

# I-205 Toll Project

## MEMORANDUM



**Date** February 11, 2021  
**To** Lucinda Broussard, Mandy Putney, Michael Holthoff, Ben White and Rob Heyman (ODOT)  
**From** Sam Roberts, WSP  
**Subject** Utilities Methodology Memorandum – Draft #4  
**CC**

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## 2 INTRODUCTION

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

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

## 10 LEGAL REGULATIONS AND STANDARDS

### 11 Laws, Plans, Policies, Regulations, and Guidance

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

- 14 • Title 23 of the United States Code (23 USC), §109(l) Federal-aid Highways Standards  
15 – Section (l) addresses the accommodation of utility facilities within the right-of-way of  
16 federal-aid highways and the criteria used to analyze eligibility
- 17 • 23 Code of Federal Regulations (CFR) 645 - Subpart B - Accommodation of Utilities
- 18 • Oregon Revised Statutes (ORS) 373.020 (2017) - Jurisdiction over streets taken over for state  
19 highway routing through cities; effect on public utility duties
- 20 • ORS 374.305 to 374.330 (2017) - Necessity of permission to build on right-of-way
- 21 • ORS 758.010 (2017) - Authority to construct lines and facilities
- 22 • ORS 758.020 (2017) - Joint occupancy of poles
- 23 • ORS 758.210 to 758.270 (2017) - Underground electric and communication facilities
- 24 • ORS 810.010 (2017) - Jurisdiction over highways

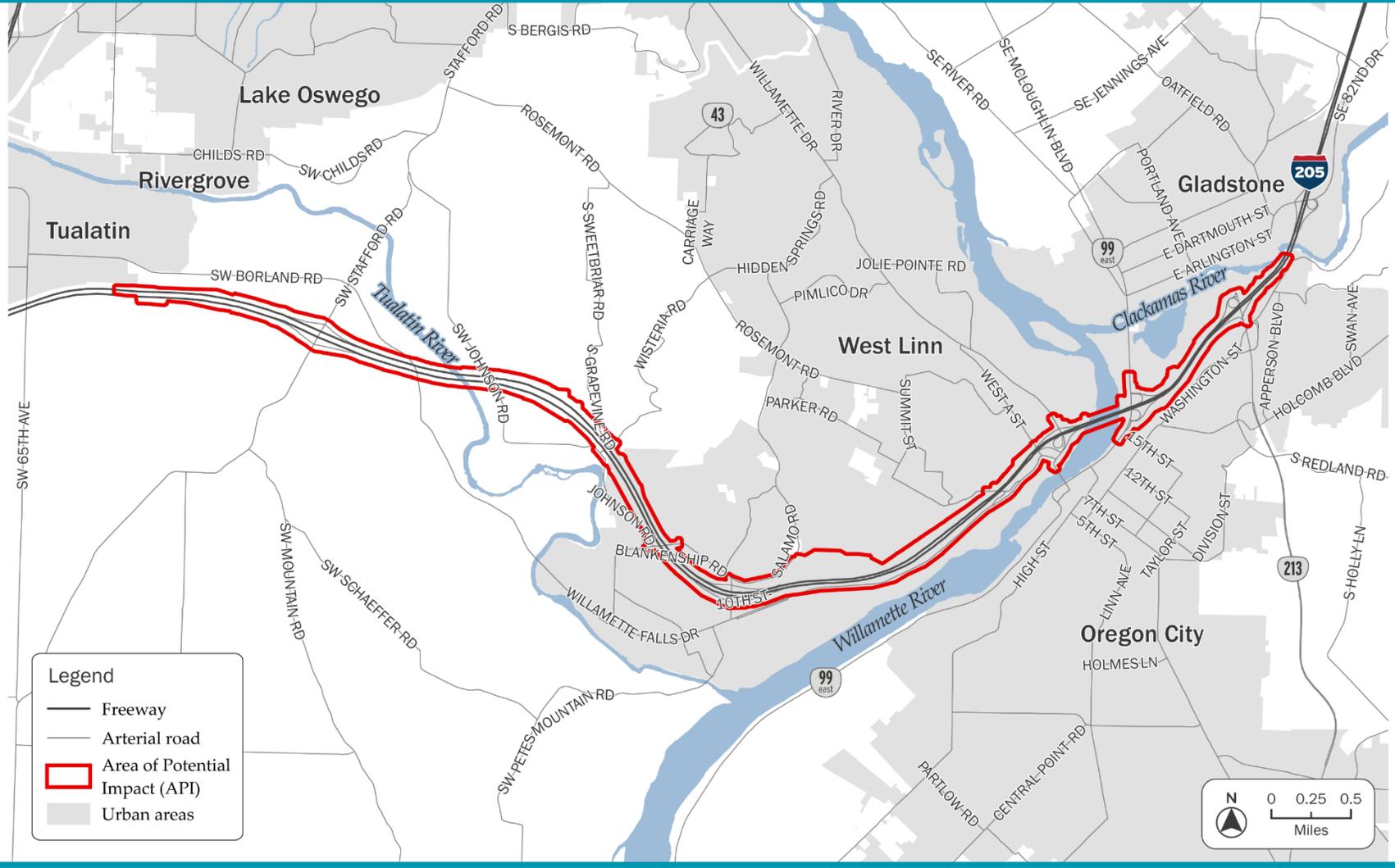
- 1 • OAR 860-024-0005 - Maps and records
- 2 • OAR 860-024-0007 - Location of underground facilities
- 3 • OAR 952 - Oregon Utility Notification Center
- 4 • Oregon Department of Transportation (ODOT), Oregon Utility Relocation Manual. 2018
- 5 • Clackamas County, Roadway Standards (2013) - Right-of-Way Permit
- 6 • Clackamas County, Title 7.03.100 to 7.03.230 (2019) - Utility Placement Permit and Standards
- 7 • Clackamas County, Title 12 Zoning and Development Ordinance Section 1006: Utilities,  
8 Street Lights, Water Supply, Sewage Disposal, Surface Water Management, and Erosion  
9 Control (2018) - General Standards
- 10 • City of West Linn Municipal Code, Chapter 3.250 (2004) - Public Works Permit
- 11 • City of West Linn Municipal Code, Chapter 4.700 (2000) - Utility Standards for  
12 Development: Purpose and Scope
- 13 • City of Oregon City Municipal Code, Chapter 12.04.005 (2019) - Right-of-Way Permit
- 14 • City of Oregon City Municipal Code, Chapter 13.34 (2013) - Utility Facilities in Public  
15 Rights-of-Way

## 16 **AREA OF POTENTIAL IMPACT**

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

24 Prior to preparation of the EA, this API may be modified once the alternatives to be studied in  
25 the EA have been identified and projected traffic volumes have been refined.

1 **Figure 1. Preliminary Utilities API**



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## 1 **DESCRIBING THE AFFECTED ENVIRONMENT**

### 2 **Published Sources and Databases**

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

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

### 13 **Contacts and Coordination**

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

### 17 **Field Surveys or Testing**

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

## 21 **IMPACT ASSESSMENT METHODS**

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

### 24 **Long-Term Impact Assessment Methods**

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

### 28 **Short-Term Impact Assessment Methods**

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

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

1 **Indirect Impacts Assessment Methods**

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

7 **Cumulative Impacts Assessment Methods**

8 The analysis of cumulative impacts to utilities will be described in the I-205 Toll Project  
9 Cumulative Impacts Methodology Memorandum.

10 **MITIGATION APPROACH**

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

15 **PERFORMANCE MEASURES**

16 1 presents a preliminary list of performance measures identified to evaluate how the  
17 alternatives compare in terms of impacts and benefits to utilities.

18 **Table 1. Utilities Performance Measures**

Performance Measure	Tool and/or Data Source used for Assessment of Measure
Changes to current and planned land uses located near roadways affected by vehicle rerouting	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	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	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	Use project design plans to identify new utility lines and connections

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