

Application for Waiver from Construction Standards for Public Water Systems

Revised March 2025

Water System Name: Portland Water Bureau

PWS ID: 00657

Project or Facility: SW Alder St & 6th Ave

County: Multnomah

Need for waiver identified: Water System Survey

Date of Survey:

Plan Review # Exempt

Construction standard requested to be waived: OAR 333-061-0050 (9)(b) water sewer separation

As provided under OAR 333-061-0055, OHA may grant waivers from the construction standards prescribed by these rules:

- (a) When it is demonstrated to the satisfaction of OHA that strict compliance with the rule would be highly burdensome or impractical due to special conditions or causes; and
- (b) When the public or private interest in the granting of the waiver is found by OHA to clearly outweigh the interest of the application of uniform rules; and
- (c) When alternate measures are provided which, in the opinion of OHA, will provide adequate protection to the health and safety of the public including the ability to produce water which does not exceed the maximum contaminant levels listed in rule 333-061-0030.

Describe situation that conflicts with the standard.

This submittal is an update to the previously approved construction waivers 526-2025 and 572-2025.

An existing 80' section of 12" ductile iron water main in SW Alder St near 6th Ave is being relocated to accommodate a new public transportation shelter. The pipe currently has about 3.5' of parallel horizontal separation from an existing 18" sewer. The proposed water alignment includes 6' of pipe with 1'-3.5' of separation creating a Zone 2 conflict (0+30A to 0+36A, red callout #1 on sheet 2 of 3 on attached plans), 32' of pipe with about 1' of separation creating a Zone 3 conflict (0+36A to 0+68A, callout #2), and 6' of pipe with 1'-5' of separation creating a Zone 2 conflict (0+68A to 0+78A, callout #3). A different segment of water pipe near 10th Ave will cross an existing sewer pipe at a shallow angle, creating a Zone 2 conflict for 20' where it is within 5' offset of the sewer (0+00B to 0+20B, callout #4 on sheet 3 of 3). Please see attached Figure 1 for a simplified plan view of the proposed conflict, and Figure 2 for a cross section view of the proposed conflict.

Condition of Existing Sewer: The sewer in conflict is an 18" DIP main installed in 1976, between 12.5'-14.5' deep. It is part of a combined sewer system which does have risk of surcharge in a 2-year, 5-year, and 25-year storm. The vertical separation is approximately 9' skin-to-skin. There are

multiple abandoned spans in SW Alder, though the segment in conflict is in service. The sewer does not follow a straight alignment.

Project Justification: The SW Alder Phase II project is needed to upgrade two frequent service transit stops in the heart of Portland's downtown. Relocating the existing water main is necessary to provide clearance for a high-capacity transit shelter footings in the highly constrained SW Alder Street right-of-way. The specific stop in question, on SW Alder Street at 6th Avenue, is the future frontage of the James Beard Public Market. The project is required to upgrade an existing temporary asphalt stop with a durable concrete platform complete with a refurbished historic transit shelter. It serves as one of the busiest transfer points in the regional transit system, allowing riders to transfer to and from MAX service on the Transit Mall in an area with among the highest proportions of Portland residents with low-incomes or who identify as people of color. Accessibility improvements will include level boarding platforms, ADA-compliant curb ramps, and additional lighting.

Describe why meeting the standard is highly burdensome or impractical.

After an extensive effort to identify plausible alternatives, the proposed alignment is the only one that is feasible due to an uncommon number of utility conflicts in this roadway. Please see Figure 3 for site visualization depicting utility locates. This proposed design has been a collaboration between designers at Trimet, the Portland Bureau of Transportation, the Portland Bureau of Environmental Service, and the Portland Water Bureau (including the Design Manager, CIP Manager, and interim Chief Engineer).

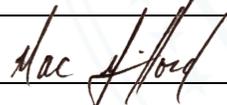
Infeasible Alternative - Abandonment: Abandoning this section of water main was considered to reduce conflicts with existing utilities. This would have created two dead-end water mains on either side of the proposed project. Engineering systems analysis showed that abandoning this section of main would result in reduced pressure to fire systems on this main affecting the in-building fire suppression systems in the area. The dead ends would be susceptible to service outages and have unforeseen consequences to sensitive customer services in the event of any shutdowns. Due to these reasons, abandonment was not considered a viable option.

Infeasible Alternative - Alternate Alignments: Multiple other alignments were evaluated but ultimately found to be infeasible. The original alignment approved with waiver 526-2025 routed to the north side of the street using 90° bends. This was considered a risky and inefficient design by the Maintenance and Construction group. Ground penetrating radar results during the design process later found that more conflicts existed than originally surveyed, identifying multiple duct banks where the original survey only identified one line. For these reasons this design was removed from consideration. The alignment proposed with waiver 572-2025 maintained 2' separation to the south

of the sewer main. Unfortunately this was later found to interfere with the casing surrounding the bus shelter foundation piles. There is also a vaulted basement to the south of the bus shelter which does not leave enough room for water main installation nor access for future maintenance. A third alignment 2' to the north of the existing sewer was evaluated. Unfortunately this conflicts with a 4" gas main and multiple high-voltage electrical duct banks. It would also require crossing the existing sewer two times, which does not actually reduce the length of water pipe in conflict. Due to these conflicts, all other possible alignments were deemed infeasible.

Describe proposed alternate measure that provide adequate protection to public health and safety. The proposed mitigation includes encasing the proposed water pipe with concrete low strength material (CLSM) from 0+29A to 0+76A. The CLSM will be set using wooden forms in the trench to ensure at least 3" of thickness from the pipe in all directions. As an extra layer of protection, the water pipe will also be wrapped in a polyethylene sleeve (polywrap) from 0+26A to 0+79A. These mitigations are included in the proposed design shown on the attached improvement plans. For ease of review they are also shown in simplified plan view in Figure 4 and cross-sectional detail in Figure 5.

EMAIL this form along with plans of proposed waiver request and additional supporting information to your regulator or dws.planreview@odhsoha.oregon.gov. If you are unable to send your documents electronically, please contact OHA before mailing them.

Signature: 	Date: 2/13/2026
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Name: Mac Gifford
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Email Address: mac.gifford@portlandoregon.gov

- Comments:
- Attachments (describe): W03129 SW Alder Phase 2 Improvement plans

OHA Use Only

Waiver ID: 586-2026

Entered into waiver database

Plan Review Coordinator's notes: CLSM and polywrap sleeve are acceptable mitigations to the zone 2 conflict.

After due consideration the above requested waiver from the construction standards of OAR 333-061-0050 is hereby:

Approved Comments:

Denied

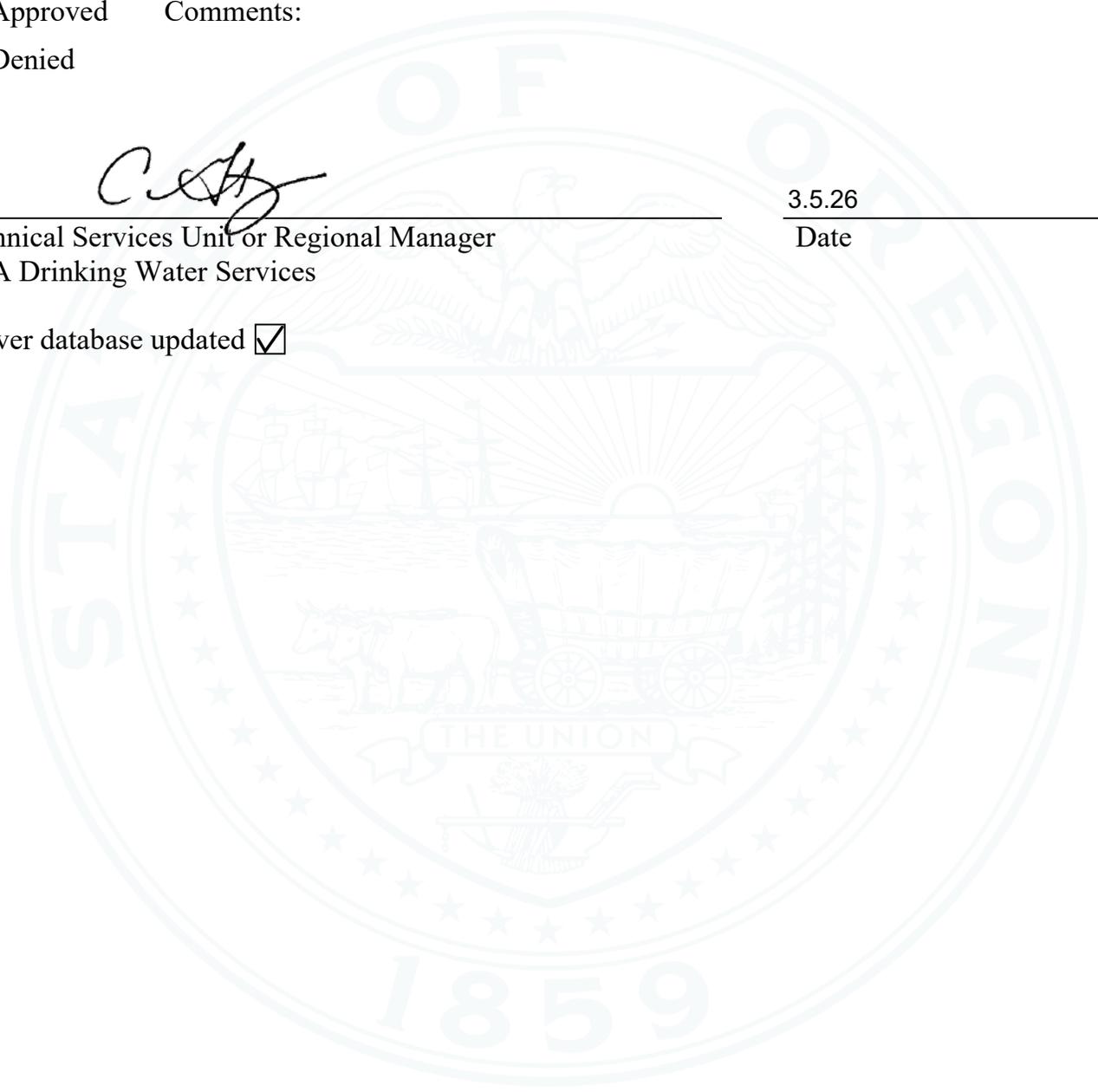


3.5.26

Technical Services Unit or Regional Manager
OHA Drinking Water Services

Date

Waiver database updated



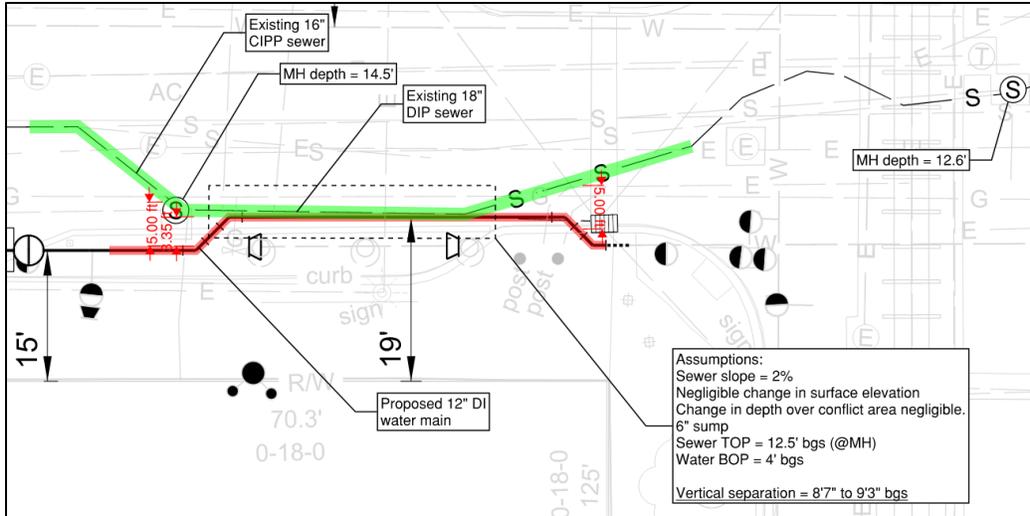


Figure 1: Simplified plan view depicting the water/sewer conflict.

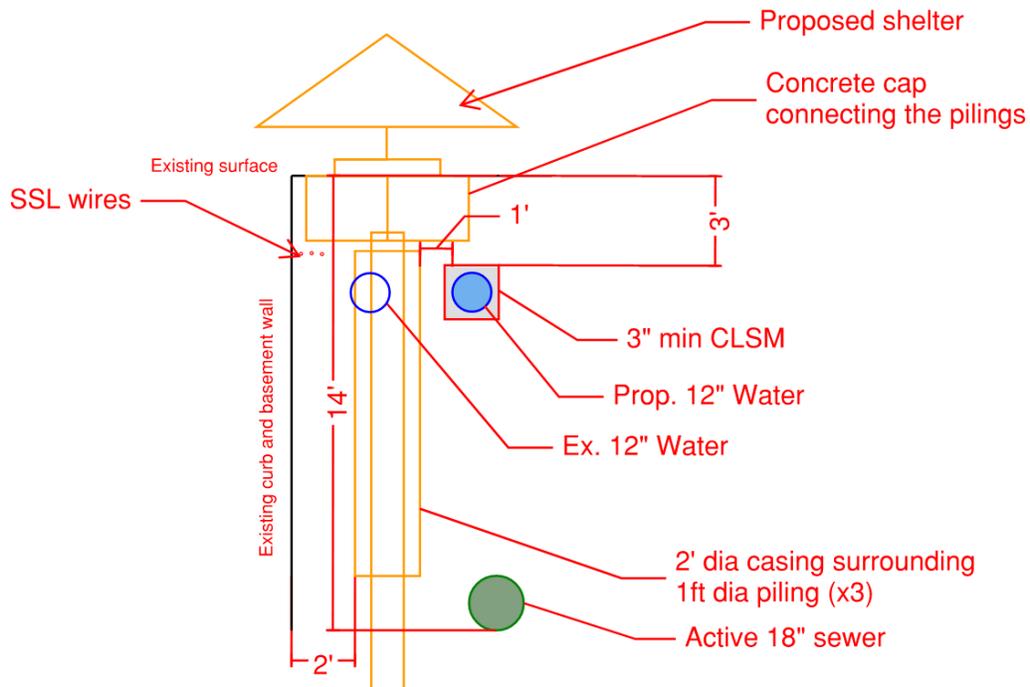
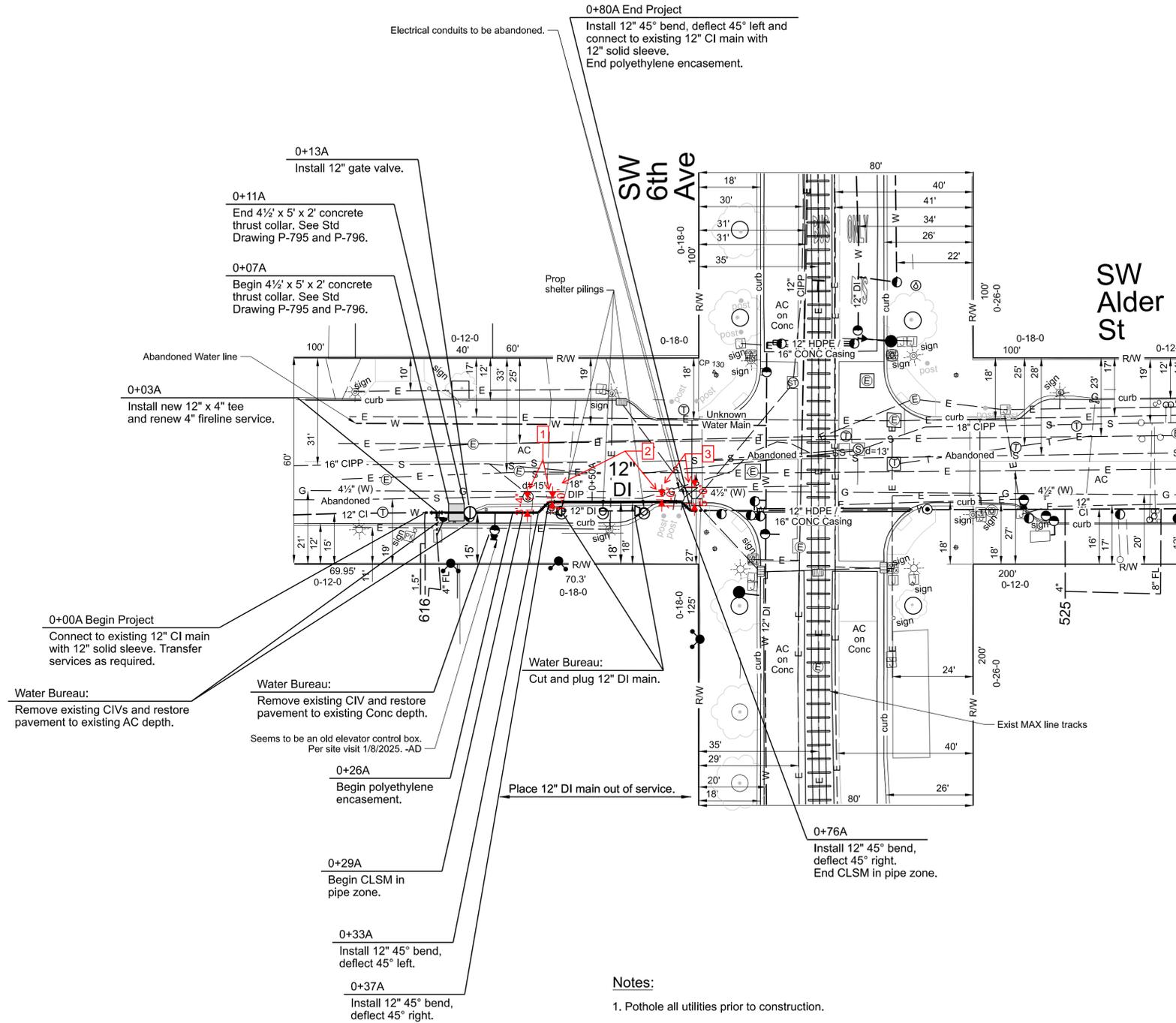


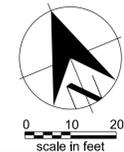
Figure 2: Cross-section of proposed bus shelter, proposed water pipe, and existing sewer where the Zone 3 conflict exists.

Level 2 Design Exceptions

Restrain All Joints



- Notes:**
1. Pothole all utilities prior to construction.
 2. (Advance Work): Place existing 12\"/>



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No	Date	Description	Appd
Revision			
Survey	UNKNOWN	PBOT	

Designed By	JDP	Program Mgr	RKW
CAD Checked By	Const Mgr		
Checked By	Const Supvr		
Project Mgr	Date		



Preliminary



12" & 6" DI Mains
SW Alder St
 From 80'± WWL SW 6th Ave To SW 6th Ave

Plan Sheet

SAP Project No	W03129
1/4 Section	3029
Sheet No	2 of 3

