



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

1200 New Jersey Avenue, SE
Washington, DC 20590

November 13, 2025

To: Jason Higgins
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From: Amanda L. Murphy
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**Subject: Categorical Exclusion Determination
City of Buford, NGDISM-FY23-CE-2025-42**

PROPOSED ACTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) reviewed the materials submitted by the City of Buford (Sponsor) to support the environmental review by PHMSA for the pipeline replacement project in Buford and Auburn, Georgia (the Project). See Attachment A for a map of the project area. PHMSA understands the Project includes replacing approximately 3.17 miles of pipeline with coated steel and polyethylene (PE) pipe. The construction will be completed within existing rights-of-way and easements using horizontal directional drilling and trenching.

APPLICABLE CATEGORICAL EXCLUSION

B.4: Repair, rehabilitation, or replacement of natural gas distribution pipelines and associated equipment within existing rights-of-way or easements.

EXTRAORDINARY CIRCUMSTANCES

Based on the scope of the action, PHMSA has determined that the proposed action does not meet the criteria for extraordinary circumstances listed in DOT 5610.1D.

Air Quality: The Project falls within Barrow and Gwinnett Counties, Georgia. The Project falls within a maintenance areas for 8-hour ozone (2008 and 2015 standards). Based on the Environmental Protection Agency MOVES model analysis, the PHMSA assessment is the Project does not require a General Conformity Analysis under Section 176(c)(4) of the Clean Air Act.

Cultural Resources: PHMSA sent a consultation letter with the agency's determination of a finding of no adverse effect under Section 106 of the National Historic Preservation Act to the Georgia State Historic Preservation Officer (SHPO) on August 27, 2025. The SHPO concurred with findings presented by PHMSA on September 26, 2025. PHMSA also invited federally recognized tribes to participate in consultation by separate letter on August 27, 2025. None of these groups have elected to participate in the process or provided comments.

Section 4(f): The Project would not result in a use of a property protected by Section 4(f) of the Department of Transportation Act.

Biological Resources: The Project would have no effect on any Endangered Species Act listed species or designated critical habitat or on any essential fish habitat as outlined in the Magnuson-Stevens Fishery Conservation and Management Act.

Land Use: The Project is not located in a coastal zone under the Coastal Zone Management Act.

The Sponsor must implement all mitigation and other commitments identified in Attachment B. In addition, the Sponsor is responsible for securing all necessary permits, approvals, and authorizations.

DETERMINATION

Based on a review of the information and documentation submitted by the Sponsor, including a review of Extraordinary Circumstances, PHMSA finds the proposed action qualifies for a Categorical Exclusion in accordance with Section 102 of the National Environmental Policy Act, 42 U.S.C. § 4332 and DOT Order 5610.D, Departmentwide National Environmental Policy Act Implementing Procedures.

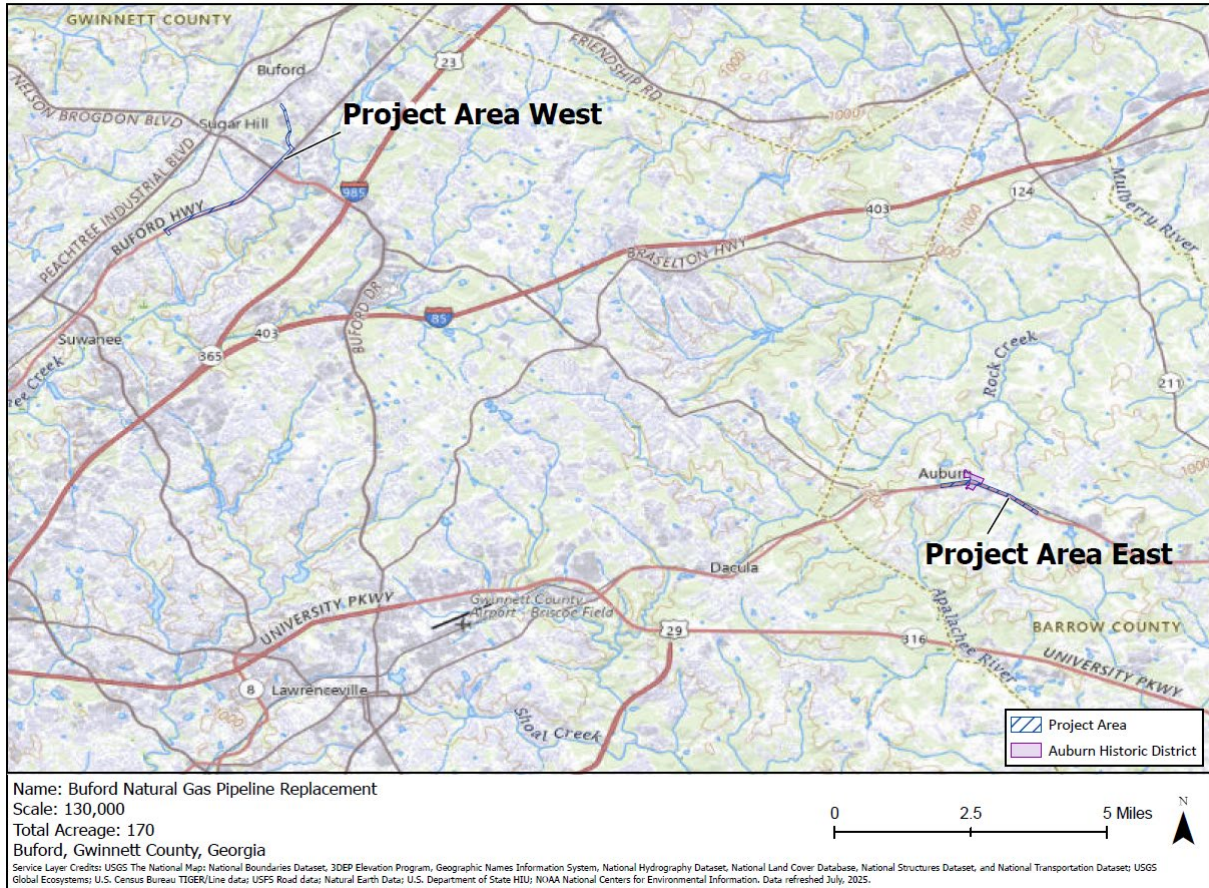
Approval by Environmental Analysis and Compliance Division:

Attachment(s):

- Attachment A: Project Area Map
- Attachment B: Mitigation and Other Commitments

Attachment A: Project Area Map

Project Area Map



Attachment B: Mitigation and Other Commitments

Air Quality

- Use on-road and non-road vehicles efficiently by minimizing speeds and the number of vehicles;
- Minimize excavation to the greatest extent practical;
- Minimize all vehicle idling and at minimum, conforming with idling regulations;
- Ensure that all vehicle and equipment are in proper operating condition;
- On-road and non-road engines must meet EPA exhaust emission standards (40 CFR Part 85, 86, and 89);
- Cover open-bodied trucks while transporting materials;
- Use water or other approved dust suppressants at the 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
- The sponsor will commit to preventing methane emissions during the construction process by using cross-compression technology.

Water Resources

- Avoid staging and laydown areas in wetlands and floodplains;
- Reseed disturbed areas with native plant species;
- Restore any disturbed areas to pre-construction contours;
- Adhere to additional mitigation measure in accordance with applicable permits; and
- Use best management practices during construction to control sediment and erosion and prevent any 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.

Groundwater and Hazardous Materials/Waste

- Develop and adhere to a Stormwater Pollution and Prevention Plan, if necessary;
- Avoid boring/drilling, staging and laydown areas within EPA superfund sites or areas containing known wastes;
- Adhere to applicable groundwater or 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 HDD on the project.

Cultural Resources

- 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 Buford

will immediately notify PHMSA. This may include discovery of cultural features (e.g., foundations, water wells, or trash pits) or artifacts (e.g., pottery, stone tools and flakes, or animal bones) 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 Buford 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 Buford 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.

Land Use and Transportation

- Restore all impacted areas to pre-construction conditions;
- Maintain traffic flows to the extent possible;
- Use traffic control measure to assist traffic negotiating through construction areas, as needed;
- Coordinate with state and local agencies regarding detours and routing adjustments during construction;
- Notify potentially impacted residents and business owners (access, parking, etc.); and
- Have a traffic control plan in place prior to construction, and coordinate with the appropriate agency well in advance of any impacted emergency services or essential agency functions.

Noise and Vibration

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

Community Effects

- Provide advanced notification of service disruptions and construction schedules to all affected parties including residents and businesses adjacent to the project area;
- Coordinate service disruptions and construction schedule with local community leader 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 populations.

Safety

- Incorporate public awareness programs, as necessary;
- Use standard construction safety methods and procedures;
- Ensure Distribution Integrity Management Procedures (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.