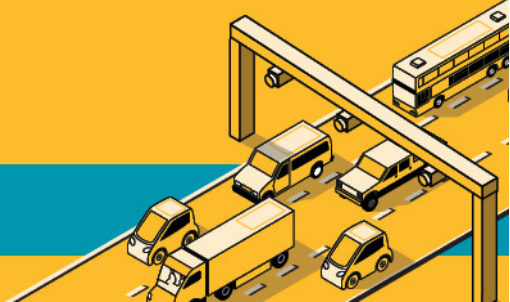


I-205 Toll Project

MEMORANDUM



Date September 1, 2021
To Lucinda Broussard, Carol Snead, and Rob Heyman (ODOT)
From Sam Roberts, WSP
Subject Utilities Methodology Memorandum
CC

INTRODUCTION

This memorandum describes the methods that will be used in the I-205 Toll Project (Project) Environmental Assessment (EA) analysis to evaluate utilities impacts of the Project alternatives. The analysis and results will be documented in the EA that will be developed to comply with federal guidelines and regulations, including the National Environmental Policy Act (NEPA) and local and state policies, standards, and regulations.

The utilities analysis will evaluate impacts from the construction, operations, and maintenance of the Project and will identify mitigation measures as needed.

LEGAL REGULATIONS AND STANDARDS

Laws, Plans, Policies, Regulations, and Guidance

The following is a list of federal, state and local laws, regulations, plans, policies, and guidance documents that guide or inform the assessment of utilities:

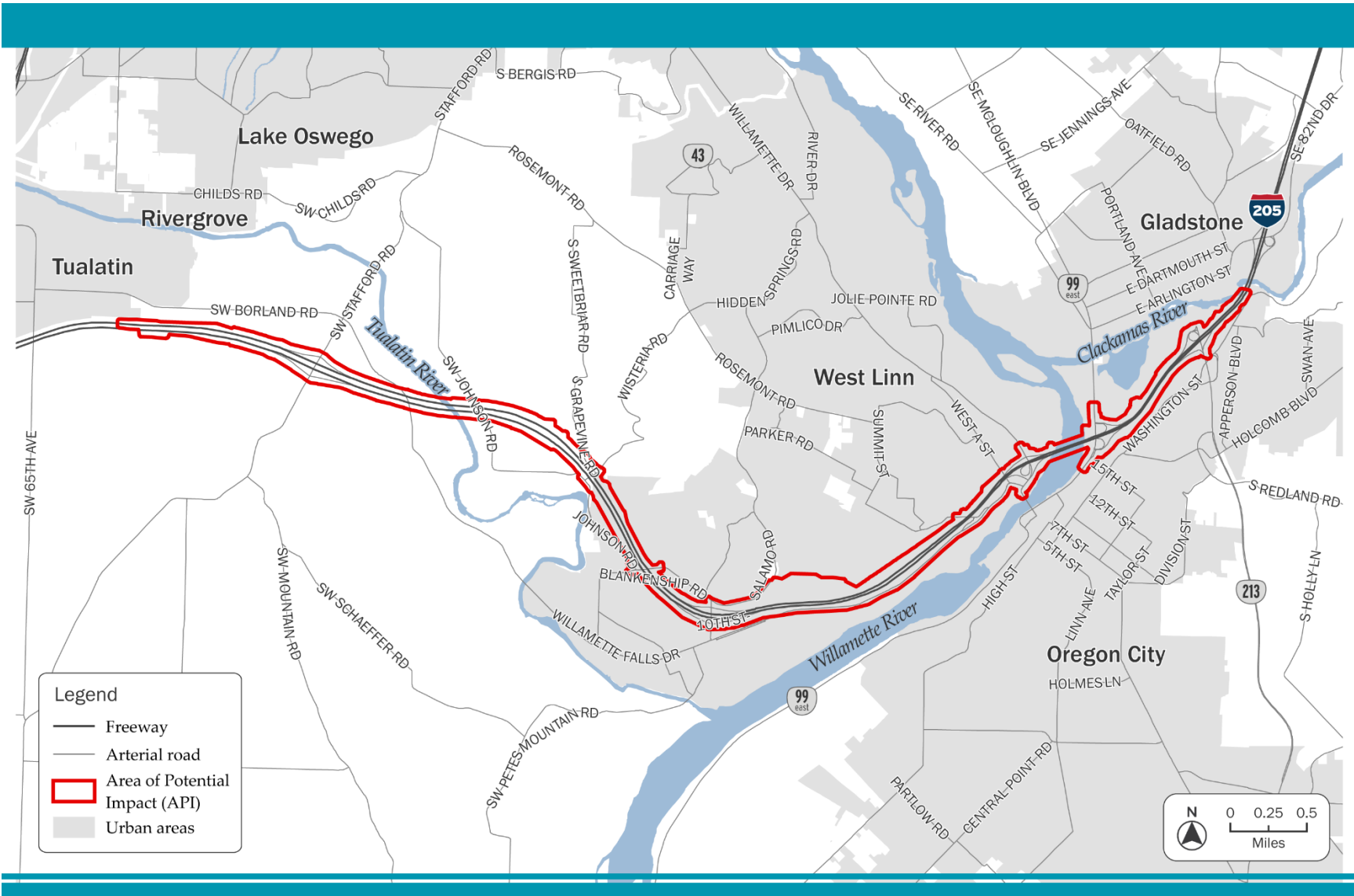
- Title 23 of the United States Code (23 USC), §109(l) Federal-aid Highways Standards
 - Section (l) addresses the accommodation of utility facilities within the right-of-way of federal-aid highways and the criteria used to analyze eligibility
- 23 Code of Federal Regulations (CFR) 645 - Subpart B - Accommodation of Utilities
- Oregon Revised Statutes (ORS) 373.020 (2017) - Jurisdiction over streets taken over for state highway routing through cities; effect on public utility duties
- ORS 374.305 to 374.330 (2017) - Necessity of permission to build on right-of-way
- ORS 758.010 (2017) - Authority to construct lines and facilities
- ORS 758.020 (2017) - Joint occupancy of poles
- ORS 758.210 to 758.270 (2017) - Underground electric and communication facilities
- ORS 810.010 (2017) - Jurisdiction over highways
- OAR 860-024-0005 - Maps and records

- OAR 860-024-0007 - Location of underground facilities
- OAR 952 - Oregon Utility Notification Center
- Oregon Department of Transportation (ODOT), Oregon Utility Relocation Manual. 2018
- Clackamas County, Roadway Standards (2013) - Right-of-Way Permit
- Clackamas County, Title 7.03.100 to 7.03.230 (2019) - Utility Placement Permit and Standards
- Clackamas County, Title 12 Zoning and Development Ordinance Section 1006: Utilities, Street Lights, Water Supply, Sewage Disposal, Surface Water Management, and Erosion Control (2018) - General Standards
- City of West Linn Municipal Code, Chapter 3.250 (2004) - Public Works Permit
- City of West Linn Municipal Code, Chapter 4.700 (2000) - Utility Standards for Development: Purpose and Scope
- City of Oregon City Municipal Code, Chapter 12.04.005 (2019) - Right-of-Way Permit
- City of Oregon City Municipal Code, Chapter 13.34 (2013) - Utility Facilities in Public Rights-of-Way

AREA OF POTENTIAL IMPACT

The area of potential impact (API) is the geographic boundary within which impacts to the environment could occur with the Project alternatives. The API for direct and indirect long-term and short-term impacts to utilities is defined as the I-205 right-of-way between SW Stafford Road and the Oregon Route 213 (OR 213) interchange, plus an 100-foot buffer from the right-of-way to capture construction staging areas, permanent improvement areas that would require utility connections, and any areas where utilities would need to be relocated, as shown in Figure 1.

1 **Figure 1. Utilities API**



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DESCRIBING THE AFFECTED ENVIRONMENT

Published Sources and Databases

Data used in the 2018 Documented Categorical Exclusion (DCE) prepared for the I-205 Improvements Project will be reviewed to confirm its relevancy and applicability to this study. The utility providers will be identified by contacting the Oregon Utility Notification Center and submitting a pre-design survey, "mapping-only," ticket request for the API through the online Internet Ticketing (ITIC) program.¹

Maps provided from the ITIC request will be reviewed to identify existing utilities within the API. Utility information, record drawings, and topographic survey gathered from the I-205 Improvements Stafford Road to OR 213 Project will also be reviewed. Published GIS mapping data will be reviewed, when available. Online sources will be researched to review the jurisdictional limits of each right-of-way authority.

Contacts and Coordination

Information from the published sources and databases mentioned above will be used to identify utilities in the API. Utility companies may be contacted for additional information if available information is incomplete.

Field Surveys or Testing

No field surveys or testing for utilities will occur. When the design of the Project alternatives is advanced and the specific locations of toll gantries are identified, ODOT may want to conduct a field survey to confirm the location of existing utilities identified in the desktop analysis.

IMPACT ASSESSMENT METHODS

The impacts analysis will address the direct long-term and short-term impacts to utilities in the API for each of the Project alternatives.

Long-Term Impact Assessment Methods

The analysis of direct long-term utilities impacts resulting from the Project will consider the electrical and communication line requirements and new utility connections to operate the new tolling equipment.

Short-Term Impact Assessment Methods

The analysis of direct short-term utilities impacts that would occur during Project construction will consider any temporary disruptions to existing electrical and communication services when new utility connections for the tolling equipment are established. Utility facilities that would appear to warrant special consideration during design will also be identified.

¹ <http://callbeforeyoudig.org/oregon/index.asp>

Indirect Impacts Assessment Methods

Most impacts to utilities will be addressed through the direct long-term and short-term impacts analyses. The Project will review differences in traffic patterns for each alternative to determine their likelihood to induce development or redevelopment of property that alters planned land uses. The indirect impact assessment will consider any alterations to planned land uses due to the Project and how this will impact future utility requirements to support these uses.

Cumulative Impacts Assessment Methods

In accordance with ODOT guidance (ODOT 2010), the cumulative impacts assessment will consist of an eight-step process to identify and evaluate cumulative impacts. The long-term, short-term, and indirect impacts identified for utilities will be used in Step 1 to identify whether the Project has the potential to contribute to cumulative impacts on utilities when considered in combination with other past, present, and future actions. For those resources studied in the cumulative impact assessment, the direct and indirect impacts identified in the respective technical analysis will also be used in Step 4: "Identify direct and indirect impacts that may contribute to a cumulative impact." See the I-205 Toll Project Cumulative Impacts Methodology Memorandum for additional details on the eight-step process and cumulative impacts methodology.

MITIGATION APPROACH

Potential mitigation measures will be identified for utility impacts of all magnitudes in the EA. Identifying the mitigation measures for utility impacts will include measures obtained from the coordination performed under the Contacts and Coordination section detailed above, as well as industry standard practices for avoidance, minimization, and mitigation of utility conflicts.

PERFORMANCE MEASURES

Table 1 presents a preliminary list of performance measures identified to evaluate how the alternatives compare in terms of impacts and benefits to utilities.

Table 1. Preliminary Utilities Performance Measures

| Performance Measure | How | Tool and/or Data Source used for Assessment of Measure |
|--|-------------|--|
| Changes to current and planned land uses located near roadways affected by vehicle rerouting | Qualitative | Current land use and zoning designations in RLIS and agency future land use maps and subarea plans outside the API along road corridors experiencing changes in traffic volumes based on Information obtained from traffic model |
| Utility relocations required due to Project construction | Qualitative | Existing utility locations will be identified using the ITIC program and other available sources. Use project design plans to identify any potential utility relocations |
| Temporary disruptions to existing electrical and communication services during construction when new utility connections for the tolling equipment are established | Qualitative | Use existing electrical and communication services information from ITIC and other available sources and project design plans to identify potential service disruptions |
| New utility lines/connections (electrical and communications) required to operate tolling equipment | Qualitative | Use project design plans to identify new utility lines and connections |

Additional performance measures may be identified during the course of analysis.

REFERENCES

Oregon Department of Transportation (ODOT). 2010. Environmental Impact Statement Annotated Template, Chapter 4: Cumulative Impacts.