



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

1200 New Jersey Avenue, SE
Washington, DC 20590

November 13, 2025

To: Jason Brimhall
City of Safford
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From: Amanda L. Murphy
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**Subject: Categorical Exclusion Determination
City of Safford, NGDISM-FY24-CE-2025-04**

PROPOSED ACTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) reviewed the materials submitted by the City of Safford (Sponsor) to support the environmental review by PHMSA for the meter replacement project in Safford, Arizona (the Project). See Attachment A for a map of the project area. PHMSA understands the Project includes replacing 2,298 outdated meters and malfunctioning regulators. The construction will be completed within existing rights-of-way and easements and no ground disturbance or attachments to existing structures are anticipated.

APPLICABLE CATEGORICAL EXCLUSION

C(5): 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.

RESOURCE REVIEW

Air Quality: The Project falls within Graham County, Arizona which is designated by the EPA as in attainment for all NAAQS based on the EPA Greenbook¹. Replacing outdated or malfunctioning regulators and outdated meters with newer, more durable materials will result in

¹ <https://www.epa.gov/green-book>

the overall reduction of risks from leaking natural gas. Therefore, it is PHMSA's assessment that the Project would provide a net benefit to air quality from the overall reduction of risks from leaking natural gas and that no adverse indirect or cumulative air quality impacts would result from the project.

Cultural Resources: PHMSA invited federally recognized tribes to participate in consultation by letter on July 15, 2025. On July 16, 2025, the Pascua Yaqui Tribe responded that because the project does not involve any ground disturbance, and because they do not have any records of non-archaeological heritage resources of significance, no further consultation with the Tribe is necessary. On July 18, 2025, the White Mountain Apache Tribe responded that the Project would not adversely affect any of the Tribe's cultural heritage resources or historic properties. On August 13, 2025, the San Carlos Apache Tribe also responded that the project would not adversely affect any properties of cultural or religious significance. No further responses were received.

PHMSA sent a separate consultation letter to the Arizona State Historic Preservation Office (SHPO) on August 21, 2025 with PHMSA's determination of a finding of no adverse effect under Section 106 of the National Historic Preservation Act. The SHPO requested additional information and a revised consultation letter on September 10, 2025. An updated letter was sent to the Arizona SHPO on September 17, 2025. The SHPO concurred with the findings presented by PHMSA on October 06, 2025.

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 within a coastal management 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 review of Extraordinary Circumstances, PHMSA finds the proposed action qualifies as 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:

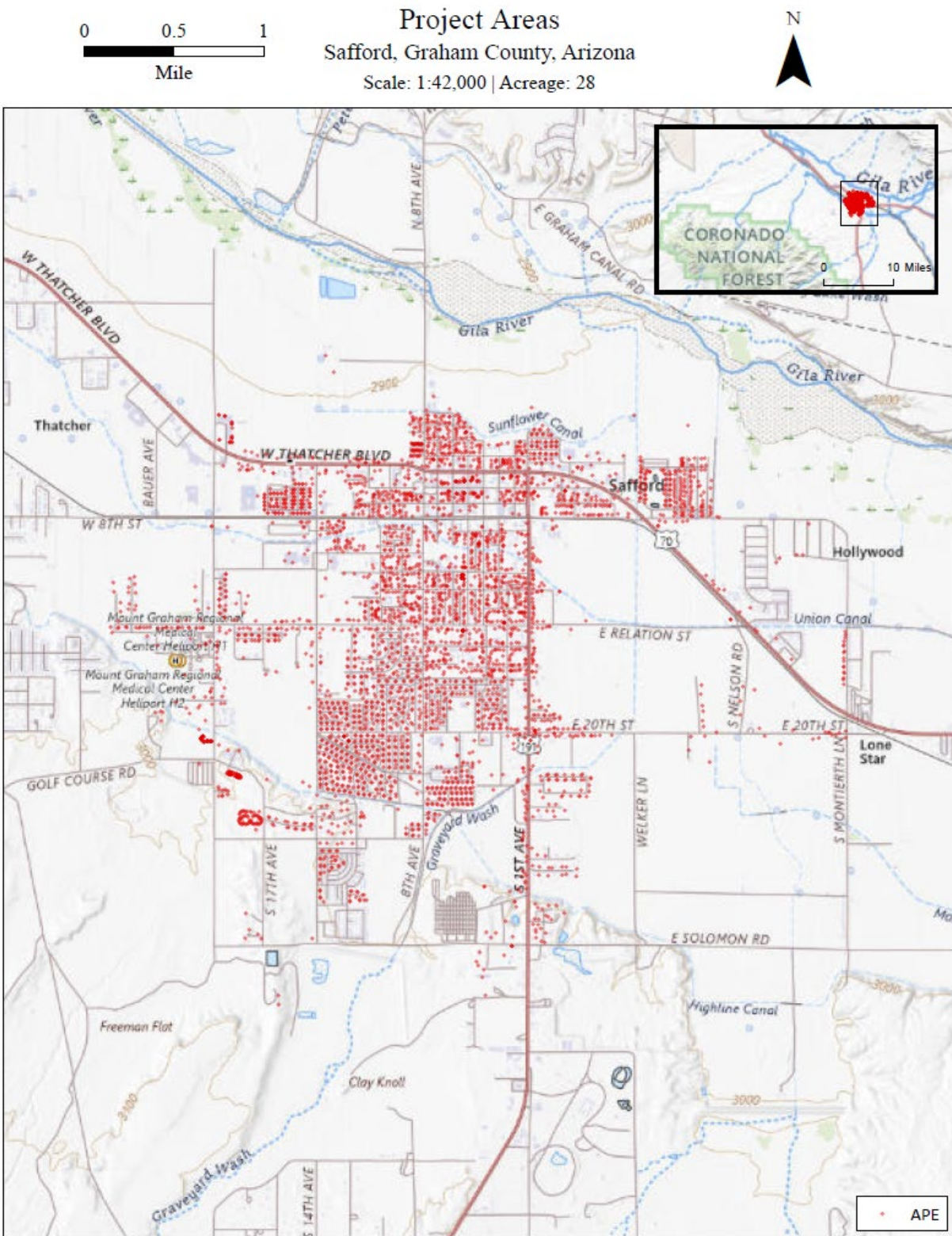
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Attachment(s):

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

Attachment A: Project Area Map



Gas Meter Assembly Replacement Project

USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/

Attachment B: Mitigation and Other Commitments

Air Quality

- Use on-road and non-road vehicles efficiently by minimizing speeds and the number of vehicles;
- Use cleaner, newer, non-road equipment as much as 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 truck while transporting materials;
- Use water or other approved dust suppressants at the construction sites and on unpaved roadways, as necessary;
- Minimize construction site traffic by using offsite parking and shuttle busses, as necessary; and
- Minimize the idling of equipment.

Water Resources

- Avoid staging and laydown areas in wetlands or floodplains;
- Adhere to additional mitigation measures 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.

Cultural Resources

- If, during project implementation, a previously undiscovered archeological 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 vicinity of the discovery will cease and the project sponsor 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;
- In the event that unmarked human remains are encountered during permitted activities, all work shall halt and the applicant 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; and

- 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.

Section 4(f)

- The City of Safford shall ensure that full public access to, and use of all adjacent public parks is maintained during construction; and
- Ensure construction activities do not interfere with public park access to and/or use of public recreational facilities during construction.

Land Use and Transportation

- 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/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

- Adhere to all state noise regulations and City of Safford noise ordinances.

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; and
- Maintain service at temporary facilities, if appropriate.

Safety

- 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.