** 31 days at 32 per day RT or 64 OW = 1984
Sep-18	1408	704	61.00	42,944.00	** 31 days at 32 per day RT or 64 OW = 1984
Oct-18	520	260	40.50	10,530.00	** 22 days at 32 per day RT or 64 OW = 1408
Nov-18	600	300	40.50	12,150.00	(Maint 5 days)
Dec-18	620	310	40.50	12,555.00	No Thanksgiving
	10,812	5,406		283,887.00	No Christmas
	160	13th month			
	10,972				
	39.00	Rate to any destination			
	427,908.00				
	1,900.00	Projected Freight Income (7600 lbs freight at .25 cents per lb)			
	429,808.00	TOTAL Projected Income with higher summer season counts			

NPS Document - NCL Frequently Asked Questions

Frequently Asked Questions Regarding the Stehekin Landing Resort – A Concession Operation within Lake Chelan National Recreation Area

What is the recent history of the National Park Service's Stehekin concession operation?

The original concession contract issued in 1994 for the North Cascades Stehekin Lodge (Jack Raines, concessionaire) expired in 1998. The concession then operated on one-year extensions through 2006. These one-year extensions were granted to allow the concessionaire to continue to provide visitor services while the National Park Service (NPS) planned for a new prospectus and contract for concession operations in Stehekin.

In the spring of 2006, Mr. Raines notified the NPS that he would not be renewing his contract via the one-year extensions after the contract expiration date of December 31, 2006.

During the fall of 2006, the NPS entered into negotiations with the current temporary concessionaire, Stehekin Adventure LLC, owned and operated by Cliff and Kerry Courtney and Cragg and Robbie Courtney of Stehekin, to operate the concession facilities on a temporary basis through October 31, 2008. This agreement was reached by a "Sale and Transfer" of Mr. Raines' personal property associated with the business and an assumption of the existing contract by Stehekin Adventure, LLC. This transfer of property and extension of the existing concession contract for 18 months allowed visitor services to continue to be provided from NPS-owned facilities and land assignment while the NPS worked to issue a prospectus for a new 10-year competitive contract. Stehekin Adventure, LLC has been operating the concession for the 2007 and 2008 seasons as Stehekin Landing Resort.

During the term of the temporary contract, work has been done to address deficiencies identified through a condition assessment of the primary Stehekin concession facilities. This assessment was completed by a contractor in June of 2006. The assessment found numerous deficiencies in the facilities resulting from deferred maintenance. Over the last two years the NPS has spent approximately \$1 million in federal funds and worked in partnership with the concessionaire and other contractors to repair these deficiencies, upgrade various components of the facilities, and work to improve overall condition of these buildings and grounds.

A prospectus for a 10-year contract was published in spring of 2008. Although the prospectus was written with careful consideration of the financial feasibility of the current operations, the NPS received no bids.

Why would no one bid on the prospectus?

The NPS met with the current concessionaire and other parties to better understand why the prospectus received no bids. The NPS learned that businesses interested in the concession contract were concerned with a number of different issues. For example, the NPS was going to require limited lodging, meals and other services to be provided on a year around basis, as was required under the previous contract. Having some basic services during the winter months was a desire expressed by the local community, and previous visitation numbers supported the provision of winter recreational opportunities and services. Potential bidders commented that the very large operational costs associated with winter operations didn't balance small amount of revenue produced. Additionally, visitation in recent years has been changing in response to economic and social dynamics. High operational costs and uncertain visitation could potentially

cause insufficient revenue in the winter months. The combination of required services and uncertain business climate led to decisions to not bid on the contract.

What are the next steps?

The NPS wants people to visit park lands. Stehekin is a gateway for recreational opportunities in North Cascades National Park Service Complex, and the concession provides additional opportunities for people to recreate in the park and experience the uniqueness of the Stehekin Valley. The NPS also recognizes that a concession operation needs to be a viable business opportunity. As a result of the work to date, it is clear the NPS and involved business entities need to develop a better understanding of the types of operations that might be sustainable for a long-term concession contract in Stehekin.

In an effort to gather such information, and develop a long-term contract that is financially feasible, the NPS has worked with the current concessionaire to establish a short-term non-competitive concession contract, which would allow the concessionaire to operate for three years. Currently, the NPS and the concessionaire are still negotiating terms and conditions of this contract.

Under laws and regulations governing NPS concessions, once the concessionaire and park reach an agreement regarding appropriate contract obligations and operational services, a request will be submitted to the Director of the NPS for approval. This is necessary because the contract is not being advertised competitively and three-year contracts are not a standard practice.

What is standard for NPS concession contracts?

Laws governing concession contracts on NPS land and in NPS facilities are required to be competitively awarded. Generally these contracts are granted for ten years. Concessionaires undergo annual evaluations. If performance is determined to be satisfactory, the contract continues to maturity. If performance is determined to be minimal or unsatisfactory, then the contract may be terminated.

Under the contract, the concessionaire has the right to operate their assigned publicly owned buildings, provided they maintain and care for the facilities, provide appropriate approved services, and meet other conditions of the contract

If not standard, why consider a short-term non-competitive contract for the Stehekin concession?

After receiving no bid on the prospectus, additional time is needed to determine how the concession business can be a viable economic opportunity with a reasonable opportunity for profit that will also provide appropriate and excellent visitor services. Because having a concession operation in Stehekin is important to the NPS to support visitor services, this short term non-competitive contract is being considered.

During this three-year term, the NPS will work with the concessionaire to evaluate the sustainability of the concession operation. While over \$1 million in federal funds have been used to improve the Stehekin concession facilities in the last couple of years, work remains to be completed to address deficiencies to the facilities as identified in the 2006 Condition Assessment. The NPS will publish a new prospectus for a competitive ten-year contract with the goal of having the long term contract awarded by December 31, 2011. If, after incorporating

what is learned over the next few years into the long term prospectus, there are no bids, the NPS will evaluate if a viable concession is sustainable in Stehekin.

Why did the Stehekin Landing Resort close down on October 31?

By request of the concession operator, the concession has shut down for the winter and the new contract will start March 1. The reduced operating season is an effort to reduce costs during a time when little revenue is generated. By focusing energy on the main summer season, the Stehekin Landing Resort and the National Park Service will build a sustainable, economically viable, business that provides quality visitor services.

What is a NPS concession?

Stephen T. Mather, first Director of the National Park Service, said

"Scenery is a hollow enjoyment to the tourist who sets out in the morning after an indigestible breakfast and a fitful night's sleep on an impossible bed."

Director Mather believed that only well-rested and well-fed visitors would be capable of appreciating the wonders of our national parks. The National Park Service concession remains mindful of this legacy, ensuring that park visitors have access to high quality commercial visitor services at reasonable prices.

Concessionaires fill a vital role in helping the National Park Service carry out its mission. They are allowed to operate publicly owned facilities to offer specific goods and services to park visitors, under contract, which are not provided by National Park Service personnel. By welcoming the private sector as a partner in park operations, the National Park Service broadens the economic base of the region in general and the communities surrounding the parks in particular.

The concession program of the National Park Service administers approximately 600 concession contracts that gross over \$750 million annually. Our concessionaires employ over 25,000 hospitality industry people during peak seasons; providing services ranging from food and lodging to camping supply retail. The National Park Service Concessions Program administers these contracts, including monitoring the performance of concessionaires.

Stehekin Landing Resort - 2009 Schedule of Operations

LODGING

Early Spring	April 3 - April 30	Housekeeping Units	Lakehouse Only
Spring	May 1 - June 18	Housekeeping Units	Units #1-4, #7 and the Lakehouse available daily
		Standard Rooms	limited weekends only (includes Unit #28)
Summer	June 19 - September 28	All units available	
Early Fall	September 29 - October 12	Housekeeping Units	Units #1-4, #7 and Lakehouse available daily;
		Standard Rooms	limited weekends only (includes Unit #28)
Late Fall	October 13-October 31	Housekeeping Units	Units #1-4, #7 and the Lakehouse available daily

FOOD AND BEVERAGE

Early Spring	April 3 - April 30	11:30 am - 1:30 pm	Lunch only; based on boat schedule
Spring	May 1 - June 18	11:30 am - 1:30 pm	Lunch only; based on boat schedule
		All Meals Served (limited hours)	3 meal provided daily when standard rooms are rented; limited hours or single seating
Summer	June 19 - September 28	All meals served	3 meals daily with extended hours
Fall	September 29 - October 12	All meals served	3 meals daily; limited hrs/single seating
Late Fall	October 13-October 31	11:30-1:30 pm	Lunch only; based on boat schedule

RETAIL

Early Spring	April 3 - April 30	11:30 am - 1:30 pm	Based on boat schedule; sales from restaurant
Spring	May 1 - June 18	11:30 am - 1:30 pm	Based on boat schedule; sales from restaurant or store
		Additional Hours	As needed; sales from restaurant or store. On-call service available.
Summer	June 19 - September 28	Reg Business Hrs	All sales from the store; on-call services available after hours
Fall	September 29 - October 12	11:30 am - 1:30 pm	Based on boat schedule; sales from restaurant or store
		Additional Hours	As needed; sales from restaurant or store. On-call service available.
Late Fall	October 12 - October 31	11:30-1:30 pm	Sales from Restaurant or store; On-call service available.

RAINBOW FALLS TOURS

Spring and Fall	April 3 - May 31; October 1 - October 31	One Trip Daily	Provided on all days the LCBC vessel is docked in Stehekin
		Two Trips Daily	On weekends when both LCBC vessels are docked in Stehekin
Summer	June 1 - September 30	Full operation	Based on arrival schedules for LCBC vessels (Lady II & Lady Express)

VALLEY SHUTTLE

Spring	May 22-25 (Memorial Weekend)	Reduced Services	Fri. (2 runs); Sat. (4 runs); Sun. (4 runs); Mon. (2 runs)
	May 15-June 18 (Other Weekends)	Reduced Services	Friday (2 runs); Saturday (4 runs); Sunday (2 runs)
Summer	June 19 - October 7	Taxi and Rental Vehicles	Available by reservation
		4x daily	All days
Fall	October 8 - October 12	Taxi and Rental Vehicles	Available by reservation
		Reduced Services	2 runs daily; taxi and rental car services are also available
Late Fall	October 12 - October 31	Taxi and Rental Vehicles	Available by reservation

PUBLIC SHOWERS AND LAUNDRY

	May 1 - October 31	Shower and laundry both open
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MARINA FUEL

	May 1 - October 31	Based on Restaurant and Store hours
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For more information on schedules and services, please contact:

Lake Chelan Boat Company
<http://www.ladyofthelake.com> or 509/682-2224

Stehekin Landing Resort
<http://stehekinlanding.com> or 509/682-4494

North Cascades National Park (Golden West Visitor Center, Stehekin)
<http://www.nps.gov/NOCA> or 360/854-7365, ext. 14

SCHEDULES ~ CHELAN TOURS ([HTTP://WWW.CHELANSEAPLANES.COM/TOURS/](http://www.chelanseaplanes.com/tours/))



CHELAN SEAPLANES WILL HOPEFULLY BE OPERATING IN 2020, BUT STAY TUNED!

([HTTP://WWW.CHELANSEAPLANES.COM/TOURS/](http://www.chelanseaplanes.com/tours/))

([HTTP://WWW.CHELANSEAPLANES.COM/](http://www.chelanseaplanes.com/))

We are presently working on resuming service at a new very near by location. Our hopes are to resume service as soon as we are able which is looking like 2020.

We are very excited about the opportunity to get the seaplane service on the lake back up and running! If you are interested in charter service between Seattle and downtown Chelan or Stehekin, try our sister company Northwest Seaplanes (<http://www.nwseaplanes.com>).

Feel free to submit your email address to stay informed on our future progress for restoring the seaplane service on the lake.

 Email

SUBMIT

[Privacy policy](#)

We respect your privacy and we won't share your information

Chelan Seaplanes returning

Lady of the Lake

2018 Sailing Schedule

Lady of the Lake II YEAR ROUND Summer Schedule

May 1st - October 15th - DAILY

Leave Lake Chelan Boat Co Dock 8:30 am
 Field's Point Landing 9:45 am
 *Prince Creek 11:00 am
 Lucerne (Port of Holden Village) 11:45 am
 *Moore Point 12:15 pm
 Arrive in Stehekin 12:30 pm

90 minute Layover in Stehekin

Leave Stehekin 2:00 pm
 *Moore Point 2:15 pm
 Lucerne (Port of Holden Village) 2:30 pm
 *Prince Creek 3:15 pm
 Field's Point Landing 4:45 pm
 Arrive in Chelan 6:00 pm

**Flag stop only when landing is safe.*

RATES BETWEEN:	<u>One Way</u>	<u>R/T</u>
Chelan/Field's Pt. & Stehekin	\$24.00	\$40.50
Chelan/Field's Pt. & Lucerne	\$22.25	\$35.75

Children age 2 through 11 half fare - under 2 ride free

Summer Combo Trip - \$61 3 Hour Layover in Stehekin

Travel on the "Lady Express" to Stehekin & return on the "Lady of the Lake II."

<u>Timeframe</u>	<u>Run days</u>
Memorial Day Weekend	Sat, Sun, Mon
June 15-Sept 15	Daily

(this option is available when both boats are running)
 You'll have time to take the
 Rainbow Falls Tour and
 have lunch in Stehekin.

-or-

You can rent bikes and ride along the valley road to Rainbow Falls (3.5 miles).

Tour on your own and stop at the historical sites along the way, including the one-room School House and Buckner Orchard.

Not to mention, you would be biking past the Stehekin Pastry Company, where you could stop in for a pastry or lunch!

Lady Express Summer Schedule

Memorial Day Weekend (Sat-Sun-Mon) and June 15 through Sept. 22 - DAILY

The Lady Express cannot make flag stops

Leave Lake Chelan Boat Co Dock 8:30 am
 Field's Point Landing 9:20 am
 Arrive in Stehekin 11:00 am

60 minute Layover in Stehekin

Leave Stehekin 12:00 pm
 Lucerne (Port of Holden Village) 12:20 pm
 Field's Point Landing 1:45 pm
 Arrive in Chelan 2:45 pm

RATES BETWEEN:	<u>One Way</u>	<u>R/T</u>
Chelan/Field's Pt. & Stehekin	\$37.00	\$61.00
Chelan/Field's Pt. & Lucerne	\$34.50	N/A

Children age 2 through 11 half fare - under 2 ride free

"Lady Express" Off Season Schedule

<u>Timeframe</u>	<u>Run days</u>
Jan 1-Mar 31	Mon, Wed, Fri
Apr 1-Apr 30	Mon, Wed, Fri, Sat, Sun
Oct 16-Oct 31	Mon, Wed, Fri, Sat, Sun
Nov 1-Dec 31	Mon, Wed, Fri, Sun

(No Service on Christmas Day)

Leave Lake Chelan Boat Co Dock 10:00 am
 Field's Point Landing 10:50 am
 Lucerne (Port of Holden Village) 12:00 pm
 Arrive in Stehekin 12:30 pm

Approx. 60 minute Layover in Stehekin

Leave Stehekin promptly at 1:30 pm
 Lucerne (Port of Holden Village) *1:50 pm
 Field's Point Landing 3:10 pm
 Arrive in Chelan 4:00 pm

RATES BETWEEN:	<u>One Way</u>	<u>R/T</u>
Chelan/Field's Pt. & Stehekin	\$24.00	\$40.50
Chelan/Field's Pt. & Lucerne	\$22.25	\$35.75

Children age 2 through 11 half fare - under 2 ride free

*The down lake Lucerne stop, at 1:50 p.m., is designated as a flag stop. A stop is always made when passengers are present at the landing area.

For additional information including Freight Charges and Charter Costs - see www.LadyoftheLake.com
 IMPORTANT NOTE: Schedule and rates subject to change without notice. --Delays in schedule may occur during peak season and holidays.

EXHIBIT I - Chelan Sunrise and Sunset times

Chelan Sunrise, Sunset times: noting LCBC's latest Field's Point departure times and earliest arrival times

	Sun Rise	Latest time to leave F.Pt	Earliest arrival to F.PT	Sun Set	
1-Apr	6:39am	10:50am	3:10pm	7:30pm	
1-May	5:43am	9:45am	4:45pm	8:13pm	
1-Jun	5:06am	9:45am	1:45pm	8:51pm	
1-Jul	5:05am	9:45am	1:45pm	9:02pm	
1-Aug	5:37am	9:45am	1:45pm	8:35pm	
1-Sep	6:18am	9:45am	1:45pm	7:41pm	
1-Oct	6:59am	9:45am	4:45pm	6:40pm	
1-Nov	6:44am	10:50am	3:10pm	4:42pm	Nov. 3rd Daylight savings time ends
1-Dec	7:28am	10:50am	3:10pm	4:10pm	
1-Jan	7:49am	10:50am	3:10pm	4:18pm	
1-Feb	7:27am	10:50am	3:10pm	5:00pm	
1-Mar	7:42am	10:50am	3:10pm	6:45pm	March 10th Daylight savings time starts

Pacific Standard Time
90% traffic

Day	Jan.		Feb.		Mar.		Apr.		May		June		July		Aug.		Sept.		Oct.		Nov.		Dec.	
	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set	Rise	Set
01	0749	1618	0727	1700	0641	1745	0539	1830	0443	1913	0406	1951	0405	2002	0437	1935	0518	1841	0559	1740	0644	1642	0728	1610
02	0749	1619	0726	1702	0639	1746	0537	1831	0441	1914	0405	1952	0406	2002	0438	1934	0519	1839	0600	1737	0646	1641	0729	1609
03	0749	1620	0725	1704	0637	1748	0535	1833	0439	1915	0404	1953	0407	2002	0439	1932	0521	1837	0602	1735	0648	1639	0730	1609
04	0749	1621	0723	1705	0635	1749	0533	1834	0438	1917	0404	1953	0407	2001	0441	1931	0522	1835	0603	1733	0649	1638	0732	1609
05	0749	1622	0722	1707	0633	1751	0531	1836	0436	1918	0403	1954	0408	2001	0442	1929	0524	1833	0605	1731	0651	1636	0733	1608
06	0749	1624	0720	1708	0631	1752	0529	1837	0435	1920	0403	1955	0409	2001	0443	1928	0525	1831	0606	1729	0652	1635	0734	1608
07	0748	1625	0719	1710	0629	1754	0527	1839	0433	1921	0402	1956	0410	2000	0445	1926	0526	1829	0607	1727	0654	1633	0735	1608
08	0748	1626	0717	1712	0627	1755	0525	1840	0432	1922	0402	1957	0410	2000	0446	1925	0528	1827	0609	1725	0655	1632	0736	1608
09	0748	1627	0716	1713	0625	1757	0523	1841	0430	1924	0402	1957	0411	1959	0447	1923	0529	1825	0610	1723	0657	1630	0737	1608
10	0747	1628	0714	1715	0623	1758	0521	1843	0429	1925	0401	1958	0412	1958	0448	1921	0530	1823	0612	1721	0658	1629	0738	1607
11	0747	1630	0713	1716	0621	1800	0519	1844	0427	1926	0401	1958	0413	1958	0450	1920	0532	1821	0613	1720	0700	1628	0739	1607
12	0746	1631	0711	1718	0619	1801	0517	1846	0426	1928	0401	1959	0414	1957	0451	1918	0533	1819	0615	1718	0701	1627	0740	1607
13	0746	1632	0710	1720	0617	1802	0515	1847	0425	1929	0401	2000	0415	1956	0452	1916	0534	1817	0616	1716	0703	1625	0741	1608
14	0745	1634	0708	1721	0615	1804	0513	1849	0423	1930	0401	2000	0416	1955	0454	1915	0536	1815	0617	1714	0704	1624	0742	1608
15	0744	1635	0706	1723	0613	1805	0511	1850	0422	1932	0401	2001	0417	1955	0455	1913	0537	1812	0619	1712	0706	1623	0742	1608
16	0744	1636	0705	1724	0611	1807	0509	1851	0421	1933	0401	2001	0418	1954	0457	1911	0538	1810	0620	1710	0707	1622	0743	1608
17	0743	1638	0703	1726	0609	1808	0507	1853	0420	1934	0401	2001	0419	1953	0458	1909	0540	1808	0622	1708	0709	1621	0744	1608
18	0742	1639	0701	1727	0607	1810	0505	1854	0418	1935	0401	2002	0420	1952	0459	1908	0541	1806	0623	1706	0710	1620	0745	1609
19	0741	1641	0659	1729	0605	1811	0504	1856	0417	1937	0401	2002	0421	1951	0501	1906	0543	1804	0625	1704	0712	1619	0745	1609
20	0741	1642	0658	1731	0603	1813	0502	1857	0416	1938	0401	2002	0422	1950	0502	1904	0544	1802	0626	1703	0713	1618	0746	1609
21	0740	1644	0656	1732	0601	1814	0500	1859	0415	1939	0401	2002	0423	1949	0503	1902	0545	1800	0628	1701	0715	1617	0746	1610
22	0739	1645	0654	1734	0559	1816	0458	1900	0414	1940	0401	2003	0424	1948	0505	1900	0547	1758	0629	1659	0716	1616	0747	1610
23	0738	1647	0652	1735	0557	1817	0456	1901	0413	1941	0402	2003	0426	1947	0506	1858	0548	1756	0631	1657	0717	1615	0747	1611
24	0737	1648	0650	1737	0555	1818	0455	1903	0412	1942	0402	2003	0427	1946	0507	1857	0549	1754	0632	1655	0719	1614	0748	1612
25	0736	1650	0649	1738	0553	1820	0453	1904	0411	1944	0402	2003	0428	1944	0509	1855	0551	1752	0634	1654	0720	1613	0748	1612
26	0735	1651	0647	1740	0551	1821	0451	1906	0410	1945	0403	2003	0429	1943	0510	1853	0552	1750	0635	1652	0722	1613	0748	1613
27	0733	1653	0645	1741	0549	1823	0449	1907	0409	1946	0403	2003	0430	1942	0511	1851	0553	1748	0637	1650	0723	1612	0749	1614
28	0732	1654	0643	1743	0547	1824	0448	1908	0408	1947	0404	2003	0432	1941	0513	1849	0555	1746	0638	1649	0724	1611	0749	1614
29	0731	1656	0641	1744	0545	1826	0446	1910	0408	1948	0404	2003	0433	1939	0514	1847	0556	1744	0640	1647	0725	1611	0749	1615
30	0730	1657	0639	1745	0543	1827	0444	1911	0407	1949	0405	2002	0434	1938	0515	1845	0558	1742	0641	1645	0727	1610	0749	1616
31	0729	1659	0637	1746	0541	1829	0441	1912	0406	1950	0406	2002	0435	1937	0517	1843	0559	1741	0643	1644	0728	1611	0749	1617

Add one hour for daylight time, if and when in use.