



**U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration**

**Natural Gas Distribution Infrastructure Safety and Modernization Grant  
Program  
Utilities Board of Roanoke  
Roanoke, Alabama  
Categorical Exclusion Documentation  
NGDISM-FY23-CE-2024-05**

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# 1. Overview

This document serves as the Pipeline and Hazardous Materials Safety Administration’s (PHMSA) determination of applicability of Department of Energy’s (DOE) B5.4 categorical exclusion (CE) for repair or replacement of pipelines for the project identified below. Effective July 3, 2024, PHMSA adopted DOE’s CE in accordance with the Section 109 of the National Environmental Policy Act, enacted as part of the Fiscal Responsibility Act of 2023, which allows a federal agency to “adopt” another federal agency’s CEs for proposed actions.

For projects that PHMSA determines that the DOE CE B5.4 is applicable, it must: (1) consider the presence of any integral elements at 10 CFR part 1021, subpart D, appendix B (1)-(5); and (2) evaluate the proposed action for extraordinary circumstances in which a normally excluded action may have a significant effect. If an extraordinary circumstance is present, the agency nevertheless may categorically exclude the proposed action if the agency determines that there are circumstances that lessen the impacts or other conditions sufficient to avoid significant effects.

The project identified below was provisionally awarded federal funding through PHMSA’s Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) grant program. This document describes the proposed action, the anticipated impacts of that action, any circumstances or conditions that must be implemented to ensure significant effects are avoided, and documents the approval of the project as a categorical exclusion.

# 2. Project Description/Proposed Action

<b>Project Title</b>	Roanoke Utility Board’s Natural Gas Pipeline Replacement
<b>Project Location</b>	City of Roanoke, Randolph County, Alabama Old US Highway 431 (Main Street) to County Road 61
<b>Project Description/Proposed Action:</b>  The natural gas distribution system operated by the Roanoke Utilities Board contains a majority of high-risk leak prone cast iron pipes. This cast iron replacement will consist of approximately 2.18 miles (11,500 feet) of 6-inch polyethylene pipe being installed between two regulator stations: one on the east side of Old United States (US) Highway (Hwy) 431 approximately 0.6 miles north of the intersection of State Highway 22 and Old US Hwy 431 (Main Street), and the other located on the east side of County Road 61 0.56 miles north of US Highway 431 (see Appendix A). The existing cast iron gas main has been identified in the Board’s Distribution Integrity Management Plan (DIMP) as having the highest overall risk ranking among all facilities owned and operated by the Board, as well as being identified by the Alabama Public Service Commission as facilities needing replacement. Primary construction methods will be directional bore or replacement through open cut trenching adjacent to existing pipe. Trenchless methods will be used where applicable, resulting in the least amount of disturbance to streets, driveways, and neighborhood landscaping. In areas where rock is encountered, open-cut trenching with rock excavation may be mandatory. Trenchless methods will be used to cross wetland streams identified in this Tier II environmental review. While direction drilling methods are occurring, there will be a need for pits to contain any encountered fluids and prevent any runoff from construction activities. The pits will also be placed within the established right-of-way. Bore pits are approximately 5-foot by 5-foot and 3 to 5-foot deep.	

Question	Information
Describe the location and dimensions of all ground disturbing activities and provide a map depicting the	The project begins on the east side of Old US Hwy 431 at a Roanoke Utilities Board regulator station 0.6

location(s) where ground disturbance would occur. (e.g., width and depth of trenching or excavation for borings, location of regulator stations, etc.). Map(s) should accompany the project area description.	miles north of the intersection of State Highway (SH) 22 and Old US Hwy 431; continues north along the east side of Old US Hwy 431 to and crossing US Hwy 431 to the northeast side of the road; continues northwest along US Hwy 431 to and turning north along County Road (CR) 61; continues north along CR 61 to a Roanoke Utilities Board receipt and regulator station 0.56 miles north of US Hwy 431. The primary construction methods used during the project will be installation by directional bore or replacement through open cut trenching adjacent to existing pipe. The directional bore pits will be placed within the established right-of-way (ROW). Bore pits are approximately 5-foot by 5-foot and 3 to 5-foot deep.
If the exact location where new pipe would be installed or where other work would occur, provide the width of the ROW and/or the general area encompassing the footprint where all work would occur. Include the anticipated footprint and depth of new pipe installation.	<p>The ROW of Highway 431 varies from approximately 190 feet to 235 feet. The ROW of Main Street is approximately 50 feet. The ROW of County Road 61 is approximately 80 feet.</p> <p>Any acquisition of new right of way or easement would adhere to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.</p>
Will service lines be replaced? If so, include a map(s) depicting the location of service line replacements.	No.
Will meters or other equipment be replaced? If so, provide a description detailing what meter components, etc. will be replaced and indicate if this will require ground disturbance, if the equipment will be attached to existing structures, etc.	No.
What portions of the pipeline will be abandoned? What portions of the pipeline will be removed? A map should be included indicating where the existing line will be abandoned or removed.	All portions of the 2.18 miles of existing pipe will be abandoned in place.

Question	Information

What construction methods will be used? (Check all methods to be used)	Directional boring and open cut trenching
Does the project require a new right-of-way not currently in the ownership of the utility? If new ROW will occur, please provide a description of the property to be acquired (existing condition and land use) and a map depicting the property to be acquired.	No new right-of-way or easement needed
How many linear feet of pipe will be replaced or repaired?	11,500.00 Linear Feet

## 2.1. Proposed Pipeline Replacement Details

Existing Pipeline Length in feet	Pipeline Diameter in inches	Pipeline Material (cast iron, bare steel, coated steel, PVC)	Operating Pressure (PSI)	Reduced Pressure if Possible (PSI)	Year installed if known.
11,500.00 feet	6.00	Cast iron	25.00		unknown

### 3. Resource Review

The following information represents questions posed to the project proponent identified on the cover page of this document regarding the project that was provisionally awarded grant funds under PHMSA's NGDISM program. The information and justification section includes the applicant's response. PHMSA's conclusions are based on applicant provided information, independently reviewed by PHMSA. The mitigation measures were reviewed and confirmed by the project proponent.

Air Quality	
Question	Information and Justification
Is the project located in an area designated by the EPA as nonattainment or maintenance status for one or more of the NAAQS <sup>1</sup> ? Attainment status can be found in 40 CFR Part 81, or in EPA's Green Book: <a href="https://www.epa.gov/green-book">https://www.epa.gov/green-book</a> . See Appendix 4 for the steps required to identify that status of the project area.	No, the project area is located in Randolph County, Alabama which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS) based on EPA's Greenbook.
Will the construction activities produce emissions that exceed de minimis thresholds (tons per year) described in the initial Tier 2 EA worksheet?	N/A
Will mitigation measures be used to capture blowdown <sup>2</sup> ? If yes, please describe how blowdown will be captured.	The Roanoke Utilities Board proposes to utilize a cross compression process to reduce methane emissions by capturing the natural gas/methane during the retirement of the old pipeline.
Will you commit to reducing pressure prior to venting if the system has the capability?	The Roanoke Utilities Board proposes to utilize a cross compression process to reduce methane emissions by capturing the natural gas/methane during the retirement of the old pipeline.
Estimate the current leak rate per mile based on the type of pipeline material. Based on mileage of replacement and new pipeline material, estimate the total reduction of natural gas.	The existing leak rate is estimated to be 6,273 kg/year.  Replacement of pipelines would result in a leak rate of approximately 63 kg/year and equates to a reduction of approximately 124,197 kg over a 20-year timeframe.
Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality.	No.

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<sup>1</sup> [Criteria Air Pollutants | US EPA](#)

<sup>2</sup> Blowdown refers to the venting of natural gas in current facilities, in order to begin rehabilitation, repair, or replacement activities.

**Conclusion:**

The project area is located in Randolph County, Alabama which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS) based on EPA's Greenbook. The Proposed Action would result in minor air quality impacts associated with construction activities. Roanoke Utility Board proposes to utilize a cross-compression process to reduce natural gas emissions by capturing the natural gas during the retirement of the old pipeline where possible. During project construction, there would be some increase in ambient dust particulate from machinery and soil disturbances. These would be only temporary in nature and all efforts would be made through proper construction methods to ensure dust control and properly functioning equipment. Replacing leak prone pipe with newer, more durable materials will reduce leaks and overall natural gas emissions. Therefore, it is PHMSA's assessment that the proposed project would provide a net benefit to air quality from the overall reduction of leaking natural gas and that no adverse indirect or cumulative impacts would result from the Proposed Action.

**Mitigation Measures:**

- Use on-road and non-road vehicles efficiently by minimizing speeds and the number of vehicles;
- Minimize excavation to the greatest extent practical;
- Use cleaner, newer, non-road equipment as much as practicable;
- Minimize all vehicle idling and at minimum, conforming with local idling regulations;
- Ensure that all vehicles and equipment are in proper operating condition;
- On-road and non-road engines must meet EPA exhaust emission standards (40 CFR Parts 85, 86, and 89);
- Cover open-bodied trucks while transporting materials;
- Use water or other approved dust suppressants at construction sites and on unpaved roadways, as necessary;
- Minimize the area of soil disturbance to that necessary for construction;
- Minimize construction site traffic by using offsite parking and shuttle buses, as necessary;
- Minimize the idling of equipment.
- Utilize cross-compression process to reduce methane emissions by capturing the natural gas/methane during the retirement of the old pipeline.

Water Resources	
Question	Information and Justification
Are there water resources within the project area, such as wetlands, streams, rivers, or floodplains? If so, would the project temporarily or permanently impact wetlands or waterways? If water resources are present but will not be impacted, please describe how these impacts will be avoided (e.g. directional boring under the resource, etc.) If possible, please provide supporting maps identifying water resources within the project area.	<p>Yes, according to United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI), and Federal Emergency Management Agency (FEMA) maps, two water bodies occur near or within the project area. Jones Creek and High Pine Creek are located within the project area.</p> <p>Riverine and freshwater forested/scrubland wetlands are indicated within and adjacent to the project area.</p> <p>Part of the project would be located within FEMA Flood Zones AE and A. No impact would occur as ground disturbance in these areas would be temporary and not cause any fill on a floodplain. Directional boring would be used in these water resource areas to avoid impacts.</p>
Under the Clean Water Act, is a Section 401 State certification potentially required? If yes, describe anticipated permit and how project proponent will ensure permit compliance.	No.
Under the Clean Water Act, is a USACE Section 404 Permit required for the discharge of dredge and fill material? If yes, describe anticipated permit and how project proponent will ensure permit compliance.	<p>No, land disturbance activities will be conducted outside of wetland areas and directional drilling techniques will be used to install the pipe at each creek crossing location. Best management practices will be implemented around the bore pits to protect the waterways and any wetland areas nearby.</p> <p>There will be no dredged or fill material discharged into the adjacent water bodies.</p>
Under the Clean Water Act, is an EPA or State Section 402 permit required for the discharge of pollutants into the waters of the United States? Is a Stormwater Pollution Prevention Plan (SWPPP) required? If yes, describe how project proponent will ensure permit compliance.	<p>No, there would only be less than an acre of land disturbed at any one time.</p> <p>Due to the proximity of surface waters to the project area, best management practices that prevent erosion of silt and prevent stormwater pollution of surface waters will be implemented. A SWPPP will also be developed by the contractor.</p>

Will work activities take place within a FEMA designated floodplain? If so, describe any permanent or temporary impacts, the state or local governing regulations, and the required coordination efforts with state or local floodplain regulatory agencies.	<p>FEMA's flood maps indicate the project area is located in FEMA Flood Zones A and AE.</p> <p>Areas designated as Zones A and AE are considered Special Flood Hazard Areas and correspond to the one percent annual chance of flooding (100-year floodplain).</p>
Is the project located in a Coastal Zone? Will the proposed project activities affect any coastal use or natural resource of the coastal zone, requiring a Consistency Determination and Certification? Please provide any relevant information regarding how the project proponent normally coordinates with the applicable state's coastal zone management agency.	No
Is there any other information relevant to the project area or the proposed work as it pertains to Water Resources.	No.
<p><b>Conclusion:</b></p> <p>PHMSA reviewed NWI maps, as well as the FEMA national flood hazard maps. Jones Creek and High Pine Creek are located within the project area. Areas within the streams are classified by the NWI as Riverine. Portions of the project area within and directly adjacent to the creeks occur in FEMA Flood Zones A and AE. Project activities would not affect the flood-holding capacity of the 100-year floodplain or cause any adverse impacts to the Special Flood Hazard Area. Directional boring would be used to replace pipeline in the water resource areas. There would be temporary impacts from directional boring activities; however, all areas would be restored to pre-construction contours and conditions and there would be no permanent impacts. By avoiding direct impacts to aquatic resources and implementing best management practices during construction, PHMSA does not anticipate any adverse impacts to water resources.</p>	
<p><b>Mitigation Measures:</b></p> <ul style="list-style-type: none"> <li>• Avoid staging and laydown areas in wetlands or floodplains;</li> <li>• Reseed disturbed areas with native plant species;</li> <li>• Restore disturbed areas to pre-construction contours;</li> <li>• Adhere to additional mitigation measures in accordance with applicable permits;</li> <li>• Use Best Management Practices during construction to control sediment and erosion and prevent pollutants from entering adjacent waterways;</li> <li>• Coordinate with the appropriate FEMA representative or local floodplain coordinator when work will occur in FEMA designated special flood hazard areas, as needed.</li> </ul>	



Groundwater and Hazardous Materials/Waste	
Question	Information and Justification
Does the project have potential to encounter and impact groundwater? If yes, describe potential impacts from construction activities.	Yes, due to ground disturbance activities, there is a potential to encounter groundwater during excavation. No impact is expected as no hazardous materials would be in contact with the groundwater.
Will the project require boring or directional drilling that may require pits containing mud and inadvertent return fluids? If yes, describe measures that will be taken during construction activities to prevent impacts to groundwater resources. If boring or directional drilling will not require pits, please describe why these will not be required and how fluids will be contained.	Yes. The project may involve horizontal directional drilling and may require pits. Construction crews would be required to contain all inadvertent returns of drilling fluids via pits, vacuum truck, or other methods and dispose of them properly.
Will the project potentially involve a site(s) contaminated by hazardous waste? Sites identified as containing hazardous waste/materials can be identified through EPA's NEPAAssist tool <a href="https://nepassisttool.epa.gov/nepassist/nepamap.aspx">https://nepassisttool.epa.gov/nepassist/nepamap.aspx</a> or local databases identifying Superfund, Brownfields, etc. If hazmat sites are identified in or near areas where work will occur, describe how the proposed work poses no risk and/or what mitigative measures will be used to avoid identified sites.	No, based on review of reviewed EPA's NEPAAssist tool.
Is there any indication that the pipeline was ever used to convey coal gas? If yes, PHMSA will work with the project proponent for required studies.	No.
Does the project have the potential to encounter or disturb lead pipes or asbestos? If yes, describe how project proponent will ensure no risk will result.	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Groundwater and hazardous materials/waste.	No.
<b>Conclusion:</b>  PHMSA reviewed EPA's NEPAAssist to identify any brownfield properties, hazardous waste sites, and/or superfund sites. There were no hazardous waste, brownfield or superfund sites identified near the project area; Hazardous waste information is identified in the Resource Conservation and Recovery Act Information (RCRAInfo), which is a national program that includes an inventory of all generators, transporters, treaters, storers, and disposers of hazardous waste that are required to provide information about their activities to state environmental agencies.	

**Mitigation Measures:**

- Develop and adhere to a Stormwater Pollution Prevention Plan;
- Avoid boring/drilling, staging and laydown areas within EPA superfund sites or areas containing known waste;
- Adhere to applicable groundwater and/or soil management plans;
- Develop and implement an HDD Inadvertent Return and Contingency Plan to establish operational procedures and responsibilities for the prevention, containment, and clean-up of inadvertent returns associated with the directional drilling on the Project.

Biological Resources	
Question	Information and Justification
Based on review of IPaC and NOAA Fisheries database, are there any federally threatened or endangered species and/or critical habitat potentially occurring within the geographic range of the project area? Are there any state listed species within the geographical range of the project area? If no, no further analysis is required. Please provide a copy of IPaC species list and relevant state protected species list.	Yes, based on review of the USFWS's Information for Planning and Consultation (IPaC). Additionally, Alabama Forestry Commission state resources were inventoried to identify state protected species <sup>3</sup> .
Are there any known State or Federally, listed threatened or endangered species or habitat areas for State or Federally listed species present in or immediately adjacent to areas where work will occur? If yes, describe how project proponent will avoid impacts to listed species or habitat. If there are potential impacts to federally listed species or critical habitat, PHMSA will work with the project proponent to conduct necessary consultation with resource agencies.	No. Due to the nature of construction no impacts are expected. Shallow excavation will be conducted in previously disturbed and developed areas. Minimal sapling tree clearing is foreseen as part of this project. No endangered or threatened species will be impacted.
Will there be any tree clearing or removal of woody vegetation involved with the proposed work?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Biological Resources?	No.

<sup>3</sup> [Alabama Threatened and Endangered Species - Alabama Forestry Commission](#)

**Conclusion:**

The project area is built out and is comprised of previously disturbed developed and residential areas. PHMSA requested an official species list through the USFWS's IPaC website. The following species were identified as potentially occurring in the project area:

- Indiana Bat (endangered)
- Tricolored Bat (proposed endangered)
- Whooping Crane (experimental population)
- Alligator Snapping Turtle (proposed threatened)
- Monarch Butterfly (candidate)
- Georgia Rockcress (threatened)

There was no critical habitat identified within the project area.

Several state-listed species also occur within the geographical range, however based on the disturbed nature of the project area, no habitat is present for these species

The work would occur within existing ROW where the footprint of the proposed work has already been disturbed and is maintained. Because these areas are within ROW that has been previously impacted (pipeline laid in the ground in close proximity to the location where new pipes would be laid and subsequently paved), the immediate project area has very limited biological resources present. All water resources would be directional drilled and therefore there would be no work occurring within water resources. Therefore, in accordance with Section 7 of the Endangered Species Act (ESA) PHMSA's assessment is that the project would have no effect to the Indiana bat and Georgia rockcress. Under Section 7(a)(4) of the ESA, federal agencies must confer with the USFWS if their action would jeopardize the continued existence of a proposed species; therefore, PHMSA's assessment is that the project is unlikely to jeopardize the continued existence of the tricolored bat or alligator snapping turtle. As a candidate species, the monarch butterfly receives no statutory protection under the ESA. PHMSA's assessment is that the project would have no adverse impacts to state-listed species and would not cause more than minor adverse impacts to other biological resources in the project area.

**Mitigation Measures:**

No mitigation measures needed.

**Cultural Resources**

Question	Information and Justification
Please describe all ground disturbing activities associated with the project (including pipeline installation, service line installation, gas meter replacements, metering station construction or demolition, etc.). What is the maximum depth, width and length of excavations for each activity involving ground disturbance?	The primary construction methods used during the project will be installation by directional bore or replacement through open cut trenching adjacent to existing pipe. The directional bore pits will be placed within the established right-of-way (ROW). Bore pits are approximately 5-foot by 5-foot and 3 to 5-foot deep.

Will ground disturbance take place entirely in existing ROW or utility easements? Will it be restricted entirely to paved areas or will some disturbance take place in grassy, undisturbed, or natural areas?	All gas main and services will be installed in existing right of ways and easements. No, some of the pipelines will be installed in grassy areas of the road ROW.
Has the entire project area (width, length and depth) been previously disturbed by the original installation or other activities? If so, provide documentation or a description of prior ground disturbances, such as road or utility cross sections, plans or as-builts. If documentation is not available provide justification for how the ground was previously disturbed.	Yes, the construction will be limited to existing right of ways. These areas have been previously disturbed by the construction of roadways and utilities.
Does the project involve any physical impacts to buildings or structures? Please provide a description of the work that may affect buildings or structures and provide addresses and/or a map showing the locations.	No.
Please describe the project area and provide several photographs to show the character of the project area and surrounding properties. Is it a residential or commercial area? Are the nearby properties old or modern? Streetscapes and views looking down the ROW to show flanking properties are preferred. Please provide a photo key and/or captions to identify where the photos were taken and what they are showing.	The project area is a mixture of commercial, rural and residential properties. Properties are a mixture of old and modern.
Does the project involve construction or installation of any new aboveground components? If so, describe the components, identify their location and provide representative images of the components.	No.

<p>Are there any nearby properties or resources that either appear to be or are documented to have been constructed more than 45 years ago?<sup>4</sup> Does there appear to be a group of properties of similar age, design, or method of construction? Or are there any designed landscapes such as a park or cemetery? Please provide photographs of any properties that may be more than 45 years in age and would have the potential to be affected by the project (such as properties that include meter replacements, service line replacements or buildings within 10 feet of the areas proposed for pipeline main replacement under pavement). Multiple properties may be photographed together in a streetscape view and if there are many properties over 45 years in age, representative photos may be provided of a neighborhood rather than individual photos of each property.</p>	<p>No.</p> <p>No.</p> <p>Yes, Union Hill Baptist Church Cemetery is near the project area.</p>
<p>Will project implementation require removal or disturbance of any stone or brick sidewalk, roadway, or landscape materials or other potentially old or unique features? Please provide a handful of representative photos of the project area to show the character of the roadway and sidewalk materials in the project and staging areas. Include a photo key and/or captions of what the photos are showing and where they were taken.</p>	<p>No.</p>
<p>Is there any other information relevant to the project area or the proposed work as it pertains to Cultural Resources?</p>	<p>No.</p>

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<sup>4</sup> Local tax and property records or historic maps may indicate dates of construction.

**Conclusion:**

PHMSA identified properties based on available information on previously identified historic properties in the APE, including the National Register of Historic Places (NRHP) database and data received from the Alabama Historical Commission. PHMSA also conducted research to determine if there are any previously unidentified properties within the APE that are 45 years of age or older and may be eligible for the NRHP. This research revealed no NRHP listed or eligible properties within the APE or within a half-mile.

A letter was sent on December 27, 2024, to the Alabama State Historic Preservation Officer (SHPO) and all consulting parties outlining the Section 106 process, including a description of the undertaking, delineation and justification of the APE, identification of historic properties and an evaluation and proposed finding of effects. Based on this consultation, PHMSA proposed a finding that the Proposed Action would not adversely affect historic properties. PHMSA has requested comments on the Section 106 process, identification of historic properties, and proposed finding within 30 days of receipt of the letter. Concurrence was received from the Alabama Historical Commission on January 17, 2025.

PHMSA also invited the following federally recognized tribes to participate in consultation by separate letter on December 27, 2024:

- Alabama-Coushatta Tribe of Texas
- Alabama-Quassarte Tribal Town
- Cherokee Nation
- Coushatta Tribe of Louisiana
- Eastern Band of Cherokee Indians
- Muscogee (Creek) Nation
- Seminole Tribe of Florida

**Mitigation Measures:**

- If, during project implementation, a previously undiscovered archaeological or cultural resource that is or could reasonably be a historic property is encountered or a previously known historic property will be affected in an unanticipated manner, all project activities in the vicinity of the discovery will cease and Roanoke Utility Board will immediately notify PHMSA. This may include discovery of cultural features (e.g., foundations, water wells, trash pits, etc.) and/or artifacts (e.g., pottery, stone tools and flakes, animal bones, etc.) or damage to a historic property that was not anticipated. PHMSA will notify the State Historic Preservation Office and participating federally recognized tribes and conduct consultation as appropriate in accordance with 36 CFR § 800.13. Construction in the area of the discovery must not resume until PHMSA provides further direction. Roanoke Utility Board will strictly adhere to PHMSA's *Unanticipated Discoveries Protocols*.
- In the event that unmarked human remains are encountered during permitted activities, all work shall halt and Roanoke Utility Board shall immediately contact PHMSA as well as the proper authorities in accordance with applicable state statutes to determine if the discovery is subject to a criminal investigation, of Native American origin, or associated with a potential archaeological resource. At all times human remains must be treated with the utmost dignity and respect. Human remains and associated artifacts will be left in place and not disturbed. No skeletal remains or materials associated with the remains will be photographed, collected, or removed until PHMSA has conducted the appropriate consultation and developed a plan of action. Project activities shall not resume until PHMSA provides further direction.
- All work, material, equipment, and staging to remain within the road's existing right-of-way or utility easement or other staging areas as identified in the environmental documentation. If the scope of work changes in any way that may alter the effects to historic properties as described herein, the grant recipient must notify PHMSA, and consultation may be reopened under Section 106.

Section 4(f)	
Question	Information and Justification
Are there Section 4(f) properties within or immediately adjacent to the project area? 4(f) properties include publicly owned parks, recreational areas, wildlife or waterfowl refuges, and historic sites. If yes, provide a list of properties and/or a map of 4(f) properties as an attachment.	No, there are no Section 4(f) properties within or immediately adjacent to the project area
Will any construction activities temporarily impact use of the park including but not limited to access to any portion of the park, parking lots, trails, recreational fields, etc.?	No.

Will any construction activities occur within the property boundaries of a Section 4(f) property? If so, please detail these activities and indicate if these are temporary or permanent uses of the Section 4(f) property. Further coordination with PHMSA is required for all projects that might impact a Section 4(f) property.	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Section 4(f)?	No.
<p><b>Conclusion:</b></p> <p>Section 4(f) of the US Department of Transportation (USDOT) Act of 1966 as amended (Section 4(f)) (49 U.S.C. § 303(c)); is a federal law that applies to transportation projects that require funding or other approvals by the USDOT. Section 4(f) prohibits the Secretary of Transportation from approving any program or project which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or any land from an historic site of national, state, or local significance unless:</p> <ul style="list-style-type: none"> <li>• There is no feasible and prudent alternative to the use of the land;</li> <li>• The program or project includes all possible planning to minimize harm to such park, recreational area; wildlife and waterfowl refuge, or historic site, resulting from such use.</li> </ul> <p>PHMSA conducted a review of the Project Area and confirmed that there are no publicly owned public parks, recreation areas, national, state, or local significant wildlife and waterfowl refuges, or any historic sites of national, state, or local significance affected by the project. Therefore, there will be no use of Section 4(f) resources.</p>	
<p><b>Mitigation Measures:</b></p> <p>No mitigation measures needed.</p>	

Land Use and Transportation	
Question	Information and Justification
Will the full extent of the project boundaries remain within the existing right-of-way or easements? If no, please describe any right-of-way acquisitions or additional easements needed and provide a map of these areas as an attachment.	Yes, all work on mains would take place within the existing ROW.
Will the project result in detours, transportation restrictions, or other impacts to normal traffic flow or to existing transportation facilities during construction? How long are construction activities estimated to last?	Yes, minor traffic interruptions are anticipated during construction, which is anticipated to last 1 to 2 months.
Will there be any permanent change to existing transportation facilities? If so, what are the changes, and how would changes affect the public?	No, there will be no permanent changes to transportation facilities.



Will the project interrupt or impede emergency response services from fire, police, ambulance or any other emergency or safety response providers? If so, describe any coordination that will occur with emergency response providers? How long will service interruptions last, if applicable.	No, the project would not interrupt or impede emergency response services.
Is there any other information relevant to the project area or the proposed work as it pertains to Land Use and Transportation?	No.
<b>Conclusion:</b>  <p>There will be no permanent changes to land use. The project is replacing/upgrading the existing pipe and would not include new pipeline to serve any additional areas. During construction, there may be short-term impacts to adjacent residences, businesses and normal traffic patterns. Potential impacts include an increase in noise, dust, and transportation accessibility, as a result of construction and construction staging.</p> <p>Local and state regulations guide the transport of machinery, equipment, and automobiles around the construction areas. Temporary traffic impacts may occur on the local road network and adjacent pedestrian routes. Any impacts will be coordinated with local and state agencies.</p>	
<b>Mitigation Measures:</b> <ul style="list-style-type: none"> <li>• Restore all Impacted areas to pre-construction conditions;</li> <li>• Maintain traffic flows to the extent possible</li> <li>• Use traffic control measures to assist traffic negotiating through construction areas, as needed.</li> <li>• Coordinate with state and local agencies regarding detours and/or routing adjustments during construction</li> <li>• Notify potentially impacted residents and/or business owners (access, parking, etc.)</li> <li>• Have a traffic control plan in place, prior to construction, and coordinate with the appropriate agency well in advance of any impacted emergency services or essential agency functions.</li> </ul>	

Noise and Vibration	
Question	Information and Justification
Will the project construction occur for longer than a month at a single project location?	No, overall construction is anticipated to last approximately 1-2 months.
Will the project location be in proximity (less than 50-ft.) to noise sensitive receivers (residences, schools, houses of worship, etc.)? If so, what measures will be taken to reduce noise and vibration impacts to sensitive receptors?	No.

Will the project require high-noise and vibration inducing construction methods? If so, please specify.	No.
Will the project comply with state and local ordinances? If so, identify applicable ordinances and limitations on noise/vibration times or sound levels.	City of Roanoke Noise Ordinance 666.
Will construction activities require large bulldozers, hoe ram, or other vibratory equipment within 20 feet of a structure?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Noise and Vibration?	No.
<p><b>Conclusion:</b></p> <p>The project is located in the City of Roanoke, Alabama. Ambient noise consists of a combination of environmental noise primarily from road traffic, construction, industry, population density and other sources.</p> <p>The pipeline replacement project would result in temporary construction noise impacts; however, no vibration impacts should occur. Excavators, dump trucks, skid steers, rollers, pavers, and other similar construction equipment would be used to excavate a trench, lay pipe, compact soils and re-pave the affected areas. Construction for the project is anticipated to last 1-2 months. There are some sensitive noise receptors (i.e., residences, schools, houses of worship, etc.) located adjacent to the streets where work would occur. Noise impacts experienced by these receptors would be minor and temporary, and no adverse vibration impacts would result from the proposed work. Construction activities would be required to abide by local noise control ordinances in the City of Roanoke Noise control measures would be chosen by the contractor and could include the following, as necessary:</p> <ul style="list-style-type: none"> <li>• Use low-noise emitting equipment;</li> <li>• Implement noise-deadening measures for truck loading and operations;</li> <li>• Conduct monitoring and maintenance of equipment to meet noise limits;</li> <li>• Use acoustic enclosures, shields, or shrouds for equipment;</li> <li>• Minimize the use of generators or use quiet generators to power equipment.</li> </ul>	
<p><b>Mitigation Measures:</b></p> <ul style="list-style-type: none"> <li>• Adhere to all local, city and/or state noise regulations.</li> </ul>	

Community Effects	
Question	Information and Justification
Will the project displace existing residents or workers from their homes and communities? If so, what is the expected duration?	No.

Will the project require service disruptions to homes and communities? If so, what is the expected communication and outreach plan to the residents and the duration of the outages?	Yes, outages are only expected on the day a natural gas service is tied over to a new natural gas main. The disruption to each resident would last less than 4 hours. The Roanoke Utilities Board will send out notices to residents to inform of service disruptions as constructions crews progress along each street.
Are there populations with Limited English Proficiency located in the project area? If so, what measures will be taken to provide communications in other languages?	Yes, the Roanoke Utilities Board will translate materials as needed.
<b>Conclusion:</b>  <p>The proposed project would result in an overall reduction in leaking natural gas pipelines. Construction activities would result in minor temporary air quality impacts, including the intentional venting of existing distribution lines prior to replacement. Noise impacts associated with construction are anticipated to be minor. Traffic impacts would be temporary and disruptions to service would last less than 2 hours. The removal of leak prone pipe would reduce leaks and the potential for incidents, will result an increase in pipeline safety across the system while also improving operation and reliability. PHMSA determined the project would not impact the local community.</p>	
<b>Mitigation Measures:</b> <ul style="list-style-type: none"> <li>• Provide advanced notification of service disruptions and construction schedule to all affected parties including residents and businesses adjacent to the project area;</li> <li>• Coordinate service disruptions and construction schedule with local community leaders and groups, as applicable;</li> <li>• Maintain service at temporary facilities, if appropriate;</li> <li>• Promote public engagement to reduce project delivery delays and public controversy;</li> <li>• Develop outreach plans to involve and engage all populations.</li> </ul>	

Safety	
Question	Information and Justification
Has a risk profile been developed to describe the condition of the current infrastructure and potential safety concerns?	Yes. The Board maintains a Distribution Integrity Management Program (DIMP), along with the annual DOT reports, annual leak surveys, work orders, and inventory to comply with Title 49 CFR 192 safety standards. A risk profile was developed through the Roanoke Utilities Board's DIMP plan's modeling software and other external sources to identify the conditions of the current infrastructure and potential safety concerns.

Has a public awareness program been developed and implemented that follows the guidance provided by the American Petroleum Institute (API) Recommended Practice (RP) 1162?	Yes, the Roanoke Utilities Board will use the guidance provided through their Public Awareness Program and the American Petroleum Institute (API) recommended practices. The Roanoke Utilities Board will also use their existing operations and maintenance (O&M) procedures for the cast iron replacement.
Does the project area include pipes prone to leakage?	Yes, the Roanoke Utilities Board has identified its cast iron pipe material as one source of potential leakage through its risk assessment.
Will construction safety methods and procedures to protect human health and prevent/minimize hazardous materials releases during construction, including personal protection, workplace monitoring and site-specific health and safety plans, be utilized? If yes, document measures and reference appropriate safety plans.	Yes. The construction contractor will be required to provide site-specific safety and health plans for project activities. The plans will be reviewed by the project engineer prior to the start of the project to ensure protection of human health and prevent/minimize hazardous material release during construction. The Roanoke Utilities Board will have a third-party inspection service on-site throughout the project to ensure that the contractor is in compliance with the health and safety plan, including the implementation of personal protection and workplace monitoring.
Has an assessment of the project been performed to analyze the risk and benefits of implementation?	Yes. The risk assessment of this project was performed using the APGA SHRIMP modeling software to help analyze the risks of its aging infrastructure. In addition, annual DOT reports, annual leak surveys, work orders, and inventory were used to determine the risks associated with this project. The improvement made to the system's infrastructure will greatly enhance the safe operation of its system and reduce methane emissions. The project is in a disadvantaged community, which will benefit the local residents by creating construction jobs and construction support jobs that will place money back into the local economy.
Is there any other information relevant to the project area or the proposed work as it pertains to Safety?	No.

**Conclusion:**

The project would reduce the risk profile of existing pipeline systems prone to methane leakage and would also benefit disadvantaged rural and urban communities with the safe provision of natural gas. The project responds to the need to address the potentially unsafe condition of the natural gas distribution system of pipelines. The repair, rehabilitation, or replacement of pipelines would be constructed in accordance with industry best practices and would comply with all local, state, and federal regulations, including those for safety.

The abandonment of the existing pipeline would be conducted in accordance with PHMSA requirements found in 49 CFR 192.727 and 195.402(c)(10). These requirements include disconnecting pipelines from all sources and supplies of gas, purging all combustibles and sealing the facilities left in place. These requirements for purging and sealing abandoned pipelines would ensure that the abandoned pipelines are properly purged and cleaned and pose no risk to safety in their abandoned state. Therefore, PHMSA's assessment is that this replacement project would improve the overall safety of the existing pipeline infrastructure.

**Mitigation Measures:**

- Incorporate public awareness programs, as necessary
- Use standard construction safety methods and procedures;
- Ensure DIMP procedures are updated as necessary;
- Ensure work is constructed in accordance with industry best practices
- Comply with all local, state, and federal regulations.

## 4. Categorical Exclusion Determination

### Categorical Exclusions to be Applied:

As the proposed action is repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way to an existing natural gas pipeline, the following Categorical Exclusion, as listed in the DOE NEPA implementing procedures, 10 CFR 1021, adopted by PHMSA effective July 3, 2024<sup>5</sup> applies:

#### B5.4 Repair or Replacement of Pipelines

Repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way, provided that the actions are in accordance with applicable requirements (such as Army Corps of Engineers permits under section 404 of the Clean Water Act). Pipelines may convey materials including, but not limited to, air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, nitrogen gas, oil, produced water, steam, and water.

### Eligibility Criteria:

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts [40 CFR 1508.25(a)(I)], is not related to other actions with individually insignificant but cumulatively significant impacts [40 CFR 1508.27(b)(7)], and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation. The "Integral Elements" of 10 CFR 1021 are satisfied because the proposed action will not:

1. Threaten a violation of statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders;
2. Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities;
3. Disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)-excluded petroleum and natural gas products that preexist in the environment such that would be uncontrolled or un-permitted releases;
4. Have the potential to cause significant impacts on environmentally sensitive resources, which includes (i) property (sites, buildings, structures, and objects) of historical, archeological, or architectural significance; (ii) federally-listed and state-listed threatened or endangered species or their habitat, federally-protected marine mammals and essential fish habitat and otherwise federally-protected species; (iii) floodplains and wetlands; (iv) federally and state designated areas (wilderness areas, national parks, national monuments, national natural landmarks, wild and scenic rivers, wildlife refuges, scenic areas, and marine sanctuaries); (v) prime or unique farmland; (vi) special sources of water (sole-source aquifers, wellhead protection areas, and other vital water resources); and (vii) tundra, coral reefs, or rain forests); or
5. Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

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<sup>5</sup> [Federal Register :: Adoption of Department of Energy Categorical Exclusion Under the National Environmental Policy Act](#)

**Compliance Action:**

PHMSA is aware of the November 12, 2024 decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality (CEQ) regulations implementing NEPA are not judicially enforceable or binding on this agency action, PHMSA has nonetheless elected to follow those regulations at 40 C.F.R. Parts 1500–1508, in addition to the USDOT Procedures for Considering Environmental Impacts – DOT Order 5610.1C at <https://www.transportation.gov/office-policy/transportation-policy/procedures-considering-environmental-impacts-dot-order-56101c>, to meet the agency’s obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

The proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, or includes conditions that must be implemented to ensure significant effects are avoided, and meets the requirements for the CE referenced above. Based on my review of the proposed action, I have determined that the proposed action fits within the specified categorical exclusion, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

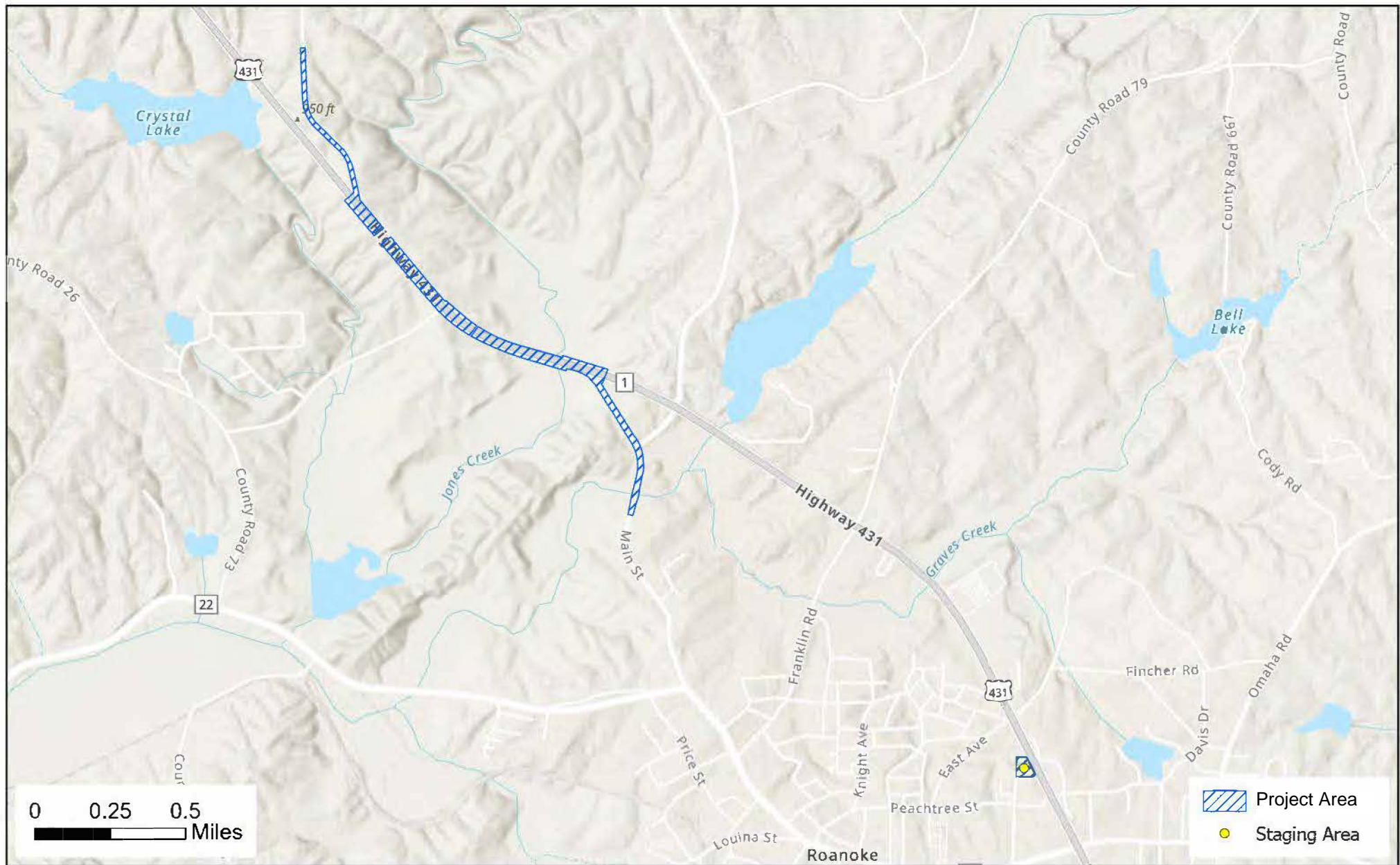
**PHMSA Approval:**

## **Appendix A**

### **Project Map**



# Project Area Map



Name: Utilities Board of Roanoke Pipeline Replacement  
Scale: 28,000  
Total Acreage: 37  
Roanoke, Alabama, Randolph County



Service Layer Credits: Esri, NASA, NGA, USGS, FEMA, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS