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August 1, 2018

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Ms. Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

**Re: Docket No. FD 35730, Ballard Terminal Railroad Company, LLC -- Lease Exemption
-- Line of Eastside Community Rail, LLC**

Dear Ms. Brown:

Enclosed for e-filing is a Petition to Intervene by the City of Woodinville, Washington. A colored map is attached to the petition.

Thank you for your assistance. If you have any questions, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Matthew Cohen", written over a horizontal line.

Matthew Cohen

MTC:sdl

Enclosures

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Finance Docket No. 35730

**BALLARD TERMINAL RAILROAD COMPANY, LLC
-- LEASE EXEMPTION --
LINE OF EASTSIDE COMMUNITY RAIL, LLC**

**CITY OF WOODINVILLE, WASHINGTON --
PETITION TO INTERVENE**

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Counsel for City of Woodinville, WA

August 1, 2018

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Finance Docket No. 35730

**BALLARD TERMINAL RAILROAD COMPANY, LLC
-- LEASE EXEMPTION --
LINE OF EASTSIDE COMMUNITY RAIL, LLC**

**CITY OF WOODINVILLE, WASHINGTON --
PETITION TO INTERVENE**

The City of Woodinville, Washington (“the City”) petitions for leave to intervene, pursuant to 49 CFR § 1112.4, in the above-captioned proceeding. On July 12, 2018 Snohomish County (“Snohomish”) filed parallel petitions in this docket and in FD 35692 to revoke *ab initio* the exemptions granted to Ballard Terminal Railroad Company Inc. (“BTRC”) and Eastside Community Rail LLC (“ERC”) to acquire, lease and operate a line of railroad that runs from MP 23.8 in Woodinville to MP 38.25 in Snohomish, Washington (“the Line”).¹ There are no shippers in Woodinville, but the City owns the real estate and physical assets of the segment of the Line that traverses the City, subject to a freight easement. *See City of Woodinville, Wash. -- Petition For Declaratory Order*, FD No. 35905 (STB served October 7, 2015).

The Snohomish petition filed in this docket asks the Board to revoke BTRC’s lease and operation exemption on grounds that it was based on materially false and misleading

¹ Petition to Revoke, *Ballard Terminal Railroad Company, LLC -- Lease Exemption -- Line of Eastside Community Rail, LLC*, FD 35730 (filed July 12, 2018) and Petition to Revoke, *Eastside Community Rail, LLC -- Acquisition and Operation Exemption -- GNP RLY, Inc.*, FD 35692 (filed July 12, 2018).

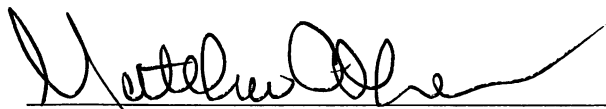
information. The City takes no position at this time on the relief requested by Snohomish, but the City petitions to intervene because the disposition of the Snohomish petition will affect the City's property rights and development options for the rail corridor that bisects the urban core of the City. The sole connection between the City segment of the Line and the national rail transportation system is the Snohomish segment of the Line. Abandonment or discontinuation of rail service in Snohomish would force abandonment or discontinuation in Woodinville, and would affect the City's property rights in the rail corridor.

Admission of the City as a party of record will not unduly broaden the issues raised in this proceeding. The Snohomish petition frames broad questions about the future of rail service on the Line that traverses Woodinville, and the City seeks to participate in the resolution of those questions. Nor will the City's participation disrupt the schedule for consideration of the Snohomish petition, as the petition was filed on July 12, 2018, and no other interested party has filed any pleading in response to it.

For these reasons the City requests that the Board issue an order granting the City leave to intervene as a party of record.

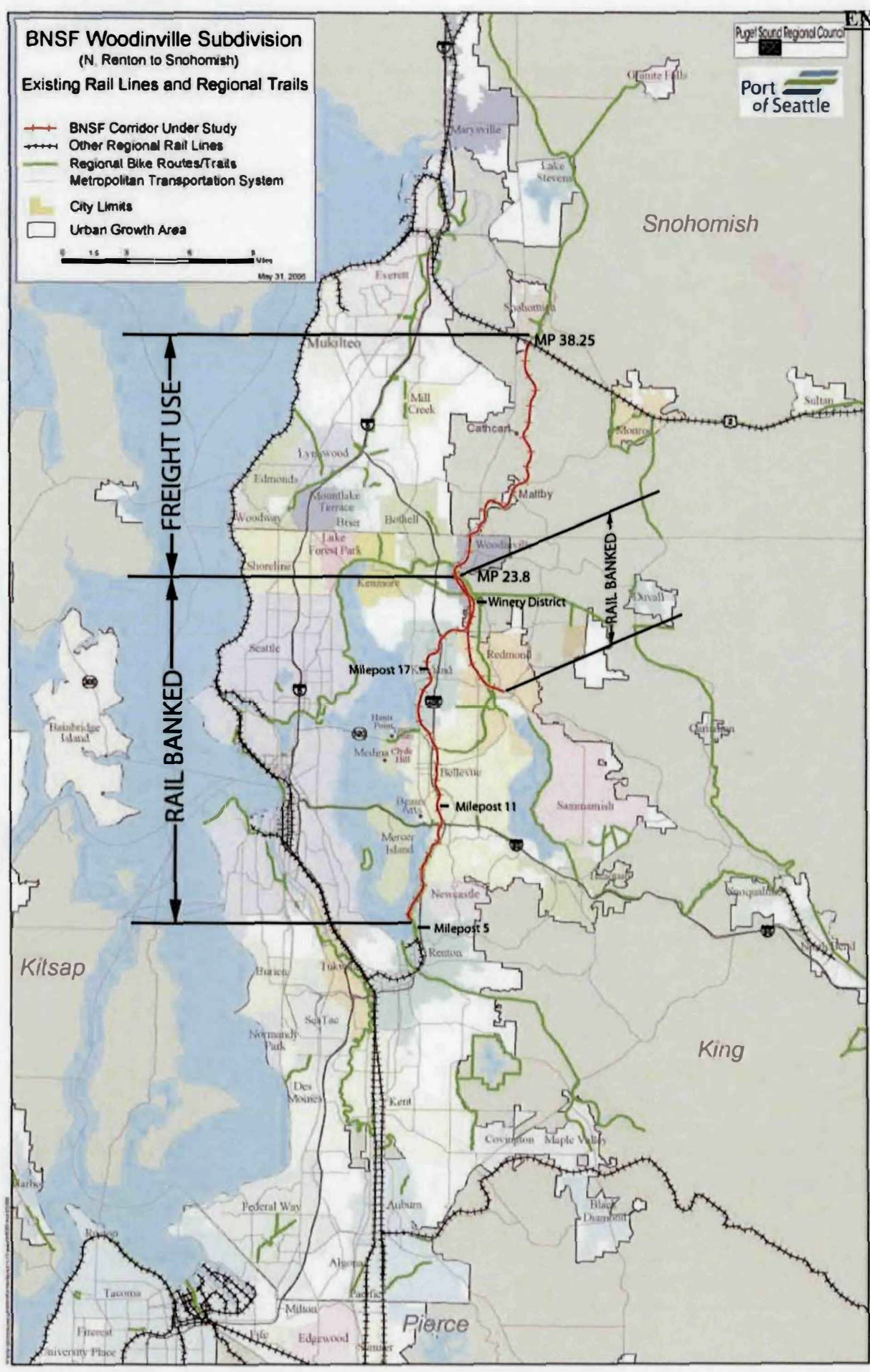
August 1, 2018

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Matthew Cohen", written over a horizontal line.

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Attorneys for the City of Woodinville, Washington



CERTIFICATE OF SERVICE

I certify that on August 1, 2018 I served an e-filed copy of the foregoing document upon all parties of record in this proceeding, as listed below per the STB service list, by e-mail and first class U.S. mail.

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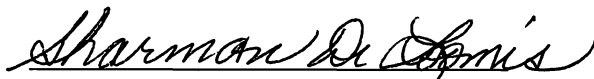
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Attorney for Ballard Terminal Railroad Co. LLC

DATED: Wednesday, August 01, 2018


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