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5 **BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
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7 **In the Matter of the Application of** )  
8 )

9 **SEATTLE HARBOR TOURS LIMITED** )  
10 **PARTNERSHIP** )

11 **For a Certificate of Public Convenience and** )  
12 **Necessity to Operate Commercial Ferry Service** )

**APPLICATION NO. B078946**

**PETITION TO INTERVENE BY**  
**THE CITY OF SEATTLE**

13 **1. Name and address of Petitioner.**  
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15 THE CITY OF SEATTLE  
16 12<sup>th</sup> Floor, Municipal Building  
17 600 Fourth Avenue  
18 Seattle, WA 98104  
19 Phone: (206) 684-4000

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20 **2. Name and address of the attorney, if any, representing the petitioner.**  
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22 GORDON B. DAVIDSON (WSBA No. 3271)  
23 Assistant City Attorney  
Seattle City Attorney's Office  
10<sup>th</sup> Floor, Municipal Building  
600 Fourth Avenue  
Seattle, WA 98104  
Phone Number: (206) 684-8239

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2 **3. If the Petitioner is an organization:**

3 **a. State the number of members in the organization:**

4 The City of Seattle, a municipal corporation of the first class in the State of Washington  
5 operating under its own charter, has a population of approximately 525,000.

6 **b. State the name of the person authorized to sign this petition for the organization:**

7 Gordon B. Davidson, Assistant City Attorney

8 **c. Attach a copy of the document authorizing participation in this case or state the  
9 basis for the authorization.**

10 Under the Charter of The City of Seattle, the City Attorney is given authority over any  
11 litigation in which the City of Seattle is involved.

12 **d. State the purpose of the organization:**

13 The City of Seattle is organized to provide local governance to the geographic area  
14 known as Seattle and to exercise all powers vested in it under its charter and the laws of  
15 the State of Washington pertaining to first class cities.

16 **4. The Petitioner has participated in the following UTC cases in the last two years:**

17 **Date: Docket No.: Title of Proceeding:**

18 Ongoing UE-951270 In the Matter of the Proposal by  
19 PUGET SOUND POWER & LIGHT COMPANY  
20 To Transfer Revenues from PRAM Rates to General Rates

21 Ongoing UE-960195 In the Matter of the Application of PUGET SOUND POWER &  
22 LIGHT COMPANY and WASHINGTON NATURE GAS  
23 COMPANY For an Order Authorizing Merger of WASHINGTON  
ENERGY COMPANY and WASHINGTON NATURAL GAS  
COMPANY with and into PUGET SOUND POWER & LIGHT  
COMPANY, and Authorizing the Issuance of Assumptions of  
Obligations, Adoption of Tariffs, and Authorizations in Connection  
Therewith.

1	10/11/1999	B078811	In the Matter of the Application of SEATTLE FERRY SERVICE,
2	through		LLC, d/b/a SEATTLE FERRY SERVICE For a Certificate of Public
3	6/29/2000		Convenience and Necessity to Operate Commercial Ferry Service
4	10/11/1999	B078822	In the Matter of the Application of SEATTLE HARBOR TOURS
5	through		LIMITED PARTNERSHIP For a Certificate of Public Convenience
6	6/29/2000		and Necessity to Operate Commercial Ferry Service
7	12/19/2000	B078937	In the Matter of the Application of DUTCHMAN MARINE, LLC,
8	and		d/b/a "LAKE WASHINGTON FERRY SERVICE" For a Certificate
9	currently		of Public Convenience and Necessity to Operate Commercial Ferry
10	on-going		Service

**5. The Petitioner has the following interest in this proceeding:**

The neighborhood in which is located the identified Seattle terminal for the applicant’s proposed commercial ferry service that is the subject of these proceedings (Application B078946) has significant traffic problems. The City of Seattle generally supports and encourages the development of alternative modes of transportation within the City as a means of reducing automobile traffic and congestion and increasing the mobility of residents and others. Nevertheless, the City has concerns about whether and how Seattle Harbor Tours Limited Partnership intends to address any of the transportation problems and related demands upon the municipalities limited resources that may be generated by the commercial ferry operation that is the subject of these proceedings. Such problems and potential demands include but are not limited to increased vehicular traffic and an increased demand for parking, parking enforcement, police protection, signage, and other, related, municipal services.

**6. The Petitioner will raise the following issues in this case:**

1. Can the applicant demonstrate that:
  - (a) arrangements have been made with King County (METRO) and with other public or commercial transportation service providers regarding the delivery of transportation service between the proposed ferry landing point in Seattle and other transportation service hubs or access points?
  - (b) reasonable parking lot space is in the vicinity of the proposed Seattle terminal to lessen the potentially adverse impacts that are likely to result from increased vehicular

1 traffic and parking on streets in the immediate neighborhood of the proposed ferry  
2 terminal in Seattle?

3 (c) additional financial burdens will not be imposed upon Seattle as a consequence of  
4 the commencement of commercial ferry service to and from the identified Seattle  
5 terminal for the proposed ferry service, including but not limited to the cost of signage  
6 and other improvements to the municipal infrastructure that may be required by increased  
7 vehicular traffic in that vicinity and increases in public demands for municipal services  
8 including but not limited to parking enforcement and police protection?

9 2. In the absence of the applicant’s demonstration that adverse impacts on the municipal  
10 infrastructure have been addressed to the reasonable satisfaction of Seattle, should any  
11 certificate of operating authority be conditioned so that Seattle’s concerns are reasonably  
12 addressed?

13 3. Can this applicant operate any commercial ferry operation on Lake Washington without a  
14 public subsidy, or at least a subsidy from The City of Seattle?

15 **7. The Petitioner intends to:**

16  X  a. **Submit written testimony and exhibits of the following people:**

17 One or more representatives of City governmental agencies including but not  
18 limited to Seattle Transportation, and the Parks and Recreation Department.

19 Others yet to be identified.

20  X  b. **Call the following witnesses to testify:**

21 One or more representatives of City governmental agencies including but not  
22 limited to Seattle Transportation, and the Parks and Recreation Department.

23 Others yet to be identified.

X  c. **Cross-examine the witness called by other parties.**

X  d. **submit written arguments and/or motions.**

