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

Natural Gas Distribution Infrastructure Safety and Modernization Grant Program
Metropolitan Utilities District, Omaha, Nebraska
Categorical Exclusion Documentation
NGDISM-FY23-CE-2025-43

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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/Proposed Action

Project Title	Metropolitan Utilities District Natural Gas Pipeline Replacement Project
Project Location	Omaha, Nebraska

Project Description:

Metropolitan Utilities District's (MUD) proposed gas line replacement project (the Project) includes 16 segments that collectively make up a large portion of the remaining cast-iron gas mains in the MUD service area (See Appendix A). The existing cast iron pipes, which are buried 2.5 to 7 feet beneath streets, would be replaced with medium density polyethylene (MDPE) plastic pipe. Replacement pipe will be installed at the back of the curb, within the existing right-of-way (ROW), and would generally vary 3 to 15 feet to the right or left of the existing pipe alignment, to accommodate other existing utilities. The new gas mains and services will be installed via directional boring and the anticipated footprint of the bore will be several inches larger than the two- and four-inch gas mains that will be installed. The average excavation size at the beginning and ending points of a direction bore is three-feet wide by five-feet long by four-feet deep and most directional bores are 400 to 500 feet in length. The targeted depth of installation of new gas mains and gas services is 3.5 feet and 2.5 feet, respectively.

All project segments would potentially require meter replacement. If the meter is already outside, there would be no alteration to any buildings or structures. If the meter is inside, it would be moved outside. As part of this process, the meter mounting bracket would be

attached to the foundation of a building. In this case, a hole would be placed in the associated building to reconnect the new meter location to the customer's internal gas piping.
Each segment of the Project would be completed in phases. Typically, the first task involves the installation of the new high-pressure plastic gas main, from which all new gas services are installed to each individual residence. Then, a separate appointment is made to perform gas service changeovers and connect the home or business to the new system. The abandonment will take place after the main installation and service installation is complete. Depending on crew availability and/or preference, the main installation and service installation could have some overlap. Finally, the existing low-pressure mains are abandoned, and areas affected by the Project (i.e. lawns, sidewalks, driveways, etc.) are restored to their original or better condition. Replacement mains would be installed under sidewalk, as this both improves deteriorating sidewalk panels and helps reduce restoration time. Construction staging areas are undetermined at this time but are negotiated with the affected property owners prior to the start of each Segment. Segment-specific details are provided as follows:

Segment GP2744:

- Project Limits – North 48th Street to North Happy Hollow Boulevard, and Burt Street to Davenport Street
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is six-, four-, and two-inch. Diameter of replacement pipe is two-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 10 psig or 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1898 and 1953.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 85 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 115 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2745:

- Project Limits – North 42nd Street to North 49th Street, and Bedford Avenue to Northwest Radial Highway.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 8-inch, and 4-inch. Diameter of replacement pipe is 4-inch and 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 10 psig or 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1915 and 1957.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 45 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 50 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2746:

• Project Limits – North 46th Street to North 49th Street, and Northwest Radial Highway to Hamilton Street.
• Existing and Proposed Pipe Diameter – Diameter of existing pipe is 12-inch, 8-inch, and 4-inch. Diameter of replacement pipe is 4-inch and 2-inch.
• Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 10 psig or 45 psig.
• Existing Cover Depth – Between 2.5 feet and 7 feet.
• Pipeline Installation Date – Predominantly between 1909 and 1967.
• Right-of-Way – No right-of-way or easement acquisition is required.
• Project Duration – Replacement gas main pipe installation is anticipated to take 35 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 20 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2747:
• Project Limits -- North 48th Street to North 66th Street, and Binney Street to Erskine Street.
• Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 8-inch, 6-inch, and 4-inch. Diameter of replacement pipe is 2-inch.
• Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
• Existing Cover Depth – Between 2.5 feet and 7 feet.
• Pipeline Installation Date – Predominantly between 1912 and 1977.
• Right-of-Way – No right-of-way or easement acquisition is required.
• Project Duration – Replacement gas main pipe installation is anticipated to take 50 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 30 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2748:
• Project Limits – North 56th Street to North 72nd Street, and Western Avenue to Fairacres Road.
• Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 12-inch, 8-inch, and 4-inch. Diameter of replacement pipe is 2-inch.
• Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
• Existing Cover Depth – Between 2.5 feet and 7 feet.
• Pipeline Installation Date – Predominantly between 1927 and 1955.
• Right-of-Way – No right-of-way or easement acquisition is required.
• Project Duration – Replacement gas main pipe installation is anticipated to take 45 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 55 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2749:
• Project Limits – North Happy Hollow Boulevard to North 56th Street, and Corby Street to

Cuming Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 12-inch, 8-inch, and 4-inch. Diameter of replacement pipe is 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1912 and 1934.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 20 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 15 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2750:
- Project Limits – North Happy Hollow Boulevard and Cuming Street to Farnam Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 8-inch, and 6-inch. Diameter of replacement pipe is 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1910 and 1928.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 10 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 10 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2832:
- Project Limits – North 28th Circle to North 30th Street, and Binney Street to Hamilton Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 12-inch, 8-inch, and 4-inch. Diameter of replacement pipe is 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1896 and 1961.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 35 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 30 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2833:
- Project Limits – North 28th Street to John A. Creighton Boulevard. and Sahler Street to Binney Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 12-inch, 8-inch, 6-

inch, and 4-inch. Diameter of replacement pipe is 4-inch and 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 10 psig or 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1890 and 1964.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 100 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 80 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2834:
- Project Limits – North 27th Street to North 33rd Street. and Saratoga Street to Paxton Boulevard.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 12-inch, 8-inch, 6-inch, and 4-inch. Diameter of replacement pipe is 4-inch and 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 10 psig or 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1890 and 1984.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 60 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 50 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2835:
- Project Limits – North 16th Street to North 22nd Street. and Sahler Street to Pratt Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 12-inch, 6-inch, and 4-inch. Diameter of replacement pipe is 4-inch and 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1898 and 1958.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 15 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 20 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2837:
- Project Limits –South 24th Street to South 38th Street. and Turner Boulevard to Poppleton Avenue.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 12-inch, 10-inch, 8-inch, 6-inch, 4-inch, and 3-inch. Diameter of replacement pipe is 4-inch and 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds

per square inch gauge (psig). The replacement mains will operate at 10 psig or 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1887 and 1961.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 45 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 45 days; however, there will be some overlap between gas main and gas service inst0allation.

Segment GP2838:
- Project Limits – South 20th Street to South 32nd Avenue, and Pacific Street to Gold Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 12-inch, 10-inch, 8-inch, 6-inch, and 4-inch. Diameter of replacement pipe is 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1887 and 1961.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 65 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 65 days; however, there will be some overlap between gas main and gas service installation.

Segment GP2839:
- Project Limits – South 10th Street to South 20th Street, and Jackson Street to Center Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch. Diameter of replacement pipe is 12-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 45 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1948 and 1964.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 245 days. Abandonment is expected to take 10 days. Replacement of service lines to customers is anticipated to take 80 days; however, there will be some overlap between gas main and gas service installation.

Segment Project 'A':
- Project Limits – South 8th Street to South 21st Street, and Pierce Street to Deer Park Boulevard.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 12-inch, 10-inch, 8-inch, 6-inch, and 4-inch. Diameter of replacement pipe is 4-inch and 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1887 and 1969.

- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 200 days. Abandonment is expected to take 40 days. Replacement of service lines to customers is anticipated to take 375 days; however, there will be some overlap between gas main and gas service installation.

Segment Project 'B':
- Project Limits – North 30th Street. to South Happy Hollow Boulevard, and Hamilton Street to Howard Street.
- Existing and Proposed Pipe Diameter – Diameter of existing pipe is 16-inch, 12-inch, 10-inch, 8-inch, 6-inch, and 4-inch. Diameter of replacement pipe is 4-inch and 2-inch.
- Existing and Proposed Pressure – The existing mains operate at a pressure of 0.25 pounds per square inch gauge (psig). The replacement mains will operate at 45 psig.
- Existing Cover Depth – Between 2.5 feet and 7 feet.
- Pipeline Installation Date – Predominantly between 1888 and 1969.
- Right-of-Way – No right-of-way or easement acquisition is required.
- Project Duration – Replacement gas main pipe installation is anticipated to take 270 days. Abandonment is expected to take 50 days. Replacement of service lines to customers is anticipated to take 465 days; however, there will be some overlap between gas main and gas service installation.

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.). Map(s) should accompany the project area description.	The new gas mains and services will be installed via directional boring and the anticipated footprint of the bore will be several inches larger than the two-inch and four-inch gas mains that will be installed. The average excavation size at the beginning and ending points of a direction bore is three-feet wide by five-feet long by four-feet deep and most directional bores are 400 to 500 feet in length. The targeted depth of installation of new gas mains and gas services is 3.5 feet, and 2.5 feet, respectively.
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.	The most common right-of-way (ROW) width in the city of Omaha is 50 feet and this occurs on the majority of residential streets. Wider ROWs (66 feet plus) will be present on arterial streets and these widths will vary greatly based on the width of the pavement in a given area. 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? 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.	Meters will not be replaced but meters currently located on the inside of a structure will be moved to the outside at an agreed upon location with the owner or customer.
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 old pipelines and service lines will be abandoned in place.

Question	**Information**
What construction methods will be used? (Check all methods to be used)	Directional boring; Replacement adjacent to existing pipe; Abandonment of an existing pipe for a new location.
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?	274,279 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.
485	2	Plastic	.25	N/A	1887-1977
1,133	2	Steel	.25	N/A	1887-1977
1,528	3	Cast Iron	.25	N/A	1887-1977
1,039	3	Steel	.25	N/A	1887-1977
93,493	4	Cast Iron	.25	N/A	1887-1977
1,790	4	Plastic	.25	N/A	1887-1977
899	4	Steel	.25	N/A	1887-1977
31,371	6	Cast Iron	.25	N/A	1887-1977
20	6	Plastic	.25	N/A	1887-1977
1,900	6	Steel	.25	N/A	1887-1977
54,504	8	Cast Iron	.25	N/A	1887-1977
1,288	8	Plastic	.25	N/A	1887-1977
6,095	8	Steel	.25	N/A	1887-1977
6,651	10	Cast Iron	.25	N/A	1887-1977
5	10	Steel	.25	N/A	1887-1977
31,129	12	Cast Iron	.25	N/A	1887-1977
5,905	12	Steel	.25	N/A	1887-1977
32,470	16	Cast Iron	.25	N/A	1887-1977
2,574	16	Steel	.25	N/A	1887-1977

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.
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).	No.
Will project proponent commit to reducing pressure on the segments/lines to be replaced, prior to venting?	No.
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 225,139 kilograms (kg)/year(yr). Replacement of pipelines would result in a leak rate of approximately 1,496 kg/yr, or a reduction of approximately 4,499,078 kg over a 20-year timeframe.
Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality?	No.

Conclusion:

The project area is located in Douglas County, NE 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 would result in minor air quality impacts associated with construction activities, including the intentional venting of natural gas contained in the existing pipelines prior to replacement. Pipeline blowdowns are typically necessary to ensure that construction and maintenance work can be conducted safely on depressurized natural gas facilities and pipelines. Venting natural gas is required when service is switched from the existing line to the newly constructed line, but the volume of vented gas can depend on the ability to reduce pressure on the pipe segment or other mitigation actions. 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 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.

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)	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 special flood hazard areas within the project area. Elmwood Creek occurs within the project area. Areas designated as Special Flood Hazard Zone AE occurs in the project area as well. The area within Elmwood Creek is classified by the NWI as Riverine. MUD will be doing work adjacent to this area; however, there will be no work within approximately 100 feet of the creek. Directional boring would be used to replace the pipeline in the project area near water resources. Therefore, there would be no impacts to water resources or Special Flood Hazard Zones.
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.	No, the project does not require a 402 permit or a SWPPP.

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[1] indicate the project area is located in FEMA Flood Zone AE. Areas designated as Zone AE are considered Special Flood Hazard Areas and correspond to the one percent annual chance of flooding (100-year floodplain).
Is the project located in a Coastal Zone? Will the proposed project activities affect any coastal use or natural resource of the coastal zone, requiring a Consistency Determination and Certification? Please provide any relevant information regarding how the project proponent normally coordinates with the applicable state's coastal zone management agency.	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Water Resources.	No.

Conclusion:

PHMSA reviewed NWI maps, as well as the FEMA national flood hazard maps. Elmwood Creek present in the project area. The area within Elmwood Creek is classified by the NWI as Riverine. Portions of the project area occur in FEMA Flood Zones A and AE. Project activities would not affect the flood-holding capacity of the 100-year floodplain or cause any adverse impacts to the Special Flood Hazard Area. Directional boring would be used to replace pipeline in the water resource areas. There would be temporary impacts from directional boring activities; however, all areas would be restored to pre-construction contours and conditions and there would be no permanent impacts. By avoiding direct impacts to aquatic resources and implementing best management practices during construction, PHMSA does not anticipate any adverse impacts to water resources.

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; and
- Coordinate with the appropriate FEMA representative or local floodplain coordinator when work will occur in FEMA designated special flood hazard areas, as needed.

[1] FEMA Flood Map Service Center | Welcome!

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.
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, no hazardous waste sites were identified near 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.	Yes. MUD operated a gas manufacturing plant until the 1950s or 1960s so these pipelines were used to convey coal gas. MUD has been working on infrastructure replacement to eliminate cast iron pipe for the past 15 years and during that time have not encountered contaminated soil due to coal gas. MUD has encountered contaminated soil due to other foreign matter and in these instances the contaminated soil is properly disposed of by an outside contractor that specializes in this task.

Does the project have the potential to encounter or disturb lead pipes or asbestos?	Yes. There are lead water services in the Omaha area. These services will not be modified in any way but may be exposed by vacuum excavation in preparation for construction activities. By procedure, all utility crossings are vacuum excavated for damage prevention purposes before directional boring can be performed. If, for any reason, a lead water service is disturbed, a contractor is brought in to replace the service.
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 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.

Mitigation Measures:

- Develop and adhere to a Stormwater Pollution Prevention Plan, if necessary;
- Avoid boring/drilling, staging and laydown areas within EPA superfund sites or areas containing known waste; and
- Adhere to applicable groundwater and soil management plans.

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, Nebraska Games and Parks Commission 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.	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.

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

- Piping plover (*Charadrius melodus*); threatened
- Northern long-eared bat (*Myotis septentrionalis*); endangered
- Western prairie fringed orchid (*Platanthera praeclara*); threatened
- Pallid sturgeon (*Scaphirhynchus albus*); endangered
- Western regal fritillary (*Argynnis idalia occidentalis*); proposed threatened
- Suckley's cuckoo bumble bee (*Bombus suckleyi*); 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 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. 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 piping plover, Northern long eared bat, Western prairie fringed orchid or Pallid sturgeon. 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 Western regal fritillary, Suckley's cuckoo bumble bee 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?	The new gas mains and services will be installed via directional boring and the anticipated footprint of the bore will be several inches larger than the two- and four-inch gas mains that will be installed. The average excavation size at the beginning and ending points of a direction bore is three-feet wide by five-feet long by four-feet deep and most directional bores are 400 to 500 feet in length. The targeted depth of installation of new gas mains and gas services is 3.5 feet and 2.5 feet, respectively.
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 work will take place in the existing right-of-way. No, the city of Omaha has requested utilities to avoid disturbing roadways as much as possible so most work will occur between the curbline and right-of-way line. This may include areas under sidewalks and may also include the grassy area between the curb and the sidewalk or the grassy area between the sidewalk and right-of-way line.
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. These projects are taking place in urban areas where ground disturbance occurred throughout the area's development. These areas were disturbed by grading activities, construction of homes/businesses (typically with eight feet deep basements), construction of roadways and construction of the existing gas distribution system. Additionally, other utilities such as sewer mains and water mains were installed in the ROW at deeper depths than the new gas pipe 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 a map showing the locations.	Yes. The physical impacts to buildings or structures will be limited to the gas meter installation and fuel line connections. Many of the homes in these project areas have their gas meters located on the inside of the structure. These meters will be moved outside as part of these projects per company and industry best practices. Most meters will be mounted using a bracket attached below grade to the structure's foundation. Once the meter has been moved outside, a downstream fuel line will be installed into the home to reconnect the existing fuel line to the new meter location.
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 projects predominantly include residential areas with smaller areas of commercial properties throughout most project areas. The projects will consist primarily of older properties; however, there will be some redeveloped areas or properties throughout the project areas.
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.	Yes. New above ground components will include gas meter assemblies and valve boxes or round irons that will be visible but level with the existing contour of the ground.

Are there any nearby properties or resources that either appear to be or are documented[2] 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 48 National Register of Historic Places (NRHP)-listed historic properties, three districts that are eligible but not listed, and 1,339 surveyed standing structures within the Area of Potential Effects (APE). Vinton School Gallagher Building St. Matthias' Episcopal Church Center School St. Joseph Parish Complex St. Philomena's Cathedral and Rectory Prague Hotel Cornish Apartments G. C. Moses Block Swoboda Bakery 10th and Pierce Car Barn Eggerss-O'Flyng Building Omaha Bolt, Nut & Screw Building The Anderson Building Normandie Apartments The Georgia Row House Terrace Court Hanscom Apartments Selma Terrace The Nottingham Apartments Hope Lutheran Church Lizzie Robinson House Arthur C. Storz Residence Joslyn, George A., Mansion Havens-Page House Saddle Creek Underpass St. Cecilia's Cathedral Dr. Samuel D. Mercer House Jacob A. Gross Store Olson's Market Benson Commercial Historic District Holy Sepulchre Cemetery Old Market Historic District Drake Court Historic District Jobbers Canyon Historic District Omaha Rail and Commerce Historic District Gold Coast Historic District Country Club Historic District Dundee/Happy Hollow Historic District Vinton Street Commercial Historic District Park Avenue Apartment District

	Omaha Park and Boulevard System Traver Brothers Row Houses Historic District Fairacres Historic District Nebraska School for the Deaf Little Bohemia Leavenworth Park Commercial Historic District Most of the buildings and homes on these projects were constructed between the 1880s and 1960s. Yes, many of the structures are similar in design and construction with minimal variation. Yes. There are 18 public parks fronted by these project areas. Holy Sepulchre Cemetery is the only cemetery that will be fronted by work within any of these project areas. The Nash Chapel Crypt is located at St. Cecilia Cathedral and this location will be fronted by work and will have the gas service replaced.
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.	Yes. There are a number of areas where brick roadways or sidewalks have the potential to be disturbed during this project.
Is there any other information relevant to the project area or the proposed work as it pertains to Cultural Resources?	No.

[2] Local tax and property records or historic maps may indicate dates of construction.

Conclusion:

PHMSA identified properties based on available information on previously identified historic properties in the APE, including the National Register of Historic Places (NRHP) database and data received from the Nebraska State Historical Society. 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 48 historic properties as defined in 36 CFR § 800.16(l) within the APE: the Vinton School, the Gallagher Building, St. Matthias' Episcopal Church, the Center School, the St. Joseph Parish Complex, St. Philomena's Cathedral & Rectory, the Prague Hotel, the Cornish Apartments, the G. C. Moses Block, the Swoboda Bakery, the 10th and Pierce Car Barn, the Eggerss-O'Flyng Building, the Omaha Bolt, Nut & Screw Building, the Anderson Building, the Normandie Apartments, the Georgia Row House, Terrace Court, the Hanscom Apartments, Selma Terrace, the Nottingham Apartments, Hope Lutheran Church, the Lizzie Robinson House, the Arthur C. Storz Residence, the Joslyn, George A., Mansion, the Havens-Page House, the Saddle Creek Underpass, St. Cecilia's Cathedral, the Dr. Samuel D. Mercer House, the Jacob A. Gross Store, Olson's Market, the Benson Commercial Historic District, Holy Sepulchre Cemetery, the Old Market Historic District, the Drake Court Historic District, the Jobbers Canyon Historic District, the Omaha Rail and Commerce Historic District, the Gold Coast Historic District, the Country Club Historic District, the Dundee/Happy Hollow Historic District, the Vinton Street Commercial Historic District, the Park Avenue Apartment District, the Omaha Park and Boulevard System, the Traver Brothers Row Houses Historic District, the Fairacres Historic District, the Nebraska School for the Deaf, Little Bohemia, and the Leavenworth Park Commercial Historic District. PHMSA's assessment is that the project would not alter any of the characteristics or contributing features of the District that qualify it for inclusion in the NRHP. Project work is limited to the replacement of existing pipelines. The Undertaking would not result in lasting physical, visual, or audible effects to the District. The Undertaking also does not include land acquisition, nor would it limit access to or change the use of the District. 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 May 21, 2025, to the Nebraska 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 Nebraska State Historical Society on June 6, 2025.

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

- Apache Tribe of Oklahoma
- Cheyenne and Arapaho Tribes, Oklahoma
- Iowa Tribe of Kansas and Nebraska
- Iowa Tribe of Oklahoma
- Omaha Tribe of Nebraska

- Otoe-Missouria Tribe of Indians, Oklahoma
- Ponca Tribe of Nebraska
- Sac & Fox Nation of Missouri in Kansas and Nebraska
- Sac & Fox Nation, Oklahoma
- Sac & Fox Tribe of the Mississippi in Iowa

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 MUD 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 MUD 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 MUD 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.	Yes. Adams Park Bedford Place Park Bemis Park Clarkson Park Cuming Corner Park Deer Hollow Park Dewey Park Elmwood Park Gallagher Park Hanscom Park James F. Lynch Park Kountze Park Lake James Park Leavenworth Park Memorial Park Mercer Park Rudy Novacek Memorial Garden Spaulding Park Center School Dr. Samuel D. Mercer House Eggerss-O'Flyng Building Gallagher Building George A. Joslyn Mansion Georgia Row House Joel N. Cornish House Lizzie Robinson House Moses, G.C. Block Omaha Bolt, Nut and Screw Building Park Avenue Apartment District Park School Prague Hotel Saddle Creek Underpass Saint Mattias' Episcopal Church St. Cecilia's Cathedral St. Joseph Parish Complex St. Philomena's Cathedral and Rectory Swoboda Bakery Terrace Court The Anderson Building Traver Brothers Row Houses Historic District

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 take place in the ROW fronting these parks. Access to the parks, parking lots, trails, historic sites or recreational fields will not be impacted at any time. Pipeline and service line installation work will be performed via directional boring to limit disturbances in front of 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.	Yes. The following historic sites will have work that takes place on their property in addition to the right-of-way fronting their property. The majority of these will have the gas service lines replaced as part of the project which will require a temporary occupancy. Gallagher Building Lizzie Robinson House Moses, G.C. Block Saddle Creek Underpass St. Cecilia's Cathedral St. Philomena's Cathedral and Rectory The service line replacements will be considered in-kind and therefore would not be a use of the Section 4(f) property.
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. Six historic sites will have service lines replaced on the property requiring a temporary occupancy. However, the service line replacements will be considered in-kind and therefore would not be a use of the Section 4(f) property. Therefore, there will be no use of Section 4(f) resources.

Mitigation Measures:

- The MUD shall ensure that full public access to, and use of parks, parking lots, trails, historic sites or recreational fields is maintained during construction.
- Ensure construction activities do not interfere with public access to and 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, main replacements would be completed within the existing ROW. Service replacements would extend outside of the ROW into adjacent properties.

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. Construction activities may result in short stretches of streets being limited to a single lane of traffic during the day; however, those streets will be unrestricted by the end of each workday. Typically, these restrictions will be due to onsite equipment rather than paving cuts. These type of restrictions may occur both during gas main and gas service installations. Gas main abandonment activities will require paving cuts in many situations. This will result in streets being limited to single lanes of traffic for several consecutive days until the city of Omaha's local paving contractor has completed their paving replacement work. The overall construction timeline for this overall project will be four to five years; however, the impact to any specific street or individual customer will be limited to several days within that overall construction timeline.
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.

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/or routing adjustments during construction;
- Notify potentially impacted residents and/or business owners (*e.g.,* 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. The construction timeline for this overall project will be four to five years; however, the impact to any specific street or individual customer will be limited to several days within that overall construction timeline.
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 activities will be limited to normal weekday business hours.
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. Municipal Code City of Omaha, Nebraska Codified through Ordinance No. 43407 enacted May 2, 2023. Chapter 17 Noise Control.
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.

Conclusion:

The project is located in the city of Omaha. 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 four to five years but the impact to any specific street or individual customer will be limited to several days within that overall construction timeline. 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?	Yes Gas service will be temporarily disrupted when the customer's service is switched over from the old gas main to the new gas main and the customer's meter is moved from inside to outside the structure. This disruption is generally limited to a couple hours, at most, and the customer's appliances will be relit upon completion of the work. For infrastructure replacement projects similar to this, MUD communications team notifies customers of the pending work through mailers, website, social media such as Nextdoor, and direct conversations with applicable homeowner associations. This communication also provides customers with a point of contact for the project. The point of contact meets with each customer towards the start of the project to coordinate an acceptable outside meter location and to answer any questions the customer may have. During a project, customers frequently approach MUD construction crews and are provided with additional information and answers to their specific questions on an as-needed basis.
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. In areas where the population predominantly speaks Spanish, the written communication associated with a project is provided in Spanish. All communication, regardless of the area, is provided with instructions on how to contact our internal Spanish speaking representatives. In addition, MUD has a contract with Lionbridge for their interpretation services. Lionbridge provides interpretation services in over 380 languages.
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;
- Develop outreach plans to involve and engage all populations; and
- MUD will provide interpretation services as needed.

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 pipe being replaced as part of this project includes cast iron that was installed in the late 1800s and early 1900s. Cast iron pipe is known to leak industry-wide, and MUD has experienced this within the distribution system. Therefore, the infrastructure replacement program focuses on the elimination of all cast iron pipe.

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. MUD has a number of safety related documents within the Gas Operations and Maintenance Procedures, Gas Construction Standards, and company safety manual. Each of these documents provides guidance on how to accomplish certain tasks while protecting human health under various scenarios and conditions.
Has an assessment of the project been performed to analyze the risk and benefits of implementation?	Yes. MUD has had a formal infrastructure replacement program since 2008 and that program has specifically targeted the replacement of cast iron pipe. As this pipe has been eliminated, MUD has noticed the total number of leaks decreased over time.
Is there any other information relevant to the project area or the proposed work as it pertains to Safety?	No.

Conclusion:

The project would reduce the risk profile of existing pipeline systems prone to 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[3] applies:

> B5.4 Repair or Replacement of Pipelines
>
> Repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way, provided that the actions are in accordance with applicable requirements (such as Army Corps of Engineers permits under section 404 of the Clean Water Act). Pipelines may convey materials including, but not limited to, air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, nitrogen gas, oil, produced water, steam, and water.

Eligibility Criteria:

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts, is not related to other actions with individually insignificant but cumulatively significant impacts, and is not precluded by 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

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

5. Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

Compliance Action:

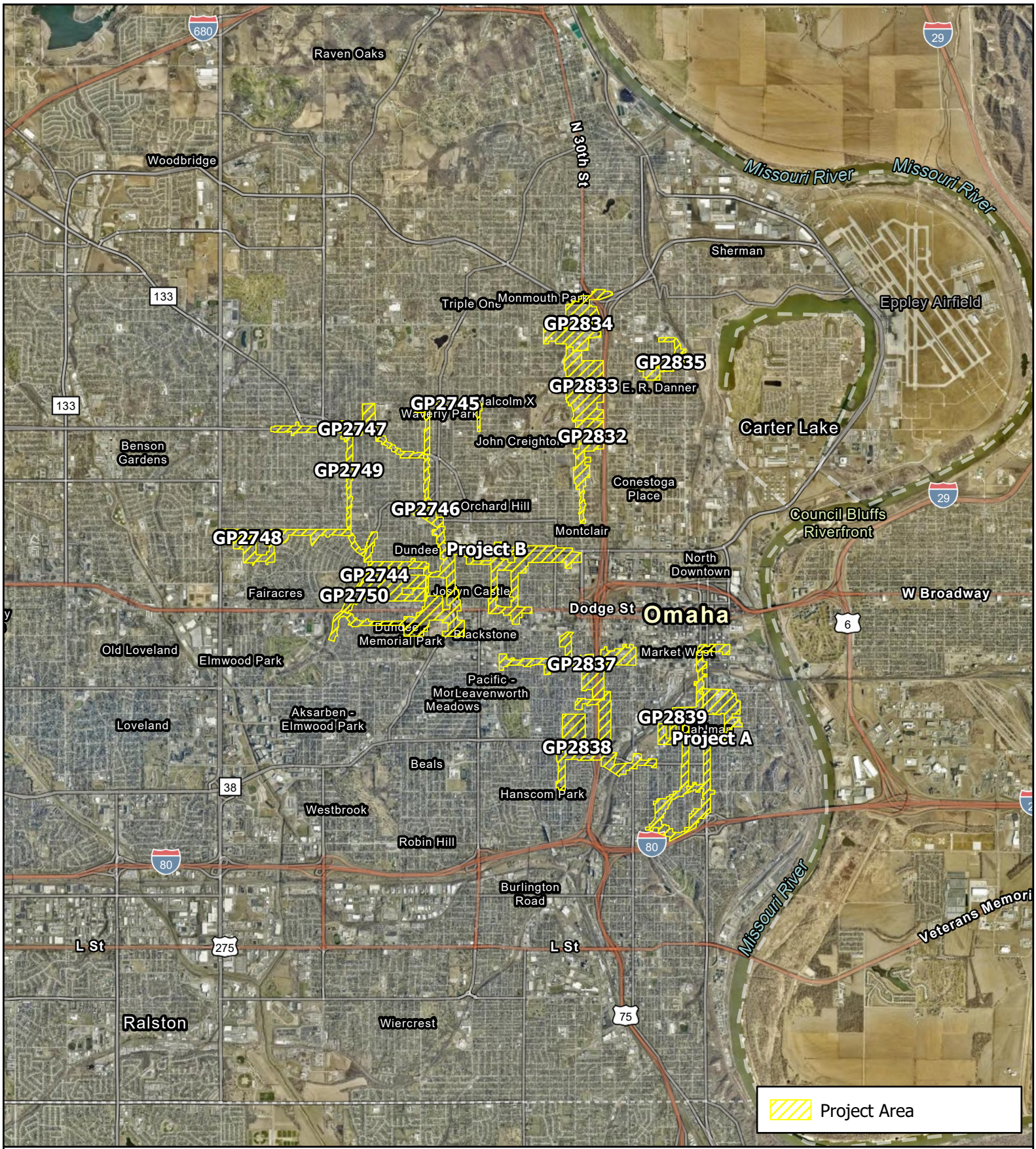
The proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, or includes conditions that must be implemented to ensure significant effects are avoided, and meets the requirements for the CE referenced above. Based on my review of the 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: 2025.07.16 19:03:25 +02'00'

Project Area Map



Name: Metropolitan Utilities District
Scale: 100,000
Total Acreage: 1,745
Omaha, Nebraska, Douglas County

0 2.5 5 Miles

N

Service Layer Credits: County of Douglas, NE, Pottawattamie County, Iowa, Iowa DNR, Nebraska Game & Parks Commission, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS, Eagleview, Pottawattamie County, Earthstar Geographics