



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

1200 New Jersey Avenue, SE
Washington, DC 20590

August 22, 2025

MEMO TO FILE

From: Amanda L. Murphy
Environmental Protection Specialist
Amanda.L.Murphy@dot.gov

Subject: **Categorical Exclusion Determination**
City of Richmond, NGDISM-FY23-CE-2024-35

PROPOSED ACTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has reviewed the materials submitted by the city of Richmond (Sponsor) to support PHMSA's environmental review of the pipeline replacement project in Richmond, Virginia (the Project). A map of the project area is enclosed as Attachment A. PHMSA understands the Project includes replacing 33 miles (175,000 linear feet) of 2-inch to 12-inch vintage gas main pipelines with new polyethylene and cathodically protected coated steel gas mainlines to address aging infrastructure, legacy pipe material, and leaks in the city of Richmond.

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 the proposed action does not meet the criteria for extraordinary circumstances listed in DOT 5610.1D.

RESOURCE REVIEW

Air Quality: The Project falls within Richmond County, Virginia which is designated by the EPA as in attainment for all NAAQS based on EPA's Greenbook. 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 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 Virginia State Historic Preservation Officer (SHPO) on July 29, 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 August 21, 2025. PHMSA also invited federally recognized tribes to participate in the consultation by separate letter on July 29, 2025. Following SHPO concurrence, but prior to the end of the consultation period, an emergency leak necessitated moving ahead with certain repairs to stabilize the infrastructure. Therefore, the project is proceeding, with these crucial repairs first. However, should any tribal group enter consultation, or should SHPO respond with additional concerns prior to the end of the Section 106 consultation deadline, PHMSA will respond to their concerns and coordinate with the project proponent to integrate their views to the extent feasible.

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 Richmond County, Virginia, which is considered a Coastal Zone and is subject to Coastal Zone Management Act compliance. Project activities consist entirely of in-kind replacement of existing infrastructure and do not constitute new development. The proposed project activities would not affect any coastal use or natural resource of the coastal zone requiring a Consistency Determination and Certification.

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:

AMANDA LAUREN
MURPHY

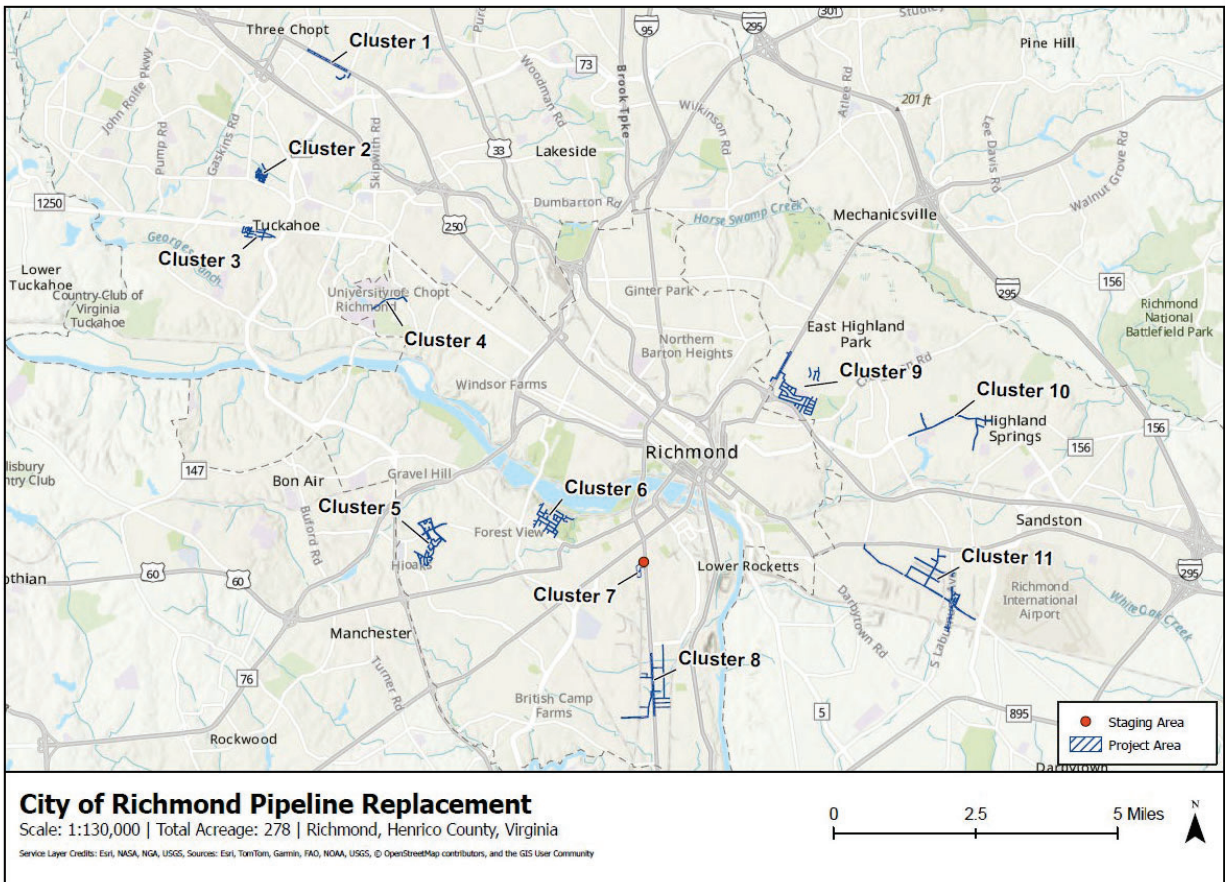
 Digitally signed by AMANDA LAUREN
MURPHY
Date: 2025.09.02 17:57:03 +02'00'

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 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; and
- Minimize construction site traffic by using offsite parking and shuttle buses, as necessary.

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;
- 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 or 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 directional drilling 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 Richmond will immediately notify PHMSA. This may include discovery of cultural features (*e.g.*, foundations, water wells, trash pits, etc.) or artifacts (*e.g.*, pottery, stone tools and flakes, animal bones, etc.) or damage to a historic property that was not anticipated. PHMSA will notify the State Historic Preservation Office and participating federally recognized tribes and conduct consultation as appropriate in accordance with 36 CFR § 800.13. Construction in the area of the discovery must not resume until PHMSA provides further direction. The city of Richmond 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 Richmond 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)

- The city of Richmond shall ensure that full public access to, and use of the Hidden Creek Park, Forest Hill Park, and the James River Park System are maintained during construction; and
- Ensure construction activities do not interfere with public park access to 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 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 if required by local permits, 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 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.