

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

Natural Gas Distribution Infrastructure Safety and Modernization Grant Program City of Rocky Mount, North Carolina Categorical Exclusion Documentation NGDISM-FY23-CE-2024-29

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# 1. Overview

This document serves as the Pipeline and Hazardous Materials Safety Administration's (PHMSA) determination of applicability of the 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 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 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

Project Title	City of Rocky Mount Natural Gas Pipeline Replacement Project
Project	Rocky Mount, North Carolina
Location	
Project Description:	

The project is within the city of Rocky Mount in Nash County. The project area will replace 9.8 miles of two-inch steel main lines and 395 pre-1980 black plastic services and homemade anode risers.

The method of construction will be horizontal directional drilling (HDD). Ground disturbance will be limited to excavations to set bores and to tie in new service lines, resulting in the least amount of disturbance to streets, driveways, and neighborhood landscaping. Main line bore pits will be no larger than ten-foot wide by ten-foot long by four-foot deep. Service line ground disturbance will be limited to one-foot-wide excavations and approximately three-foot-long excavations at tie in sites. The maximum depth for service line installation will be approximately three feet. The length of individual bored lines will be approximately 300 feet or less. No new ground disturbance is expected for riser replacement. All new pipelines will be installed within existing rights-of-way (ROW). The existing pipelines will be abandoned in place. Construction is expected to last 15 months. Staging will be at 1251 Thorpe Road, Rocky Mount.

Question	Information
Question Describe the location and dimensions of all ground disturbing activities and provide a map depicting the location(s) where ground disturbance would occur. ( <i>e.g.</i> , width and depth of trenching or excavation for borings, location of regulator stations, etc.). Map(s) should accompany the project area description.	Information The method of construction will be horizontal directional drilling (HDD). Ground disturbance will be limited to excavations to set bores and to tie in new service lines, resulting in the least amount of disturbance to streets, driveways, and neighborhood landscaping. Main line bore pits will be no larger than ten-foot wide by ten-foot long at a depth of four-foot. Service line ground disturbance will be limited to one-foot-wide excavations and approximately three-foot-long excavations at tie in sites. The maximum depth for service line installation will be approximately three feet. The length of individual bored lines will be approximately 300 feet or less. No new ground disturbance is
	expected for riser replacement.
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	The pipe will be installed within four feet of the existing pipeline. The ROW is 50 feet total width for the city streets

encompassing the footprint where all work would occur. Include the anticipated footprint and depth of new pipe installation.	<ul><li>and 60 feet for state roads which includes Sunset Avenue.</li><li>Any acquisition of new right of way or easement would adhere to the Uniform Relocation Assistance and Real Property</li></ul>
	Acquisition Policies Act of 1970.
Will service lines be replaced? If so, include a map(s) depicting the location of service line replacements.	Yes.
Will meters or other equipment be replaced? If so, provide a description detailing what meter components and associated equipment will be replaced and indicate if this will require ground disturbance, if the equipment will be attached to existing structures, etc.	Yes - 395 pre-1980 plastic services and homemade anode risers will be replaced as part of this project.
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 of the existing pipeline is being replaced and will be left in the ROW.

Question	Information
What construction methods will be used? (Check all methods to be used)	Directional boring; 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) 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?	51,744.00 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.
51,744 feet	2.00	Bare steel	25.00	0.00	pre -1980

# 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)?	No, the project area is located in Nash County, North Carolina which is designated by the EPA as in attainment for all NAAQS based on EPA's Greenbook. <sup>1</sup>	
Will the construction activities produce emissions that exceed de minimis thresholds (tons per year)?	No.	
Will mitigation measures be used to capture blowdown? (Blowdown refers to the venting of natural gas in current facilities, in order to begin rehabilitation, repair, or replacement activities).	Yes The city proposes to utilize cross compression processes to reduce natural gas emissions by capturing natural gas during the retirement of the old pipeline.	
Will project proponent commit to reducing pressure on the segments/lines to be replaced, prior to venting?	N/A	
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 20,799 kilograms (kg)/year(yr). Replacement of pipelines would result in a leak rate of approximately 282 kg/yr or a reduction of approximately 410,326 kg over a 20-yr timeframe.	
Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality?	No.	

<sup>&</sup>lt;sup>1</sup> Criteria Air Pollutants | US EPA

The project area is located in Nash County, North Carolina 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. The city of Rocky Mount proposes to utilize a cross-compression process to reduce 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 methane 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 project.

- 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; and
- The city of Rocky Mount will cross-compression technology to capture natural gas during the retirement of the existing 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 ( <i>e.g.</i> directional	Yes, according to United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI), there are wetlands in the project area. Federal Emergency Management Agency (FEMA) maps show that there are no special flood hazard areas within the project area.	
boring under the resource)	Maple Creek occurs within the project area. The area within Maple Creek is classified by the NWI as Riverine and an area near Nottingham Road is classified as Freshwater Forested/Shrub Wetland. Directional boring would be used to replace the pipeline in the project area near and beneath these streams. Therefore, there would be no impacts to open water resources or wetlands. The selected contractor will maintain a minimum distance of 100 feet from the edges of surface water bodies and directional boring pits.	
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	Yes.
402 permit required for the discharge of pollutants into	
the waters of the United States? Is a Stormwater	Construction activities in the project area have
Pollution Prevention Plan (SWPPP) required? If yes	the potential to impact these surface water
describe how project proponent will ensure permit	resources. The North Carolina Department of
accention now project proponent will ensure permit	Environmental Quality (NCDEQ) issued the
compnance.	North Carolina General Permit for the
	construction of linear utility line projects and
	associated incidental activities effective July 1,
	2010. Coverage under this general permit
	authorizes the discharge of stormwater runoff
	from construction activities for sites where the
	discharge point is located in North Carolina and
	for discharges and construction activities that are
	conducted in accordance with the provisions and
	requirements of this permit and in accordance
	with a site-specific stormwater pollution
	prevention plan.
	V
	Yes.
	Coverage under this general permit authorizes
	the discharge of stormwater runoff from
	construction activities for sites where the
	discharge point is located in North Carolina and
	for discharges and construction activities that are
	conducted in accordance with the provisions and
	requirements of this permit and in accordance
	with a site-specific stormwater pollution
	prevention plan.
Will work activities take place within a FEMA	No, there are no project activities planned in
designated floodplain? If so, describe any permanent	FEMA designated floodplains.
or temporary impacts and the required coordination	
efforts with state or local floodplain regulatory	
agencies.	
Is the project located in a Coastal Zone? Will the	No, the project is not located within a designated
proposed project activities affect any coastal use or	coastal zone.
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	
applicable state s coastal zone management agency.	
Is there any other information relevant to the project	No
area or the proposed work as it pertains to Water	110.
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PHMSA reviewed NWI maps, as well as the FEMA national flood hazard maps. Maple Creek present in the project area. The area within Maple Creek is classified by the NWI as Riverine and an area near Nottingham Road is classified as Freshwater Forested/Shrub Wetland. No FEMA Special Flood Hazard Areas are present in the project area. 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.

- 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; and
- Use best management practices during construction to control sediment and erosion and prevent pollutants from entering adjacent waterways.

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, there is a possibility of encountering groundwater while trenching for gas mains and services, though unlikely. No impact is expected as no hazardous materials would be in contact with the groundwater. Construction would involve the placement of pipe bedding or use of native materials in the trenches.	
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.	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.	

No
10.
Based on review of EPA's NEPAssist tool, no
hazardous waste sites were identified near the
project area.
No.
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No.
No
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PHMSA reviewed EPA's NEPAssist to identify any brownfield properties, hazardous waste sites, and superfund sites. There were no hazardous waste 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.

- 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, based on review of the USFWS's Information for Planning and Consultation (IPaC), there is some potential for federally threatened or endangered species or critical habitat to occur within the geographic range of the project area. In addition, North Carolina Wildlife Resources Commission state resources were inventoried to identify potential 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.	There are listed endangered or threatened species potentially within the vicinity of the project area but due to the nature of construction no impacts are expected. Shallow excavation will be conducted in previously disturbed and developed areas. No tree clearing is foreseen as part of this project. Therefore, no endangered or threatened species are expected to 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.

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 Federally listed species were identified as potentially occurring in the project area:

- Neuse River waterdog (Necturus lewisi); threatened
- Carolina madtom (*Noturus furiosus*); endangered
- Atlantic pigtoe (Fusconaia masoni); threatened
- Dwarf wedgemussel (*Alasmidonta heterodon*); endangered
- Tar River spinymussel (Parvaspina steinstansana); endangered
- Yellow lance (Elliptio lanceolata); threatened
- Michaux's sumac (Rhus michauxii); endangered
- Green floater (*Lasmigona subviridis*); proposed threatened
- Tricolored bat (*Perimyotis subflavus*); proposed endangered
- Monarch butterfly (*Danaus plexippus*); proposed 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 have 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. By avoiding direct impacts to aquatic resources and implementing best management practices during construction, PHMSA does not anticipate any adverse impacts to water resources or freshwater mussels. 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 Neuse River waterdog, Carolina madtom, Atlantic pigtoe, Tar River spinymussel, yellow lance, Michaux's sumac and dwarf wedgemussel. Under Section 7(a)(4) of the ESA, federal agencies must confer with the USFWS if their action would jeopardize the continued existence of the tricolored bat, green floater 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 required.

Cultural Resources	
Question	Information and Justification
Question   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?   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?	Information and JustificationThe method of construction will be horizontal directional drilling (HDD). Ground disturbance will be limited to excavations to set bores and to tie in new service lines, resulting in the least amount of disturbance to streets, driveways, and neighborhood landscaping. Main line bore pits will be no larger than ten -foot wide by ten -foot long at a depth of four-foot. Service line ground disturbance will be limited to one-foot-wide excavations and approximately three feet-long excavations at tie in sites. The maximum depth for service line installation will be approximately three feet. The length of individual bored lines will be approximately 300 feet or less. No new ground disturbance is expected for riser replacement.Yes, ROW Width is 50 feet total for the city streets and 60 feet for state roads. Distance of new pipe from old pipeline will be placed approximately within four feet.Yes, when possible, the bore pits for the directional drilling will be placed in grassy and undisturbed areas to keep from disturbing paved
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. There are existing pipelines in the ROW where the new pipe is being placed. Likely, due to the age of the pipe, the pipeline was installed using trenching methods when it was previously installed. There are no available as-built drawings for these existing lines as most of these lines were installed in the late 1950s and early 1960s.
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 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 or captions to identify where the photos were taken and what they are showing.	The Project consists of residential and commercial locations across Rocky Mount, North Carolina. The properties include both modern and older designs.
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.
Are there any nearby properties or resources that either appear to be or are documented <sup>2</sup> to have been constructed more than 45 years ago? 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.	Yes, there are four NRHP-listed historic properties intersecting the Area of Potential Effects (APE): Rocky Mount Electric Power Plant Villa Place Historic District and Boundary Expansion Machaven Building West Haven Historic District Yes, the residences appear to be of similar age and construction. Yes, Western Avenue Park located at the corner of South Vyne Street and Nash Street is in the project
	area.
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.

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<sup>&</sup>lt;sup>2</sup> Local tax and property records or historic maps may indicate dates of construction.

Is there any other information relevant to the	No.
project area or the proposed work as it pertains to	
Cultural Resources?	

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 North Carolina State Historic Preservation Office. 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.

Based on the aforementioned identification and evaluation, PHMSA found four historic properties as defined in 36 CFR § 800.16(l) within the APE: the Rocky Mount Electric Power Plant, the Villa Place Historic District and Boundary Expansion, the Machaven building, and the West Haven Historic District. PHMSA's assessment is that the Proposed Project would not alter any of the characteristics or contributing features of the historic properties that qualify them for inclusion in the NRHP. Project work is limited to the replacement of existing pipelines. The project also does not include land acquisition, nor would it limit access to or change the use of these historic properties. In accordance with 36 CFR Part 800.5, PHMSA's assessment is that the project would have No Adverse Effect on historic properties.

A letter was sent on April 22, 2025, to the North Carolina State Historic Preservation Officer (SHPO) and all consulting parties outlining the Section 106 process, including a description of the project, 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 North Carolina State Historic Preservation Office on May 20, 2025.

PHMSA also invited the following federally recognized tribes to participate in consultation by separate letter on April 22, 2025:

- Catawba Indian Nation (aka Catawba Indian Tribe of South Carolina)
- Tuscarora Nation

- 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 The city of Rocky Mount 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. The city of Rocky Mount 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 The city of Rocky Mount 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-ofway 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)	Yes.
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.	Western Avenue Park located at the corner of South Vyne Street and Nash Street.

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, construction activities will not impact or limit access to Western Avenue Park. Since should be able to continue as normal while the project is taking place.
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, construction activities will not occur within Western Avenue Park.
Is there any other information relevant to the project area or the proposed work as it pertains to Section $4(f)$ ?	No.

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

- The city of Rocky Mount shall ensure that full public access to, and use of Western Avenue Park is maintained during construction.
- Ensure construction activities do not interfere with public access to and/or use of public recreational facilities during construction.

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 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. As with any construction project, temporary detours, transportation restrictions and other minor impacts may occur although the extent is unknown at this time as detailed design engineering of the project is incomplete. If detours are required during project activities, a traffic control and routing plan will be developed and implemented by the contractor in the areas where traffic patterns must be adjusted. Construction for the project is anticipated to last 15 months.
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, the project would not result in any 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.

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.

- 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/or routing adjustments during construction;
- Notify potentially impacted residents and/or 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, there is the potential for activities to occur within 50 feet of residences during the course of the project.
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. Project activities will comply with the noise ordinance for the city of Rocky Mount. Exemptions for construction activities are provided for construction provided such activities do not take place between the hours of 9:00 p.m. and 7:00 a.m. on weekdays and Saturdays, or at any time on Sunday.
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.

The project is located in the city of Rocky Mount. 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 15 months. There are numerous sensitive noise receptors (*e.g.*, residences, schools, houses of worship) 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 limited to daytime hours. 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?	No.
Are there populations with limited english proficiency located in the project area? If so, what measures will	Yes.
be taken to provide communications in other languages?	Therefore, interaction with these residents that speak in other languages should be minimal and they should see no impact to their everyday lives from the construction activities.
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.

- 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, the pipes schedules for replacement under this project are aging leak prone pipes.
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 prior to the start of the project to ensure protection of human health and prevent/minimize hazardous material release during construction. The city of Rocky Mount 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 personal protection and workplace monitoring.
Has an assessment of the project been performed to analyze the risk and benefits of implementation?	Yes, an assessment of the project has determined that it would have a large benefit to the community given the current risk caused by the existing leak prone pipe.
Is there any other information relevant to the project area or the proposed work as it pertains to Safety?	No.

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.

- 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<sup>3</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 1021.41O(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.

<sup>&</sup>lt;sup>3</sup> Federal Register :: Adoption of Department of Energy Categorical Exclusion Under the National Environmental Policy Act

#### **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:**

# Project Area Map



Service Layer Credits: Duke University, State of North Carolina DOT, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS, Maxar