



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

1200 New Jersey Avenue, SE
Washington, DC 20590

October 9, 2025

MEMO TO FILE

From: Amanda L. Murphy
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Subject: **Categorical Exclusion Determination**
City of Corpus Christi, NGDISM-FY24-CE-2025-01

PROPOSED ACTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has reviewed the materials submitted by the City of Corpus Christi (Sponsor) to support PHMSA's environmental review for the pipeline replacement project Corpus Christi, Texas (the Project). A map of the project is enclosed as Attachment A. PHMSA understands the Project includes replacing approximately 5.22 miles of coated steel pipeline with modern polyethylene (PE) pipe. The Project also includes installation of new service line connections and replacement of gas meters and associated hardware. The construction will be completed within existing rights-of-way and easements using directional drilling and trenching methods.

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 Nueces County, Texas which is designated by the EPA as in attainment for all NAAQS based on the EPA Greenbook¹. Replacing leak-prone pipe with newer, more durable materials will result in 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

¹ <https://www.epa.gov/green-book>

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 sent a consultation letter to the State Historic Preservation Officer (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 concurred with the findings presented by PHMSA on September 12, 2025. PHMSA also invited federally recognized tribes to participate in consultation by separate letter on August 21, 2025. None of these tribes 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 located in Nueces County, Texas, which is considered a coastal zone and is subject to the Coastal Zone Management Act under the Texas Coastal Management Program. The Project consists of the replacement of existing infrastructure and does not constitute as new development. The project would not affect any coastal use or natural resource of the coastal zone. Therefore, a Consistency Determination and Certification is not required for federal consistency.

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.

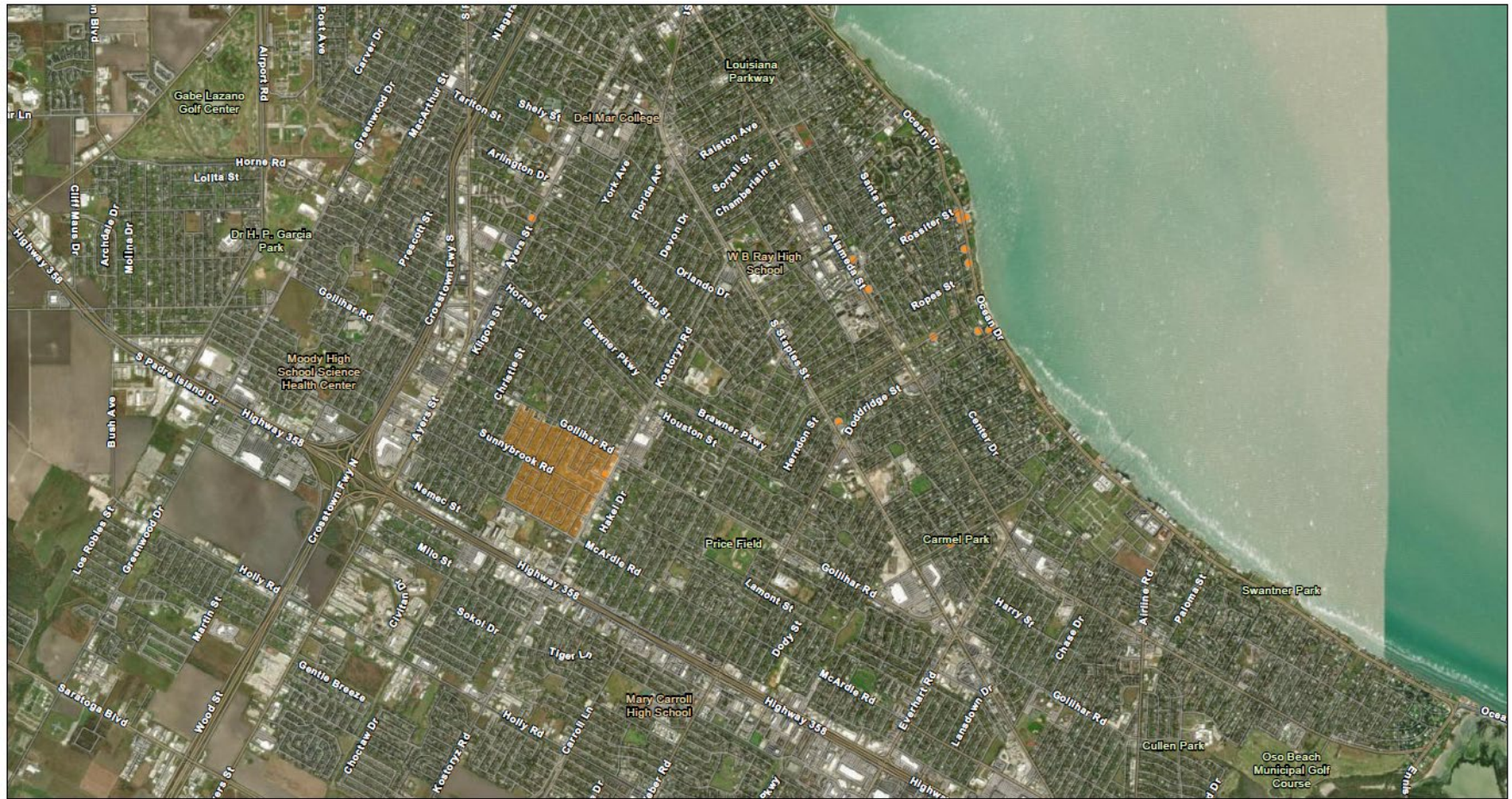
Approval by Environmental Analysis and Compliance Division:

Attachment(s):

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

Attachment A: Project Area Map

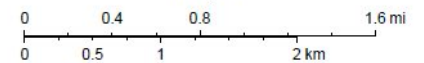
Project Area and Historic Sites



August 14, 2025

- project area
- historic sites

1:36,112



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Maxar

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;
- 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 the area of soil disturbance to that necessary for construction;
- 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 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 practice's during construction to control sediment and erosion and prevent any pollutants from entering adjacent waterways.

Groundwater and Hazardous Materials/Waste

- Develop and adhere to a Stormwater Pollution and Prevention Plan;
- Avoid boring/drilling, staging and laydown areas within EPA superfund sites or areas containing known wastes;
- Adhere to applicable groundwater and/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 Corpus Christi 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 Corpus Christi will strictly adhere to PHMSA's Unanticipated Discoveries Protocol;

- In the event that unmarked human remains are encountered during permitted activities, all work shall halt and The City of Corpus Christi 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
- While the exact staging areas for the Undertaking are currently unknown, staging should be confined to paved areas; if staging cannot be confined to paved areas, geotextile fabric or other similar protective measures (such as pressure distributing mats) must be laid in any affected unpaved area to minimize ground disturbance, prevent soil compaction, and protect potential archaeological features and artifacts.

Section 4(f)

- The City of Corpus Christi 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

- 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/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 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.