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

Natural Gas Distribution Infrastructure Safety and Modernization Grant Program

City of Reklaw

Cherokee County, Texas

Categorical Exclusion Documentation

NGDISM-FY23-CE-2024-08

PHMSA Office of Planning and Analytics
Environmental Analysis and Compliance Division
Amanda Murphy
Amanda.L.Murphy@dot.gov

City of Reklaw
Kevin Pell
Kevin.pell@grantworks.net

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 PHMA'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

Project Title	City of Reklaw Pipeline Replacement
Project Location	Cherokee County, Texas.

Project Description/Proposed Action:

The Proposed Action will replace 13.12 miles (approximately 69,296 linear feet) of the 6-inch PVC gas distribution line with 6-inch polyethylene (MDPE) pipe (See Appendix A). The work will include boring under driveways, roads and highways, tie-in (with emergency valves) to existing gas lines, installation of emergency valves, creeks crossings by bore, tracer wire with terminals, line markers, properly abandoning existing line in place, pressure testing and associated work. In order to eliminate potential leaks associated with expended anodes, all of the service lines connected to the existing 6-inch line will be replaced to the locking stopcock at the meter. The new service lines will use polyethylene tubing and anodeless risers to eliminate the need for cathodic protection associated with the service lines. Replacement of the regulators, meters and associated fittings will be bid as an additive alternate and will be taken if the bids are within the budget.

The work will occur in the right-of-way (ROW) of rural Texas Department of Transportation (TxDOT) maintained highways. All surfaces in the project area are paved. Where ditches are adjacent to the roadway, they are normally vegetated with native grasses. As usual with most similar roadways in this area, encroachment of trees and brush is expected into the ROW. Pavement widths and ROW widths will be identified during the topographical survey/design phase but are expected to vary from 60 to 120 feet. The paved surface is approximately 28 feet, consisting of two opposing travel lanes with no median. A paved median (continuous turn lane) is present on Highway 79. The ditches are typically mowed 2 to 3 times per year by contractors procured by TxDOT.

Question	Information
Describe the location and dimensions of all ground disturbing activities and provide a map depicting the location(s) where ground disturbance would occur. (*e.g.*, width and depth of trenching or excavation for borings, location of regulator stations, etc.)	Work will start from the Gulf South gate on FM 13 approximately 0.3 mi south east of the City limits of Troup Texas, thence south easterly with FM 13 to FM 856, thence south with FM 856 to FM 2274, thence southeasterly with FM 2274 to U.S. Highway 79, thence easterly with U.S. Highway 79 to FM 2274 South, tying into the existing 4-inch PVC gas lines at the intersection of U.S. Highway 79 and FM 2274 South. On average excavation will be approximately 5 feet in width and 6 feet in depth for the replacement of gas lines and associated appurtenances. Service line work

	will require excavation that is approximately 12 inches wide and 24 inches deep.
If the exact location where new pipe would be installed or where other work would occur, provide the width of the ROW or the general area encompassing the footprint where all work would occur. Include the anticipated footprint and depth of new pipe installation.	Work will be along the state-maintained highways listed in the project description. Work will occur within ROWs. The previous pipeline is believed to be about 4 feet from the paved roadway, and, when possible, the project will install the new pipeline in between the roadway and the existing pipeline. Any acquisition of new right of way or easement would adhere to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
Will service lines be replaced?	Yes.
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.	Yes, new service lines will tie into new meters.
What portions of the pipeline will be abandoned? What portions of the pipeline will be removed?	The entire length of the existing pipeline will be abandoned.
What construction methods will be used?	Insertion, Directional Boring, and Cut and Cover (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).	No new right-of-way or easement is needed.
How many linear feet of pipe will be replaced or repaired?	69,296 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)
69,296	6	PVC	180	NA	1968

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 non-attainment or maintenance status for one or more of the National Ambient Air Quality Standards (NAAQS)[1]?	No, based on review of the EPA Greenbook.
Will the construction activities produce emissions that exceed de minimis thresholds (tons per year)?	No.
Will mitigation measures be used to capture blowdown[2]?	Yes. The main line will be flared (not vented) in accordance with the operators OM&E manual prior to abandonment.
Will project proponent commit to reducing pressure on the segments/lines to be replaced, prior to venting?	Yes, pressure will be reduced to 10 PSI prior to flaring.
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 leakage.	The existing leak rate is estimated to be 2,501 kg/year Replacement of pipelines will result in a leak rate of approximately 377 kg per year. This will result in a reduction of approximately 42,470 kg of methane over a 20-year timeframe.[3]
Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality?	No.
Conclusion:	

[1] Criteria Air Pollutants | US EPA

[2] Blowdown refers to the venting of natural gas in current facilities, in order to begin rehabilitation, repair, or replacement activities.

[3] These calculations are based on the replacement of the 69,296 feet of main distribution lines. There may be a minor amount of venting resulting in minimal mounts of methane emissions resulting from the replacement of service lines and meters.

The project area is located in Cherokee County, TX which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS) based on EPA's Greenbook. The proposed project will result in minor air quality impacts associated with construction activities. During project construction, there will be some increase in ambient dust particulate from machinery and soil disturbances. These will be only temporary in nature and all efforts will 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 natural gas leaks. Therefore, it is PHMSA's assessment that the proposed project will provide a net benefit to air quality from the overall reduction of leaking natural gas and that no adverse indirect or cumulative impacts will result from the project.

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; and
- Minimize the idling of equipment.

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.)	Yes, according to USFWS National Wetland Inventory (NWI), available via NEPAssist.[4] The City of Reklaw will obtain an environmental professional to identify and clearly mark all streams, wetlands, and other aquatic resources in the project area where work will occur. Directional boring will occur under all aquatic resources and a minimum of a 50 foot buffer will remain between the edge of the aquatic resource and any ground disturbing activities to include bore pits, trenching, etc. Best management practices will be followed to assure water quality

[4] NEPAssist

	standards are met. All work will occur within previously disturbed pipeline and roadway ROW and all pipeline work will be replacement work so no additional impacts are anticipated.
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.	No.
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.	Construction activities will exceed soil disturbance thresholds, and a Section 402 permit will be required prior to construction. Yes, a SWPPP is required.
Will work activities take place within a FEMA designated floodplain? If so, describe any permanent or temporary impacts and the required coordination efforts with state or local floodplain regulatory agencies.	FEMA's flood maps[5] indicate portions of the project area are in a FEMA Flood Zone A. Areas designated as Zone A are considered Special Flood Hazard Areas (SFHA) and correspond to a one percent annual chance of flooding (100-year floodplain). The project area along FM-13E crosses a SFHA associated with Hampton Creek and the project area along FM 856N crosses SFHAs associated with Hampton Creek /Mill Creek and Campground Creek, the project area along FM 2274 N crosses SFHAs associated with Boggy Branch and Sampson Creek. All impacts will be temporary in nature and all mitigation measures will be followed when work is being done within FEMA designated floodplains.
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	No, the project is not located within a designated coastal zone.

[5] FEMA Flood Map Service Center | Welcome!

management agency.	
Is there any other information relevant to the project area or the proposed work as it pertains to Water Resources.	No.

Conclusion:

PHMSA reviewed NWI maps, as well as the FEMA national flood hazard maps. According to these sources, there are numerous wetlands and streams throughout the project area. The City of Reklaw intends to directional bore all wetlands and streams located in the project area to avoid impacting these resources. The City of Reklaw will hire an environmental professional to delineate all aquatic resources, to include wetlands and waters within the ROW and clearly mark these areas with appropriate flagging. The wetland delineation will be coordinated with the U.S. Army Corps of Engineers' Forth Worth District (Corps) for review and verification, consistent with the Corps' normal practices. Upon completion of final design and prior to construction, the City of Reklaw will confirm that the work for replacing pipelines will not encroach on any aquatic resources. If final design shows that there would be a discharge within wetlands or other aquatic resources (to include the placement of dirt, rock, or any fill material), the City of Reklaw will reassess the proposed work in these areas to avoid and minimize impacts. If complete avoidance is not possible, the appropriate authorization will be obtained from the Corps and the City of Reklaw will provide a copy to PHMSA, prior to beginning construction activities. The project area also includes FEMA designated special flood hazard areas. It is anticipated that ground disturbance activities in these areas would be avoided by directional drilling pipelines under identified floodplains. Should any work occur within special food hazard areas, the City of Reklaw should coordinate with the appropriate FEMA representative or local floodplain coordinator. By avoiding direct impacts to aquatic resources and implementing best management practices during construction, PHMSA does not anticipate any adverse impacts to water resources.

Mitigation Measures:

- Avoid staging and laydown areas in wetlands or floodplains;
- Reseed disturbed areas with native plant species;
- Restore disturbed areas to pre-construction contours;
- Adhere to additional mitigation measures in accordance with applicable permits;
- Use Best Management Practices during construction to control sediment and erosion and prevent pollutants from entering adjacent waterways;
- Coordinate with the appropriate FEMA representative or local floodplain coordinator when work will occur in FEMA designated special flood hazard areas, as needed;
- If final design shows that there would be a discharge within wetlands or other aquatic resources (to include the placement of dirt, rock, or any fill material), the City of Reklaw will reassess the proposed work in these areas to avoid and minimize impacts. If complete avoidance is not possible, the City of Reklaw will ensure the appropriate authorization is obtained from the Corps and will provide a copy to PHMSA, prior to beginning construction activities; and

- The City of Reklaw will ensure the appropriate Section 402 Permit is obtained before construction begins.

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 drilling fluids will not be allowed to be placed within 50 feet of active or unplugged water wells which could be contaminated by the fluids. The water bearing aquifers in the project area are geologically isolated from surface where drilling fluids may be found.
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 NEPAssist tool https://nepassisttool.epa.gov/nepassist/nepamap.aspx 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 or what mitigative measures will be used to avoid identified sites.	No. Based on review of EPA's NEPAssist tool, numerous hazardous waste sites were identified near the project area, but no Brownfield or Superfund sites were identified within the project area.
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?	No. Given the shallow depth of placement for gas main pipes compared to that of other utilities it is not likely that asbestos or lead pipes will be encountered during construction.
Is there any other information relevant to the project area or the proposed work as it pertains to groundwater and hazardous materials/waste.	No.

Conclusion:

PHMSA reviewed EPA's NEPAssist to identify any brownfield properties, hazardous waste sites, and superfund sites. There were numerous hazardous waste sites identified near the project area; however, there were no Brownfields sites or Superfund sites identified in 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 soil management plans; and
- 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 or critical habitat potentially occurring within the geographic range of the project area?	Yes, such species are potentially occurring within the geographic range of the project area based on review of the USFWS's Information for Planning and Consultation (IPaC). In addition, Texas state resources were inventoried to identify state listed species.
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.

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:

- Tricolored Bat (Perimyotis subflavus) proposed endangered
- Piping plover (*Charadrius melodus)* threatened
- Red-cockaded woodpecker (*Picoides borealis)* endangered
- Rufa Red Knot (Calidris *canutus rufa)* threatened
- Alligator snapping turtle (*Macrochelys temminckii)* proposed threatened
- Louisiana Pigtoe (*Pleurobema riddellii)* proposed threatened
- Monarch butterfly (*Danaus Plexippus)* proposed threatened
- Neches River rose-mallow (*Hibiscus dasycalyx)* 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 piping plover, red-cockaded woodpecker, rufa Red Knot Calidris, or Neches River rose-mallow. 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, alligator snapping turtle, the Louisiana pigtoe, or monarch butterfly. 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?	Ground disturbance will involve the replacement of 13.12 miles of existing 6 gas main lines. Replacement of these lines will involve excavation at an average width of approximately 2 feet and an average depth of approximately 6 feet. Tie-ins to existing gas main lines and installation of plug valves will involve excavation of an approximate width of 5 feet and an approximate depth of six feet. Service line work and pipeline crossings maybe involve excavation of approximately 24 feet in depth and approximately 12 feet in width.
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?	Yes. All pipeline replacement work will take place in previously disturbed areas, either under paved roadways or in rights of way along them.
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 ground was disturbed throughout the project area to install the existing pipeline, which is the same size as the pipeline that will be installed.
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. The project is in existing right-of-way and will not impact existing buildings.
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 or captions to identify where the photos were taken and what they are showing.	The project area takes place along an existing roadway/highway, subject to frequent vehicular traffic, running through a rural area. The pipeline being replaced does not run through a heavily populated area, or through/under buildings. Some commercial properties do exist along the roadway, but all work will take place in public rights-of-way.
Does the project involve construction or installation of any new aboveground components?	No. All work is replacing below ground, existing pipeline.

If so, describe the components, identify their location and provide representative images of the components.	
Are there any nearby properties or resources that either appear to be or are documented to have been constructed more than 45 years ago?[6] 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.	The project area was surveyed in 1980 by the Texas Railroad Commission (Atlas 8500006898). Twenty two buildings older than 45 years old were identified at the time. No NRHP evaluations are recorded from the survey, and neither the NRHP nor THC Atlas databases show that any of the properties have been nominated as eligible. This project will not directly or indirectly impact designed landscapes. It will not intersect with nearby historic properties or parks.
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.	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Cultural Resources?	No.
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 Texas 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 March 21, 2025, to the Texas 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 Texas Historical Commission on April 9, 2025.

PHMSA also invited the following federally recognized tribes to participate in consultation by separate letter on March 21, 2025:

- Apache Tribe of Oklahoma
- Caddo Nation of Oklahoma
- Alabama-Coushatta Tribe of Texas
- Kickapoo Traditional Tribe of Texas, Oklahoma
- Absentee-Shawnee Tribe Indians of Oklahoma
- Kickapoo Tribe of Oklahoma
- Tonkawa Tribe of Indians of Oklahoma
- Wichita and Affiliated Tribes

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 City of Reklaw 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. City of Reklaw 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 City of Reklaw 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 a map of 4(f) properties as an attachment.	No.
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. The project will not intersect with or be adjacent to any public parks.
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.	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Section 4(f)?	No.

Conclusion:

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:

- There is no feasible and prudent alternative to the use of the land;
- 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.

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 would be no use of Section 4(f) resources.

Mitigation Measures:

No mitigation measures needed.

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.	Yes, all work will take place within the existing right-of-way.
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. Temporary impacts to normal traffic flow will occur during flaring. Each flaring event is anticipated to last less than four hours, and will be performed when traffic is lighter, outside of normal commute periods, and at a time which will not disrupt the free passage of school buses. Flaring locations will be selected so that alternate routes are available. S Signage will be placed as necessary for detours and to denote "no through traffic." Barricades will prevent traffic in close proximity to the flare (exact distance to be determined in design phase).
Will there be any permanent change to existing transportation facilities? If so, what are the changes, and how would the changes affect the public?	No.
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 will 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?	Disruptions to transportation will be temporary and detours will be provided and clearly marked.

Conclusion:

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.

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.

Mitigation Measures:

- Restore all impacted areas to pre-construction conditions;
- Maintain traffic flows to the extent possible;
- Use traffic control measures to assist traffic negotiating through construction areas, as needed;
- Coordinate with state and local agencies regarding detours and routing adjustments during construction;
- Notify potentially impacted residents and business owners (access, parking, etc.); and
- 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.

Noise and Vibration	
Question	**Information and Justification**
Will the project construction occur for longer than a month at a single project location?	No.
Will the project location be in proximity (less than 50 feet) 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?	Yes. Construction methods and equipment will be used which will not produce a decibel level exceeding 85 at the point where it is observed by others (those not working on the project.) As necessary, work times will be adjusted so as to not produce excessive noise while persons not associated with the construction are present at the church building or at any project location. No vibration-producing equipment will be used in vicinity of houses of worship.

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.	Yes. All construction will take place in unincorporated areas. Texas Counties have no authority to regulate noise. Texas Penal Code Section 42.01(c)(2) will be followed. This section states that a noise is presumed unreasonable if the decibel level exceeds 85 at the point where it is observed by other (those not working on the project.)
Will construction activities require large bulldozers, hoe ram, or other vibratory equipment within 20 ft 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.

Conclusion:

The project is located in the vicinity of the City of Reklaw, Texas. None of the project elements are within the city itself. Ambient noise consists of a combination of environmental noise primarily from road traffic, construction, industry, population density and other sources.

The pipeline replacement project would result in temporary construction noise impacts; however, no vibration impact 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 6 to 12 months. There are numerous sensitive noise receptors (*e.g.*, 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 would be required to abide by local noise control ordinances in the City of Reklaw. Noise control measures would be chosen by the contractor and could include the following, as necessary:

- Use low noise emitting equipment;
- Implement noise-deadening measures for truck loading and operations;
- Conduct monitoring and maintenance of equipment to meet noise limits;
- Use acoustic enclosures, shields, or shrouds for equipment; and
- Minimize the use of generators or use quiet generators to power equipment.

Mitigation Measures:

- Adhere to all local, city and/or state noise regulations.

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. The service transfers will be conducted only when the new line (or section thereof) has been tested and placed into service. The old line (or sections thereof) will remain in service until all services have been transferred from it. All of the work associated with a service transfer will be constructed prior to the service transfer so that the period during which the customer has no gas can be limited to two hours. The contractor will be responsible for coordinating with each customer when their service is being transferred so that the transfer will result in minimal inconvenience to the customer and so that the customer will know that they will need to re-light their pilots.
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. Public notices will adhere to necessary standards to ensure the community is notified of project developments.
Is there any other information relevant to the project area or the proposed work as it pertains to Community Effects?	No.

Conclusion:

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. The removal of leak prone pipe would reduce leaks and the potential for incidents, will result in an increase in pipeline safety across the system while also improving operation and reliability. PHMSA determined the project would not impact the local community.

Mitigation Measures:

- Provide advanced notification of service disruptions and construction schedule to all affected parties including residents and businesses adjacent to the project area;
- Coordinate service disruptions and construction schedule with local community leaders and groups, as applicable;
- Maintain service at temporary facilities, if appropriate;
- Promote public engagement to reduce project delivery delays and public controversy; and
- Develop outreach plans to involve and engage all populations.

Safety	
Question	**Information and Justification**
Has a risk profile been developed to describe the condition of the current infrastructure and potential safety concerns?	Yes, as described in the Distribution Integrity Management Program (DIMP).
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.
Does the project area include pipes prone to leakage?	Yes.
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. During abandonment, the main line will be purged by flaring (not venting) in accordance with the system's OM&E manual. After purging, a combustible gas detector will be used to make sure that the explosive gas and air mixture does not remain in the pipe. During startup the system will be prepared to be purged of all air by the use of gas. All vents or valves used in the purging process will be equipped with vents at least 6 feet above the ground. As necessary to protect the public and environment, areas will be barricaded, vehicle traffic stopped, and other sources of ignition stopped. Venting will be kept to a minimum to prevent damage to the environment with fugitive and vented emission.
Has an assessment of the project been performed to analyze the risk and benefits of implementation?	Yes.
Is there any other information relevant to the	No.

project area or the proposed work as it pertains to Safety?	

Conclusion:

The project would reduce the risk profile of existing pipeline systems prone to leakage from the natural gas pipeline system and would also benefit the local community with the safe provision of natural gas. The project responds to the need to address the aging and leaky 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; and
- 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[7] 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

[7] Federal Register :: Adoption of Department of Energy Categorical Exclusion Under the National Environmental Policy Act

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 1021.41O(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)(l)], 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 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.

Compliance Action:

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:

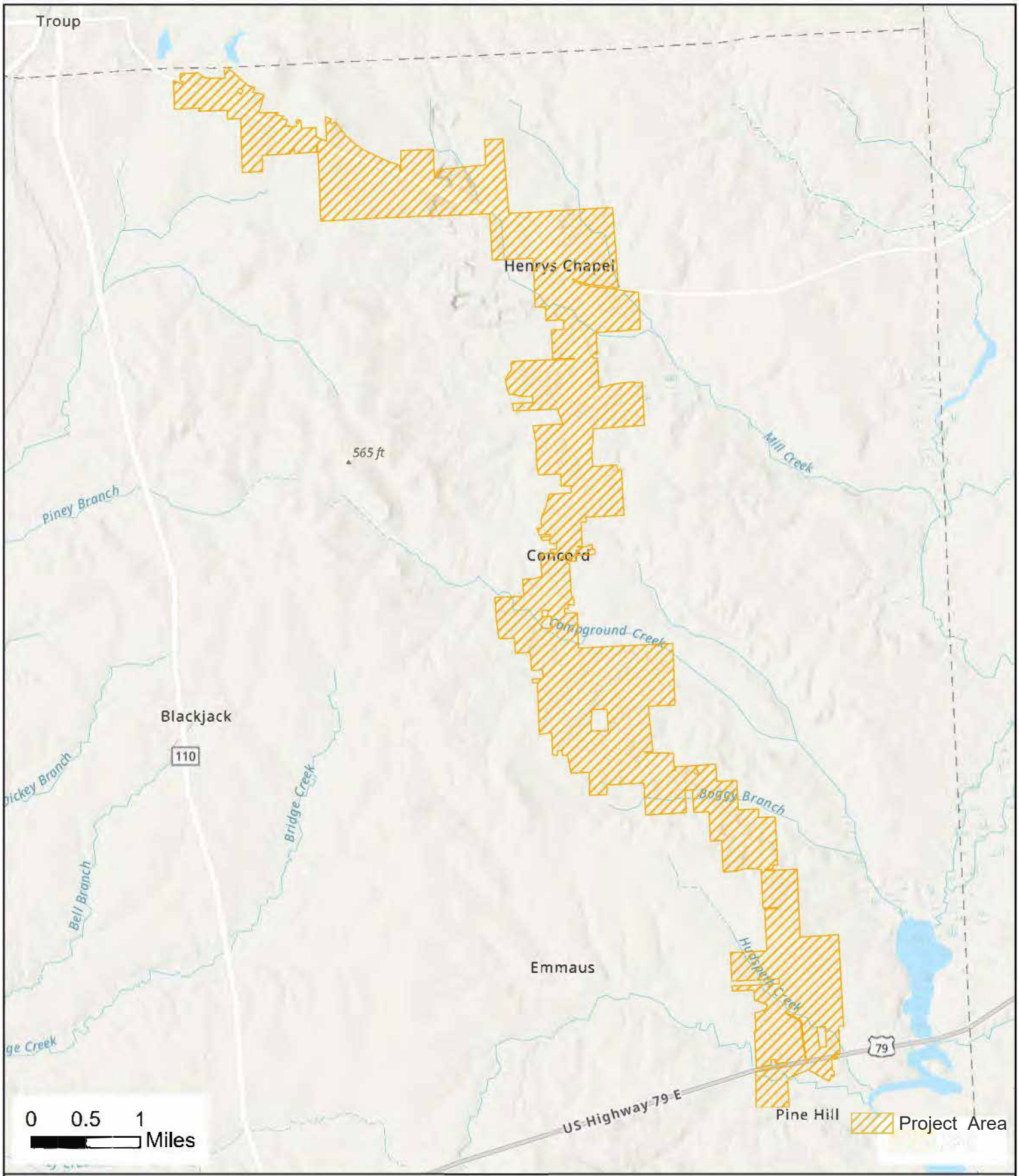
AMANDA LAUREN MURPHY

Digitally signed by AMANDA LAUREN MURPHY
Date: 2025.05.22 10:58:35 +02'00'

Appendix A

Project Map

Project Area Map



Name: City of Reklaw Pipeline Replacement
Scale: 75,000
Total Acreage: 4,816
Reklaw, Cherokee County, Texas

N

Service Layer Credits: Texas Parks & Wildlife, CONANP, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS, Esri, NASA, NGA, USGS, FEMA